Pg. 7, line (43) – the definition of sealed should require that “all” entrances be sealed. As it is written, if “any” entrance is sealed, then the entire mine is considered sealed. This incorrectly implies that if just one of many gob wells is sealed, then the entire mine is considered sealed.

Pg. 18, Section 3.2(c)(2) – add trona as eligible AMM mine type.

Pg. 19, Section 3.4.1 – Investors and developers require investment predictability and stability from long-term investments. It is imperative that developers be assured a crediting period of a full ten years, regardless of the implementation of new regulations during the crediting period that would require the project activity. The clause “at the time of offset project commencement” should be reinstated to eliminate the barrier this will certainly present to investors. This issue should be consistent with and clarified in the Regulation.

Pg. 20, Section 3.4(b)(3) – SMM drainage is actually standard practice. In fact, O&G developers extracted methane prior to mining activity from a mine in the vicinity of the North Antelope Rochelle Mine. If surface mine pipeline delivery is permitted, then active underground pipeline projects should also be permitted.

Pg. 27, Table 4.2, SSR 2 and SSR – Some gob gas extraction pumps capture gas and generate electricity for project activities. The pumps use mine methane as fuel to capture gas and generate electricity. These pumps operate in the baseline scenario. Using these pumps to capture gas or generate electricity does not significantly increase mine methane combustion or associated emissions. Emissions from this should conservatively not be Included in either the baseline or project scenario.

Pg. 85, Equation 5.44 – Clarify that ER(AMM) includes both drainage and ventilation emissions

Pg. 123, Section (f)(1) – Clarify if this is for all wells or a representative sample that can be used to extrapolate total mine emissions.

Pg. 136, Section 7.2(a)(9) – Some existing projects are located where physical addresses do not exist. Recommend lat/lon only be acceptable if no physical address exists.