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Encore BioRenewables is a marketing and business development company based in California, specializing in sustainable, recyclable and renewable bio-based products.

Encore BioRenewables strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects. This will be the first protocol written entirely by ARB through the public protocol development process. Offset credits represent a crucial cost containment mechanism to help the California cap-and-trade program achieve GHG emission reductions in an economically efficient manner.

Experts are now reporting that Methane is a green house gas with a Global Warming Potential twenty five times that of Carbon Dioxide. Methane also is an energy source that, if used, conserves energy from other sources and reduces green house gas emissions. The World Bank estimates that 7,500,000,000 Metric Tons of CO2 equivalent of methane is emitted annually around the world. That methane, if used for electricity generation for example, could produce 250,000,000 Mega Watt Hours per year.

Mines in the United States typically are pressured to sign electricity agreements prohibiting them from self-generating any electricity from their own waste methane. There is no incentive to avoid methane emissions and rules to reduce emissions are likely to take years and never be as effective as an economic incentive. We have no verifiable estimate of methane emissions overall from active or abandoned mines as the cost of performing detailed surveys is prohibitive. This protocol will encourage the generation of new and accurate data of methane emissions from mines. This could also encourage more research and measurement of methane emissions from all sources.

Encore BioRenewables encourages officials to approve and make effective the protocol as soon as possible.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Joe Gershen", with a long horizontal flourish extending to the right.

Joe Gershen
President
Encore BioRenewables LLC