



SOUTHERN UTE INDIAN TRIBE DEPARTMENT OF ENERGY

May 24, 2016

Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Comments on the Proposed SLCP Reduction Strategy

Upon review of the Proposed Short-Lived Climate Pollutant Reduction Strategy (Strategy) we noticed that one of the major sources of methane emissions in California was not included in the analysis. The missing source is methane seepage from geologic formations. Completion of a high level literature search for geologic sources of methane emissions within California identified at least three specific sources of emissions (LA Basin, La Brea tar pit, and Coal Oil Point) totaling approximately 16.4 MMTCO₂e/yr. Emissions from these sources increase California's annual methane emissions by an estimated 13.9% above the 118 MMTCO₂e/yr identified in the Strategy.

We see the Strategy's omission of these geologic sources of emissions as a missed opportunity. Methane emissions from geologic seeps can, and are, being successfully captured and utilized. Since 2009 the Southern Ute Indian Tribe in Southwest Colorado has addressed geologic methane seeps similar to those in California by capturing methane (destined for the atmosphere) in shallow wells near where the methane reaches the surface. The captured gas is then routed for treatment and ultimate consumer use. This project generates carbon credits under a Verified Carbon Standard (VCS) Methodology (VM0014). In addition, the State of Colorado operates a system that captures geologic methane in a shallow trench system and generates electricity using a microturbine that is net-metering into the local power grid. The Air Resources Board is aware of both projects.

We encourage the Air Resources Board to include geologic methane seepage in the emission inventory and to also develop a strategy for reducing emissions from these sources. The CA-ARB Mine Methane Capture (MMC) Compliance Offset Protocol is similar to VCS VM0014 and may provide a streamlined starting point. We would be happy to provide a tour of our methane capture project to anyone who is interested in learning more about this issue and opportunity. We could also help facilitate a tour of the nearby State of Colorado system as well.

Please feel free to call me at 970-563-5556 or email me at kspray@sudoe.us if you have any questions regarding these projects or wish to explore a field visit.

Sincerely,



Karen L. Spray
Exploration & Production Manager
Department of Energy
Southern Ute Indian Tribe

cc: Southern Ute Tribal Council
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