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Responses to Review

Dear Sirs,

Please find below the response to the request for review for issuance of CDM project with the registration number 0425. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Javier Castro
Carbon Management Service

Industrie Service

Response to the CDM Executive Board

Issue 1:

The total amount of electricity imported in October 2006 was calculated from the monthly invoice. However the methodology requires this parameter to be continuously measured. Further clarification is required on how the DOE verified the total amount of the electricity import.

Response by PP

The amount of electricity was obtained from the monthly invoice in October 2006. The invoice itself, present the measured electricity consumption associated with the project. However, for October 2006, part of the electricity consumption stated in the invoice was considered in the previous verification report (17 July-17 October 2006). Therefore, the rest of the electricity consumed during October corresponds to the current monitoring period and the associated emissions were calculated accordingly to this value.

Response by DOE

During the onsite visit carried on September 21, the audit team has confirmed that the project participant is monitoring the electricity consumption using an electricity meter which is under control of the Mexican Energy Company CFE (Comisión Federal de Electricidad), furthermore, the only conservative manner to confirm and to evidence the correct amount of electricity consumed by the project is using the invoices provided by the energy Company CFE.
The total amount of electricity consumed during the project has been verified. Part of it has been already taken into account in the last verification period, therefore the difference is the applied for this period.

Issue 2:

No methane was measured in the exhaust gas for calculating the flare efficiency while the monitoring plan requires the methane content of the flare emissions to be analyzed at least quarterly. Further clarification is required on how the DOE verified the flare efficiency.

Response by PP

The flare tests were carried out every quarter as stated in the monitoring plan of the validated PDD. The flare tests were checked by the DOE and found to be satisfactory. No methane was detected in any of the flare tests. Further, the remark 5 in Annex I of the Monitoring report mentions "detection limit of <0.1% CH4", and a conservative flare efficiency has been applied.

Response by DOE

Methane content of the flare efficiency has been analyzed quarterly according to the monitoring plan, this information has been checked by the audit team and test reports are available as evidence, additionally and as further clarification, the statement included in the monitoring report "5 No methane was measured in the exhaust gas of the flare during any of the flare tests

[detection limit < 0.1% CH4], a conservative flare efficiency has been applied" means that the results of the methane content analysis results were 0 and as a conservative manner, the project participant has calculated the flare efficiency subtracting the detection limit < 0.1% of the equipment used for the test. The audit team confirms that the flare efficiency of 99.8% has been calculated in a conservative manner and in compliance with the monitoring plan.

Issue 3:

The required values for calculating the quantity of methane destroyed by flaring (MDflared) presented in the spreadsheet can not reproduce the same result (5,138 tCH4) stated in the monitoring report. Clarification is required.

Response by PP

The calculation of MDflared is the sum of calculated MDflare on a record-by-record basis. For example, the flare efficiency is set to zero if LFG flow, flare combustion temperature and/or methane content are below preset conditions. MDflare = LFGflared * Dch4 * Wch4 * FE [see note 17 in annex of monitoring report]; therefore MDflare will be zero for measurements where FE has been set to zero even if the LFG was flared. The flare efficiencies referred to in note 5 in the annex of the monitoring report refers to quarterly flare efficiency measurements by an external party, as required by the validated monitoring plan. Applying the FE from flare tests will lead to errors as it ignores the fact that FE has been set to zero in cases where CH4%, LFG flow and/or flare combustion temperature are below preset levels. Also note that the methane concentration reported in the annex of the monitoring report is an *average*. The real concentration is used in the calculations as this parameter is continuously monitored [see note 6 of annex of monitoring report.] Applying the average concentration will lead to errors, as the measured CH4% that has been used in the calculations can vary.

Response by DOE

The calculation of the methane destroyed is done using the real values monitored and the average is presented in the monitoring report. Therefore it is not possible to obtain the same result using the data presented in the monitoring report as using the complete raw data, which is the correct way to obtain the total amount of methane destroyed.
Additionally during the review of the data, based on this request for review a mistake in the excel file has been found which lead to a decrease of 50 t CO_{2e} in relation with the total emission reductions value presented in the previous verification report (version 2) used for the request for issuance. The source of this difference comes from an error by copying the information of San Nicolas 2 into the summary file, additional a minimal difference also comes from the correction of the total electricity consumption. The mistake in the excel file has been corrected and this difference is now reflected in the revised documents. Following documents are included to this response: revised Monitoring Report, revised Verification Report, revised Certification Report and revised Workbook.