



**Approved baseline and monitoring methodology /
methodological tool clarification response form
(Version 03.0)**

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Date and number of Panel / WG meeting:	2–5 October 2018 / MP 77
Title/Subject of the request for clarification:	Eligibility for virgin coal bed methane extraction projects under ACM0008 methodology in following aspect
Reference number of the request for clarification:	AM_CLA_0279
Exact reference (number, title and version) of the methodology or methodological tool to which the request for clarification applies:	ACM0008: Abatement of methane from coal mines Version 8.0
Fast track or Regular track:	<input type="checkbox"/> Fast track <input checked="" type="checkbox"/> Regular track

Summary of the request for clarification

This is with reference to projects of methane gas extraction from virgin coal bed seam (CBM Production).

Many coal-mining areas in the world currently emit fugitive methane gas. Whereas, areas containing virgin coal resources are expected to produce significant volumes of fugitive methane gas in the near future during mining operations. Extraction of CBM gas from such coal rich areas where coal mining operations are yet to be carried out, avoids methane release into the atmosphere and supports GHG emission reductions.

Certain countries like India where the mining of coal and extraction of CBM gas are governed by separate government bodies (for Coal Mining - Ministry of Coal (MoC) and for Natural Gas- Ministry of Petroleum and Natural Gas (MoPNG)), the areas with virgin coal bed seams are first allocated by MoPNG for CBM extraction and after CBM extraction phase of about 25-30 years, the same area will be allocated by MoC for coal mining. Moreover, technical feasibility of CBM extraction (from virgin coal seams) and coal mining does not allow simultaneous operations in same allocated areas, and CBM extraction must precede coal mining operations.

Thus the simultaneous extraction of methane from CBM blocks and coal mining operations in the same block is not possible. New allocated CBM blocks will extract methane gas from CBM blocks first and then the same area will be allocated for mining operations as per regulation of the host country India.

We understand and propose that such projects where methane gas is extracted from CBM blocks, avoid the methane release into atmosphere during the coal mining operations (i.e. baseline scenario for methane gas extraction from CBM wells projects will be same as methane gas release during coal mining activities).

This request seeks to add baseline scenario for such methane gas extraction from virgin coal bed (CBM Production).

The current ACM0008 Version 8 methodology is not applicable for virgin coal bed methane extraction projects.

As per current existing ACM0008 version 8 methodology

8. The methodology does not apply to project activities with any of the following features:

(a) Capture/use of virgin coal bed methane, e.g. methane extracted from coal seams for which there is no valid coal mining concession

Based on these applicability criteria if there is a valid coal mining concession, then methane extracted from virgin coal bed seams is acceptable.

However as mentioned above, the simultaneous operation of methane extraction from CBM blocks and coal mining operation is not possible and coal mining operations will commence or coal mining concession will be given only after completion of lease/allocation period for methane extraction from CBM blocks authorized by

Government Agency or relevant authorized body as applicable.

It is also clear that in absence of CBM extraction projects, the mining activities would take place and baseline scenario of current mining operations will be applicable for the project activity.

However, it is also pertinent to mention that during coal mining operations (without prior CBM extraction project in the area), the fugitive methane emission will be much higher and captured/confined CMM can mostly be flared. In case of CBM operations, CBM is captured and instead of flaring, it can be used for different energy/industrial feed purposes. Therefore, CBM operations provide GHG reduction along with clear energy source.

This request seeks to broaden the applicability or revise the existing methodology upon which the extraction/capture of virgin coal bed methane from coal seams, where there is valid approval or authorization for methane gas extraction through allocation of CBM blocks, would qualify under CDM project. As mentioned, the valid coal mining concession is not possible at the same time when there is CBM extraction, hence at present, CBM extraction projects are not eligible due to "valid mine concession" applicability criteria. Thus, this request seeks to remove this clause of non-applicability of project due to no valid coal mining concession.

In such projects, the proposed baseline scenario will be similar to the scenario of mining operation in the project activity region. It is well understood that in absence of methane extraction from CBM blocks, the mining activity would occur in same region and mining operation scenario for methane gas will be applicable for the project activity.

This request seeks to revise the applicability of methodology to include such methane extraction projects from virgin coal bed seams under the same methodology and revise relevant sections of methodology accordingly.

This request seeks to revise the methodology title considering the methane extraction from virgin coal bed seams which is involved before mining activities.

We seek to clarify the possibility of inclusion of eligibility for virgin coal bed methane extraction projects under ACM0008 methodology in following aspect.

Clarification by the secretariat or Panel / WG

The Methodologies Panel (Meth Panel) of the CDM Executive Board would like to thank the author for the submission. The proposed submission suggests the necessity of a new methodology, as the approved methodology ACM0008 version 8.0 is not applicable to project activities that capture/use virgin coal bed methane (paragraph 8). Furthermore, the Meth Panel noted that the proponent has already submitted a new proposed methodology relevant to this type of project activity.

Version(s) of the approved methodology / methodological tool to which the clarification is applicable:

ACM0008: Abatement of methane from coal mines --- Version 8.0

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Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
03.0	13 May 2016	Revised to include the row "Version(s) of the approved methodology / methodological tool to which the clarification is applicable"
02.0	18 July 2013	Revised to remove the row "Date and signature of the chair and vice chair of Panel/WG (in case of clarification by Panel/WG)"

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	4 July 2013	<p>Initial publication. This document supersedes and replaces the following documents:</p> <ul style="list-style-type: none">• Recommendation Form for Small Scale Methodologies (F-CDM-SSCwg) (Version 01.1)• Recommendation Form for Small Scale A/R Methodologies and Procedures (F-CDM-SSC-AR) (Version 01.1)
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