

VERIFICATION REPORT FOR THE CORINTH ABANDONED MINE METHANE RECOVERY PROJECT



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Prepared By	First Environment, Inc.
Contact	91 Fulton Street Boonton, New Jersey 07005 Tel: 973-334-0003 www.firstenvironment.com
Approved By	James Wintergreen
Work Carried Out By	Michael Carim Howard Kanter Luca Nencetti Albert Nedelman

Summary:

This report is provided to Keyrock Energy, LLC (Keyrock) as a deliverable of the Verified Carbon Standard (VCS) project verification process for the Corinth Abandoned Mine Methane Recovery Project (the Project) located within Franklin, Jefferson, and Williamson counties, Illinois.

The Project voluntarily captures methane gas from 14 abandoned underground coal mines. The gas is processed to produce pipeline-quality methane, which is injected into a natural gas distribution pipeline. A portion of the raw gas is also consumed by fuel equipment used to gather and treat gas from abandoned mines.

The verification process consists of the independent third-party assessment of the implementation of the Project and emission reduction assertion against the criteria stated in the *VCS Standard*, 25 March 2015, v3.5; the approved CDM methodology ACM0008 (Version 6); the approved VCS methodology revision VMR0002 (Version 1.0); and the validated Project Description (PD). The purpose of the verification is to ensure the project was implemented and monitored in accordance with the validated Project Description and underlying methodology.

During the verification process, First Environment issued six corrective action requests and one clarification request, all of which were addressed sufficiently by Keyrock. No uncertainties were identified during the verification process. The Project claims emission reductions of 272,222 metric tonnes CO₂e for the period of January 1, 2013 through December 31, 2014. First Environment is reasonably assured that the Project meets all relevant VCS program requirements and correctly applies the approved CDM methodology ACM0008 (Version 6), the approved VCS methodology revision VMR0002 (Version 1.0), and the validated VCS PD.

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1 INTRODUCTION

This report is provided to Keyrock Energy, LLC (Keyrock) as a deliverable of the Verified Carbon Standard (VCS) project verification process for the Corinth Abandoned Mine Methane Recovery Project (the Project) located within Franklin, Jefferson, and Williamson counties in Illinois. This report covers the verification of greenhouse gas (GHG) emission reductions from the capture and destruction of abandoned mine methane (AMM) over the period from January 1, 2013 through December 31, 2014. First Environment, Inc. (First Environment) conducted the verification from the date of the kickoff meeting through July 14, 2015.

During the verification process, Environmental Commodities Corporation (ECC) served as the project consultant for the project proponent, Keyrock. First Environment communicated with both Keyrock and ECC regarding verification activities.

1.1 Objective

The purpose of this verification was, through review of appropriate evidence, to establish that the Project conforms to the requirements of the verification criteria discussed in Section 1.2.

1.2 Scope and Criteria

The specific scope metrics for the verification are outlined in the table below:

Reporting Period	January 1, 2013 through December 31, 2014
Emission Sources Verified	<i>Baseline Sources</i> - Emission reductions of methane from the destruction of fugitive AMM <i>Project Sources</i> - Emissions of CO₂ from on-site fossil fuel combustion and from purchased electricity - Emissions of CO₂ from AMM destruction in the gas grid and by project equipment - Emissions of CH₄ from un-combusted methane
Definition of Materiality	- Misstatements of greater than five percent of the Project's GHG assertion; and - Qualitative non-conformities with the Standards of Verification described below

The following table outlines the guidance and protocols used to conduct this verification:

Standards of Verification	- VCS Standard: VCS Version 3, 25 March 2015, v3.5 (VCS Standard) - Validated VCS Project Description (VCS PD), November 18, 2010 - VMR0002 – <i>Revision to ACM0008 to Include Methane Capture and Destruction from Abandoned Coal Mines</i>, Version 1.0 (VMR0002) - ACM0008 – <i>Consolidated methodology for coal bed methane, coal mine methane and ventilation air methane capture and use for power (electrical or motive) and heat and/or destruction through flaring and flameless oxidation</i>, Version 6 (ACM0008)
Verification Process	- VCS Standard - VCS Program Guide: VCS Version 3, 8 October 2013, v3.5 - ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

The Monitoring Report dated August 18, 2015 and titled "Corinth Abandoned Mine Methane Recovery Project," Version 10.0 was also used to inform the verification assessment.

1.3 Level of Assurance

First Environment and Keyrock have agreed that a reasonable level of assurance be applied for the Project.

1.4 Summary Description of the Project

The Project consists of the collection and utilization of fugitive methane emissions from a collection of 14 abandoned coal mines located within Franklin, Jefferson, and Williamson counties in Illinois. The main Project plant is located in Corinth, Illinois (latitude and longitude are N 37.8691, W 88.7879, respectively). The captured AMM is purified and injected into a natural gas transmission pipeline. A portion of the captured AMM is destroyed on site in compressors and other auxiliary project equipment. The Project claims GHG emission reductions from the destruction of the AMM that would otherwise have been released to the atmosphere. The VCS PD provides additional details regarding the site and the gas collection and distribution system.

2 VERIFICATION PROCESS

The verification process consisted of an assessment of the Project's implementation, as described in the Monitoring Report, against the verification criteria described above, as well as an assessment of the GHG emission reduction assertion. Discrepancies between project documentation and the verification criteria were considered material and identified for corrective action. Project description deviations were evaluated on the basis of the requirements in VMR002, ACM0008, and the VCS Standard and required appropriate justification from Keyrock.

2.1 Method and Criteria

To review the Project's GHG information, the following verification process was used:

- conflict of interest review;
- selection of Audit Team;
- kick-off meeting with Keyrock;
- review of the validated VCS PD;
- development of the verification plan and sampling plan;
- site visit;
- desktop review and evaluation of raw data, calculations, and supporting documentation for the period under review;
- follow-up interaction with Keyrock for corrective action or supplemental data as needed; and
- final statement and report development.

The verification process was utilized to gain an understanding of the Project's GHG emission sources and reductions and to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

Conflict of Interest Review

Prior to beginning any verification project, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the project. No potential conflicts were found for this project.

Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their verification experience, as well as familiarity with coal mine operations and methane capture:

Michael Carim – Lead Verifier
Howard Kanter – Verifier
Luca Nencetti – Verifier
Albert Nedelman – Verifier
James Wintergreen – Internal Reviewer

Audit Kick-off

The verification audit was initiated with a kick-off conference call on May 14, 2015 between First Environment and representatives from Keyrock. The communication focused on confirming the verification scope, objectives, criteria, schedule, and the data required for the verification.

Project Description Review

The Audit Team reviewed the validated VCS PD as a basis for developing the verification plan.

Development of the Verification and Sampling Plans

The Audit Team formally documented its verification plan as well as determined the data-sampling plan. The verification plan was developed based on discussion of key elements of the verification process during the kick-off meeting; and Keyrock was afforded the opportunity to comment on key elements of the plan. Based on items discussed and agreed upon with Keyrock, the plan identified the First Environment team members, project level of assurance, materiality threshold, and standards of evaluation and reporting for the verification. It also provided an outline of the verification process and established project deliverables. A separate sampling plan was designed to review all project elements in areas of high risk of inaccuracy or non-conformance.

Site Visit

Mr. Michael Carim, Lead Verifier, performed a site visit on June 16, 2015 as described below in Section 2.4.

Desktop Review

The Audit Team performed a desktop review of the Monitoring Report, GHG emission reduction assertion, and supporting documentation, as further described in Section 2.2 below.

Corrective Actions and Supplemental Information

The Audit Team issued requests for supplemental information, clarification, and corrective action during the verification process. The clarification and corrective action requests and the responses provided by Keyrock are summarized below in Section 2.5.

Verification Reporting

Verification reporting documents the verification process and identifies its findings and results. Verification reporting consists of this report and a separate Deed of Representation to be submitted to the VCS Association.

2.2 Document Review

During the verification process, First Environment reviewed the Project's Monitoring Report, GHG emission reduction assertion, and supporting documentation for the current verification period to ensure consistency with the validated VCS PD, VMR0002, and ACM0008. Discrepancies between Project documentation and the verification criteria were considered material and identified for corrective action. Additionally, First Environment assessed the GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements. The results of these reviews are discussed in greater detail below.

2.3 Interviews

Through the course of verification activities, First Environment interviewed the following project personnel to inform the verification process:

Chris Shea – Operations Manager, Keyrock Energy, LLC
 Ben Apple – Technical Consultant, Environmental Commodities Corporation
 Mark Benefiel – Plant Manager, Keyrock Energy, LLC

2.4 Site Inspections

First Environment performed a site visit on June 16, 2015. The site visit included review of site operations, equipment quality assurance and quality control activities, data collection processes, and information management systems, as well as interviews with key project personnel.

2.5 Resolution of Findings

The Audit Team issued six requests for corrective action and one request for clarification during the verification process. Keyrock's responses were sufficient to resolve the corrective action and clarification requests. The corrective action and clarification requests and the responses provided by Keyrock are summarized in an appendix to this report.

2.5.1 Forward Action Requests

Not applicable – No forward action requests were identified during previous verification activities, nor did First Environment issue any forward action requests during the current verification activities.

2.6 Eligibility for Validation Activities

First Environment is accredited to perform validation activities in Sectoral Scopes 8 and 10, which are the applicable scopes for the approved methodologies ACM0008 and VMR0002.

3 VALIDATION FINDINGS

The validation process consisted of an assessment of any deviations or other discrepancies from information presented in the validated VCS PD. The Audit Team reviewed justification for each deviation, including supporting documentation, in order to confirm that it was consistent with the underlying methodology and did not negatively impact the conservativeness or accuracy of the emission reductions.

3.1 Participation under Other GHG Programs

During the verification process, First Environment reviewed an attestation from Keyrock confirming that GHG emission reduction credits from the Project have not been registered under another GHG programme.

First Environment concluded that the project is eligible to participate under the VCS Programme.

3.2 Methodology Deviations

No new methodology deviations were identified during the current verification. See Section 4.1 for a list of previously validated methodology deviations.

3.3 Project Description Deviations

Several project description deviations were identified in the Monitoring Report and approved for the Project during the current verification as described below.

- Keyrock Energy, LLC purchased the project activity from DTE Methane Resources and is now identified as the Project Proponent.
- Gas injected to the natural gas pipeline (AMM_{GAS}) and its associated methane content is monitored on a dry basis instead of a wet basis, as required by ACM0008. The deviation does not impact data quality and is acceptable because both gas flow and methane content for the parameter are measured on the same relative moisture basis.
- The gas analyzer installed at the pipeline used to measure PC_{CH_4} was replaced in October 2013. The new instrument meets continuous monitoring capability requirements so does not affect data quality.
- Instruments used to determine PC_{CH_4} and PC_{NMHC} were not calibrated before each use as identified in the validated VCS PD. The gas analyzer used to measure methane content in order to quantify AMM_{GAS} and AMM_{NRU} automatically calibrates on a daily basis. The gas chromatograph used by the third-party laboratory to determine methane content for AMM_{BOILER} and $AMM_{COMPRESSOR}$ is calibrated monthly. First Environment concluded that the deviation does not affect data quality because the first instance calibration occurs more frequently than required. It is not impacted in the second instance based on the perceived low risk of increased uncertainty associated with the laboratory's procedure.
- The gas flow meters used to determine $AMM_{COMPRESSOR}$ and AMM_{BOILER} were not calibrated annually as identified in the validated VCS PD. A calibration accuracy check was performed in December 2014 on all meters. The results of this check indicated that all instruments were operating accurately and that no calibration was necessary; therefore, it was concluded that the deviation has no impact on metered data.

The project description deviations described above did not impact the applicability of the methodology, additionality, or the appropriateness of the baseline scenario, and the Project remained in compliance with VMR0002, ACM0008, and VCS requirements. In addition, Keyrock provided appropriate descriptions and justifications for all relevant deviations during the verification process. All project deviations were deemed to be valid.

3.4 Grouped Project

Not applicable – The Project is not a grouped project.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

The Project was implemented according to the description provided in the validated VCS PD, except where noted in this report as a deviation. The Project began operation by recovering AMM gas from eight mines on September 26, 2002. The project was initially implemented by Illinois Methane in 2002, however, was shut down in 2004; DTE Methane Resources, LLC (DTE) acquired the Project's assets at this time and resumed production of gas in May 2005. The Project was subsequently purchased by Keyrock from DTE and is currently owned and operated by Keyrock. First Environment reviewed evidence during the verification process that confirmed Keyrock holds right of use for GHG emission reductions generated by the project activity. The 10-year project crediting period began on January 1, 2010 and ends on December 31, 2019.

The Audit Team confirmed that no data and/or variables presented in the Monitoring Report differ from those stated in the validated VCS PD, except where noted below as a project description deviation. Similarly, the data collection and recordkeeping procedures were found to be generally consistent with those outlined in the monitoring plan described by the VCS PD, except where noted below, and meet the requirements of VMR0002 and ACM0008. Keyrock has adequate management and operational systems

in place with respect to monitoring and reporting, as determined through observation during the verification site visit and the desktop review of project documentation.

Through communications with Keyrock, the Audit Team confirmed that the Project is not participating in any other GHG programs or emissions trading programs, nor attempted to register with such programs. As indicated in the validated VCS PD, no other environmental credits are generated by the Project. Keyrock also provided an attestation confirming these aspects of project eligibility for the current reporting period.

The following methodology deviations were approved for the Project at validation and remain relevant to the current reporting period:

- The value of the parameter $V_{AMM, is}$ – Initial emission of methane from abandoned mine at time t_0 (after sealing) – is calculated using established concepts of fluid flow in porous media and other historical data about the individual mines rather than sourced from public mining records.
- The value for the parameter CEF_{ELEC} is not determined using the “*Tool to calculate the emission factor for an electricity system.*” Instead the value is determined using the most current version of the USEPA’s eGrid emission factor database.
- Gas flow totals are standardized to reference conditions at 60°F and one atmosphere of pressure and a corresponding density of methane of 0.68 kg/m³ is applied in calculations, instead of the reference conditions of 68°F and one atmosphere of pressure and a corresponding density of 0.67 kg/m³ cited in ACM0008.

Although not explicitly identified in the validation report, the following methodology deviation was approved for the Project during the validation process:

- Methane concentration in AMM used to determine the parameters AMM_{COMP} and AMM_{BOILER} is not monitored hourly or at least daily. Rather, the project collects a small amount of gas in a canister every 40 minutes to create a composite sample and measures the methane concentration in this composite sample every month.

4.2 Accuracy of GHG Emission Reduction and Removal Calculations

Emission reductions are calculated ex post using the approach indicated in VMR0002, ACM0008, and the validated VCS PD. Emission reduction calculations for the verification period were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. The formulas used to quantify baseline and project emissions were tested and found to be consistent with the calculations described in VMR0002, ACM0008, and the validated VCS PD.

Monitored data for AMM captured and injected in the pipeline (AMM_{GAS}) or destroyed by plant equipment (AMM_{COMP} and AMM_{BOILER}), are multiplied by the respective monitored methane concentration (PC_{CH_4}), to determine the total quantity methane destroyed by the project activity ($AMM_{PJ,y}$). This value is compared to the avoided methane emissions released in the atmosphere by the abandoned mine ($AMM_{DC,y}$), estimated according to the decline curve. The lesser of the two values is used in the emission reduction calculations. In the current monitoring period, $AMM_{DC,y}$ was the lower of the two values. This value is then multiplied by GWP_{CH_4} to obtain the baseline emissions from methane destruction ($BE_{MR,y}$) in metric tons of CO₂e.

There are three sources of GHG emissions due to the project activity:

- project emissions of CO₂ from use of additional energy for the capture and use of AMM ($PE_{ME,y}$);
- project emissions of CO₂ from destruction of methane by the project (PE_{MD}); and
- project emissions from un-combusted methane (PE_{UM}).

Project emissions from energy use ($PE_{ME,y}$) result from electricity and gasoline usage. Purchased electricity activity data ($CONS_{ELEC}$) is aggregated annually from utility bills and multiplied by an appropriate emission factor obtained from the USEPA eGrid database to quantify total emissions. Gasoline consumption ($CONS_{FOSS_Fuel}$) is determined from fuel purchase receipts, converted to GJ, and multiplied by an appropriate IPCC emission factor to obtain total emissions. Default emission and other conversion factors applied in the quantification of $PE_{ME,y}$ were consistent with validated VCS PD.

Project emissions of CO_2 ($PE_{MD,y}$) from methane destruction are determined from the monitored gas flow to each combustion device and measured methane concentration in AMM. Emissions are quantified appropriately by multiplying the AMM gas flow to each destruction device by the carbon emission factor specified in the validated PD.

The quantity of un-combusted methane emissions (PE_{UM}) are quantified by multiplying the AMM gas flow to each destruction device by the methane concentration and device-specific destruction efficiency. Destruction efficiencies applied in calculations were consistent with the validated VCS PD. Additionally, methane released by the Nitrogen Rejection Unit (NRU) at the plant is accounted for by multiplying total gas treated and injected into the pipeline by the specified default leak rate of the NRU unit.

For the current reporting period, the monitored concentration of non-methane hydrocarbon concentration in AMM (PC_{NMHC}) was less than the one percent threshold indicated in the methodology and therefore was excluded from the calculation of project emissions.

A separate stream of third-party gas (collected outside the project boundary) is injected into the pipeline by Keyrock through the project activity's interconnection. This quantity of gas is reported monthly and deducted from the total volume of gas injected into the pipeline in emission reduction calculations.

The verification process focused on the assessment of calculation spreadsheets to ensure that they were consistent with the formulas and equations described in VMR0002, ACM0008, and the validated VCS PD. Copies of the raw data used in the calculations, including AMM gas flow measurements, gas analysis data, gas sales invoices, instrument calibration and accuracy check records, and electricity invoices, were compared with the values used in the final calculations and tested for transcription or mathematical errors. The calculations for the entire period were reviewed as well to determine whether they were free of material misstatement. All calculation methods and emission factors used to determine emission reductions were consistent with those outlined in the validated VCS PD. No material misstatements were observed in the final GHG assertion.

4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

Keyrock provided adequate documentation for the emission reduction calculations as well as its management systems around the data collection process. Specifically, First Environment was provided a Monitoring Report prepared in accordance with the VCS program template, transparent calculation spreadsheets, calibration records, raw data for compressor fuel, copies of pipeline gas and electricity invoices and summary spreadsheets, and electronic data associated with AMM gas analyses and flow. The evidence provided was consistent with the requirements of VMR0002, ACM0008, and the validated VCS PD and meets generally accepted evidentiary standards for best practice in GHG accounting.

4.4 Non-Permanence Risk Analysis

Not applicable.

5 VERIFICATION CONCLUSION

First Environment was retained to provide verification services for the Project's GHG emission reductions assertion based on the following fundamentals:

- *Level of assurance:* Reasonable assurance.

- *Objectives of verification:* To assure project conformance with the VCS Standard, the VCS methodology VMR0002, the CDM methodology ACM0008, and the validated VCS PD.
- *Verification criteria:* VCS Standard, the VCS methodology VMR0002, the CDM methodology ACM0008, and the validated VCS PD.
- *Definition of materiality:* Misstatements of more than five percent of the GHG assertion and qualitative non-conformities with the verification criteria are considered material.
- *Scope, including:*
 - o *Boundaries of the assertion:* Abandoned mines in located in Franklin, Jefferson and Williamson Counties in Illinois and gas treatment plant and pipeline injection of methane;
 - o *The physical infrastructure, facilities, and activities within the assertion:* AMM collection wells and field compressors, gas treatment and compression facility, amine reboiler, and commercial gas pipeline;
 - o *GHG sources, sinks, and reservoirs included within the assertion:* Carbon dioxide and methane emission reductions due to the capture and destruction of AMM, expressed as carbon dioxide-equivalents; carbon dioxide emissions due to the operation of project equipment and methane destruction as part of the project activity; and methane emissions from un-combusted methane due to the project activity expressed as carbon dioxide-equivalents; and
 - o *The time period for the assertion:* January 1, 2013 through December 31, 2014.

Based on the assessments performed and the historical evidence collected, First Environment concludes with a reasonable level of assurance that the emissions reductions of the Project resulting from the capture and destruction of coal mine methane gas for the period of January 1, 2013 through December 31, 2014 are:

- consistent with the validated VCS PD of November 18, 2010;
- in conformance with the VCS Standard, the VCS methodology VMR0002 (Version 1.0), and the CDM methodology ACM0008 (Version 6.0); and
- without material discrepancy, i.e., meeting the minimum level of accuracy of at least 95 percent.

Additionally, the project description deviations reviewed and approved during the current verification process are consistent with the VCS Standard and the VMR0002 and ACM0008 methodologies.

Verification period: From 1-January-2013 to 31-December-2014

Verified GHG emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2013	198,674	60,103	0	138,571
2014	194,970	61,319	0	133,651
Total	393,644	121,422	0	272,222

APPENDIX A – DETAILED RESOLUTION OF FINDINGS

ID	Clarification Request	Participant Response	Verification Conclusion
1	Please clarify whether AMMgas is adjusted for non-project gas (e.g., "Shakespeare gas") injected into the pipeline by Keyrock on behalf of third parties.	Keyrock confirmed that the value of the parameter AMMgas is calculated net of any third-party gas injected into the pipeline.	Response is acceptable.

ID	Corrective Action Request	Participant Response	Verification Conclusion
1	The Monitoring Report does not include a description of all methodology and project description deviations applied during the verification period, nor project description deviations applied in previous monitoring reports.	The Monitoring Report was revised to identify all methodology and project description deviations relevant to the current reporting period, including both new and existing deviations. Appropriate justification was provided for all new deviations proposed.	Response is acceptable.
2	Gas flow totals for the inlet compressor, sales compressor, reboiler, and pipeline are not corrected to a standard temperature and pressure that is consistent with the density of methane applied in emission reduction calculations.	Keyrock revised its emission reduction calculations to consistently apply a density of methane corresponding to a standard temperature and pressure of 60°F and 1ATM. Where appropriate, gas flow totals were also adjusted to this standard temperature and pressure in calculations.	Response is acceptable.
3	Equation 26 from VMR0002 to determine the annual value of AMMy is applied incorrectly in emission reduction calculations.	The emission reduction calculations were revised to correctly apply Equation 2 from VMR0002.	Response is acceptable.
4	Project emissions of methane from the NRU are not accounted for in emission reduction calculations.	Emission reduction calculations were revised to account for project emissions of methane from the source.	Response is acceptable.
5	The following parameters are omitted from Section 3 of the Monitoring Report: Parameters monitored: • AMM_{COMP} • AMM_{NRU} • AMM_{GAS} • AMM_{BOILER} • PC_{CH4} • PC_{NMHC} Parameters not monitored: • CEF_{NMHC} • $CEF_{FOSS FUEL}$ (CEFGasoline) • $VAMM_{is}$ • t	The monitoring report was revised to include all parameters previously omitted.	Descriptions provided were consistent with the validated VCS PD. Response is acceptable.
6	The values identified for the parameter Eff_i for the natural gas pipeline and the NRU in the Monitoring report are inconsistent with those provided in the validated VCS PD and emission reduction calculations.	The values applied for the parameter Eff_i identified in the Monitoring Report were revised to match the values from the validated VCS PD and are consistent with those applied in calculation worksheets.	Response is acceptable.