

Santiago, November 2, 2006

Dear Members of the Executive Board:


We have received the notification from the Secretariat that our CDM project "0457 Ramirana Emission Reduction Project of Agricola Super Ltda." has received 4 requests for review by EB members. These requests have raised 2 issues:

1. The requirements of semi-annual flare efficiency measurements of AM0006 are not followed and the combustion efficiency of 98% provided by the manufacturer is applied instead, considered to be more conservative (the 99% stipulated for closed flares in AM0016). Accordingly a new monitoring plan is seemingly developed including weekly testing of the electric flare igniters and monthly checking of the safety valve, but such a plan has not been attached nor included in the existing monitoring plan. The proper procedure for such a case is requesting a deviation.
2. The LoA by the Chilean DNA does not explicitly declare the voluntary participation by the Host Country, but only confirms the voluntary participation by the company.

In the paragraphs below, we would like to provide response to these issues:

1. Agricola Super Ltda. fully acknowledges that the maintenance plan developed to ensure proper flare performance, was not included on part D.1 of the PDD submitted for registration, however, it was attached in the existing monitoring plan and the registries will be available for the verification audit. This plan takes into account all the equipment and actions required for periodical maintenance of the flare, including weekly checking of the electric flare igniters and blowers and monthly maintenance of the safety valve. This maintenance plan is attached below.

The flare supplier, Perennial, stated that "The overall, average weighted destruction efficiency of such a device is theoretically a minimum of 98% VOC's, or a maximum of 20 ppm non-methane organics (NMOC's), evaluated as hexane and corrected to 3% oxygen. This theoretical destruction efficiency is supported in an EPA "Air Pollution Technology Fact Sheet" entitled *EPA-CICA Fact Sheet - Flare (EPA-452/F-03-019)*" (see the whole document in Annex 1). EPA's fact sheet specifies that "Flaring is a VOC combustion control process in which the VOC are piped to a remote usually elevated, location and burned in an open flame in the open air using a specially designed burner tip, auxiliary fuel, and steam or air to promote mixing for nearly complete (>98%) VOC destruction. Completeness of combustion in a flare is governed by flame temperature, residence time in the combustion zone, turbulent mixing of the gas stream components to complete the oxidation reaction, and available oxygen for free radical formation". EPA's fact sheet *EPA-452/F-03-019* is in Annex 2.

A handwritten signature in dark ink is located at the bottom right of the page, overlapping the end of the main text block.

Considering that the maintenance plan allows proper flare operation, and taking into account technical data of flare efficiency provided by the equipment manufacturer, it is possible to ensure a flare efficiency of 98%. On the other hand, the automatic control system of the flares consider automatic shutdown when the thermocouples detect lower temperature than the setpoints, as it was verified by the DOE on site.

Agrosuper understands the relevance of this issue, and will take special care in the implementation of its monitoring plan. In addition, the swine production department and the treatment systems are working with Environmental Management Systems (EMS), that contribute to ensure the generation of high quality and thorough information in this regard, for an accurate calculation of the corresponding emission reductions of the project activity.

2. With respect to this issue, although it should be the Chilean DNA that should respond to this request, we will try to give an answer considering that the format of this LoA is the one that has been used by the Chilean DNA for all the LoA so far issued by them.

The LoA of the Chilean DNA makes explicit reference to the voluntary participation of the company, since in our view, the voluntary participation of the Government of Chile is sufficiently addressed by having the Government of Chile ratified the Kyoto Protocol and issued Resolution No. 216/2003 of the National Environmental Commission, which creates the Designated National Authority for CDM purposes, and authorizes the Executive Director of the National Environmental Commission to issue and sign the documents required by the CDM on behalf of the Government of Chile.

Based on these facts, we consider that stating again that the Government of Chile is participating voluntary in the CDM is redundant. Otherwise the Chilean DNA on behalf of the Government of Chile could have decided not to sign this LoA, or any of the more than 10 LoA that has already been issued.

E-mail and its translation from DNA is attached.

For all the reasons mentioned above, Agrícola Super Ltda. believes that the "0457 Ramirana Emission Reduction Project of Agrícola Super Ltda." reunites all the requirements to fully qualify as a CDM project activity. It clearly aims at sustainable development in Chile by implementing state of the art waste management technology.

According to this, Agrícola Super Ltda. would respectfully like to request the Executive Board to authorize the registration of the "0457 Ramirana Emission Reduction Project of Agrícola Super Ltda. " as a CDM project activity by its 28<sup>th</sup> meeting.

Best regards,

  
Luis Felipe Fuenzalida  
CFO  
Agrícola Super Ltda.



**FLARE MAINTENANCE PLAN AGRICOLA SUPER LTDA.**

		<b>Part</b>	<b>Periodical Maintenance</b>	<b>Component</b>	<b>Action</b>
PT	301	Vacuum pressure sensor for Gas suction (0,8" WC)	Once every 6 months	Pressure Sensor	Contrast and cleaning - Replace in case of failure
PI	301	Analogue Vacuum Manometer gas suction (0-4"WC)	Once every 6 months	Manometer	Contrast - Replace in case of failure
TI	301	Analogue thermometer inlet gas to system	Once every 6 months	Thermometer	Contrast - Replace in case of failure
PDI	301	Analogue manometer Differential Pressure Condenser	Once every 6 months	Manometer	Contrast - Replace in case of failure
COND	3	Condenser	Once every month	Particle filter	Cleaning with water under pressure and replace once a year.
BLR	301	Blower	Once every week	Bearings	Check the oil level of the bearing. The lever can be observed in the viewer and has to remain in the middle of the viewer. For refilling use SAE N°40 oil (no detergent)
MOTOR	1	Blower Motor (10 HP)	Once every week	Motor Lubrication	Grease the motor every 7 days using EP N°2 Grease and check the alignment by vibration.
PDT	301	Flow sensor	Once every 6 months	Cleaning	Disassemble and clean pressure differential orificies
PT	302	Blower outlet pressure sensor (24"WC)	Once every 6 months	Pressure Sensor	Contrast and cleaning - Replace in case of failure
PI	302	Analogue manometer Blower outlet pressure (0-40"WC)	Once every 6 months	Manometer	Contrast - Replace in case of failure
ZC	301	Electrical Motor FCV 303	Once every month	Motor	Check functioning
FV	301	Safety valve Shut gas flow to Flare	Once every month	Bearings	Lubricate with SAE N° 20 drops
ZS	301	Control Solenoid valve to control air flow to FV 301	Once every month		Check functioning
PI	301	Analogue manometer Delta Pressure Flare feed (0-15"WC)	Once every 6 months	Manometer	Contrast - Replace in case of failure
TE	502	Thermocouple combustion gas flare temperature (0-1000 °F)	Once every 6 months	Thermocouple	Contrast - Replace in case of failure
IGN	1	Electric flare igniter	Once every week	Ignitor	Check functioning
PLT	101	Flame Ignition pilot	Once every week	Pilot	Cleaning and visually check of operation
FLARE	1	Excess gas burner	Once every other month	Propane discharge reduction	Compressed air cleaning



## **PEI Candlestick (Utility) Flaring Systems**

(Theoretical by-products of combustion & destruction efficiency)

This is to certify that all standard **PEI** designed and manufactured candlestick (utility) type flares are designed in accordance with **40 CFR, §60.18** requirements for non-assisted combustion devices.

The theoretical temperatures of combustion within the flame cone, based on the combustion of 300 Btu/ft<sup>3</sup> to 550 Btu/ft<sup>3</sup> LHV typical bio-gas, are between 1400°F and 1600°F. While combustion in these types of flares is not completed until the flame has been fully diluted in atmospheric air, the theoretical by-products of combustion are assumed to be a maximum of 0.07 lb/MMBtu NO<sub>x</sub>, and 0.15 lb/MMBtu CO. The overall, average weighted destruction efficiency of such a device is theoretically a minimum of 98% VOC's, or a maximum of 20 ppm non-methane organics (NMOC's), evaluated as hexane and corrected to 3% oxygen. This theoretical destruction efficiency is supported in an EPA "Air Pollution Technology Fact Sheet" entitled **EPA-CICA Fact Sheet - Flare** (EPA-452/F-03-019). Other criteria pollutant emissions are within the guidelines of EPA AP-42 speciated compound listings. While sulphurous compounds (generally H<sub>2</sub>S) are very efficiently oxidized (generally into SO<sub>x</sub> compounds), please note that candlestick flaring systems neither generate nor destroy sulphurs.

The above theoretical performance of **PEI** flares is only valid if the devices are operated in accordance with the design limitation(s) under which they were provided.

The actual "in field" emissions from a candlestick (utility) flare cannot be accurately measured or monitored because of the immediate dilution of the flame cone to atmosphere, and the continual movement of the central flame cone because of air and wind currents.

For verifiable, field measured by-products of combustion, and verifiable field measured destruction efficiencies, use of a **PEI** enclosed ground flaring device is recommended.

Respectfully Submitted,



*L. H. Conner*

Larry H. Conner, VP



## Air Pollution Control Technology Fact Sheet

**Name of Technology:** Flare

This includes elevated flares, steam-assisted flares, air-assisted flares, non-assisted flares, pressure-assisted flares, and enclosed ground flares.

**Type of Technology:** Destruction by thermal oxidation.

**Applicable Pollutants:** Volatile organic compounds (VOC), with the exception of halogenated compounds (EPA, 1995).

**Achievable Emission Limits/Reductions:**

VOC destruction efficiency depends upon an adequate flame temperature, sufficient residence time in the combustion zone, and turbulent mixing (EPA, 1992). A properly operated flare can achieve a destruction efficiency of 98 percent or greater when controlling emission streams with heat contents greater than 11 megajoules per standard cubic meter ( $\text{MJ}/\text{sm}^3$ ) (300 British thermal units per standard cubic foot ( $\text{Btu}/\text{scf}$ )) (EPA, 1995; AWWA, 1992; EPA, 1992; EPA, 1991).

**Applicable Source Type:** Point

**Typical Industrial Applications:**

Flares can be used to control almost any VOC stream, and can typically handle large fluctuations in VOC concentration, flow rate, heating value, and inert species content. Flaring is appropriate for continuous, batch, and variable flow vent stream applications, but the primary use is that of a safety device used to control a large volume of pollutant resulting from upset conditions. Flares find their primary application in the petroleum and petrochemical industries. The majority of chemical plants and refineries have existing flare systems designed to relieve emergency process upsets that require release of large volumes of gas. These large diameter flares are designed to handle emergency releases, but can also be used to control vent streams from various process operations. Gases flared from refineries, petroleum production, and the chemical industry are composed largely of low molecular weight VOC and have high heating values. Flares used to control waste gases from blast furnaces consist of inert species and carbon monoxide with a low heating value. Gases flared from coke ovens are intermediate in composition to the other two groups and have a moderate heating value (EPA, 1995; EPA, 1992).

**Emission Stream Characteristics:**

- a. **Air Flow:** The flow rate through the flare is dependent upon the properties of the waste gas stream and the configuration of the flare. Steam-, air-, and pressure-assisted flares add flow to the waste stream in order to improve flame stability. In cases where the heating value of the waste gas is too low or too high, auxiliary fuel or additional air must be added to the flow, respectively. The maximum flow through commercially available flares is about 500 standard cubic meters per second ( $\text{sm}^3/\text{sec}$ ) (1,060,000 standard cubic feet per minute ( $\text{scfm}$ )), and the minimum can approach zero flow (EPA, 1995).

- b. Temperature:** The discharge temperature is typically in the range of 500 to 1100°C (1000 to 2000°F), depending upon the composition of the waste gas flow (AWMA, 1992).
- c. Pollutant Loading:** Depending upon the type of flare configuration (e.g., elevated or ground flares) and the source of the waste stream, the capacity of flares to treat waste gases can vary up to about 50,000 kilograms per hour (kg/hr) (100,000 pounds per hour (lb/hr)) of hydrocarbon gases for ground flares and about 1 million kg/hr (2 million lb/hr) or more for elevated flares (EPA, 1991). Flares are not subject to the safety concern of incinerators regarding having a high concentration of organics in the waste gas. This is because flaring is an open combustion process and does not have an enclosed combustion chamber that can create an explosive environment. Incinerators, however, have an enclosed combustion chamber, which requires that the concentration of the waste gas be substantially below the lower flammable level (lower explosive limit, or LEL) of the specific compound being controlled to avoid the potential for explosion (as a rule, a safety factor of four (i.e., 25% of the LEL) is used).
- d. Other Considerations:** The waste gas stream must have a heating value of greater than 11 MJ/scm (300 Btu/scf). If this minimum is not met by the waste gas, auxiliary fuel must be introduced in sufficient quantity to make up the difference (EPA, 1995).

#### **Emission Stream Pretreatment Requirements:**

Liquids that may be in the vent stream gas or that may condense out in the collection header and transfer lines are removed by a knock-out drum. The knock-out or disentrainment drum is typically either a horizontal or vertical vessel located at or close to the base of the flare, or a vertical vessel located inside the base of the flare stack. Liquid in the vent stream can extinguish the flame or cause irregular combustion and smoking. In addition, flaring liquids can generate a spray of burning chemicals that could reach ground level and create a safety hazard (EPA, 1995).

#### **Cost Information:**

Typical elevated flares are primarily safety devices which prevent the emissions of large quantities of raw unburned hydrocarbons during plant upset conditions. The capital costs of elevated flare systems can range from \$10,000 to \$3,000,000, depending upon the application (Gonzalez, 1999). The controlling factors in the cost of the flare are the basic support structure of the flare, the size and height, and the auxiliary equipment. Other factors influencing the cost are the degree of sophistication desired (i.e., manual vs. automatic control) and the number of appurtenances selected, such as knock-out drums, seals, controls, ladders, and platforms. The minimum flare diameter is 2.5 centimeters (cm) (1 inch); the maximum flare diameter currently commercially available is 2.3 meters (90 inches). (EPA, 1996)

Operating costs for an elevated flare depend largely upon the design of the flare (e.g., a steam-assisted flare will require steam), the flow rate (this will determine the diameter of the flare tip), and the heating value of the gas to be controlled (this will be a factor in determining the height of the flare and the amount of auxiliary natural gas required to achieve the desired destruction temperature) (EPA, 1996).

The following are cost ranges (expressed in 2002 dollars) for elevated steam-assisted flares of conventional design under typical operating conditions, developed using EPA cost-estimating spreadsheets (EPA, 1996) and referenced to the volumetric flow rate of the waste stream treated. Costs were calculated for flares with tips between 2.5 cm (2 in) and 2.3 m (90 in) in diameter, burning 100 percent combustible waste gas (no air) with a heat content of approximately 4000 kcal/m<sup>3</sup> (450 Btu/scf), and operated between 1 and 100 hours per year. Flares in the lower end of the capital, operating &

maintenance, and annualized cost ranges have higher flow capacity (approximately 90 m<sup>3</sup>/s or 190,000 scfm), with a flare tip diameter of up to 2.3 m (90 in), and operate 100 hours per year or more. The higher end of the cost ranges have lower flow capacity (approximately 0.01 m<sup>3</sup>/s, or 24 scfm), flare tip diameters as small as 2.5 cm (1 inch), and operate fewer than ten hours per year.

Because flares are primarily safety devices which deal with flows of short duration (generally an upset condition or an accidental release from a process) rather than a control device which treats a continuous waste stream, it is not entirely appropriate to compare the cost effectiveness of flares to other control devices. Cost per ton of pollutant controlled largely depends upon the annual hours of operation. Infrequent use of the flare (approximately ten hours per year) will result in greater cost per ton of pollutant controlled, while more frequent use (approximately 100 hours per year) is represented by the lower costs per ton of pollutant controlled in the ranges presented below.

- a. **Capital Cost:** \$27,000 to \$4,000,000 per sm<sup>3</sup>/sec (\$13 to \$21,000 per scfm)
- b. **O & M Cost:** \$2,000 to \$20,000 per sm<sup>3</sup>/sec (\$1 to \$10 per scfm), annually
- c. **Annualized Cost:** \$6,000 to \$650,000 per sm<sup>3</sup>/sec (\$3 to \$300 per scfm), annually
- d. **Cost Effectiveness:** \$17 to \$6,500 per metric ton (\$15 to \$5,800 per short ton), annualized cost per ton per year of pollutant controlled

### Theory of Operation:

Flaring is a VOC combustion control process in which the VOC are piped to a remote, usually elevated, location and burned in an open flame in the open air using a specially designed burner tip, auxiliary fuel, and steam or air to promote mixing for nearly complete (> 98%) VOC destruction. Completeness of combustion in a flare is governed by flame temperature, residence time in the combustion zone, turbulent mixing of the gas stream components to complete the oxidation reaction, and available oxygen for free radical formation. Combustion is complete if all VOC are converted to carbon dioxide and water. Incomplete combustion results in some of the VOC being unaltered or converted to other organic compounds such as aldehydes or acids.

Flares are generally categorized in two ways: (1) by the height of the flare tip (i.e., ground or elevated), and (2) by the method of enhancing mixing at the flare tip (i.e., steam-assisted, air-assisted, pressure-assisted, or non-assisted). Elevating the flare can prevent potentially dangerous conditions at ground level where the open flame (i.e., an ignition source) is located near a process unit. Elevating the flare also allows the products of combustion to be dispersed above working areas to reduce the effects of noise, heat, smoke, and objectionable odors.

In most flares, combustion occurs by means of a diffusion flame. A diffusion flame is one in which air diffuses across the boundary of the fuel/combustion product stream toward the center of the fuel flow, forming the envelope of a combustible gas mixture around a core of fuel gas. This mixture, on ignition, establishes a stable flame zone around the gas core above the burner tip. This inner gas core is heated by diffusion of hot combustion products from the flame zone.

Cracking can occur with the formation of small hot particles of carbon that give the flame its characteristic luminosity. If there is an oxygen deficiency and if the carbon particles are cooled to below their ignition temperature, smoking occurs. In large diffusion flames, combustion product vortices can form around burning portions of the gas and shut off the supply of oxygen. This localized instability causes flame

flickering, which can be accompanied by soot formation. As in all combustion processes, an adequate air supply and good mixing are required to complete combustion and minimize smoke. The various flare designs differ primarily in their accomplishment of mixing.

Steam-assisted flares are single burner tips, elevated above ground level for safety reasons, that burn the vented gas in a diffusion flame. They reportedly account for the majority of the flares installed and are the predominant flare type found in refineries and chemical plants. To ensure an adequate air supply and good mixing, this type of flare system injects steam into the combustion zone to promote turbulence for mixing and to induce air into the flame.

Some flares use forced air to provide the combustion air and the mixing required for smokeless operation. These flares are built with a spider-shaped burner (with many small gas orifices) located inside but near the top of a steel cylinder 0.6 meters (24 inches) or more in diameter. Combustion air is provided by a fan in the bottom of the cylinder. The amount of combustion air can be varied by varying the fan speed. The principal advantage of air-assisted flares is that they can be used where steam is not available. Although air assistance is not usually used on large flares (because it is generally not economical when the gas volume is large) the number of large air-assisted flares being built is increasing.

The non-assisted flare consists of a flare tip without any auxiliary provision for enhancing the mixing of air into its flame. Its use is limited to gas streams that have a low heat content and a low carbon/hydrogen ratio that burn readily without producing smoke. These streams require less air for complete combustion, have lower combustion temperatures that minimize cracking reactions, and are more resistant to cracking.

Pressure-assisted flares use the vent stream pressure to promote mixing at the burner tip. Several vendors now market proprietary, high pressure drop burner tip designs. If sufficient vent stream pressure is available, these flares can be applied to streams previously requiring steam or air assist for smokeless operation. Pressure-assisted flares generally (but not necessarily) have the burner arrangement at ground level, and consequently, must be located in a remote area of the plant where there is plenty of space available. They have multiple burner heads that are staged to operate based on the quantity of gas being released. The size, design, number, and group arrangement of the burner heads depend on the vent gas characteristics.

An enclosed flare's burner heads are inside a shell that is internally insulated. The shell reduces noise, luminosity, and heat radiation and provides wind protection. Enclosed, or ground-based flares are generally used instead of elevated flares for aesthetic or safety reasons. A high nozzle pressure drop is usually adequate to provide the mixing necessary for smokeless operation and air or steam assistance is not required. In this context, enclosed flares can be considered a special class of pressure-assisted or non-assisted flares. The height must be adequate for creating enough draft to supply sufficient air for smokeless combustion and for dispersion of the thermal plume. These flares are always at ground level.

Enclosed flares generally have less capacity than open flares and are used to combust continuous, constant flow vent streams, although reliable and efficient operation can be attained over a wide range of design capacity. Stable combustion can be obtained with lower heat content vent gases than is possible with open flare designs (1.9 to 2.2 MJ/sm<sup>3</sup> (50 to 60 Btu/scf)), probably due to their isolation from wind effects. Enclosed flares are typically used at landfills to destroy landfill gas. (EPA, 1995)

#### **Advantages:**

Advantages of flares over other types of VOC oxidizers include (EPA, 1992; EPA, 1991):



1. Can be an economical way to dispose of sudden releases of large amounts of gas;
2. In many cases do not require auxiliary fuel to support combustion; and
3. Can be used to control intermittent or fluctuating waste streams.

## **12. Disadvantages:**

Disadvantages of flares include (EPA, 1995):

- d. Can produce undesirable noise, smoke, heat radiation, and light;
- e. Can be a source of SO<sub>x</sub>, NO<sub>x</sub>, and CO;
- f. Cannot be used to treat waste streams with halogenated compounds; and
- g. Released heat from combustion is lost.

## **Other Considerations:**

Flaring is considered as a control option when the heating value of the emission stream cannot be recovered because of uncertain or intermittent flow as in process upsets or emergencies. If the waste gas has a heating value high enough to sustain combustion (i.e. greater than 11 MJ/sm<sup>3</sup> or 300 Btu/scf), the stream may serve as a fuel gas for an incinerator if one is employed at the site (EPA, 1991).

## **References:**

AWMA, 1992. Air & Waste Management Association, Air Pollution Engineering Manual. Van Nostrand Reinhold, New York.

EPA, 1991. U.S. EPA, Office of Research and Development, "Control Technologies for Hazardous Air Pollutants," EPA/625/6-91/014, Washington, D.C., June.

EPA, 1992. U.S. EPA, Office of Air Quality Planning and Standards, "Control Techniques for Volatile Organic Emissions from Stationary Sources," EPA-453/R-92-018, Research Triangle Park, NC., December.

EPA, 1995. U.S. EPA, Office of Air Quality Planning and Standards, "Survey of Control Technologies for Low Concentration Organic Vapor Gas Streams," EPA-456/R-95-003, Research Triangle Park, NC., May.

EPA, 1996. U.S. EPA, Office of Air Quality Planning and Standards, "OAQPS Control Cost Manual," Fifth Edition, EPA 453/B-96-001, Research Triangle Park, NC. February.

Gonzalez, 1999. Steve Gonzalez, Kaldair, Inc., Houston, Texas, (800) 525-3247, personal communications with Eric Albright, April 15 and 16, 1999.

## Vives C, Carlos Andres

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De: Sergio Vives [svives@urquidiriesco.cl]  
Enviado el: Miércoles, 01 de Noviembre de 2006 23:09  
Para: Vives C, Carlos Andres  
Asunto: Fw: La Ramirana - LoA



Carta DNA  
ramirana.doc (34 KB)

Carlos Andres:

Please find attached a translation of the response of the Chilean DNA represented by the National Commission for the Environment (CONAMA).

Yours,

Sergio Vives

----- Original Message -----

From: "Marcela Main Sancha" <mmain@conama.cl>  
To: <svives@urquidiriesco.cl>  
Cc: "Alvaro Sapag Rajevic" <ASapag@conama.cl>  
Sent: Wednesday, November 01, 2006 10:25 AM  
Subject: La Ramirana - LoA

> Estimado Sergio  
>  
> En relacion a tu consulta en correo de 25-10 y revisados los antecedentes  
> tanto del proyecto La Ramirana 0457 como de la regulacion propia de las  
> cartas de aprobacion/autorizacion otorgadas por las Autoridades Nacionales  
> Designadas para efectos del Mecanismo de Desarrollo Limpio del Protocolo  
> de  
> Kyoto (MDL), te informo que esta Autoridad Nacional Designada (AND)  
> considera que la carta otorgada cumple con todos los requisitos necesarios  
> establecidos sobre la materia. En particular y para estos efectos, cumple  
> con declarar la participacion voluntaria en el MDL.  
>  
> Dado lo anterior, esta AND no considera pertinente emitir otra carta  
> respecto del citado proyecto por lo que no realizara acciones directas con  
> la Junta Ejecutiva del MDL o su Secretaria.  
>  
> Sin perjuicio de lo anterior y reiterando nuestro apoyo al desarrollo de  
> proyectos MDL, quedamos a tu disposicion en caso de requerir futuras  
> gestiones.  
>  
> Atte,  
> Marcela Main  
>

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Correo recibido, certificado libre de virus.  
Informatica - Agrosuper.-

**Unofficial Translation**

**E-mail: November 1<sup>st</sup>, 2006**

Dear Sergio

In relation to your consultation regarding your e-mail dated October 25th and after reviewing the information from the Project La Ramirana 0457, as well as, the regulations related to the letters of approval/authorization issued by the Designated National Authorities for the effects of the Clean Development Mechanism of the Kyoto Protocol (CDM), I can inform you that this Designated National Authority (DNA) considers that the letter issued complies with all the requirements necessary established to that respect. In particular and for this effect, it complies with the voluntary participation in the CDM.

Considering the previous, this DNA does not consider pertinent to issue another letter with respect to the mentioned Project and for that reason it will not take any direct actions with the Executive Board of the CDM or its Secretary.

Notwithstanding the previous, and reiterating our support to the development of CDM projects, we are at your disposition in case you require further actions.

Yours,  
Marcela Main