Comment 1	28-08-06 10:05am
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James and	

Comments on Chmetovo Project

- 1. Owner of landfill site is the city of Moscow. Ownership of the land is Moscow Oblast. So who is the owner of the gas rights and the ERU rights The City of Moscow or the Moscow Oblast. Since there is no agreement with Moscow Oblast there is the potential to be some ownership disputes over the ERUs (between Moscow City, EkoTechProm, and Moscow Oblast) once project is realized. How is this issue being addressed?
- 2. How can EkoTechProm and ECOCOM both not be project participants?
- 3. LFG methane recovery is not currently required under Russian government legislation but what is the likelihood or plans that it may be so in future? There should be some discussion of future possible legislation and initiatives regarding LFG recovert.
- 4. bottom of page 9 "... since there will be or the selling of electrical or themal electricity" makes no sense in english.
- 5. With only flaring and no electricity generation there are limited sustainability or social benefits associated with this project. Why is electricity/heat generation from the project not seriously considered as an option. Surely, the electricity/heat generation option has the opportunity to further boost the rate of return on the project as well as providing additional interesting benefits from heat and electricity generation. The decision not to include this should be justified.
- 6. Without detailed pump testing and boreholes being drilled how is it possible to have an accurate estimate of the number of emission reduction units generated.