

VERIFICATION REPORT FOR THE SOUTHERN UTE INDIAN TRIBE WESTSIDE CBM SEEP CAPTURE & USE PROJECT



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Summary:

The Project voluntarily captures and destroys fugitive methane gas from a coal bed owned by the Southern Ute Indian Tribe. The coal bed methane is captured via an active gas collection system, upgraded to pipeline quality natural gas, and injected into a gas transmission pipeline operated by Kinder Morgan Trans Colorado. The upgraded gas is also utilized on site for project operations.

The verification process consists of the independent third-party assessment of the implementation of the Project and emission reduction assertion against the criteria stated in the *Verified Carbon Standard (VCS) Standard*, 25 March 2015, v3.5; the approved VCS methodology VM0014 (Version 1.0); and the validated Project Description (PD). The purpose of the verification is to ensure the project was implemented and monitored in accordance with the validated Project Description and underlying methodology.

During the verification process, First Environment issued three corrective action and three clarification requests, all of which were addressed sufficiently by SUDOE. No uncertainties were identified during the verification process. The Project claims emission reductions of 56,363 metric tonnes CO₂e for the period of January 1 through December 31, 2014. First Environment is reasonably assured that the Project meets all relevant VCS program requirements and correctly applies the approved VCS methodology VM0014 (Version 1.0) and the validated VCS PD.

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1 INTRODUCTION

This report is provided to Southern Ute Indian Tribe – Growth Fund – Department of Energy (SUDOE) as a deliverable of the Verified Carbon Standard (VCS) project verification process for the Southern Ute Indian Tribe Westside CBM Seep Capture & Use Project (the Project) located in La Plata County, Colorado. This report covers the verification of greenhouse gas (GHG) emission reductions from the capture and destruction of coal bed methane (CBM) over the period from January 1 through December 31, 2014. First Environment, Inc. (First Environment) conducted the verification from the date of the kickoff meeting through March 19, 2015.

1.1 Objective

The purpose of this verification was, through review of appropriate evidence, to establish that the Project conforms to the requirements of the verification criteria discussed in Section 1.2.

1.2 Scope and Criteria

The specific scope metrics for the verification are outlined in the table below:

Reporting Period	<ul style="list-style-type: none"> January 1 through December 31, 2014
Emission Sources Verified	<p><i>Baseline Sources</i></p> <ul style="list-style-type: none"> Emissions of CH₄ from surface gas seeps at coal outcroppings Emissions of CO₂ from the production of heat (i.e., injection into gas grids) that is replaced by the project activity <p><i>Project Sources</i></p> <ul style="list-style-type: none"> Emissions of CO₂ from on-site fossil fuel combustion and purchased electricity consumed by the project activity Emissions of CO₂ from CBM destruction in the gas grid and by project equipment
Definition of Materiality	<ul style="list-style-type: none"> Misstatements of greater than five percent of the Project's GHG assertion; and Qualitative non-conformities with the Standards of Verification described below

The following table outlines the guidance and protocols used to conduct this verification:

Standards of Verification	<ul style="list-style-type: none"> VCS Standard: VCS Version 3, 25 March 2015, v3.5 (VCS Standard) Validated VCS Project Description (VCS PD), December 21, 2011 VM0014 – <i>Interception and Destruction of Fugitive Methane from Coal Bed Methane (CBM) Seeps</i>, Version 1.0 (VM0014)
Verification Process	<ul style="list-style-type: none"> VCS Standard VCS Program Guide: VCS Version 3, 8 October 2013, v3.5 ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

The Monitoring Report dated June 9, 2015 and titled "SUIT Westside CBM Seep Capture and Use Project Monitoring Report #4," Version 2.4 was also used to inform the verification assessment.

1.3 Level of Assurance

First Environment and SUDOE have agreed that a reasonable level of assurance be applied for the Project.

1.4 Summary Description of the Project

The Project voluntarily captures and destroys CBM from the Fruitland coal formation in La Plata County, Colorado. The GPS coordinates of the project activity are located in Table 2 of the Monitoring Report. The CBM extracted from a total of 29 individual wells is aggregated at a Central Delivery Point (CDP). Two of these wells were added to the grouped project as a new project activity instance in 2014. CBM is upgraded to pipeline quality natural gas and then injected into a natural gas transmission pipeline operated by Kinder Morgan Trans Colorado or utilized on site. The Project primarily claims GHG emission reductions from the capture and destruction of fugitive CBM, which otherwise would have been emitted to the atmosphere. In addition, emission reductions are claimed from the displacement of fossil fuel-derived natural gas in the gas grid. The VCS PD provides additional details regarding the site and the gas collection and distribution system.

2 VERIFICATION PROCESS

The verification process consisted of an assessment of the Project's implementation, as described in the Monitoring Report, against the verification criteria described above, as well as an assessment of the GHG emission reduction assertion. Discrepancies between project documentation and the verification criteria were considered material and identified for corrective action. Project description deviations were evaluated on the basis of the requirements in VM0014 and the VCS Standard and required appropriate justification from SUDOE.

2.1 Method and Criteria

To review the Project's GHG information, the following verification process was used:

- conflict of interest review;
- selection of Audit Team;
- kick-off meeting with SUDOE;
- review of the validated VCS PD;
- development of the verification plan and sampling plan;
- site visit;
- desktop review and evaluation of raw data, calculations, and supporting documentation for the period under review;
- follow-up interaction with SUDOE for corrective action or supplemental data as needed; and
- final statement and report development.

The verification process was utilized to gain an understanding of the Project's GHG emission sources and reductions and to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

Conflict of Interest Review

Prior to beginning any verification project, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the project. No potential conflicts were found for this project.

Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their verification experience, as well as familiarity with coal bed operations and methane capture:

Michael Carim – Lead Verifier
Howard Kanter – Verifier
Luca Nencetti – Verifier
James Wintergreen – Internal Reviewer

Audit Kick-off

The verification audit was initiated with a kick-off conference call on December 8, 2014 between First Environment and the primary client contact, Rebecca Kauffman. The communication focused on confirming the verification scope, objectives, criteria, schedule, and the data required for the verification.

Project Description Review

The Audit Team reviewed the validated VCS PD as a basis for developing the verification plan.

Development of the Verification and Sampling Plans

The Audit Team formally documented its verification plan as well as determined the data-sampling plan. The verification plan was developed based on discussion of key elements of the verification process during the kick-off meeting. SUDOE was afforded the opportunity to comment on key elements of the plan for verification. Based on items discussed and agreed upon with SUDOE, the plan identified the First Environment team members, project level of assurance, materiality threshold, and standards of evaluation and reporting for the verification. It also provided an outline of the verification process and established project deliverables. A separate sampling plan was designed to review all project elements in areas of high risk of inaccuracy or non-conformance.

Site Visit

Mr. Michael Carim, Lead Verifier, performed a site visit on March 5, 2015 as described below in Section 2.4.

Desktop Review

The Audit Team performed a desktop review of the Monitoring Report, GHG emission reduction assertion, and supporting documentation, as further described in Section 2.2 below.

Corrective Actions and Supplemental Information

The Audit Team issued requests for supplemental information, clarification, and corrective action during the verification process. The clarification and corrective action requests and the responses provided by SUDOE are summarized below in Section 2.5.

Verification Reporting

Verification reporting documents the verification process and identifies its findings and results. Verification reporting consists of this report and a separate Deed of Representation to be submitted to the VCS Association.

2.2 Document Review

During the verification process, First Environment reviewed the Project's Monitoring Report, GHG emission reduction assertion, and supporting documentation for the current verification period to ensure consistency with the validated VCS PD and VM0014. Discrepancies between Project documentation and

the verification criteria were considered material and identified for corrective action. Additionally, First Environment assessed the GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements. The results of these reviews are discussed in greater detail below.

2.3 Interviews

Through the course of verification activities, First Environment interviewed the following project personnel to inform the verification process:

Dan Cartier – Red Cedar Gathering Company
 Davis Dunagan – Red Cedar Gathering Company
 Rebecca Kauffman – Southern Ute Alternative Energy
 Karen Spray – Southern Ute Department of Energy
 Adam Red – Southern Ute Department of Energy
 David Wyatt – Red Cedar Gathering Company

2.4 Site Inspections

First Environment performed a site visit on March 5, 2015. The site visit included review of site operations, equipment quality assurance and quality control activities, data collection processes, and information management systems, as well as interviews with relevant project personnel.

2.5 Resolution of Findings

The Audit Team issued three requests for corrective action and three requests for clarification during the verification process. SUDOE's responses were sufficient to resolve the corrective action and clarification requests. The corrective action and clarification requests and the responses provided are summarized in an appendix to this report.

2.5.1 Forward Action Requests

During previous verifications, three FARs were identified. The Audit Team assessed the status of the FARs over the current verification period as follows:

- FAR No. 1 – *Project developer shall maintain records of meter drift at each calibration.* During the verification site visit, project personnel described in detail the calibration procedures being followed. Portable gas chromatographs are field calibrated and checked daily using calibration gas prior to use. First Environment confirmed that records of meter as-found/as-left conditions were documented for the CBM and fuel flow meters, as appropriate, over the current verification period, allowing for the calculation and confirmation of meter drift.
- FAR No. 2 - *The project proponent removed one well-head from the project boundary, necessitating a change to the project design and monitoring plan. Future verifications shall consider the deviation considered in Section 2.1.* This FAR is not applicable for the current reporting period.
- FAR No. 3 – *SUGF (or designee) shall record the serial numbers of gas chromatographs used during the verification period as well as the locations where they are used. Additionally, monthly inspections of the portable gas chromatographs shall be formally documented.* Gas chromatograph serial numbers and measurement locations were recorded. First Environment also reviewed evidence that documented monthly inspections of the portable gas chromatographs.

No new forward action requests were issued during this verification.

2.6 Eligibility for Validation Activities

First Environment is accredited to perform validation activities in Sectoral Scopes 1 and 10, which are the applicable scopes for the approved methodology VM0014.

3 VALIDATION FINDINGS

The validation process consisted of an assessment of any deviations or other discrepancies from information presented in the validated VCS PD. The Audit Team reviewed justification for each deviation, including supporting documentation, in order to confirm that it was consistent with the underlying methodology and did not negatively impact the conservativeness or accuracy of the emission reductions.

The validation process also included the assessment of a new project activity instance of the grouped project against the eligibility criteria defined in the validated VCS PD.

3.1 Participation under Other GHG Programs

During the verification process, First Environment reviewed an attestation from SUDOE confirming that GHG emission reduction credits from the Project have not been registered under another GHG programme.

First Environment concluded that the project is eligible to participate under the VCS Programme.

3.2 Methodology Deviations

No new methodology deviations were identified during the current verification. See Section 4.1 for a list of previously validated methodology deviations.

3.3 Project Description Deviations

The following project description deviations were identified in the Monitoring Report and approved for the Project during prior verifications and remain relevant to the current reporting period:

- Consumption of a small quantity of liquefied petroleum gas (LPG) was introduced during the reporting period to provide heat for freeze protection in winter months. This additional source of fossil fuel emissions was accounted for as project emissions consistent with the VM0014 methodology. First Environment accepted this deviation because it provided a more accurate representation of GHG emissions associated with the Project.
- Additional H₂S removal equipment was added at the CDP during a prior reporting period and remained in use during the current reporting period. This deviation does not result in any changes to the monitoring plan.
- The two field operations companies responsible for data monitoring and QA/QC were incorrectly identified in the validated VCS PD. Red Willow Production Company provides maintenance support and operates the wellfield system, the CDP, and the gas compression facility. Red Cedar Gathering Company (Red Cedar) operates the treating plant and maintains and calibrates all data acquisition and storage equipment, including flow meters and gas chromatographs. This deviation does not represent an actual change in monitoring activities, but rather a correction to the written description of the monitoring plan to more accurately identify project responsibilities.
- The CDP vent gas flow meter and the vent gas fuel flow meter were not field calibrated according to the frequencies specified in the previously approved project description deviation. The CDP vent gas and vent gas fuel flow meters were calibrated more frequently than scheduled as a best management practice. First Environment accepted this deviation because it represented improved quality control and assurance (QA/QC) activities. It was also confirmed that calibrations were carried out monthly for these instruments during the current reporting period.

The following project description deviations were newly identified in the Monitoring Report and approved for the Project during the current verification:

- The Coyote Gulch Compressor fuel flow meter was calibrated twice during 2014, not four times as stated in the validated VCS PD. Accuracy checks were performed in all four quarters of 2014. Because all checks showed the instrument to be operating accurately within tolerances, First Environment concluded that the deviation is reasonable and will not impact the quality or conservativeness of the data monitored by the meter.
- Criteria for assessing the additionality of new instances of the grouped project were identified. The deviation was necessary because the validated VCS PD did not describe the characteristics relative to additionality for new project activity instances. Specifically, new instances will be evaluated for regulatory additionality and then only deemed eligible if the price of natural gas at the time at which the new instance reached financial closure is below the level (\$6.24/MCF) that was used in the demonstration of additionality performed at validation. As gas sales from the project activity are the primary non-carbon revenue driver and given that gas collection volumes remain below the levels projected at validation, First Environment concluded that these criteria are reasonable.

The following project description deviations were approved for the Project during the prior verifications but are not relevant to the current reporting period:

- The Coyote Gulch Compressor fuel flow meter was not field calibrated according to the frequencies specified in the previously approved project description deviation. The Coyote Compressor fuel flow meter was not calibrated during the third quarter of the verification period. However, the calibration performed in the subsequent fourth quarter indicated that the flow meter was operating accurately. First Environment accepted this deviation because it did not appear to impact data quality or uncertainty.
- Evidence to support daily field calibration of portable gas chromatographs prior to use was not available for several dates in June and July 2013. SUDOE clarified that field calibrations and checks were performed daily throughout the reporting period as standard procedure and provided additional samples of evidence to support this assertion. First Environment reviewed the records provided and accepted this deviation based on the perceived low risk to data quality or uncertainty.

The project description deviations described above did not impact the applicability of the methodology, additionality, or the appropriateness of the baseline scenario, and the Project remained in compliance with VM0014 and VCS requirements. In addition, SUDOE provided appropriate descriptions and justifications for all relevant deviations during the verification process. All project deviations were deemed to be valid.

3.4 Grouped Project

One new project activity instance consisting of two additional gas collection wells was included into the grouped project during the current reporting period. Sampling was not required in the validation process due to the limited scope of the new project activity instance and both wells were assessed against all eligibility criteria.

SUDOE provided sufficient evidence, data, and supporting documentation to demonstrate the eligibility of the new project activity instance. Through review of site maps and observations at the site visit, First Environment confirmed that all new instances added to the Project during the current verification period were eligible for crediting in accordance with the eligibility requirements listed in the validated VCS PD.

Additionally, First Environment confirmed that Southern Ute Growth Fund holds right of use relative to the new gas wells and that the new project activity instance is eligible for crediting beginning in the current reporting period and through the end of the first crediting period. First Environment also confirmed that the new instance has additionality characteristics consistent with the initial instance via the criteria

identified in the project description deviation, specifically that the price of natural gas at the time the new wells reached financial closure was below the benchmark identified. No legal requirements exist that compel the collection and subsequent destruction of fugitive methane emissions from coal outcroppings.

First Environment determined the inclusion of the new project activity instance to be valid based on its satisfaction of the criteria described above.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

The Project was implemented according to the description provided in the validated VCS PD, except where noted in this report as a deviation. Sixteen initial instances of the Project (i.e., Phase I) became operational on January 1, 2009. Phase II became operational on January 16, 2012 with the addition of 11 new wells. Two additional wells become operational in 2014 and were added to the grouped project as described above for a project total of 29 wells. The 10-year project crediting period began on January 1, 2009 and ends on December 31, 2018.

The Audit Team confirmed that no data and/or variables presented in the Monitoring Report differ from those stated in the validated VCS PD, except where noted above in Section 3 or below in this section. Similarly, the data collection and recordkeeping procedures were found to be generally consistent with those outlined in the monitoring plan described by the VCS PD, except where noted above, and met the requirements of VM0014. SUDOE has adequate management and operational systems in place with respect to monitoring and reporting, as determined through observation during the site visit and the desktop review of project documentation.

Through communications with SUDOE, the Audit Team confirmed that the Project is not participating in any other GHG programs or emissions trading programs nor attempted to register with such programs. As indicated in the validated VCS PD, no other environmental credits are generated by the Project.

Although the validation report did not explicitly identify any methodology deviations, the following methodology deviation was approved for the Project during the validation process:

- The Project utilizes a regional default value for the CO₂ emission factor for displaced gas grid fuel (EF_{CO₂,i}) instead of site-specific data for calculating the emission factor for pipeline natural gas replaced by the project (EF_{GAS}). First Environment confirmed that this previously validated deviation was implemented during the verification period in accordance with the validated VCS PD.

4.2 Accuracy of GHG Emission Reduction and Removal Calculations

Emission reductions are calculated ex post using the approach indicated in VM0014 and the validated VCS PD. Emission reduction calculations for the verification period were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. The formulas were tested and found to be consistent with the calculations described in VM0014 and the validated VCS PD.

Project monitoring data for CBM captured and used by the compressor station (CM_{MECH,CS,PJ}), treatment plant (CM_{MECH,TP,PJ}), and injected into the natural gas pipeline (CM_{GAS,PJ}) were used to calculate the total avoided methane releases to the atmosphere (CM_{PJ}). Baseline emissions from avoided methane releases (BE_{MR}) are quantified as the product of CM_{PJ} and the global warming potential of methane (GWP_{CH₄}). Baseline emissions from displaced pipeline natural gas are quantified as the product of CM_{GAS,PJ} and an emission factor for pipeline natural gas replaced by the Project (EF_{GAS}).

There are four sources of project emissions identified within the project boundaries: emissions from combustion of purchased CBM as a fuel source for project equipment, emissions from combustion of CBM delivered via pipeline, emissions from the consumption of a minor quantity of fossil fuel (LPG), and

indirect emissions associated with electricity consumption from the project activity. Project emissions from electricity use and combustion of higher-grade CBM gas and LPG are deducted from the overall emission reductions created by the Project.

The verification process focused on the assessment of calculation spreadsheets to ensure that they were consistent with the formulas and equations described in VM0014 and the validated VCS PD. Copies of the raw data used in the calculations, including CBM gas volumes, invoices, gas compositional analysis data, and fossil fuel consumption data were compared with the values used in the final calculations and tested for transcription or mathematical errors. The calculations for the entire period were reviewed as well to determine whether they were free of material misstatement. All calculation methods and emission factors used to determine emission reductions were consistent with those outlined in the validated VCS PD

The GHG emission reductions were quantified correctly in accordance with the validated VCS PD and VM0014 and no material misstatements were observed.

4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

SUDOE provided adequate documentation for the emission reduction calculations as well as its management systems around the data collection process. Specifically, First Environment was provided a Monitoring Report prepared in accordance with the VCS programme template, transparent calculation spreadsheets, calibration records, CBM gas invoices and summary spreadsheets, and electronic data associated with CBM gas analyses. The assessments performed on this data, as described above, confirmed the reliability of the evidence and verified the accuracy of the information flow.

The evidence provided was consistent with the requirements of VM0014 and the validated VCS PD and meets generally accepted evidentiary standards for best practice in GHG accounting.

4.4 Non-Permanence Risk Analysis

Not applicable.

5 VERIFICATION CONCLUSION

First Environment was retained to provide verification services for the Project's GHG emission reductions assertion based on the following fundamentals:

- *Level of assurance:* Reasonable assurance.
- *Objectives of verification:* To assure project conformance with the VCS Standard, the VCS Methodology VM0014, and the validated VCS PD.
- *Verification criteria:* VCS Standard, the VCS methodology VM0014, and the validated VCS PD.
- *Definition of materiality:* Misstatements of more than five percent of the GHG assertion and qualitative non-conformities with the verification criteria are considered material.
- *Scope, including:*
 - *Boundaries of the assertion:* SUIT's CBM recovery and treatment operations located in La Plata County, Colorado as well as gas transport via Kinder Morgan Trans Colorado's natural gas transmission pipeline and combustion by end users connected to the natural gas grid;
 - *The physical infrastructure, facilities, and activities within the assertion:* interception well heads, central delivery facility, gas compression station, gas treatment plant, and commercial pipeline;

- *GHG sources, sinks, and reservoirs included within the assertion:* Carbon dioxide and methane emission reductions due to displacement of pipeline natural gas for heat production and capture of fugitive CBM at coal outcroppings, respectively, expressed as carbon dioxide-equivalents; and carbon dioxide emissions due to the operation of project equipment and methane destruction as part of the project activity.

Based on the assessments performed and the historical evidence collected, First Environment concludes, with a reasonable level of assurance, that the emissions reductions of the Project resulting from the capture and pipeline injection of coal bed methane gas for the period of January 1 through December 31, 2014 are:

- consistent with the validated VCS PD of December 21, 2011;
- in conformance with the VCS Standard and the VCS methodology VM0014 (Version 1.0); and
- without material discrepancy and meeting the minimum level of accuracy of at least 95 percent.

Additionally, the project description deviations reviewed and approved during the current audit process are consistent with the VCS Standard and VM0014 methodology, including all validation criteria therein.

Verification period: From 1-January to 31-December-2014

Verified GHG emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2014	67,032	10,669	0	56,363
Total	67,032	10,669	0	56,363

APPENDIX A – DETAILED RESOLUTION OF FINDINGS

ID	Clarification Request	Participant Response	Verification Conclusion
1	Please clarify whether any additional calibrations were performed subsequent to the accuracy check performed on GC instrument GC490-1 on January 28, 2014	SUDOE provided evidence of a calibration event performed after the field check on January 28, 2014.	Response is acceptable.
2	During previous verification activities, it was clarified that the accuracy threshold beyond which corrective action would be required for the Vent Gas Fuel and Vent Gas CDP flow meters (stations #0400501 and #0410501, respectively) is 0.25%. Please provide the threshold for measurement accuracy for the pressure transmitter installed at the compressor meter station #0269901.	SUDOE explained that the accuracy threshold for the meter in question is 0.25% and provided clarification on the calculation of drift associated with the pressure transmitter for the instrument.	Response is acceptable.
3	Gas volume statements for the Coyote Gulch Compressor station monitoring point (#0269901) indicate that samples for gas composition analysis were taken during the reporting period on 6/25, 8/20, 10/10 and 12/18. Please clarify whether calibrations of the GC instrument were performed on these dates as well, and provide supporting evidence as appropriate.	Calibration records for the gas chromatographs for events on 6/25, 8/20, 10/10 and 12/18 were provided.	Response is acceptable.

ID	Corrective Action Request	Participant Response	Verification Conclusion
1	The Monitoring Report does not describe in sufficient detail how the new instances of the grouped project meet the eligibility requirements in the validated PD.	Section 2.3 of the Monitoring Report was revised to address how the new project activity instance meet the eligibility requirements described in the PDD.	Response is acceptable. Conformance with all eligibility criteria was confirmed during the site visit or through document review.
2	Please demonstrate how the new project activity instances have characteristics with respect to additionality that are consistent with the initial instance(s) for the specified project activity and geographic area.	The project proponent revised the Monitoring Report to apply a Project Description deviation to identify additionality criteria for the inclusion of new project activity instances. The monitoring report was further revised to demonstrate how the new project activity instance meets the identified criteria.	Response is acceptable. Conformance with additionality criteria was confirmed during document review.
3	The mostly recently available eGrid data is not utilized for the determination of the parameter CEF_{ELEC} .	SUDOE revised its calculations to utilize the current eGrid emission factor for the project's region. The Monitoring Report was also revised to identify the updated emission factor.	Response is acceptable.