



**CDM project activity/programme of activities registration request review form (CDM-REGR-FORM)
(Version 03.0)**

Section 1. General Information

Designated national authority/Executive Board member submitting this form (Name in print)

Title and UNFCCC reference number of the proposed project activity or programme of activities (PoA) submitted for registration

3067 Tunlan Coal Mine Methane Utilization Project, Shanxi Province, People's Republic of China

Section 2. Basis for review request

Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures (the annex to decision 3/CMP.1), which validation requirements may require review. Please tick the appropriate boxes in the list of requirements below. For requesting a review of a proposed afforestation or reforestation project activity or PoA, please refer to paragraphs 12 and 15 of the CDM modalities and procedures for afforestation and reforestation project activities (the annex to decision 5/CMP.1), and tick the equivalent boxes below mutatis mutandis.

The following are requirements derived from paragraph 37 of the CDM modalities and procedures:

- The participation requirements as set out in paragraph 28 to 30 of the CDM modalities and procedures are satisfied;
- Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity (DOE) on how due account was taken of any comments has been received;
- Project Participants have submitted to the DOE documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party;
- The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity, in accordance with paragraphs 43 to 52 of the CDM modalities and procedures;
- The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board;
- Provisions for monitoring, verification and reporting are in accordance with decision 17/CP.7, the CDM modalities and procedures and relevant decisions of the COP/MOP;
- The project activity conforms to all other requirements for CDM project activities in decision 17/CP.7, the CDM modalities and procedures and relevant decisions by the COP/MOP and the Executive Board.

The following are requirements derived from paragraph 40 of the CDM modalities and procedures:

- The DOE shall, prior to the submission of the validation report to the Executive Board, have received from the project participants written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development;
- In accordance with provisions on confidentiality contained in paragraph 27(h) of the CDM modalities and procedures, the DOE shall make publicly available the project design document;
- The DOE shall receive, within 30 days, comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available;
- After the deadline for receipt of comments, the DOE shall make a determination as to whether, on the basis of the information provided and taking into account the comments received, the project activity should be validated;
- The DOE shall inform project participants of its determination on the validation of the project activity. Notification to the project participants will include confirmation of validation and the date of submission of the validation report to the Executive Board;

- The DOE shall submit to the Executive Board, if it determines the proposed project activity to be valid, a request for registration in the form of a validation report including of the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received.
- There are only minor issues which should be addressed by the DOE/project participants prior to the registration of the project.

Section 3: Comments supporting review request

Please elaborate the reason for requesting a review on the requirements you indicated in section 2 above.

1. The DOE shall ensure that the project description clearly states the differences resulting from the project activity compared to the pre-project situation in compliance to the paragraph 63 of VVM 1.1, in particular, detail information of the consumers heat output derived from existing CMM. Further the DOE shall clarify the validation of amount of absolute gas and relative gas drained in the baseline.
2. The DOE should justify the suitability of criteria used to identify the similar projects and application of these criteria in identifying the similar projects in the common practice analysis line with para. 118-120 of VVM 1.1.
3. The DOE shall further substantiate the identification of the baseline scenario in line with baseline methodology procedure of ACM0008 v6, in particular, how it has validated: (a) suitability of the scenario i, which is considered as current practice, given that the heat generation using CMM and coal has not been considered under this scenario and emissions above 30% in concentration seem to be no longer allowed; (b) use of low concentration CMM (<30% CH₄) and high concentration (>30% CH₄) are not systematically enforced and also that non-compliance with this requirement is widespread in the country; (c) the elimination of scenario vi, in particular, how it is considered that extraction and liquefaction of low concentration CH₄ is at demonstration stage; (d) identified alternatives, in particular, how the alternatives can produce similar output given that the project activity is generation of 33.5 MW power and 410,428 GJ heat whereas the alternatives considered have different power and heat generation values than the project activity.
4. The DOE shall justify the appropriateness of the investment comparison analysis to identify the most economically attractive baseline in line with step 5 of identification of the baseline of ACM0008 v6, given that this scenario i does not involve an investment.
5. The DOE shall further substantiate the suitability of the input values to the investment comparison analyses in line with paragraph 112 (c) of VVM v1.1, in particular, total investment, plant load factor, project life time, heat generation cost, electricity purchase tariff, etc. Further the DOE shall clarify if there are any preferential policies on capture and utilization of low/high concentration CMM such as reducing or waiving taxes and charges, preferential price polices, pre-tax appropriation of safety cost, refund VAT, etc. If so, the DOE shall provide detail information how these preferential policies have been considered in the investment comparison analyses.
6. The DOE shall further substantiate: (i) the suitability of the methane concentration and flare availability assumed in calculating emission reduction; and (ii) why the emissions due to destruction of methane in the baseline have not been considered in calculating the baseline emissions.
7. The DOE shall clarify validation of the ex-ante projection of thermal energy demand in the absence of the project, in particular: (i) the number of end users serviced by the distribution system relative to the total pool of possible end users, given infrastructure constraints; (ii) how quickly the total pool of possible end users is expected to grow, if at all; (iii) the type and cost of alternative fuels for potential or existing CMM thermal energy customers, compared to the cost of delivering CMM; and (iv) any other variables relevant to the particular thermal energy CMM distribution system associated with the project, in accordance with page 16-17 of ACM0008 v6.
8. The DOE shall further substantiate the validation of the project boundary in accordance with ACM0008 v6 (page 3), in particular, exclusion of the drainage system from the project boundary that is used as part of the project activity.
9. The project participant shall monitor pre -mining CMM and post-mining CMM destroyed in the project activity separately as required by the monitoring methodology of ACM0008 v6.
10. The DOE should clarify how the project participant makes sure that the pre-existing users received same amount of gas what they received in pre-project scenario or more.

11. The DOE shall further clarify why PEMvent, dKmax, CMMBL,I, PMMBL,I,y, PMMBL,I,y, MMheat, MMflare, CMMPJ,I,y, PMMPJ,I,y FvCH4,FG,h are not included in the monitoring plan.

Date received at UNFCCC secretariat

27 Jul 10