TRUSTWELL ASSESSMENT OVERVIEW

PROJECT CANARY

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EXECUTIVE SUMMARY & OBJECTIVE

Project Canary's assessment programs are designed to differentiate companies and their operations by evaluating their overall approach to responsible operations, specifically as it relates to operational excellence and environmental stewardship.

The purpose of Project Canary's TrustWell Assessment is to provide a robust, credible, and quantified view of responsibility in the upstream production segment. To deliver this, TrustWell incorporates the standards, practices, and policies outlined in this document.

The TrustWell assessment identifies and recognizes operators implementing the best environmental practices that differentiate their production with defensible, site and facility-level environmental assessments. This assessment provides independent assessments against industry best practices for stakeholders across the energy value chain. The assessment program is based upon various industry best practices including benchmarks developed in conjunction with 3rd party experts and stakeholders, including from industry, academia, state government, and non-government entities.

The assessment has two foundational components that factor into the assessment process:

- Inherent (localized) Risks
- Control Measures

Within each of these components is a series of subcategories and practices. Each evaluated category is then mapped to at least one of the four primary categories – air, water, land, and community.

This document outlines the TrustWell assessment process and the engineering and technically-focused evaluation criteria contained within the assessment.

DEFINITIONS

The Project Canary assessment is designed for scalability, robustness, credibility, and adaptability. To define performance in an objective and systematic manner, Project Canary has developed a methodology that addresses and normalizes inherent risks and operating conditions largely outside of a company's control and combines those with control measures that are used to manage and or mitigate those risks. The assessment's scoring methodology uses the following definitions:

Amortization – The action or process of gradually writing off the initial deduction of an asset.

Continuous Emissions Monitoring – A site level detection and monitoring system. It can include fixed location gas plume imaging cameras, open path laser system, and autonomous fixed-point monitors. These systems often include fixed location monitors that detect continuously.

Control Measures – A set of quantitative or qualitative metrics intended to measure an operator's governance and risk management to promote responsible environmental and operational stewardship.

Events – A set of industry-specific topics which may reasonably influence an operator's safe operation, thereby affecting their environmental and social impact. These may also be known as "cause categories", "mode of failure", or "threats."

First Aid Incident – Medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer (1904.7(b)(5)(ii).

Inherent Risk Profile – An intermediary and baseline severity profile given to an event after consideration toward risk severity and relevant external factors.

Local Factors – A set of industry-specific conditions which increase an operator's exposure to risk, either in severity or probability. These are typically outside of the operator's control.

Medical Aid Incident[1] – An incident requiring medical treatment beyond first aid that does not involve death, one or more days away from work, one or more days of restricted work, or one or more days of job transfer (1904.7(b)(5)).

1 Department of Labor Logo United States Department of Labor. Home | Occupational Safety and Health Administration. (n.d.). Retrieved August 3, 2022, from https://www.osha.gov/

Operator – An energy company in the oil and gas supply chain. For the purposes of this protocol, it will be an onshore production company or segment of a company that deals with onshore production.

Performance Score – A set of quantitative or qualitative metrics intended to measure an operator's governance and risk management to promote responsible environmental and operational stewardship.

Permanent Partial Disability[2] – Compensation disability measure pertaining to an injured employee who is capable of performing work but not at the level demonstrated prior to the injury.

Permanent Total Disability[3] – Compensation disability measure pertaining to an injured employee who is incapable of returning to work.

Restricted Work[4] – A work-related injury or illness that results in: keeping the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or a physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work (1904.7(b)(4)(i)).

Severity Limits – Boundary limitations of a Event, bracketing the minimum and maximum potential severity for each threat.

Site – Well pad, tank-battery, or centralized tank battery undergoing evaluation.

Site-Level Monitoring – Monitoring capable of detecting site-wide emissions, including but not limited to suitable aerial, continuous monitoring, and open-path sensor technologies. All site-level monitoring technologies must have an MDL of 30 kg/hr or lower.

Source-Level Monitoring – Monitoring capable of detecting site-wide emissions, including but not limited to suitable aerial, continuous monitoring, and open-path sensor technologies. All site-level monitoring technologies must have an MDL of 30 kg/hr or lower.

Temporary Partial Disability[3] – Compensation disability measure pertaining to an injured worker who is precluded from performing his/her normal job function and must temporarily reduce work level.

2 Insurance Glossary Definition | IRMI.com. (n.d.). Retrieved August 3, 2022, from https://www.irmi.com/term/insurance-definitions
3 Insurance Glossary Definition | IRMI.com. (n.d.). Retrieved August 3, 2022, from https://www.irmi.com/term/insurance-definitions
4 Department of Labor Logo United States Department of Labor. Home | Occupational Safety and Health Administration. (n.d.). Retrieved August 3, 2022, from https://www.osha.gov/

PROCESS

Project Canary TrustWell assessment reviews operators across three primary phases: Policy, Plan, and Execution.

Policy

Documentation and practices standardized across all operations and filters down to all assets.

Plan

Plan documentation addresses operations at a pad level and incorporates the standards developed at the policy level.

Execution

Execution documentation is validation that the policies and plans are being followed at the operational phase.

TrustWell is a robust, comprehensive, and rigorous standard established and to accomplish this objective, Project Canary engineers complete a methodical and established process that consists of documentation review, subject matter expert interviews, and site inspections of each location and well that is assessed.

DOCUMENT REVIEW

Project Canary reviews internal documentation provided by the operator as the initial step in the assessment process. The documentation requested and its applicability to the assessment is summarized below:

DOCUMENT GLOSSARY

Area Development Plan:

The area development plan outlines the company's approach to mitigating the effects of operations throughout the project lifecycle of the pad from construction through production and reclamation.

Documentation May Include:

- Pad/site development standards
- Environmental compliance studies/plans
- Reforestation/reclamation/restoration procedures, etc.

This material may also be disclosed during an SME interview.

Best Management Practices (BMP's) & Standard Operating Procedures (SOP's)

BMPs and SOPs are company established practices to help ensure success in all phases and operations.

These documents are typically at a high level and may include (but are not limited to) the following categories:

- General Construction / Facilities Design & Construction
- Environmental / EHS / Contractor Management
- Operations and handoffs: Drilling / Completions / Production
- Well Preparation / Well Operations/ Well Maintenance
- Emissions Monitoring

Completion Post Job Report

Frac report provided by vendor including an overall job summary and appropriate equipment testing parameters and methodologies.

Daily Drilling/Completions/Flowback Reports (WellView or Equivalent)

Reports summarizing the day-to-day activities during drilling & completion operations.

Drilling & Completion Programs

Program/Plan usually provided by company (operator) personnel to field personnel outlining the well construction and/or completion process.

Drilling & Completion Basis of Design

Design criteria governing wellbore construction and the parameters established by the operator.

- Burst, Collapse, and Tension safety factors & requirements.
- StressCheck (or equivalent) of casing program Geologic data built into design parameters (PP-FG, Temperature logs)

Drilling End of Well Report

Summary of all daily drilling reports (preferred substitute to individual daily reports).

Emergency/Incident Response Policy/Plan

- Emergency Response Program (ERP)
- Site Specific ERP
- Crisis Management Program
- Business Resumption Plans
- Results of any Table-Top Exercises performed by the operator

Emissions Reporting, Monitoring, and LDAR Program or BMP

- LDAR Program developed by the company to meet OOOOa requirements
- Previous year emissions reporting submitted to the EPA
- Policy/Program level documentation addressing initiatives within the company to reduce or eliminate emissions (venting, exhaust, etc.)

Environmental Policy

- Company-wide program outlining the environmental components and requirements of a company's operation.

OSHA Violations or EPA/State Recordable Spills Related to Wells/Pads Undergoing Assessment

- Employee AND Contractor related recordable incidents for wells undergoing assessment.
- Reportable Spills per local regulatory agency for wells undergoing assessment.
    - Remediation methods, root cause analysis, confirmation of remediation from regulatory agency.

Operational Impact Policy/Program

This category covers policies and programs that the client has in place to reduce operational impacts such as light & noise assessments, road development or traffic mitigations, community and landowner outreach/engagement, environmental policies, etc.

This material may also be disclosed during an SME interview.

Pad-Site Construction and Restoration/Reclamation

- Pre job testing conducted by the vendor which includes testing parameters and compressive strength results.
- Post job testing conducted on the cement and post job report provided by vendor.

Risk Assessment Template

Risk Assessment Templates includes operational hazard risk assessments to evaluate hazards such as natural hazards, technological or business hazards, and human hazards.

This is separate from a JSA and centers along the risk mitigation at an engineering/design level.

Site Specific ERP (if available) & SPCC

- Emergency Response Plan focused on a specific pad/location
- Spill Prevention, Control, & Countermeasure documentation

Waste Management Policy/Plans, and/or Examples of Waste Transfer Tracking

- Company (operator) policy/program outlining:
  - Waste Characterization
  - Appropriate handling practices
  - Approved facilities
  - Waste facility auditing requirements
  - Recycling initiatives
- Waste Transfer Tracking Document

Water Tracking, Sampling, or Reuse Documentation

- Water source tracking
- Recycled volumes for produced water and flowback water
- Disposal tracking & approved facilities

Wellhead Design Criteria

- Wellhead schematic(s) and any design calculations or parameters that went into wellhead selection.
- Wellhead maintenance program (greasing scheduling, painting, etc.)

Well Control Policy

- Company program outlining the various types of well control situations, the preferred method for addressing a well control event, emergency call outs, and well control training requirements for both company and contract personnel.
- Documentation and/or results of any Well Control Audits performed by third party contractors.
- Records or summary of No-Notice Drills performed during operations.

Well Integrity Monitoring – Telemetry/SCADA Overview

- SCADA monitoring program.
  - Outlines which annuli are to be monitored and any process controls an operator has established to address unexpected events or inconsistencies.

SUBJECT MATTER EXPERT INTERVIEWS

Project Canary recognizes that certain practices and operations may not be captured through written documentation. This may also be the case for smaller operators where there is a strong amount of expertise, but not a corresponding amount of documentation. As part of the documentation review process, the environmental assessment team will conduct subject matter expert interviews with relevant personnel. Although many of the highest-scoring data points rely on document review, the assessment team will work with the operator to obtain the most representative depiction of the operator's practices.

Potential SME Interview candidates include:

- Drilling Manager
- Completions Manager
- Production Foreman
- Head of Health & Safety
- Head of Environmental Programs
- Water Specialist
- Air Specialist
- Waste Specialist

SITE INSPECTIONS

Project Canary personnel visits each pad undergoing assessment. We do not spot check or take a sample set, we visit every location. During site inspections, Project Canary engineers walk the process from the wellhead to the sales point. Targeted observations include:

- Evaluation of well integrity based on the utilization of SCADA monitoring with remote ESD (Emergency shut down valves) capability, wellhead greasing programs, valve accessibility and general maintenance observations.
- Processing equipment is assessed based on preventative maintenance observations, secondary containment, and the utilization of the various pneumatic devices such as air driven pneumatics.
- Remote ESD capability evaluates whether an operator can remotely shutdown operations and if that capability is tied to various pieces of equipment such as separators, upright storage tanks, and the wellhead.
- Evaluation of the use of secondary containment around all processing equipment, chemical storage, and fluid storage vessel impoundments.
- By visiting each pad, TrustWell is able to factor in any unique local community concerns such as proximity to schools and housing, traffic considerations, and location security needs.

CONTINUOUS ENGAGEMENT

In addition to the steps outlined above, TrustWell interacts dynamically with operators regarding emissions performance, water reporting, safety programs, and improvement paths.

LOCAL FACTORS OVERVIEW

Each operator and associated facilities are exposed to a unique set of risks and circumstances relevant to its area of operations. Risks are localized from both a probability and a consequence standpoint to create context in establishing benchmarking standards. By determining local factors, Project Canary ensures appropriate emphasis is applied to critical areas specific to the operator. Conversely, local factors also ensure that operators are not overly penalized in areas that may not have as significant environmental impacts in their operating area.

The local factors listed below were selected to address the various elements of upstream operations.

Project Canary's TrustWell assessment localizes and prioritizes risks in accordance with several criteria, including:

Operations	Production	Environmental	Community
Completion Operations Size	Facility Age	Air Sensitivity	Community Sensitivity
Drilling Operation Size	Flow Potential	Ground Water Sensitivity	Land Sensitivity
Fracture Pressure	Gas Production Volume	Local Aquifer	Property Value
Fracture Completion Volume	H2S Concentration	Local Seismic Activity	Travel Distance
Injection Fluid Volume	Onsight Chemical Volume	Precipitation Severity	
Injection Rate	Corrosive Production Fluids	Surface Water Sensitivity	
Measured Depth	Fluid Storage Risk	Weather Severity	
Offset Activity	Produced Fluid Volume		
Pit Age	Produced Water Volume		
Pit Fluids	Production Activity Level		
Pit Size	On-Site Storage Capacity		
	Storage Vessel Volume		
	Transfer Risk		
	Site Size		

LOCAL FACTORS

Each of the local factors above has a set of boundary conditions used to determine the importance of each individual local factor. Boundaries, or bins, allow for weighted scoring ensuring that the mapped events carry the most significance. Higher risk profiles result in the need for stronger control measures.

Local Factor	Definition
Air Sensitivity	What is the local air quality index?
Community Sensitivity	How sensitive is the local community?
Completion Operation Size	How large is the completion operation?
Corrosive Production Fluids	How corrosive is production fluid?
Drilling Operation Size	How large is the drilling operation?
Facility Ave	How old is the facility?
Fracture Pressure (PSI)	What is the uncontrolled flow potential of this well?
Fracture (Completion) Volume	How high are surface pressures during the fracture operation?
Gas Production Volume	How large, volume wise, is the fracture operation?
Ground Water Sensitivity	How much gas is produced?
H2S Concentration	How sensitive is local ground water?
Land Sensitivity	How sensitive is the local land?
Local Aquifer	Is there groundwater at this location? And is it used for drinking?
Local Seismic Activity	How significant is local seismic activity?
Measured Depth	How long is the total length of the well?

Offset Activity	How significant is the risk of offset wells during the drilling/fracturing operation?
Onsite Chemical Volume	How much chemical volume is stored onsite?
Pit Age	How old are pits on site?
Pit Fluids	How risky are fluids stored in pits?
Pit Size	How large are any pits on site?
Precipitation Severity	How severe is local precipitation?
Produced Fluid Volume	How much fluid is produced?
Produced Water Volume	How much water is produced?
Production Activity Level	How much production is occurring on the pad? 4 wells or 20 wells? In the event a pad must be shut-down for emergency is the company looking at significant production loss?
Property Value	How sensitive to oil & gas operations are the local properties?
Site Size	How large is the site?
Storage Activity Level	How large are storage activities? How much produced fluid is stored on location? In the event of a storage vessel release, are we looking at 3,000 bbls (5 uprights) or 30,000 bbls?
Storage Vessel Volume	How much volume of fluids can storage vessels hold?
Surface Water Sensitivity	How sensitive is the local surface water?
Transfer Risk	Are adequate safeguards in place to prevent spills during fluid transfers?
Travel Distance	How significant is the travel time/distance to location?
Vessel Fluids	How risky are fluids stored in vessels?
Weather Severity	How severe is local weather?

CONTROL MEASURES OVERVIEW

Control measures are an operator's answer to local factors. Unlike the inherent factors that are predominately out of a producer's ability to control, control measures are the engineering and operational practices utilized to mitigate or eliminate operational risks.

The categories and control measures listed below are used to assess operational excellence and environmental stewardship through the company's practices in each respective category.

Well Integrity

Surface Casing
Intermediate Casing
Production Casing
Surface Cement
Intermediate Cement
Production Cement
Well Integrity
Wellhead
Frac Ops

Safety

Emergency Response
Operational Impacts
Well Collision
Well Control (Drilling)
Well Control (Completions)

Environmental Performance

Environmental Programs (Exhaust)
Environmental Programs (Flaring)
Environmental Programs (GHG Emissions)
Environmental Programs (Water)
Spill Prevention
Spill Response
Pits, Tanks, Impoundments

Community

Waste Management
Reclamation

WELLBORE DESIGN & ENGINEERING

Wellbore design plays a critical role in successfully developing and producing oil & gas. Appropriate casing and cementing practices demonstrate engineering competency and the ability to produce a well that adequately protects the local aquifer and additional subsurface risks. In addition to proper casing and cementing protocols, an operator's wellhead preventative maintenance programs and well integrity safeguards ensure that the well can be responsibly produced throughout its life.

Critical aspects of this program include:

- Casing & Cementing Design Criteria:
  - Established burst, collapse, & tension safety factors
  - Casing centralization and standoff
  - Proper torque and make-up guidelines
  - Identification of potential subsurface hazards encountered by Drilling & Completions operations
  - Appropriate cementing testing requirements
- Well Integrity
  - Implementation of SCADA monitoring on annuli
  - Preventative maintenance and greasing programs for wellheads and surface equipment
  - Remote activated emergency shut-downs (ESD's) tied to both the wellhead and equipment

OPERATIONS – FRAC OPS

Completions are a critical part of any oil and gas operation. How a well is completed and the operational practices and environmental controls implemented during that phase of the well provide an opportunity for operators to differentiate their practices.

Operators with high scores in Project Canary's "Frac Ops" rubric have demonstrated a commitment to evolution and have implemented technology such as micro-seismic, tracers, offset well monitoring, "green" completions, and fiber optics.

Critical aspects of this program include:

- Implementation of best available technologies throughout the life of the asset
  - Deployment of fiber optics for real-time downhole measurements
  - Use of tracers and frac modeling
  - Microseismic conducted at various intervals
- Completion design & layout
  - Completion equipment is designed to eliminate need to access the red-zone and improves personnel safety
  - Operator engages with all stakeholders to optimize pad layout and routing
- Spill Prevention & Containment
  - Containment is applied and utilized in an appropriate and effective manner.
  - All equipment stored within secondary containment and temporary equipment stored on impermeable containment
- Equipment testing
  - Equipment testing is done to the appropriate pressures and intervals.
- Water transfer
  - The operator implements strategies to reduce the impact of completion operations on the surrounding community.

ENVIRONMENTAL PROGRAMS (EMISSIONS) – GHG EMISSIONS, EXHAUST, & FLARING

Greenhouse gases resulting from fugitive and operational emissions released by the oil and gas industry must be accurately identified and addressed. An operator's environmental programs establish a protocol for employees to reduce emissions during normal and abnormal conditions. These programs are an operator's first step toward distinguishing themselves as a responsible steward toward improving air quality and addressing climate change.

Critical aspects of this program include:

- Sensor based continuous monitoring at select facilities:
  - Equipment monitoring (e.g., tank emissions controls, engine exhaust)
  - Events monitoring (e.g., unintended activation, venting of ESDs/relief devices)
  - Activities monitoring
- Unintentional emissions surveys and timely repair including:
  - Optical gas imaging cameras
  - Drone Detection
  - Leak grading and repair criteria and timelines
- Emissions mitigation management in normal and abnormal operating conditions.
  - Elimination of routine flaring (flaring during upset/emergency conditions only)
  - Planned maintenance
  - Vehicle usage and equipment idling
- Technology and equipment selection include:
  - Continuous emissions monitors at fixed locations
  - Continuous low-bleed pneumatic controllers
  - Instrument air, battery and/or solar systems
  - Combustors or flares
  - Vapor Recovery Units (VRU's)
  - Other innovative technologies or controls

COMMUNITY IMPACTS – SAFETY, EMERGENCY RESPONSE, & CRISIS MANAGEMENT

The oil and gas industry faces wide-ranging inherent risks in its operations, from man-made and natural incidents. As such, operators must place the utmost commitment to an integrated safety culture within their organization. A robust emergency response program will incorporate effective training programs, include all potential stakeholders, and consider business resumption plans and community impacts. Should an emergency occur, operators must have practiced programs in place to act swiftly and minimize the impact on the community while keeping employees safe.

Critical aspects of this program include:

- Executive leadership engagement and participation
  - Annual training for leadership
  - Public engagement
    - Operational impact recognition and community education
    - Emergency evacuation plan
    - Voluntary relocation assistance to community
  - Business resumption plans
- Training curriculum and competency testing
  - Internal incident command structure
  - Reporting mechanisms internally and externally
  - Risk management
- Frequency and type of drills
- Program Evaluation
  - Scheduled review and update of standard operating procedures
  - Incident tracking and trending review
  - Knowledge share and policy adjustment at enterprise level

COMMUNITY – OPERATIONAL IMPACTS & RECLAMATION

Operators must put a concerted effort into limiting their impact on the land and the communities in which they operate. Unplanned events such as leaks or loss of containment can severely impact the ecological area surrounding operations. Even planned development such as pipeline right-of-way may cause habitat loss or wildlife movement if proper environmental surveys are not completed. Careful planning around potential environmental impact allows companies to proactively address regulatory requirements and operational inefficiencies.

Critical aspects of this program include:

- Release prevention measures and response
  - Containment plans
  - Spill Prevention & Response
  - Automatic shut-in capability
- Environmental impact evaluation
  - Environmental surveys
  - Sensitive area identification and employee training
- Engagement with local and federal impacted communities
  - Noise mitigation
  - Aesthetics mitigation
- Specialized reseeding requirements are specifically designed to enhance the area disturbed by operations.

OPERATIONAL SAFETY & CONTROL

An established process safety management system is critical to managing hazards and reducing the frequency and severity of incidents. Operators should be able to utilize their PSM program as an effective communication tool across all relevant disciplines. Assessment performance is determined by the efficacy and integration of a successful PSM program.

Critical aspects of this program include:

- Training and consistent usage of PSM programs
  - Interdisciplinary team engagement
  - Employee participation
- Internal program auditing and findings closure
  - Management of Change (MOC)
  - Process Hazard Analysis (PHA)
  - Pre-startup Safety Review (PSSR)
  - Hot work policy and management
- Document control
  - Accessible documentation to employees
  - Document maintenance as assets are changed

POINT DEDUCTIONS

Safety and environmental stewardship are essential metrics in evaluating Differentiated Gas; consequently, recordable incidents, Spills, and Well Control Events are assessed and impact performance scoring.

Amortization

Point amortization is designated by the severity of the incident. Not all deductions are amortizable.

Recordable Incidents

Point amortization begins on the date issued on the certificate, not on the date of the incident. Eligible incidents will amortize at a rate of 3% per year.

Point Deduction	Years to Amortize
3%	1 Year
10%	3 Years
17%	Ineligible for Amortization

Recordable Spills

Point amortization begins the first year of assessment after the state or regulatory agency deems the spill remediated. If the spill is deemed remediated within the assessment year, the full year of amortization will be counted during renewal.

Classification	Percent Deduction	Years to Amortize
< 1bbl Spill Outside of Containment	3%	1 Year
> 1bbl Spill Outside of Containment	10%	3 Years
On site Hazardous Spill Outside of Containment	17%	3 Years
Off-site Non-Hazardous Spill	17%	3 Years
Spill that has entered an Off-site Body of Water	17%	**Ineligible for Amortization**
Off-site Hazardous Spill	17%	**Ineligible for Amortization**

Well Control

TrustWell defines a well control event as an incident in which the Emergency Action Plan was enacted, with a prolonged period where control of the well was not maintained. This encompasses events such as uncontrolled blowouts, significant air releases, fires, etc.

DEDUCTIONS CRITERIA

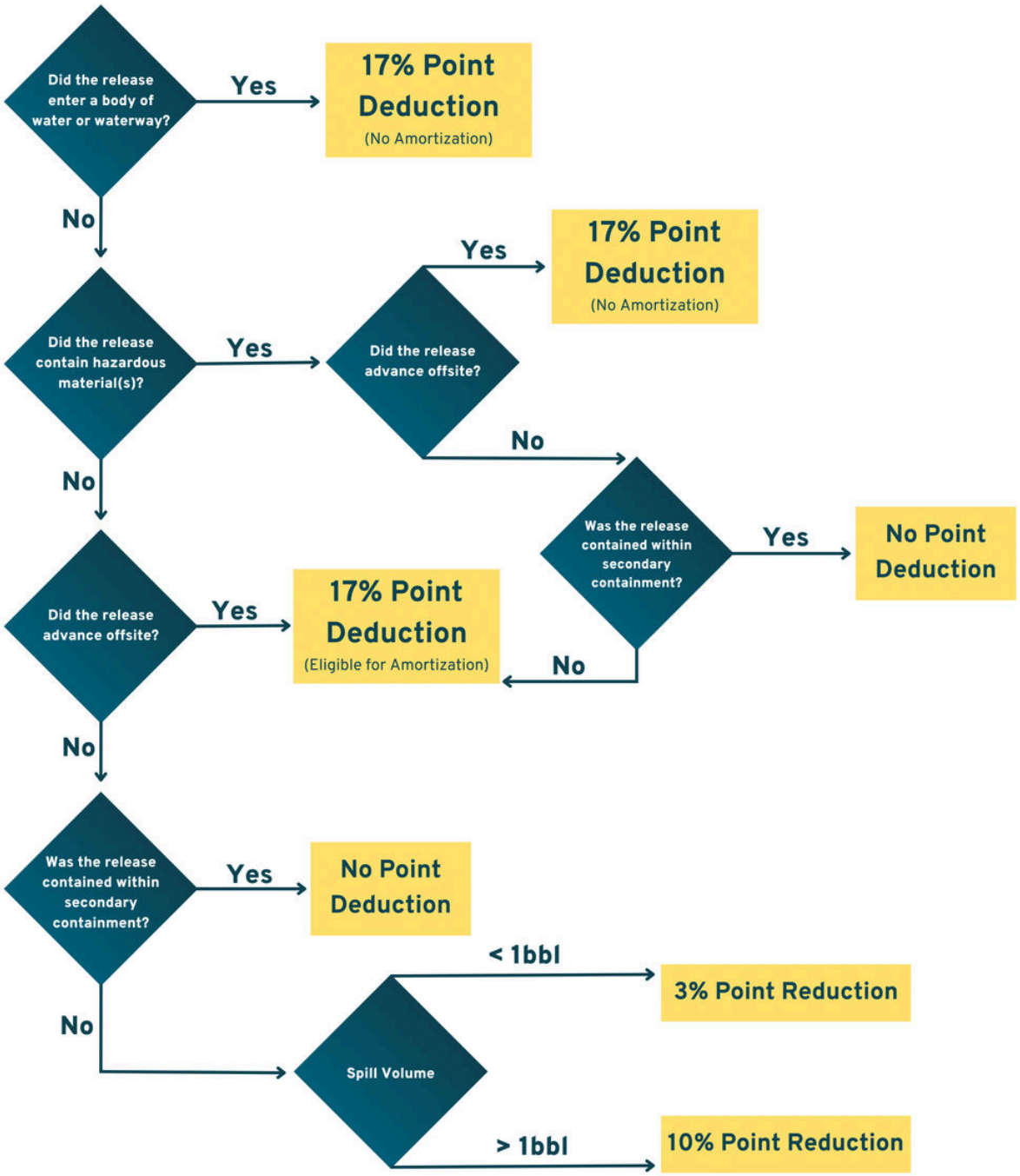
Recordable Incidents

Score reductions and criteria are outlined below, utilizing classifications developed by the US Occupational Safety and Health Administration (OSHA). Amortizable incidents are indicated below and outlined in the following table.

	Deduction (%)	Classification
Amortization	No Point Reduction	**First Aid:** an incident requiring medical attention, which can be administered onsite or at the location of the incident. Examples include cleaning/bandaging minor cuts, drinking fluids to reduce heat stress, etc.
	3%	**Medical Aid:** a work-related incident requiring medical treatment; for example, the use of prescription medication, the necessity of wound closing devices, etc.
	10%	**Restricted Work:** a work-related injury or illness that results in a physician recommending a job restriction or preventing an employee from performing one or more of the routine functions of his or her job, or from working the full workday.
	10%	**A Lost Time Incident (LTI)** resulting in *temporary partial disability* and/or hospitalization for one day or less. Examples include smashed fingers, broken bones, etc.
Non-Amortization	17% or Permanent Rating Deduction to Silver	**A Lost Time Incident (LTI)** resulting in *permanent partial disability* and/or requiring consecutive days of hospitalization. Examples include small amputation, hearing loss, partial loss of vision, etc.
	17% or Permanent Rating Deduction to Silver	**A Lost Time Incident (LTI)** resulting in *permanent total disability* or fatality. Examples include large amputation, full loss of vision, paralysis, or death.

Reportable Spills

Spill deductions based on reportable spills are outlined below. Deductions only apply for spills deemed reportable by the regulatory agency with jurisdiction. Deductions eligible for amortization begin once the regulatory agency deems the spill remediated, not on the date of the spill.



Well Control

TrustWell defines a well control event as an incident in which the Emergency Action Plan was enacted, with a prolonged period where control of the well was not maintained. This encompasses events such as uncontrolled blowouts, significant air releases, fires, etc.

Classification	Percent Deduction	Years to Amortize
Loss of Well Control	17%	Ineligible for Amortization

GET IN TOUCH WITH US

Project Canary is a climate technology company that offers an enterprise emissions data platform that helps companies identify, measure, understand, and act to reduce emissions across the energy value chain. Given its outsized impact, the Company started with methane and has since expanded to other greenhouse gasses. Project Canary's mission is to Measure It — leveraging sophisticated software solutions to help companies improve and report on their emissions footprint. They do this by building high-fidelity sensors, ingesting data from various other technologies and sources, characterizing the accuracy of such emissions data, and deploying advanced physics-based AI-powered models to identify leaks and quantify emissions.
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