

January 10, 2008

UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D-53153 Bonn
Germany
Attn: CDM Executive Board

Subject: Request for review: AWMS GHG Mitigation Project BR05-B-12, Mato Grasso, Mato Grosso do Sul, Minas Gerais and Sao Paulo, Brazil (0472)

Dear EB Members:

In response to the subject “request for review” of project 0472, the Project Participants provide the following clarifications:

The monitoring report is not in accordance with the methodology. Parameters required by the approved methodology including the flow rate of the biogas extracted by digester, the methane percentage in the biogas and flare efficiency were not monitored by the project participant. Further clarification is required on how DOE verified the monitoring is in accordance with AM0016 version 3.

- I. The flow rate of the biogas extracted by the digester is monitored as ID 12 in the validated PDD. This parameter is monitored continuously and recorded monthly by trained technicians.
- II. The methane percentage of the biogas is measured indirectly through the direct measurement of CO₂ and subsequent determination of methane content. The Project Participant acknowledges that this monitoring method may differ from the version 03 requirements; however, it was believed that this method was suitable to meet version 03 requirements since this method is in direct accordance with version 02 of the methodology.
- III. The flare efficiency was not monitored due to the inability to precisely measure the methane content of the exhaust gas. Therefore, in accordance with version 03 of AM0016 a conservative destruction efficiency factor of 99% for enclosed flares was used.

The PPD should indicate whether there is any current or future plan to measure the methane content in the exhaust gas after the flaring process, as mentioned in the validated PDD.

The Project Participant has no plans to measure the methane content of the exhaust gas and is applying the conservative destruction efficiency factor of 99% as defined in the footnote on page 30 of AM0016 version 03.

The title of the table on page 12 of the Monitoring Report shall be corrected as it should refer to “project emission reductions,” and not merely—and mistakenly—to “project emissions,” as currently written.

The title of table D.6 on page 12 has been revised to include the word “reductions”.

Should you require any additional information regarding this request please feel free to contact me at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Leo S. Perkowski". The signature is written in a cursive style with a large initial "L" and a distinct "P".

Leo S. Perkowski
Vice President, Regulatory Affairs