



Mr. Rajesh Kumar Sethi
Chair, CDM Executive Board

UNFCCC Secretariat
CDMinfo@unfccc.int

14/07/2008

Re: Request for review of the request for issuance for the CDM project activity "AWMS Methane Recovery Project, MX06-S-35, Jalisco and Michoacán, México" (Ref. no. 0538)

Dear Mr. Sethi,

SGS has been informed that the request for issuance for the CDM project activity "AWMS Methane Recovery Project, MX06-S-35, Jalisco and Michoacán, México" (Ref. no. 0538) is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the reason as outlined below. Through this letter we would like to comment on the reason for review and provide additional information.

The concern in the Requests states:

The DOE verified that the methane content in the biogas was calculated based on the CO₂ measurements. Although this approach was stated in the PDD, it is not in accordance with the registered monitoring plan and the methodology which require the methane content to be measured. The PP/DOE should explain why the indirect measurement of methane through the use of an Orsat analysis would be accurate, taking into account that also other inert gasses (e.g. nitrogen) could be detected as if being methane.

SGS response:

The project participant determined the concentration of methane in biogas using the direct measurement of CO₂ as described on page 21 of the registered PDD. This analytical method for determining the CO₂ has been standard practice for all project activities developed by the project participant and has been accepted by industry and regulators as a preferred method. This method was chosen by the project participant because it has improved accuracy and is more robust under typical field conditions as compared to available technology for CH₄ measurement. Under normal operating conditions, the two main products of anaerobic digestion in the project activity system are CO₂ and CH₄. Trace gases, if any, are present in negligible amounts which typically are below the accuracy level of the measuring instrument.

Therefore, we feel that the concern for request for review requested by the board members has been taken into account. We do however apologize if this was not sufficiently clear from the earlier verification and certification report.

We hope that this letter addresses the concern of the Board. If further information is required, Emilio Doens (Emilio.Doens@sgs.com; +507 317 0828) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review if necessary.

Yours sincerely,

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