

Guidance on Mine Methane Offset Project Eligibility and MSHA Mine Status

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Purpose: At present, the Mine Methane Capture (MMC) Compliance Offset Protocol (COP) defines active mines as those classified by the Mine Safety and Health Administration (MSHA) as active, intermittent, or temporarily idle and abandoned mines as those classified as abandoned or abandoned and sealed. Absent from the protocol are several MSHA mine statuses that reflect transient mining operations (i.e., non-producing active, inactive). Moreover, the protocol does not provide guidance for offset projects at mines that begin decommissioning mining operations in the middle of a crediting or reporting period. This document aims to address these gaps by establishing clear and consistent guidelines for assessing eligibility of offset projects located at mines with MSHA statuses that fall outside of the clear delineations made in Section 3.2(c) of the MMC COP.

Below are three common cases CARB has identified where eligibility and reporting requirements are not immediately clear for specific mine statuses. If there are additional scenarios missing from this list that you believe CARB should provide guidance on, please contact ghgoffsetverification@arb.ca.gov.

Case 1:

Project type: Methane drainage or VAM on active underground mines

Mine status transition: Active/Intermittent/Temporarily Idle → Inactive

Documentation: CARB would expect the OPO to provide a letter from MSHA stating that inactivity is temporary and the mine continues to meet characteristics of an active, temporarily idle, or intermittent mine.

Changes to reporting requirements: None. CARB expects the project to continue following the requirements for methane drainage or VAM on active mines.

Case 2:

Project type: Methane drainage or VAM on abandoned mines

Mine Status: Non-producing Active

Documentation: CARB would expect the OPO to provide a letter from MSHA confirming that the section of the mine where the offset project operates is functionally abandoned (e.g., sealed, no personnel, no active ventilation).

Changes to reporting requirements: None. CARB expects the project to continue following the requirements for methane drainage or VAM on abandoned mines.

Case 3:

Project type: Methane drainage or VAM on active underground mines

Mine status transition: Active/Intermittent/Temporarily Idle → Non-producing Active

Documentation: CARB would expect the OPO to provide a letter from MSHA confirming that the section of the mine where the offset project operates is functionally abandoned (e.g., sealed, no personnel, no active ventilation).

Approval process:

1. CARB would expect the OPO to submit a short summary about the mine status and current operations along with supporting documentation to ghgoffsetverification@arb.ca.gov. This documentation can be submitted as soon as possible which may be mid reporting period. Supporting documents should also be made available to verifiers.
2. Current operations should be consistent with an abandoned mine and show that the MMC COP is applicable to the project.
3. A CARB-accredited offset verifier will verify the accuracy of the information submitted to CARB staff during the next verification. If there are any concerns about the information, the verifier must notify CARB.

Changes to reporting requirements: CARB would expect the OPO to follow the protocol requirements and reporting requirements for Abandoned Underground Mine Methane Recovery Activities, as outlined in MMC COP 6.7. The project does not need to list as a new project. If the mine transitions to Active Non-producing partway through a reporting period, the OPO should apply the quantification methodology for abandoned mines for the portion of the reporting period following the status change. Specifically, baseline emissions should be quantified using Equation 5.43 during that time. For all subsequent RPs, CARB would expect the project to adhere to the protocol requirements for Abandoned Underground Mine Methane Recovery Activities. Please note: this guidance is only applicable in cases where a single offset project is operating on the mine. Future guidance will be issued for situations involving multiple offset projects on a mine transitioning to an abandoned status.