

Santiago, April 9th, 2008

CDM Executive Board

**Ref.: Response to Request for Review**

Dear Sirs:

Please find below our response to the Request for Review formulated for the CDM project with the registration number 0254. In case you have any further inquiries please let us know.

Yours sincerely,

Florencio Velasco  
General Manager, Aconcagua CDM

**Issue 1. The spreadsheet shows that 0.8m<sup>3</sup>/min of LFG gas was supplied and no LFG was flared from 8:30 to 10:14 on 1 February 2007, while the temperature of flare shows 700.8109°C for this specific period. Further clarification is required on how the DOE verified the temperature of the flare.**

Response from Aconcagua:

The PLC sends a signal to the server every time any of the parameters changes with respect to the value reported before. The values are updated every minute. If one minute one parameter is different than the value obtained in the previous minute, then a signal is sent to the server and the parameter is updated.

As a precaution measure, the flare station is turned off once it stops operating; this simple measure prevents potential failures in the flare's monitoring system due to voltage variations in the electricity supply.

Once the flare station is turned off, the server stops receiving information, which is interpreted by the system as if no changes in the monitoring system occur. That's why the values reported show no changes.

On the other hand, the flare station cannot operate if it is turned off; electrovalves automatically shut down preventing the biogas being vented.

The flare station is equipped with a laser flare monitor: if no flame is present in the flare station, it reports a 0 (zero). If the laser detects a flare, then it shows the number 1.

Every set of data that is captured by the PLC and sent to the server includes that parameter, specifying if it is a valid set of data (1) or if it is invalid (0). The calculation methodology considers only valid data for the calculations, excluding therefore the possibility of any set of data being considered as valid if no flare was present.

This issue was informed to the audit team and they acknowledged that:

- The server repeated the last data captured once the flare station was turned off.
- The presence of a flare was monitored and reported the set of data as valid or invalid depending on that parameter.
- The system automatically stopped the flow of biogas if no flare was present, unless the flare was operated manually.
- The calculation methodology prevented the sets of data where no flare was present to be considered as valid data.

For all the reasons described above, the project managers considered that the data calculated was not corrupted or falsely presented.

**Issue 2. The spreadsheet shows that 6,978.71m<sup>3</sup>/hour of LFG gas was supplied and no LFG was flared from 3 to 5 February 2007, while about 2,000 m<sup>3</sup>/hour of LFG was supplied under normal operation during this monitoring period. Further clarification is required.**

Response from Aconcagua:

The operation records show that in February 5<sup>th</sup>, while the plant was being shut off, it suffered of an electricity cut. Also, according to an expert's report (available in case it is necessary, although it is Spanish), an external failure in the sub-station that feeds the project caused malfunctioning of some devices. That failure was the cause of the readings reflected in the spreadsheet.

There is no doubt that the flow values captured were an error and that the error was caused by an external failure in the electricity supply.

When the failure occurred, the plant was being shut-off and no biogas was flowing through the pipes; therefore, no flare was present at the time.

Due to the way the server is programmed (see response to issue 1) and since the electricity cuts caused the PLC to stop working, the last value reported by the flow meter was repeated until the plant started its operations in February 5<sup>th</sup> at 10:51 A.M.

To prevent the occurrence of errors like this, the project developer took two measures:

1. Installation of a current regulator and emergency batteries system (UPS).
2. Installation of an emergency electricity generator.

In any case, the project developer wishes to state that the data questioned was not involved in any way in the calculation of the CERs claimed, since the whole plant was shut-off at that moment due to the electricity problem.

**Issue 3. The monitoring plan requires the yearly monitoring of regulatory requirements relating to LFG projects regarding the adjustment factor (AF). However, neither the monitoring report nor the verification report states this. Further clarification is required.**

Response from Aconcagua:

Since the registration of the project, in March 30<sup>th</sup>, 2006, until today, no changes in the law of Chile were observed with respect to the landfills operation or abandonment.

Since local laws haven't changed the AF remains as was described in the PDD. The project developer has added this requirement to its monitoring system. That will also be reflected in future monitoring reports.

**Issue 4. The monitoring report stated that the flare efficiency was monitored at least yearly, with the first measurement made at the time of the installation of the flare, while the approved methodology requires that the flare efficiency should be checked quarterly, with monthly checks if the efficiency shows significant deviations from previous values. Further clarification is required on how the DOE verified the flare efficiency.**

Response from Aconcagua:

The project developer acknowledges that there was a serious error when applying the monitoring plan. No flare efficiency was measured that could be applied to the crediting period. The project developer misunderstood the monitoring plan and the methodology applied to the PDD and thought that the flare efficiency had to be measured once a year.

However, the project developer wishes to declare that from the beginning of the operations of the project until the date of completion of this report, two measurements of the flare efficiency have been performed and both tests have shown that the combustion is almost perfect with values higher than 99%.

The first test was performed five days before the end of the period covered by this verification process, showing combustion efficiency over 99%. This measurement was the one that was used to calculate the CERs in the monitoring report.

The second measurement was performed in February this year showing efficiencies around 100%

<b>Date of measurement</b>	<b>Flare efficiency</b>
April 19th, 2007	99.7%
February 8th, 2008	100% <sup>1</sup>

Even though the projects participants acknowledge the fact that the monitoring plan was not applied properly, based in the excellent results obtained in the tests performed and the stability of those outcomes it is their belief that the efficiency factor of 99.7% was correctly applied and the calculation of the CERs are realistic and conservative.

For future validation processes, the project managers have already scheduled quarterly measurements of the flare efficiency.

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<sup>1</sup> The value 0.8 mg/m<sup>3</sup>N was reported. The efficiency calculated was 99.9998%

**Issue 5. The monitoring report is required to contain the data of the monitored parameters listed in the monitoring plan. However, the data of the monitored parameters is only presented in the spreadsheet as a confidential document.**

Response from Aconcagua:

A daily resume will be included in the following versions of the Monitoring Report.

The project participants wish to withdrawn the status of confidential to all the spreadsheets containing calculations of the CERs.