Global

* Add to all references to MSHA "or other government authority".  Example: (a)(41) "Sealed" recognizes that a state mining agency might correctly classify a mine as sealed whereas MSHA might not.  OPO should have ability to use states' classification if it is more accurate.
* Enable projects eligibility under at mines of all MSHA classifications. Mines of all classifications emit methane. MSHA uses the following classifications:
	+ Abandoned
	+ Abandoned and Sealed
	+ Active
	+ Intermittent
	+ New Mine
	+ Non-Producing Active
	+ Temporarily Idled
* Consolidate and standardize definitions of sources. The list includes:
	+ existing CBM wells that would otherwise be shut-in and abandoned as a result of encroaching mining
	+ existing coal bed methane wells
	+ newly drilled surface wells
	+ post-mining gob wells
	+ post-mining gob wells drilled into the mine during active mining operations
	+ pre-mining in-mine boreholes
	+ pre-mining in-mine boreholes drilled into the mine during active mining operations
	+ pre-mining surface wells
	+ pre-mining surface wells drilled into the mine during active mining operations
* ​Add to eligible sources for underground mine projects wells that were originally drilled for purposes other than methane extraction (e.g., communications) that can be repurposed for methane extraction. These types of wells are numerous and often leak significant quantities of methane.  This would prevent the unnecessary drilling of additional wells.
* Clarify that emission reductions are not automatically disqualified if an instance of non-compliance is not directly related to the destruction of methane. A mechanical or electrical connection of a non-confirming issue to a destruction device is not necessarily related to the integrity of the methane destruction. For example, a citation for low air pressure on the tire of a generator should not disqualify the methane destruction, even though the generator is connected to the destruction device.
* Chapter 5 (F) – align global warming potential of methane to current EPA and IPCC specifications
* Reduce data recording frequency to hourly for all project types and all parameters. CH4 and flow rates of projects are stable. Hourly recording reduces verification
* Consolidate definitions of sources (e.g., types of wells).
* Typo in Equation 5.44: 42.3 should be 0.0423 or (lb CH4/mscf CH4)
* Typo: 6.1 (e): delete underscore of “\_Offset Project…”
* Clarify the level of certainty to be achieved by verifiers to confirm evidence of rights to emission offset credits generated by the project
* Section 7.1. Clarify information needed in product diagrams to avoid inconsistencies among verifiers.

Abandoned Mine Projects:

* Allow use of emissions data from any government sources.
* Eliminate decline curve to reflect long-term nature of project benefits and align with international standards.
* Section 4.4 – eliminate need to account of emissions associated with drilling wells into abandoned mines. Emissions are very small.  Drillers don't typically save records.
* Section 2.4(b) – eliminate requirement that a destruction device not be operational at the mine prior to project commencement.  This applies when a mine transitions from active to abandoned and the OPO desires to continue project operations but must re-list the project because it becomes an abandoned mine project.
* Section 5.4(b) – clarify definition of "drainage system" as it relates to application of the uncertainty deduction.  Drainage systems (i.e., wells or boreholes) are documented by government authorities or are accurately labeled on mine maps.

Ventilation Air Methane Projects:

* Equation 5.4 – Increase data recoding frequency to every 15 minutes to avoid strain on reporting systems and reduce ER calculation verification burden.  VAM emissions are very stable.

Active Mine Project

* Section 2.2 (b) – The ineligibility of a destruction device if it previously operated at a mine is unclear. Clarify that if two projects are operated on the same active mine, one project may transfer (e.g., sell) a destruction device to the other project.