** Vessels Coal Gas, Inc. ™**

**Ms. Jessica Bede April 23, 2013**

**Coal Mine Methane Protocol Contact**

**California Air Resources Board**

**Re: Comments Offsets Work Shop**

Vessels Coal Gas appreciates the opportunity to comment after the Air Resources Board (ARB) public meeting to discuss the new offset protocols~~;~~ addressing Coal Mine Methane and Rice Cultivation.

Vessels Coal Gas is a mine methane emissions reduction company active in four states.

As noted by PG&E, the pool of offsets may be diminished by the linkage with Quebec and there is a need for addition offset supply.  Coal Mine Methane (CMM) represents a significant pool of potential offsets.   Specifically coal mine methane generated from closed mines is a source of up to 10 billion cubic  feet of methane per year (please check the number) which can be used beneficially.  Of the possible ~300 projects for coal mine methane from closed mines, only 14 projects are ongoing.

Vessels has extensive experience in permitting and operations on federal lands, working with federal, state, local and tribal authorities.   Limiting projects to only private lands would potentially eliminate a substantial portion of the possible offset pool.

Vessels welcomes any opportunity to help ARB understand the complexity of permitting, operation, closing and ownership.  We believe it is vital to the success of the ARB cap-and-trade program to include this new protocol.  I can be reached at 303.995.8341 cell, or tvessels@vesselscoalgas.com.

**Sincerely,**

**Thomas J. Vessels**

**President, Vessels Coal Gas, Inc.**