

ALBERTA OFFSET SYSTEM
5TH CYCLE PROTOCOL DEVELOPMENT
3RD ROUND PUBLIC REVIEW
NOVEMBER 23, 2009 – JANUARY 29, 2010

Protocols Under Review:

1. DRAFT PUMP SYSTEM CONVERSION EMISSION REDUCTION QUANTIFICATION PROTOCOL
2. DRAFT REDUCTION OF METHANE EMISSIONS FROM OIL AND GAS QUANTIFICATION PROTOCOL
3. DRAFT SOLUTION GAS CONSERVATION QUANTIFICATION PROTOCOL
4. DRAFT MECHANICAL PULP SLUDGE UTILIZATION – AGRICULTURE APPLICATION QUANTIFICATION PROTOCOL
5. DRAFT NITROUS OXIDE EMISSION REDUCTION QUANTIFICATION PROTOCOL
6. DRAFT SELECTION FOR RESIDUAL FEED INTAKE IN BEEF CATTLE QUANTIFICATION PROTOCOL
7. DRAFT SUMMERFALLOW REDUCTION AGRICULTURE PRACTICES QUANTIFICATION PROTOCOL

GENERAL COMMENTS SUBMITTED:

1.

“Having personally enjoyed and found meaningful the development of project specific emission reduction protocols, I'm pleased and supportive of CCC's efforts now focused on developing difficult and verifiable carbon offset protocols specific to Canada.

Best Regards,”

2.

“Hello,

While xxxx... will likely not provide protocol-specific comments, we'd like to draw your attention to our thoughts on project-based issues within the current Alberta system. This is highlighted in Annex 2 of the attached. This should provide useful insights for protocol development based on existing concerns we have.” {NOTE: Annex 2 report has been sent to Alberta Environment}

1. DRAFT PUMP SYSTEM CONVERSION EMISSION REDUCTION QUANTIFICATION PROTOCOL

NOTE: There were no public comment submissions on this draft protocol during the public review period November 23, 2009 to January 29, 2010.

This protocol was submitted to Alberta Environment for government review.

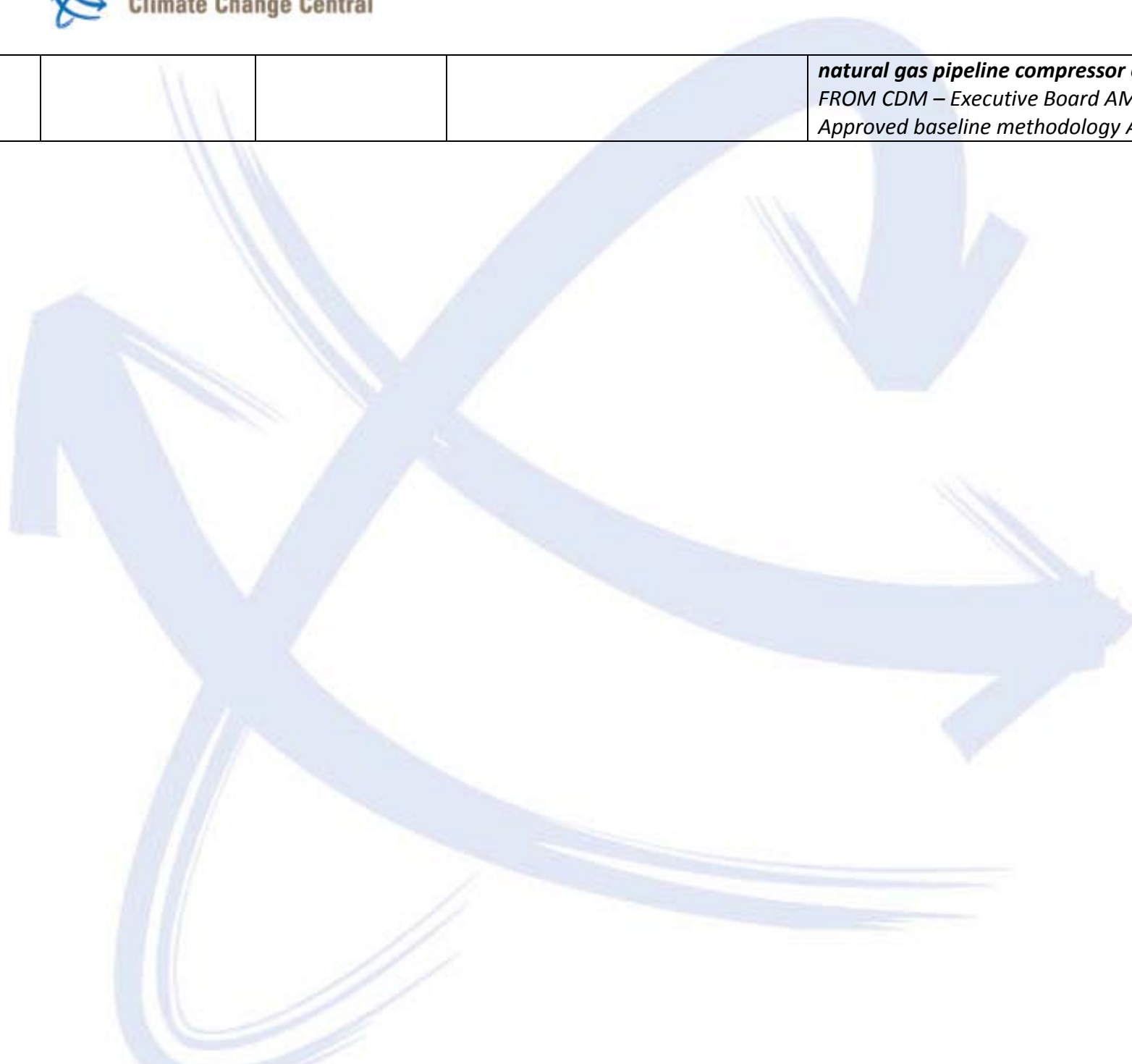
2. DRAFT REDUCTION OF METHANE EMISSIONS FROM OIL AND GAS QUANTIFICATION PROTOCOL

#	Clause/Section Number	Type of Comment (general, technical, editorial, policy)	Comment or Justification for Proposed Wording Change	Comment / Proposed Change
1	General Protocol (Quantification)	Technical	<p>Alberta Environment has identified areas for further work and clarification pertaining to establishing and quantifying the emissions baseline and an ability to quantify a demonstrated change (reduction in emissions) that is beyond business as usual and supplemental to regulatory requirements.</p> <p>We are continuing to review this protocol. Any changes made to the protocol will be subject to additional stakeholder and public review.</p> <p>There are no anticipated timelines for this work.</p>	<p>We have not been able to locate any data that supports the claims within the QUANTIFICATION PROTOCOL FOR THE REDUCTION OF METHANE EMISSIONS FROM OIL AND GAS FACILITIES.</p> <p>The data we have requested could support the proposed protocol we have sought the information and have spoken to our colleagues regarding the inquiry for data on a correlation to direct measurements using the [9.3.1] Open Path Tunable Diode Laser Absorption Spectroscopy (TDLAS). * Table 1 from the Technical Seed Document (2008) completed by Keyera, Husky, Shell and Nexen.</p> <p>In absence of such data we submit the approved UN methodology, which clearly explains the difference between screenings and direct measurement, and we accordingly cannot accept the term QUANTIFICATION within the context of Direct Measurement. [see below]</p> <p>Relative parts per million is subject to error and a variety of environmental factors. The EPA Method 21 is at best a screening technique however may useful in conjunction</p>

			<p>with continuous monitoring systems and when leakage does occur a direct measurement may be taken.</p> <p>As the requirement is continuous reporting, we did write however did not publish a White Paper on this subject due to proprietary nature of this and other key technologies are companies are working on.</p> <p>We do feel that the current proposed protocol and the technologies do represent a means of monitoring and screening however they may not be suitable for the measurements required.</p> <p>Alberta may wish to consider further testing to assure that these new technologies do correlate to direct measurements or make available the data for public review that prove they are accurate for measurement purposes.</p> <p>By proceeding this direction Alberta can assure that they have a defensible offset inventory and this will prove critical to the future of North Americas emerging GHG trading system that will require consistency and creditability in terms of offset generation. This is also critical to Alberta in the context of a Global GHG trading system.</p> <p><i>(Also submitted information from: “Leak reduction from</i></p>
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				<p><i>natural gas pipeline compressor or gate stations”</i> <i>FROM CDM – Executive Board AM0023 / Version 03</i> <i>Approved baseline methodology AM0023”</i></p>
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3. DRAFT SOLUTION GAS CONSERVATION QUANTIFICATION PROTOCOL

NOTE: There were no public comment submissions on this draft protocol during the public review period November 23, 2009 to January 29, 2010.

This protocol has been forwarded to Alberta Environment for government review.

4. DRAFT MECHANICAL PULP SLUDGE UTILIZATION – AGRICULTURE APPLICATION QUANTIFICATION PROTOCOL

NOTE: There were no public comment submissions on this draft protocol during the public review period November 23, 2009 to January 29, 2010.

Government review determined that this activity was business as usual for this sector. This protocol was terminated and will not be approved for use in the Alberta Offset System.

5. DRAFT NITROUS OXIDE EMISSION REDUCTION QUANTIFICATION PROTOCOL

#	Clause/Section Number	Type of Comment (general, technical, editorial, policy)	Comment or Justification for Proposed Wording Change	Comment / Proposed Change
1	Protocol Eligibility	General	<p>Comments received on this protocol were incorporated into a revised protocol that was re-posted for public comment in August 2010.</p> <p>The role of nitrogen fixing (pulse) crops is included in quantification and was further clarified.</p> <p>Upstream fertilizer manufacturing is regulated under the <i>Specified Gas Emitters Regulation</i> and are, therefore, out of scope for this protocol.</p>	<p>xxxx... thanks Climate Change Central for the opportunity to comment on the NERP, and applauds CCC for its leadership toward developing offsets that recognize agriculture's potential to mitigate CO₂e emissions.</p> <p>xxxx...feels that while the NERP appears to thoroughly cover nitrogen management change for non-leguminous annual crops, management changes will result in relatively small changes in amounts of N fertilizer use relative to much larger changes that represent the elimination of an entire crop year of N fertilizer use while growing pulse crops.</p> <p>The biological nitrogen fixation ability of pulse crops must be fully recognized, particularly in terms of avoided emissions due to reduced upstream nitrogen fertilizer manufacture. xxxx... requests that this source of avoided emissions be addressed under the appropriate protocol.</p>

6. DRAFT SELECTION FOR RESIDUAL FEED INTAKE IN BEEF CATTLE QUANTIFICATION PROTOCOL

NOTE: There were no public comment submissions on this draft protocol during the public review period November 23, 2009 to January 29, 2010.

This protocol was submitted to Alberta Environment. The draft is being incorporated into the new Alberta Environment protocol format and will be re-posted for public comment in 2011.

7. DRAFT SUMMERFALLOW REDUCTION AGRICULTURE PRACTICES QUANTIFICATION PROTOCOL

#	Clause/Section Number	Type of Comment (general, technical, editorial, policy)	Comment or Justification for Proposed Wording Change	Proposed Wording Change
1	General	General	<p>Reductions in summerfallow practices will be included as a flexibility mechanism in the revised Tillage System Management protocol and will be applicable starting January 1, 2012.</p>	<p>Read the "DRAFT SUMMERFALLOW REDUCTION AGRICULTURE PRACTICES QUANTIFICATION PROTOCOL" as well as the comments on "2nd Round Technical Review".</p> <p>The whole concept (the protocol, calculations, review) has come up beautifully. And, I firmly believe that it is meant for the benefit of farming community of Alberta.</p>