Solvay Chemicals, Inc.
PO Box 1167
Green River, WY 82935

Solvay Chemicals, Inc. Comments on the Proposed Compliance Offset Protocol for Mine Methane Capture Projects and Accompanying Regulatory Amendments Scheduled for Public Hearing on October 24, 2013

Solvay Chemicals, Inc. (SCI) appreciates the opportunity to comment on the "Proposed Compliance Offset Protocol - Mine Methane Capture Projects: Capturing and Destroying Methane from U.S. Coal and Trona Mines" and accompanying Staff Report.

As a leader in sustainable business practices, SCI supports ARB efforts to reduce global greenhouse gas emissions through a market driven cap and trade program. We particularly applaud the efforts of ARB Staff to develop the Proposed Compliance Offset Protocol for Mine Methane Capture (MMC) Projects. Their professionalism and dedication to the development of a high quality work product while giving serious consideration to the participating public during the technical working sessions was admirable. SCI urges ARB to adopt the Proposed Protocol for MMC Projects and accompanying amendments to the Cap and Trade Regulations.

SCI operates an active, underground trona mine in Southwest Wyoming. Trona is processed into soda ash, a key ingredient in everyday products such as glass and baking soda. To ensure worker safety, SCI vents mine methane from the strata above and below the trona seam. SCI, which has no legal obligation to capture and treat the mine methane, developed and installed an innovative, cutting edge capture and treatment system. The system has been listed with the Climate Action Reserve and would be covered by the Proposed Protocol for MMC Projects. SCI is currently contemplating expansion of the system to double the mine methane capture and destruction capacity. Anticipation of the acceptance of the project into the ARB carbon offset program will play a key role in that investment decision.

Fundamentally, SCI believes that market driven cap and trade systems when properly deployed on a global scale will significantly reduce greenhouse gas emissions while at the same time preserving economic stability. ARB and the California legislature are to be commended for once again demonstrating national leadership toward environmental, economic, and social stewardship.

In the case of mine methane emissions, SCI believes that a well run cap and trade system in California will provide mine operators in the USA an economic incentive to invest capital in projects to reduce methane emissions which would not otherwise be legally required. And, these methane reductions can come from not only underground coal mines but also nonmetal mines, including trona mines like the one operated by SCI, that liberate methane as a result of the mining process. To this end, SCI supports the inclusion of non-coal mining operations in the Proposed Protocol for MMC Projects. Further, it is SCI's experience that as mine operators seek to design and implement methane capture and destruction systems it is quite likely that the technology to do so will evolve toward better, more productive and cost efficient systems

In the event ARB adopts the Proposed Protocol for MMC Projects, SCI would recommend that the MMC Projects Regulatory Guidance Document, which will need to be drafted, include a clarifying definition of Offset Project Operator (OPO). Clarifying OPO definitions have been included in the Regulatory Guidance Documents accompanying the other offset compliance protocols. In the case of the MMC Projects Regulatory Compliance Guidance Document, SCI would recommend that the OPO be defined as the owner of the mine methane capture and destruction technology. Such a clarification will facilitate implementation of the MMC Projects Protocol by recognizing the OPO as the person or entity who acquired the necessary regulatory authorizations, invested in, built, and operated the MMC project to ensure the destruction of the captured mine methane.

Respectfully submitted on behalf of Solvay Chemicals, Inc.