

July 10, 2008

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

Subject: Request for review: AWMS Methane Recovery Project, MX06-S-35, Jalisco and Michoacán, México (0538)

Dear EB Members:

In response to the subject "request for review" of project 0538, the Project Participant provides the following clarifications:

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.

The project participant determined the concentration of methane content of the 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 in our field conditions as compared to available technology for CH₄ measurement. The major 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.

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

Sincerely,



Leo S. Perkowski
Vice President, Regulatory Affairs