



10 North Reading Avenue  
Boyertown, PA 19512  
484.415.0501

**William E. Flederbach, Jr.**  
President & CEO

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April 4, 2014

Ms. Rajinder Sahota  
Chief  
Climate Change Program Evaluation Branch  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Re: Comments in support of CA ARB Mine Methane Capture (MMA) protocol

Ms. Sahota,

ClimeCo Corporation strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects.

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.

As a respected advisor and trader of environmental commodity market products, ClimeCo has specialized expertise in California cap-and-trade, voluntary market advisory and project financing of internal CO2 abatement systems. ClimeCo managed projects generate in excess of 3 million credits per year, including a diverse commodity portfolio which includes CRTs generated under the Nitric Acid Production protocol and California Air Resources Board (CARB) Forestry, Ozone Depleting Substance and Agricultural Methane protocols.

Anticipated to be the first protocol written entirely by ARB through the public protocol development process, ClimeCo encourages officials to approve and make effective the compliance offset protocol for mine methane capture (MMC) projects as soon as possible.

Sincerely;

ClimeCo Corporation

William E. Flederbach, Jr.  
President & CEO