Verification Report – Indian River County Landfill – CAR558

Vero Beach, Florida

June 2025

Prepared for:	Anew Environmental, LLC 3200 Southwest Freeway, Suite 1310 Houston, Texas 77027
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1. Introduction

This report is provided to the Project Developer, Anew Environmental, LLC (Anew), as a deliverable of the Climate Action Reserve (CAR) project verification process. This report covers the verification of the Indian River County Landfill Project – CAR558 (the Project) for the reporting period of January 1 through December 31, 2023.

Anew is the responsible party for the GHG statement under verification. Anew was responsible for the preparation and fair presentation of the GHG statement. First Environment is responsible for expressing the opinion below on the GHG statement based on the outcome of the verification process.

2. Objectives

The purpose of this verification was, through review of appropriate evidence, to establish that:

- The Project conforms to the requirements of the verification criteria, including all eligibility requirements, discussed in Section 4 of this report.
- The data reported are accurate, complete, consistent, transparent, and free of material error or omission.

Verification objectives also included reaching a conclusion about the accuracy of the GHG statement and the conformity of the statement with criteria.

3. Verification Scope

Specific scope metrics for the verification are outlined in the table below:

Geographic Boundaries	Indian River County Landfill, Vero Beach, Florida
Emission Reduction Sources, Project Emissions, and Greenhouse Gases	Emissions reductions (expressed in units of Carbon Dioxide equivalents (CO2e)) resulting from methane destruction; Project emissions of CO2 from fossil fuel combustion and purchased electricity.
Reporting Period	January 1 through December 31, 2023
Data Sources	Metered Data and Emissions Reduction Calculations

4. Standards Used to Verify Emissions (Criteria)

The following table outlines the guidance and protocols used to conduct this verification:

Standard of Verification	• Climate Action Reserve Landfill Project Protocol, Version 6.0, June 2022 (CAR Protocol) • U.S. Landfill Project Protocol, Version 6.0 Errata and Clarifications, April 13, 2023 • Reserve Offset Program Manual (April 2024, v9.2) • Applicable Climate Action Reserve Policy Memos

Verification Process	• Section 8 of the CAR Protocol, Version 6.0 • Climate Action Reserve Verification Program Manual, February 3, 2021 • ISO 14064-3: Specification with guidance for the verification and validation of greenhouse gas statements, 2019
Level of Assurance	• Reasonable Level of Assurance
Materiality	• Misstatements greater than one percent of the Project's emission reductions assertion are considered material. • Qualitative non-conformities with the CAR Protocol are also considered material.

5. Overview of the Verification Process

The verification process was utilized to gain an understanding of the Project's 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.

The following verification process was used:

- Conflict of interest review
- Selection of audit team
- Verification preparations
- Initial interaction and kickoff meeting with Anew
- Development of the verification and evidence gathering plan
- Execution
- Site visit
- Assessment of raw data and calculations for period under review
- Follow-up interaction with the project developer and Anew for corrective action, clarification, or supplemental data as needed
- Independent review
- Final opinion and report submittal

5.1 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. First Environment received authorization to proceed with verification activities for the project developer from CAR in a notification dated March 11, 2024.

5.2 Audit Team Selection

First Environment's Verification Team consisted of the following individuals who were selected based on their verification experience, as well as familiarity with landfill operations.

Lead Verifier – Jeff Daley

Verifier – Logan Simpson

Senior Internal Reviewer – Michael Carim

5.3 Strategic Analysis and Verification Preparations

First Environment performed pre-engagement activities to confirm the type of engagement, level of assurance, materiality thresholds, the objectives, criteria, and scope for verification activities.

First Environment also performed a strategic analysis to understand the activities and complexity of the project and to determine the nature and extent of the verification activities required. The strategic analysis was also used to develop sufficient understanding of the GHG-related activity and its relevant sector information to plan and conduct the verification.

5.4 Audit Kick-off

The verification was initiated with a kick-off meeting on July 15, 2024 with Anew. The meeting focused on confirming the scope, schedule, and data required for verification.

5.5 Development of the Verification and Evidence-Gathering Plan

The Audit Team formally documented the verification plan as well as determined the evidence gathering plan. The verification plan was informed by the kick-off meeting where key elements of the verification scope were discussed including project team members, project level of assurance, materiality threshold, and standards of reporting and evaluation. It also provided an outline of the verification processes and established project deliverables. Anew was afforded the opportunity to comment on the key elements of the plan for verification. A separate evidence gathering plan was designed to review all project elements in areas of potentially high risk of inaccuracy or non-conformance.

5.6 Execution of Evidence Gathering Activities

The Audit Team executed the evidence-gathering activities. The verification was conducted according to the verification plan and the evidence-gathering activities according to the evidence-gathering plan.

5.7 Site Visit

Mr. Jeff Daley conducted a site visit on September 13, 2024, to assess the Project's data management systems and interview personnel relevant to the Project as part of the verification process.

5.8 Emissions Reduction Data and Calculation Assessment

This assessment used information and insights gained during the previous steps to evaluate the collected data and reported emissions reduction quantities, and to identify whether either contained material or immaterial misstatements.

5.9 Corrective Actions and Supplemental Information

The team issued corrective action and clarification requests during the verification process. Anew provided sufficient responses to all corrective action and clarification requests.

5.10 Independent Review

Before verification reporting is released to the client, a First Environment lead verifier, who has not participated in the verification activities, conducts an independent review to confirm that all verification activities have been completed and provide the agreed upon level of assurance.

5.11 Verification Reporting and Opinion Issuance

Verification reporting, represented by this report, documents the verification process and identifies its findings and results. Verification reporting consists of this report for Anew, a verification opinion, and a list of findings, all to be submitted to the Climate Action Reserve.

6. Conformance with Verification Criteria

6.1 Project Description

The Indian River Landfill is located in Vero Beach, Florida. The landfill is owned and operated by The Indian River County Solid Waste Disposal District. The landfill opened in 1978 and currently receives municipal solid waste.

The Project consists of the voluntary collection and destruction of landfill gas in an open flare. The Project destroys landfill gas that otherwise would be vented to the atmosphere, resulting in a net reduction of CO2-equivalents.

The baseline scenario is defined as the total release of landfill gas to the atmosphere.

6.2 Eligibility

The Project meets the eligibility requirements set forth in the CAR Protocol as described below.

6.2.1 Ownership and Title

The Indian River County Solid Waste Disposal District (IRCSWDD) is the owner of the landfill. IRCSWDD entered into a landfill gas agreement with Indian River Eco-District,

LLC whereby Indian River Eco-District, LLC will be assigned the right and title of the environmental attributes for the purposes of marketing and sale of subsequently generated emissions reduction credits. Indian River Eco-District, LLC entered into an agreement with Anew Environmental, LLC giving ownership of the environmental attributes to Anew Environmental, LLC. Indian River Eco-District, LLC has since been acquired by Nopetro Energy. Written confirmation was received from Nopetro Energy stating that all of the above-mentioned agreements and arrangements are still effective and in place. First Environment has reviewed all relevant contractual documents which reasonably establish transfer of ownership to Anew Environmental, LLC.

Additionally, First Environment relied on the Attestation of Title completed by Anew for the current verification period. The Attestation is on file with CAR and was reviewed to confirm that it was completed correctly.

6.2.2 Project Start Date

First Environment confirmed that the Project meets CAR's start date requirements. The Project start date is June 22, 2005, which was confirmed through review of the construction and startup letter from Camp Dresser & McKee Inc. who completed construction of the Project activity.

The project is currently within its second crediting period which spans from June 22, 2015 through June 21, 2025.

6.2.3 Additionality

The Project passes both the Performance Standard Test and the Legal Requirements Test, as described below.

6.2.3.1 Performance Standard Test

The Project consists of the installation of a landfill gas collection and control system and therefore exceeds the performance standard defined by the CAR protocol, specifically Scenario 1 from the list provided in Section 3.4.1 of the CAR Protocol, because no collection or control system existed prior to the Project start date.

A passive flare was installed at a leachate lift station prior to the Project's start date solely for safety purposes. There was a possibility of methane accumulating in the lift station resulting in a safety issue for workers and a customized passive flare was installed in order to mitigate the gas build-up and was connected to the lift station only. However, there was never enough gas to keep the passive flare lit. First Environment confirmed this through interviews during the previous site visits and prior verification.

It was also confirmed that the landfill is not a bioreactor.

6.2.3.2 Limits on Credit Stacking

The project is not claiming any other credits or incentives for methane destruction activities and did not upgrade landfill gas into high-Btu fuel during the current reporting period. Therefore, there is no stacking of credits relevant to Project activity during the current reporting period.

6.2.3.3 Legal Requirements Test

In May 2021, the EPA published the final MSW Landfills Federal Plan (40 CFR 62, Subpart OOO). This new Subpart implements the 2016 emission guidelines for existing MSW landfills in 40 CFR Part 60, Subpart Cf, which are located in states that did not have approved and effective state plans in place. This Federal Plan became effective on June 21, 2021 and implements a NMOC emissions threshold of 34Mg./yr.

The Indian River landfill has a permitted capacity above the 2.5 million cubic meter threshold of municipal solid waste that triggers New Source Performance Standard (NSPS) requirements, and the State of Florida did not have an approved state plan in place. Therefore, 40 CFR 62, Subpart OOO requirements apply to the Indian River Landfill.

The most recent non-methane organic compounds (NMOC) emissions rate testing occurred on August 10, 2021, and a subsequent NSPS Tier II NMOC Testing, and Emissions Rate Report dated September 20, 2021, was submitted to the U.S. EPA. The report identifies that the five-year NMOC emission rates are estimated to be 11.79 Megagrams (Mg) per year in 2023. This NMOC emissions rate is below the 34 Mg per year threshold established by 40 CFR 62, Subpart OOO, and are also below the 34Mg per year threshold previously established by Subpart XXX. Therefore, the landfill is not required to operate an active collection system under NSPS requirements.

First Environment reviewed the facility's Solid Waste Operating permit and Title V permit to confirm that no other requirements for an active landfill gas collection and control system existed. This cursory review of permits, laws, and regulations indicated the voluntary nature of the Project.

Additionally, First Environment relied on the Attestation of Voluntary Implementation completed by Anew for the current verification period. The Attestation is on file with CAR and was reviewed to confirm that it was completed correctly.

6.2.4 Regulatory Compliance

First Environment reviewed the landfill's Solid Waste Operating Permit, annual statement of compliance, and Title V Permit to inform regulatory compliance. Additionally, First Environment generated a compliance report on July 18, 2024 using the Environmental Protection Agency's (EPA) Enforcement and Compliance History Online (ECHO) database. The cursory review of permits, compliance statements, and the EPA ECHO database indicated that there was no evidence of non-compliance related to the Project during the current reporting period.

The ECHO database did identify a Clean Air Act violation during the first quarter of 2023. First Environment received clarification and supplemental documentation from the facility which confirmed that this issue was due to missing submittal of an annual C&D report, and unavailability of leachate records. Review of these records confirmed that the issue was administrative in nature and did not have an impact on the current reporting period.

Additionally, First Environment relied on the Attestation of Regulatory Compliance completed by Anew for the current verification period. The Attestation is on file with CAR and was reviewed to confirm that it was completed correctly.

6.3 Project Performance Against CAR Protocol and Projects Management System

The Project was implemented in conformity with the CAR Protocol. Anew developed and implemented a Monitoring Plan to track relevant project parameters and data sources. The Monitoring Plan, including the Project Diagram, was reviewed to determine compliance with the protocol requirements. Based on observations made during review of relevant project documentation, First Environment found the Monitoring Plan and Project Diagram to meet the requirements set forth by the CAR Protocol and the Project to be implemented in accordance with the Monitoring Plan. First Environment confirmed during the course of verification activities that relevant individuals are properly trained to implement the Monitoring Plan. Additionally, First Environment reviewed the Project Data Report (PDR) to confirm that the form was filled out accurately and the information contained within was accurate and correct.

6.3.1 Project Monitoring

The Project's monitoring conforms to the requirements of the CAR Protocol, as discussed below.

Landfill gas flow to the flare is continuously measured using an FCI-ST98 flow meter. A Yokogawa data logger records the flow rate at least once every 15 minutes. The flow rate is standardized from ambient conditions to a standard temperature and pressure of 70°F and one atmosphere. Additional flow meters are used to facilitate routine calibration of the primary meter when required.

During the reporting period instances of flow spiking were identified which are caused by maintenance events, and landfill gas moisture impacting the flow meter probe. As a result, Anew requested a monitoring variance to address this issue. The variance request was approved and is discussed in Section 6.5 below.

The methane concentration of the landfill gas is measured weekly with Landtec GEM-5000 portable gas analyzers through June 17, 2023, and is recorded by the analyzer(s) unit memory and exported in Microsoft Excel format. After this date, an Ecotec continuous analyzer was installed at the landfill and methane was recorded continuously through the rest of the reporting period.

Flare operation is continuously monitored with a thermocouple.

Both gas flow rates and methane concentration are measured on the same relative moisture basis.

Table 1 summarizes the Project monitoring system parameters and monitoring equipment employed by the Project.

TABLE 1: Monitoring Equipment

Parameter	Monitoring Equipment	Frequency of Measurement	Frequency of Recording	Recording Device
Landfill gas flow	FCI-ST98 flow meter	Continuous	At least every 15 minutes	Yokogawa data logger

TABLE 1: Monitoring Equipment				
Parameter	**Monitoring Equipment**	**Frequency of Measurement**	**Frequency of Recording**	**Recording Device**
Methane Concentration	LandTec GEM-5000 portable gas analyzers	At least weekly	As measured	Unit memory
Methane Concentration	Landtec Ecotec continuous analyzer	Continuous	Every minute	Yokogawa data logger
Hourly Operation of Destruction Device	Thermocouple	Continuous	At least every 15 minutes	Yokogawa data logger

6.3.2 Instrument Quality Assurance/Quality Control

Anew's instrument quality assurance/quality control (QA/QC) plan for the Project's monitoring equipment complies with CAR Protocol's requirements.

The FCI flow meters are inspected and cleaned at a minimum during the routine manufacturer calibration events as stipulated in the Project's monitoring plan. Additionally, the meters are inspected and cleaned periodically throughout the monitoring period by landfill personnel. The manufacturer recommends a calibration frequency of once every 18 months. All flow meters were calibrated within the manufacturer's recommended frequency. The facility maintains three flow meters, a primary meter, and two spare meters to facilitate routine calibrations. The primary meter was not field checked for calibration accuracy within two months of the end of the reporting period. As a result, a variance request was submitted and subsequently approved to address this issue. The variance is discussed in Section 6.5 below.

The Project used three Landtec GEM-5000 gas analyzers to measure methane concentration of the landfill gas during the reporting period. The manufacturer requires annual calibration of the GEM-5000 gas analyzer. The Landtec GEM gas analyzers were calibrated by the manufacturer according to the manufacturer recommended calibration intervals. Additionally, the gas analyzers were field calibrated to a known span gas prior to each use. Documentation of field calibration prior to each use was provided for all weekly methane readings applied in the emission reduction calculations. First Environment reviewed all field calibration records and confirmed that the gas analyzers were operating within the five percent accuracy range required by the CAR Protocol.

The Landtec Ecotec FAU-TDL continuous gas analyzer is inspected/cleaned and checked for calibration accuracy with as-found/as-left conditions documented during the annual calibration accuracy checks. The manufacturer of the analyzer recommends calibrations once every three years. First Environment reviewed all calibration records to confirm that the gas analyzer was operating within the required five percent accuracy range.

The flow meters and gas analyzers were calibrated to a range of conditions corresponding to the range of conditions as expected at the landfill.

Table 2 shows the dates when instrument QA/QC was performed.

TABLE 2: Instrument QA/QC				
Monitoring Equipment	**Dates of Use**	**Inspected/ Cleaned [2]**	**Calibration Accuracy Check**	**Calibration [3]**
Thermal Instruments Flow Meter S/N 706663 (Spare Meter)	1/1/2023 – 3/8/2023	1/1/2023 ; 3/8/2023	12/17/2022; 5/22/2023	12/17/2022; 5/22/2023
Thermal Instruments Flow Meter S/N 520626 (Spare Meter)	9/7/2023 – 10/3/2023	9/7/2023	N/A [1]	7/27/2023[4]
Thermal Instruments Flow Meter S/N247700 (Primary Meter)	3/8/2023-9/7/2023; 10/3/2023 – 12/31/2023	3/8/2023; 6/28/2023; 9/7/2023; 10/23/2023	2/16/2023; 9/28/2023	2/16/2023; 9/28/2023
Landtec Ecotec FAU-TDL continuous gas analyzer (S/N 1235)	6/17/2023 – 12/31/2023	6/9/2023; 1/19/2024	6/9/2023; 1/19/2024	6/9/2023; 1/19/2024
GEM-5000 (S/N: G503776)	1/3/2023; 1/17/2023; 1/20/2023; 2/9/2023; 2/14/2023; 2/20/2023; 3/8/2023; 3/15/2023; 3/23/2023; 3/27/2023; 4/6/2023; 4/13/2023; 4/19/2023; 4/25/2023; 5/1/2023; 5/11/2023; 5/17/2023	Prior to each use.	Field calibrated to a known sample gas prior to each use.	6/9/2022; 6/15/2023
GEM-5000 (S/N: G501763)	5/26/2023	Prior to each use.	Field calibrated to a known sample gas prior to each use.	4/12/2023; 8/22/2023
GEM-5000 (S/N: G501626)	6/9/2023; 6/12/2023	Prior to each use.	Field calibrated to a known sample gas prior to each use.	11/15/2022; 4/11/2023; 5/9/2023; 7/27/2023; 9/20/2023
GEM-5000 (S/N: G500401)	1/10/2023; 2/2/2023; 2/28/2023; 6/2/2023	Prior to each use.	Field calibrated to a known sample gas prior to each use.	4/21/2022; 5/9/2023; 6/23/2023; 5/15/2024

[1] *Flow meter was not in use for 60 days or more during the reporting period.*
[2] *Inspection / Cleanings conducted by landfill personnel.*
[3] *Meters are also inspected / cleaned, and checked for calibration accuracy during routine manufacturer calibrations.*
[4] *Loaner meter was manufacturer calibrated within twelve months prior to use as specified in U.S. Landfill Project Protocol Version 6.0 Errata & Clarification, April 13, 2023.*

6.3.3 Project Emissions

Project emissions sources and the associated monitoring methodology are summarized in Table 3.

TABLE 3: Project Emissions	
Project Emissions Source	**Monitoring**
Consumption of Purchased Electricity to power the Project equipment	Monthly electrical utility bills
Propane consumption	Purchase Invoices

6.4 Emissions Reduction Calculation Assessment

The emission reduction calculations were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. The formulas were tested to ensure consistency with the calculation methodology described in the CAR Protocol.

Total landfill gas flow in a given interval was computed by multiplying the flow rate by the length of the interval. Metered gas flow volumes were measured at standard conditions at one atmosphere of pressure and a temperature of 70ºF. Flow was corrected in the emission reduction calculations to standard conditions of one atmosphere of pressure and a temperature of 60ºF. The total volume of methane destroyed by the Project was computed in daily intervals by multiplying the daily landfill gas flow by the weekly or daily average of methane concentration measurements and converted to a mass flow using the density of methane at 60°F and one atmosphere of pressure. The total quantity of methane destroyed by the Project is aggregated daily and summed over the reporting period to obtain the total baseline emissions.

Project emissions were calculated by multiplying activity data by appropriate emission factor.

There was one instance of weekly methane concentration data substitution applied during the reporting period. First Environment confirmed that data substitution was applied in accordance with Appendix D of the Protocol.

No sources of leakage emissions are relevant under the Landfill Protocol.

The total emission reductions were determined by subtracting the Project emissions from the baseline emissions.

Table 4 summarizes the input parameters used in the emission reduction calculations.

TABLE 4: Input Parameters		
Project Emissions Source	**Monitoring**	
Input Parameter	**Name**	**Description/ Value**
LFGi,t	Total quantity of landfill gas sent to the flare	Aggregated daily from metered data, recorded at 70°F and one atmosphere of pressure

TABLE 4: Input Parameters		
Project Emissions Source	**Monitoring**	
PRCH4,t	Methane content	Averaged weekly from non-continuously methane readings and averaged daily from continuous readings
DEi	Default destruction efficiency	96% - Open Flare
OX	Oxidation Factor	10%
DF	Discount Factor	10% - for use of weekly measurements of methane concentration
EFFF,j	Propane emission factor	5.721 kg CO2/gallon
Flare Temperature Cut-off	Metered data below corresponding temperature cut-off are excluded from calculations.	500ºF
EFEL	Purchased electricity emission factor	801.891 lb. CO2/MWh (FRCC eGrid Subregion)
GWPCH4	Global Warming Potential of Methane	28 (IPCC 5th Assessment Report)

Copies of the raw data used in the calculations, including flow data and methane content data, were compared with the data used in the final calculations and tested for transcription or mathematical errors. A representative sample of raw data sources and calculations over the reporting period was reviewed. First Environment performed recalculations of emission reductions for the entire reporting period to assess whether they were free of material misstatement.

Table 5 below contains a detailed comparison of Anew's reported emission reductions, and First Environment's recalculation based on the data and documentation reviewed during the verification process.

TABLE 5: Results of Data Checks Conducted and GHG Assertion Comparison		
Anew's emission reduction assertion (tCO2e)	**First Environment's estimated emission reduction assertion (tCO2e)**	**Applicable Threshold**
108,736	108,731	1%
$\%Error = abs\left(\frac{Stated\ reductions - Verified\ reductions}{Verified\ reductions}\right) \times 100$		**0.005%**

First Environment found the emission reduction calculations to be free of material misstatement.

6.5 Approved Variance or Deviations

Anew requested a variance from the CAR Protocol for the current reporting period for the following reasons:

- Variance #1: Flow meter (s/n 247770) was not field checked for calibration accuracy within two months of the end of the reporting period.
- Variance #2: Instances of recorded flow data that was abnormally high due to maintenance events and moisture issues with the flow meter probe.

Two separate variance requests were submitted to address these issues. The variance requests were subsequently approved by CAR. Table 6 summarizes the specific conditions of the variance approval and First Environment's verification conclusion.

TABLE 6: Assessment of Variance Requirements	
Variance #1 Requirements	**Verification Conclusion**
The verifier confirms that the factory calibration for the flow meter performed on 9/28/2023 has as-found and as-left conditions within the 5% threshold for accuracy.	The September 28, 2023 calibration of flow meter s/n: 247700 documented a maximum "as found" condition of -2.15%, and a maximum "as left" condition of +0.49%. Both the "as found" and "as left" conditions are within the five percent threshold allowable by the Protocol.
The monitoring plan is reviewed and updated to ensure that all QA/QC requirements will be met in the future.	First Environment confirmed that the Monitoring Plan has been updated during the current verification period to align with Protocol QAQC requirements.
The verifier confirms that all other QA/QC requirements were met.	First Environment confirmed that all other QA/QC requirements were met. See Section 6.3.2 / Table 2 above for details.
Variance #2 Requirements	**Verification Conclusion**
The verifier confirms that the flow meter data that exceeds the 99th percentile is appropriately removed from quantification.	First Environment confirmed that all flow data that exceeded the 99th percentile of flow readings over the reporting period have been removed from emission reduction quantification. Less than 1% of all flow data recorded exceeded the 99th percentile of flow.
The verifier confirms that the flow meter spikes coincide with cleaning and maintenance dates.	Though not explicitly documented, it was confirmed with the site that flow meter spikes (i.e. readings of 2,000scfm and above) are related to maintenance at the flare skid and/or landfill. Most spikes occurred during periods when the system was rotating blowers (stopping one blower and starting up another), or when moisture in the landfill gas was suspected to have caused the spike.
The verifier confirms that the flow meter was maintained and calibrated per the manufacturer's specifications.	The manufacturer recommends calibration every 18 months. The flow meter was calibrated according to manufacturer's

TABLE 6: Assessment of Variance Requirements	
Variance #1 Requirements	**Verification Conclusion**
	recommendations. See Section 6.3.2 / Table 2 above for details.
The verifier confirms that all other QA/QC requirements have been met per the requirements of the protocol.	With the exception of Variance #1 identified in this table, First Environment confirmed that all other QA/QC requirements were met. See Section 6.3.2 / Table 2 above for details.

7. Verification Results

Based on the historical evidence collected and the assessments performed, First Environment concludes that the Project's GHG emissions reductions achieved through the collection and combustion of landfill gas for the reporting period of January 1, 2023 through December 31, 2023:

- Can be considered free from material discrepancy
- Cannot be considered in conformance with the verification criteria for the reasons identified in Section 6.5 above.

Which would therefore result in a *modified verification opinion*.

Verified results show:

December 1, 2023 to December 31, 2023	Total
Baseline Emissions (tCO_2e)	108,765
Project Emissions (tCO_2e)	29
Emissions Reductions (tCO_2e)	**108,736**

8. Lead Verifier Signature

Jeff Daley
Senior Associate

9. Senior Internal Reviewer Signature

Michael Carim
Senior Associate