

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



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Prepared By	First Environment, Inc.
Contact	91 Fulton Street Boonton, New Jersey 07005 Tel: 973-334-0003 www.firstenvironment.com
Approved By	James Wintergreen
Work Carried Out By	Michael Carim Luca Nencetti

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 to fuel project equipment.

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 two corrective action requests, both of which were addressed sufficiently by SUDOE. No uncertainties were identified during the verification process. The Project claims emission reductions of 60,359 metric tonnes CO₂e for the period of January 1 through December 31, 2015. 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, 2015. First Environment, Inc. (First Environment) conducted the verification from the date of the kickoff meeting through February 11, 2016.

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, 2015
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 February 8, 2016 and titled “SUIT Westside CBM Seep Capture and Use Project Monitoring Report #5,” Version 2.0 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. CBM extracted from a total of 29 individual wells is aggregated at a Central Delivery Point (CDP). No new wells were added to the system in 2015. 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
 Luca Nencetti – Verifier
 James Wintergreen – Internal Reviewer

Audit Kick-off

The verification audit was initiated with a kick-off conference call on December 3, 2015 between First Environment and the primary client contacts, Karen Spray, James Jensen, Alastair Luna, and 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

First Environment performed a site visit in March 2015 as part of previous verification activities to review and assess site operations, emissions sources, data collection processes, and management systems. It was confirmed during the current verification through review of the Monitoring Report, interviews with project personnel, and assessment of project documentation—raw data files, meter calibration records, and field records—that no significant operational or data management system changes had occurred since the previous site visit. Specifically, the data formats, monitoring and recording frequencies, and data quality assurance processes were found to be consistent with previous reporting periods for all records reviewed. Through the above identified review processes, First Environment was able to confirm with reasonable assurance that there have been no material changes to the Project's Monitoring Plan or data management practices since the previous site visit, therefore, follow up on-site inspection was not warranted for the current verification period.

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 and corrective action during the verification process. The 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:

Rebecca Kauffman – Southern Ute Alternative Energy
Karen Spray – Southern Ute Department of Energy

2.4 Site Inspections

First Environment performed a site visit on March 5, 2015, as part of previous verification activities. Since no material changes to the Project's monitoring configurations and/or data management systems occurred since the previous site visit, First Environment did not conduct an on-site inspection for the current verification period.

2.5 Resolution of Findings

The Audit Team issued two requests for corrective action during the verification process. SUDOE's responses were sufficient to resolve the requests. The corrective action 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.* 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.

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:

- 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 Coyote Gulch Compressor fuel flow meter was not calibrated at the frequency required by the validated VCS PD. The instrument was calibrated only thrice during 2015 — during the second, third, and fourth quarters—not four times as stated in the VCS PD. Because the accuracy check performed prior to calibration of the meter in April 2015 showed the instrument to be operating accurately within tolerances, First Environment concluded that the deviation was reasonable and did not impact the quality or conservativeness of the data monitored by the meter.
- Consumption of a small quantity of liquefied petroleum gas (LPG) was introduced during the 2013 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 the 2013 reporting period and remained in use during the current reporting period. This deviation does not result in any changes to the monitoring plan.
- 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 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.

No new project description deviations were identified in the Monitoring Report relative to the current reporting period.

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. All project deviations were deemed to be valid.

3.4 Grouped Project

No new project activity instances were added to the grouped project during the current reporting period.

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 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 as deviations, 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 previous site visits 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 ($EF_{CO_2,i}$) 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_{CH_4}). 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 CBM purchased 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) to provide heat for freeze protection during winter months, and indirect emissions associated with electricity consumption by the project activity.

CBM used as a fuel source for project equipment include fuel used by well compressors ($CONS_{FossilFuel,PJ}$) as well as the portion attributed to the project of the CBM fuel used by the Coyote compression station ($CM_{MECH,CS,PJ}$) and gas treatment plant ($CM_{MECH,TP,PJ}$). GHG emissions are calculated for each source by multiplying the gas volume for the appropriate combustion emission factor.

GHG emissions from combustion of CBM delivered via pipeline are calculated by multiplying the volume of treated CBM injected into the natural gas pipeline ($CM_{GAS,PJ}$) by the CH_4 content and the combustion emission factor, both established ex-ante in the VCS PD and reported correctly in the Monitoring Report. GHG emissions attributable to combustion of LPG fossil fuel are calculated by multiplying the volume of fuel utilized ($CONS_{LPG FossilFuel,PJ}$) by the default emission factor reported in the Monitoring Report. The calculation of GHG emissions from combustion of CBM injected in the pipeline includes the evaluation of the methane ($PC_{CH_4,CDP}$) and non-methane hydrocarbon ($PC_{NMHC,CDP}$) content in the well gas, measured at CDP. These and the related emission factor (CEF_{NMHC}) are calculated on the basis of the gas composition analysis of monthly samples of vent well gas. In accordance with VM0014, the GHG emissions due to NMHC are accounted for only if $PC_{NMHC,CDP}$ is higher than one percent. SUDOIE applies a more conservative approach by evaluating whether $PC_{NMHC,CDP}/PC_{CH_4}$ is greater than one percent. First Environment verified the calculation and confirmed that $PC_{NMHC,CDP}$ is lower than one percent throughout the current reporting period.

The Coyote Gulch gas treatment plant also processes non-project gas; therefore, the electricity consumption by the project ($CONS_{ELEC,PJ}$) is calculated from the plant specific consumption (kWh/MMBtu) then multiplied by the quantity of project gas treated ($CM_{GAS,PJ}$).

Project emissions from electricity use, combustion of 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 detected.

4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

SUDOIE 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, 2015 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-2015

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)
2015	71,919	11,560	0	60,359
Total	71,919	11,560	0	60,359

APPENDIX A – DETAILED RESOLUTION OF FINDINGS

ID	Corrective Action Request	Participant Response	Verification Conclusion
1	<p>Please revise Section 2.2.2 of the Monitoring Report to address the following:</p> <ul style="list-style-type: none"> • Deviation No. 1 should be removed from the Monitoring Report because it is unclear why the change in calibration procedure for the gas chromatographs represents a project description deviation as defined by the VCS. • The Monitoring Report is inconsistent about the number of deviations applied and which deviations reported in prior monitoring periods remain relevant. • Relative to Deviation #3, it is unclear why information regarding the calibration schedule followed for meter #0269901 in 2014 is relevant to the current reporting period. 	<p>Southern Ute revised the Monitoring Report at Section 2.2.2 to resolve all issues raised in the finding.</p>	<p>Response is acceptable.</p>
2	<p>Please justify why no adjustment to the value monitored for the parameter $CONS_{FossilFuel,PJ}$ is required between September 8 and October 6 to account for the 'as-found' drift of the instrument observed during the October 6 inspection and calibration event.</p>	<p>Southern Ute provided evidence that confirmed the value applied for the parameter $CONS_{FossilFuel,PJ}$ accounts for the accrued drift observed during the October 6, 2014 calibration event.</p>	<p>Response is acceptable.</p> <p>The value applied is sourced from a billing statement; given that the metered quantities are used for a financial transaction, gas volume data applied in emission reduction calculations is deemed reliable.</p>

ID	Clarification Request	Participant Response	Verification Conclusion
<p><i>No requests for clarification were issued during the verification process.</i></p>			