

| EARLY ACTION DESK REVIEW FINDINGS | | | | |
|---|----------------------------------|---|--|--|
| ARB Staff Use Only | ARB Form Tracking Number: | Date Findings Received: | Date Findings Processed: | ARB Staff Use Only |
| | Date Findings Reviewed: | Date More Information Requested: | Date Findings Approved: | |
| PART I. VERIFICATION BODY INFORMATION | | | | |
| Verification Body Name: Ruby Canyon Engineering, Inc. | | | Verification Body ID Number: H2-12-008 | |
| PART II. EARLY ACTION PROJECT INFORMATION | | | | |
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | | | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | | | |
| Reporting Period Start Date: 10/09/2007 | | Reporting Period End Date: 12/31/2007 | | |
| <i>Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.</i> | | | | |
| Part III. ATTACHMENT | | | | |
| <input checked="" type="checkbox"/> Report Detailing the Desk Review Findings | | | | |
| Part IV. DESK REVIEW FINDINGS SUMMARY | | | | |
| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Part V. VERIFICATION BODY ATTESTATION AND SIGNATURE | | | | |
| <i>If the verification body answered "No" to any of the three questions in Part IV, sign this form in Part V.A immediately below. If the verification body answered "Yes" to all three questions, provide the attestation in Part V.B.</i> | | | | |
| Part V.A. LEAD VERIFIER SIGNATURE IF NOT CONCURRING | | | | |
| SIGNATURE: | | PRINTED NAME: | | |
| TITLE: | | DATE: | | |

Part V.B. LEAD VERIFIER ATTESTATION AND SIGNATURE IF CONCURRING

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Zach Eyler

TITLE:

Project Manager

DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Michael Coté

TITLE:

President

DATE:

7/23/2015

EARLY ACTION DESK REVIEW FINDINGS

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PART I. VERIFICATION BODY INFORMATION

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| Verification Body Name: Ruby Canyon Engineering, Inc. | Verification Body ID Number: H2-12-008 |
|--|---|

PART II. EARLY ACTION PROJECT INFORMATION

| | | |
|---|--|------------------------------|
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | |
| Reporting Period Start Date: 1/1/2008 | Reporting Period End Date: 12/31/2008 | |

Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.

Part III. ATTACHMENT

☒ Report Detailing the Desk Review Findings

Part IV. DESK REVIEW FINDINGS SUMMARY

| | |
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| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Part V. VERIFICATION BODY ATTESTATION AND SIGNATURE

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Part V.A. LEAD VERIFIER SIGNATURE IF NOT CONCURRING

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ATTESTATION SIGNATURE:**PRINTED NAME:**

Zach Eyler

TITLE:

Project Manager

DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Michael Coté

TITLE:

President

DATE:

7/23/2015

EARLY ACTION DESK REVIEW FINDINGS

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PART I. VERIFICATION BODY INFORMATION

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| Verification Body Name: Ruby Canyon Engineering, Inc. | Verification Body ID Number: H2-12-008 |
|--|---|

PART II. EARLY ACTION PROJECT INFORMATION

| | | |
|---|--|------------------------------|
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | |
| Reporting Period Start Date: 1/1/2009 | Reporting Period End Date: 12/31/2009 | |

Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.

Part III. ATTACHMENT

☒ Report Detailing the Desk Review Findings

Part IV. DESK REVIEW FINDINGS SUMMARY

| | |
|---|--|
| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

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ATTESTATION SIGNATURE:**PRINTED NAME:**

Zach Eyler

TITLE:

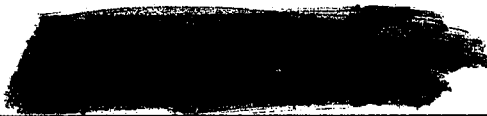
Project Manager

DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Michael Coté

TITLE:

President

DATE:

7/23/2015

EARLY ACTION DESK REVIEW FINDINGS

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PART I. VERIFICATION BODY INFORMATION

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| Verification Body Name: Ruby Canyon Engineering, Inc. | Verification Body ID Number: H2-12-008 |
|---|--|

PART II. EARLY ACTION PROJECT INFORMATION

| | | |
|--|---|-------------------------------------|
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | |
| Reporting Period Start Date: 1/1/2010 | Reporting Period End Date: 12/31/2010 | |

Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.

Part III. ATTACHMENT

☒ **Report Detailing the Desk Review Findings**

Part IV. DESK REVIEW FINDINGS SUMMARY

| | |
|---|--|
| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
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Part V.A. LEAD VERIFIER SIGNATURE IF NOT CONCURRING

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| SIGNATURE: | PRINTED NAME: |
| TITLE: | DATE: |

Part V.B. LEAD VERIFIER ATTESTATION AND SIGNATURE IF CONCURRING

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Zach Eyer

TITLE:

Project Manager

DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Michael Coté

TITLE:

President

DATE:

7/23/2015

| EARLY ACTION DESK REVIEW FINDINGS | | | | |
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| PART I. VERIFICATION BODY INFORMATION | | | | |
| Verification Body Name: Ruby Canyon Engineering, Inc. | | | Verification Body ID Number: H2-12-008 | |
| PART II. EARLY ACTION PROJECT INFORMATION | | | | |
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | | | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | | | |
| Reporting Period Start Date: 01/01/2011 | | Reporting Period End Date: 12/31/2011 | | |
| <i>Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.</i> | | | | |
| Part III. ATTACHMENT | | | | |
| <input checked="" type="checkbox"/> Report Detailing the Desk Review Findings | | | | |
| Part IV. DESK REVIEW FINDINGS SUMMARY | | | | |
| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
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| Part V. VERIFICATION BODY ATTESTATION AND SIGNATURE | | | | |
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I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Zach Eyler

TITLE:

Project Manager

DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Michael Coté

TITLE:

President

DATE:

7/23/2015

EARLY ACTION DESK REVIEW FINDINGS

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PART I. VERIFICATION BODY INFORMATION

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| Verification Body Name: Ruby Canyon Engineering, Inc. | Verification Body ID Number: H2-12-008 |
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PART II. EARLY ACTION PROJECT INFORMATION

| | | |
|---|--|------------------------------|
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | |
| Reporting Period Start Date: 1/1/2012 | Reporting Period End Date: 12/31/2012 | |

Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.

Part III. ATTACHMENT

☒ Report Detailing the Desk Review Findings

Part IV. DESK REVIEW FINDINGS SUMMARY

| | |
|---|--|
| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Part V. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered "No" to any of the three questions in Part IV, sign this form in Part V.A immediately below. If the verification body answered "Yes" to all three questions, provide the attestation in Part V.B.

Part V.A. LEAD VERIFIER SIGNATURE IF NOT CONCURRING

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| TITLE: | DATE: |

Part V.B. LEAD VERIFIER ATTESTATION AND SIGNATURE IF CONCURRING

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Zach Eyler

TITLE:

Project Manager

DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:**PRINTED NAME:**

Michael Coté

TITLE:

President

DATE:


7/23/2015

| EARLY ACTION DESK REVIEW FINDINGS | | | | |
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| PART I. VERIFICATION BODY INFORMATION | | | | |
| Verification Body Name: Ruby Canyon Engineering, Inc. | | | Verification Body ID Number: H2-12-008 | |
| PART II. EARLY ACTION PROJECT INFORMATION | | | | |
| Early Action Project Name: Finite Carbon - MWF Brimstone IFM Project I | | | EAOP Project ID#: CAR582 | ARB Project ID#: CAFR0103 |
| Name of Party Requesting Desk Review: Finite Carbon Corp. | | | | |
| Reporting Period Start Date: 1/1/2013 | | Reporting Period End Date: 08/30/2013 | | |
| <i>Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.</i> | | | | |
| Part III. ATTACHMENT | | | | |
| <input checked="" type="checkbox"/> Report Detailing the Desk Review Findings | | | | |
| Part IV. DESK REVIEW FINDINGS SUMMARY | | | | |
| 1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology? | | | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
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I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

ATTESTATION SIGNATURE:



PRINTED NAME:

Zach Eyler

TITLE:

Project Manager


DATE:

7/23/2015

Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

ATTESTATION SIGNATURE:



PRINTED NAME:

Michael Coté

TITLE:

President

DATE:

7/23/2015

Background for Early Action Desk Review Findings

Section 95990 of the Cap-and-Trade Regulation provides for recognition of Early Action Offset Credits. Among the requirements for such recognition are the requirements in Section 95990(f)(3) that a desk review by an ARB-accredited offset verification body must satisfy. This form is designed to help offset verification bodies fulfill the requirements of Section 95990(f)(3).

If full offset verification services are performed for an Early Action Verification Report and the Offset Verification Statement following a desk review, the verification body may not use this form to make its findings. To render an opinion related to full offset verification services, the verification body would use the Offset Verification Statement form provided by ARB on its website.

Where to Submit Information Contained in This Form

Please complete the information on the form using your computer. Then either add an electronic signature to the form or print, sign, and scan the form. The completed and signed information and all supporting documentation should be emailed to ARB at ghgoffsetverification@arb.ca.gov.

This form is also available from the ARB website at:

<http://www.arb.ca.gov/cc/capandtrade/offsets/forms/forms.htm>

Detailed Instructions for Early Action Desk Review Findings

The information requested in this form should be provided by the lead verifier of the offset verification team providing offset verification services. Use a separate Early Action Desk Review Findings form for each early action reporting period being reviewed. This form is protected with restricted editing to facilitate completing the form. If the applicant wishes to unprotect the form, the password is "form".

Part I. Verification Body Information:

- Provide the name of the offset verification body reviewing the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program. Also provide the verification body's identification number, which is the number of the Executive Order issued by ARB's Executive Officer accrediting the offset verification body.

Part II. Early Action Project Information:

Email the information in this form to
ghgoffsetverification@arb.ca.gov