



Montreal, April 3, 2014

Ms. Rajinder Sahota  
Chief  
Cap-and-Trade Program  
California Air Resources Board

Object: Support for Mine Methane Capture Protocol

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Dear Ms. Sahota,

Biothermica Technologies Inc. ("Biothermica") would like to thank the California Air Resources Board (ARB) for this opportunity to support the approval of the proposed Mine Methane Capture (MMC) Protocol.

Our support is provided from the perspective of a ventilation air methane (VAM) project developer and technology owner, having developed and implemented the first VAM destruction project at an active mine in the U.S.

#### **Methane abatement and Clean Technology Deployment**

Mine ventilation air methane (VAM) emissions are one of the largest sources of non-regulated greenhouse gas emissions in the U.S. Based on the nature of these emissions –high volume but very low methane concentrations - carbon offsets are the most effective way to support the development of VAM abatement technologies.

Thanks to the carbon price signal finally provided by the Protocol's adoption, project developers will be able to deploy their innovative methane abatement projects at several U.S. mine sites. This price signal is a crucial factor, considering these projects rely on carbon offsets as a source of revenues.

#### **Swift implementation**

We understand the actual implementation of the Protocol will take place only after its approval by the Office of Administrative Law (OAL) and the training of accredited verifiers. While we understand and respect ARB's administrative constraints, we do wish to underline the importance of not delaying the implementation schedule in order to ensure MMC projects will start delivering offsets as soon as possible.

Sincerely,

Raphaël Bruneau  
Director – Carbon Markets  
Biothermica Technologies Inc.

#### **Biothermica**

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