Public Project Description

This document is a project description made available in the Puro Registry to summarize the information available about a certified production facility. The project description is organized as follow:

1 Production Facility and Supplier information

This project description corresponds to the following **Production Facility** and **CO_2 Removal supplier**, acting as registering entity of the facility.

Production Facility	
Production Facility name	Mast Wood Preserve MT1
Registration date (YYYY-MM-DD)	2024-12-13
Production Facility ID	272514
Location of facility	Big Horn County, 59010, United States
Host Country of removal	United States
Has this facility been registered in another registry?	[x]No ☐Yes, additional information (registration periods):
This table is filled in by the CO_2 Removal Supplier.	

CO_2 Removal Supplier	
Supplier name	Mast Reforestation
Supplier address	1144 NW 53rd St. Seattle, WA 98107
Business ID	81-0921776
KYC status	Choose an item.
This table is filled in by the CO_2 Removal Supplier.	

The above-mentioned production facility has undergone the following audit, during which the project description, alongside other audit documents were verified.

Facility Audit	
Type of audit	Joint Validation and Verification
General Rules version	Puro Standard General Rules Version 4.2
Methodology name	Puro Standard General Rules Version 4.2
Methodology edition and version	Edition: 2023 Version: V1
Date of audit completion	21 January 2026
Conclusion of audit	Positive
Auditing body	350 Solutions
Start date of crediting period	01 April 2025
End date of crediting period	01 April 2030
This table is filled in by the Issuing Body.	

2 Overview of activity, its location, and operators

The information in this section provides an overview of how and where carbon dioxide removal is achieved, and by whom.

2.1 Non-technical description

Instructions	*Please provide a non-technical description of the carbon removal activity taking place at the production facility. Word limit: 100 words.*
Non-technical description	The Mast Wood Preserve MT1 project is a restorative carbon removal project on post-wildfire lands that combines a biomass burial project with 125 acres of non-credited reforestation as a co-benefit, restoring native ponderosa pine forest. This project buries non-merchantable, fire-damaged logs in an engineered underground chamber designed to physically remove carbon from atmospheric cycles and ensure at least 100 years of permanence. In the absence of this project, the landowners intended to burn the fire-damaged wood, most of which they had cleared and piled before Mast's involvement, to decrease hazardous wildfire fuel on their property.
This table is filled-in by the supplier and verified by the auditor.	

2.2 Locations

Instructions	*Please provide a list of locations associated with the carbon removal activity. Additional locations or areas can refer to e.g. the location of the storage site, the spatial extent of the area of use of a carbon removal product or sourcing of a specific feedstock.*
Production Facility Location (as registered)	Address: Big Horn County, 59010, United States
Additional location(s)	*Specify purpose, location, address, coordinates, to the extent possible, for one or multiple additional locations relevant to the removal activity.* Click or tap here to enter text.
This table is filled-in by the supplier and verified by the auditor.	

2.3 Operators

Instructions	*Please provide a full list of operators or organizations that contribute to the removal activity. Add rows as necessary. For each entity, provide the name, a business ID, an address, and the role of the entity.*
CO_2 Removal Supplier	Entity name: Mast Reforestation Entity business ID: 92-3012896 Entity address: 1144 NW 53rd St. Seattle, WA 98107 Role of entity: Project Developer
Organization 2	Entity name: B & M Trucking Inc Entity business ID: 32-0028196 Entity address: 1015 BOX ELDER CREEK RD BILLINGS, MT 59101 Role of entity: General Contractor
Organization 3	Entity name: Tetra Tech Inc Entity business ID: 954148514 Entity address: PO Box 911674 Denver, CO 80291-1674 Role of entity: Construction Engineering Firm

Organization 4	Entity name: SET Environmental Entity business ID: 36-3018246 Entity address: 450 Sumac Road, Wheeling, IL, 60090 Role of entity: Environmental and Geotechnical Consultants
Organization 5	Entity name: Verdensriker, LLC Entity business ID: 862-33-6339 Entity address: 101 N. River Road, Laurel, MT, 59044 Role of entity: Technical Installation Specialist - Contractor
Organization 6	Entity name: Qube Technologies (US) Inc. Entity business ID: 38-4195395 Entity address: 632 Confluence Way SE, Suite 300, Calgary, Alberta T2G 0G1 Role of Entity: Emissions monitoring service provider
This table is filled-in by the supplier and verified by the auditor.	

3 Technical description of the removal activity

The information in this section provides more technical details about the technologies and processes deployed to achieve carbon dioxide removal.

3.1 Technical description

Instructions	*Please provide a technical description of the carbon removal activity taking place at the production facility. Word limit: 500 words.*
Technical description	The Mast Wood Preserve MT1 biomass storage site, located in Big Horn County, Montana, is designed for long-term carbon storage through subterranean biomass burial. The site covers approximately 0.50 hectares (1.24 acres) based on as-built plans, with burned logs and woody debris stored in underground chambers designed to inhibit decomposition. The majority (95.2%) of biomass is sourced from piles of dead fire-damaged wood that was cut-and-decked by the landowners before Mast's involvement from the 2021 Poverty Flats Fire. A minority (4.8%) of biomass sourced was from standing dead wood, killed in the same fire, in the vicinity of the chamber. Mast's Wood Preserve MT1 stores 3,460 dry tonnes of biomass. The storage site is protected by a 100-year legal easement to ensure carbon retention and access to the site for maintenance, repair, and long-term MRV. Biomass was buried in an engineered burial site. The chamber design aims to minimize moisture infiltration and oxygen exposure, critical for inhibiting biomass decomposition. The chamber was strategically placed based on biomass availability, soil permeability, geomorphology, and hydrology. The burial process involved site preparation, including earth-moving and excavation. Machinery used during construction included standard logging and excavation equipment. The process ultimately involved stacking biomass and covering it with an engineered cap. Sampling and biomass weighing protocols were in place during operations. The burial site construction involved multiple steps: 1. Soil Testing – To confirm low permeability and support hydrologic modeling. 2. Excavation – A chamber was excavated to an average of approximately 4 meters deep.

	3. Biomass Placement – Biomass was forwarded to the burial site, weighed, sampled, and tightly packed into the chamber, then covered with soil to create an even grade. 4. Capping – The biomass is capped with a leveling layer of soil, woven geotextile, fine-grain compacted soils, gravel, woven geotextile to retain gravel, ,and topsoil to prevent water ingress, reduce gas permeability, and allow for methane gas diffusion and oxidation. 5. Surface Restoration – The area is reseeded with native vegetation to blend the site into the natural landscape and promote evapotranspiration. Monitoring equipment is installed to track GHG emissions, ensuring compliance with long-term storage requirements. Monitoring systems include above-ground continuous emissions monitoring systems (CO_2 and CH_4) to track any re-emissions, wells were installed for interior gas sampling, and temperature and relative humidity sensors were installed to monitor interior storage conditions. Fences enclose the monitoring equipment to prevent livestock damage or human interference. Trees will not be permitted to grow in the area to avoid root penetration into the burial chamber. An endowed Permanence Fund will ensure MRV, site maintenance, and any potential reversals are addressed for the full commitment period.
This table is filled-in by the supplier and verified by the auditor.	

3.2 Illustration

Instructions	*Please provide up to three illustrations of the process and technologies described above (e.g. picture of equipment, flowcharts of process).* *Note that you must own the rights to reproduce and publish the illustration and that you also authorize puro.earth to reproduce and publish the illustration in the Puro Registry.*
Authorization to reproduce and publish the illustration	[X] Puro.earth is authorized to reproduce and publish the illustrations below, for use in the Puro Registry. *Illustrations will be provided to Puro for upload and use in the Puro registry upon final submission of the facility audit. Illustrations may include examples of: Site design, burial operations, graphs representing key chamber parameters such as temperature or humidity, etc.* *Images provided in the folder to Puro:* *MT1_Chamber_full_002* *MRV_MT1* *MT1_Drone_Construction_001*

4 Application of the Puro Standard (boundary, baseline, additionality, quantification)

4.1 Scope and project boundary

Instructions	*Please provide a brief demonstration that the removal activity described above fits within the scope of the methodology and that the system boundaries of the removal activity correspond to the ones defined in the methodology. Word limit: 150 words.*
Scope and system boundary	The carbon removal activities fit within the corresponding scope and system boundaries shown in Figure 4, page 34, of the TSB methodology. 1. The project started with the establishment of the storage site location through consultation and negotiation with the Montana landowner, with whom the long-term open space easement and servitude agreement was signed. 2. The site design and construction plans were guided by consultation with Mast's contracted geoengineering firm. 3. The operations of the stored biomass were developed through contracting with heavy-duty machine operators and scientific labs. Once the biomass was buried and the chamber sealed, this ended the operation of storage units as defined in the TSB methodology. 4. Site closure and post-closure monitoring and emissions control were enacted to ensure the stability of the site and long-term GHG emissions monitoring.
This table is filled-in by the supplier and verified by the auditor.	

4.2 Baseline scenario

*The information in this section provides a summary of the project-specific **baseline scenario**.*

Instructions	*Please provide a summary of the project-specific baseline scenario. The summary shall be based on the additionality questionnaire (available separately). Word limit: 150 words.*
Summary of the project-specific baseline scenario	
The project baseline is set to the Puro defined "B: sourced from forests that are not managed for production of materials or energy". Most (95.2%) of the wood had already been cut-and-decked as part of fire mitigation work before Mast's involvement with the landowner. A portion (4.8%) was standing dead wood which remained in the vicinity of the chamber at time of operations. The landowners have signed an attestation of intent to burn the piled biomass,in the absence of Mast's involvement. Prior to and after the wildfire, this land was widely used for grazing and hunting leases. The land will continue to be used for grazing and hunting leases once the project is complete.	
This table is filled-in by the supplier and verified by the auditor.	

Further information on the baseline scenario:

Instructions	*If the methodology explicitly defines one or several possible baseline scenarios for the removal activity, please specify which ones was selected:*

Selected baseline scenario	B: sourced from forests that are not managed for production of materials or energy"
This table is filled-in by the supplier and verified by the auditor.	

4.3 Demonstration of additionality

*The information in this section provides a summary of the project-specific **additionality assessment**.*

Instructions	*Please provide a summary of the project-specific additionality assessment, considering baseline removal, regulatory and financial additionality. The summary shall be based on the additionality questionnaire (available separately). Word limit: 150 words.*
Summary of additionality assessment	
The Mast Wood Preserve MT 1 biomass burial project aims to sequester carbon by burying fire-damaged wood in engineered chambers to prevent decomposition. The baseline scenario involves open space land used for grazing and hunting leases and defined within Puro's TSB methodology as "[biomass] sourced from forests that are not managed for production of materials or energy". Landowners signed an Intent to Burn Attestation to demonstrate the counterfactual of the source biomass. The project is not required or encouraged by any law or regulation, nor does it support fossil fuel extraction or energy production. The project is aligned with net-zero transition goals. Carbon removal credit sales serve as the sole revenue stream for this project. The project is more expensive than the counterfactual scenario of the feedstock, and would be highly unlikely to occur in the absence of carbon finance.	
This table is filled-in by the supplier and verified by the auditor.	

The following files are further made available in the Puro Registry.

Additionality questionnaire (required)	Filename	FA MT1 Puro Additionality v1.9 - Signed Copy.pdf
	Description	Additionality questionnaire signed and audited, used to determine the additionality of the project following the Puro requirements for additionality.
Additional file (optional)	Filename	
	Description	
Additional file (optional)	Filename	
	Description	
Add rows as necessary, following same template as for additional file. The filename shall be the exact filename as provided in the audit documentation. The description shall be at most a 3-line summary of what the file contains. This table is filled-in by the supplier and verified by the auditor.		

4.4 Quantification of net carbon dioxide removal

*The information in this section provides a description of how **quantification of net carbon dioxide removal removals** is achieved, including **monitoring** of the removal activity, and calculation of **supply-chain emissions**.*

Quantification implementation

Instructions	*Please describe how the quantification of net carbon dioxide removal, as described in the methodology (see CORC equation), is implemented by the supplier. Word limit: 200 words.*
Description of quantification implementation	
Quantification of net carbon dioxide removal (E_{stored}) is achieved through the weighing of biomass (M) prior to placement in the MT1 storage chamber. This biomass is corrected from wet mass to dry mass (DM) through sample moisture testing. Gross carbon removal volumes are then calculated from third-party tested carbon content percent(C_{org}) and the percent carbon to CO_2 mass conversion factor of (44/12). Production emissions from burial operations (E_{CO2}) are then subtracted, as well as a baseline 8.8% re-emission factor. The 8.8% deduction also considers a methane oxidation [O_x] rate through the chamber's soil cover layer. Additional re-emissions related to possible wet chamber unoxidized methane are finally subtracted ($E_{re\text{-}emission}$).	
This table is filled-in by the supplier and verified by the auditor.	

Monitoring and reporting

Instructions	*Please provide a summary of the monitoring procedures and monitoring plan which are in place at the production facility to ensure i) the safety of the removal activity, ii) the eligibility of the removal activity, and iii) the precise quantification of CORCs. The summary shall be project-specific and based on related evidence pieces that were submitted in the audit documentation. Word limit: 500 words.*
Summary of monitoring and reporting plan	
The Storage Site Monitoring Plan outlines the long-term monitoring, reporting, and verification process for Mast Wood Preserve MT1. The Northwest Permanence Foundation will oversee site monitoring, as a third-party entity, funded through a dedicated endowment. This fund, calculated based on long-term risk and impact, covers monitoring, reporting, potential repair, remediation, and compensation costs over 100 years, ensuring site permanence. The monitoring approach uses technologies to continuously detect greenhouse gas emissions (above-ground CO_2 and CH_4) across the site at a sensitivity of 2 parts per million by volume. Data is transmitted remotely via cellular connectivity to a web dashboard, enabling real−time monitoring. System functionality is ensured through a vendor service agreement. The monitoring of within-chamber conditions is done through installed wells.Monitoring activities include site visits that assess the site for physical integrity, settlement, deep rooting vegetation establishment, and animal disturbances. The endowment will fund repair of the chamber in case of events that cause detected re-emissions, or put the chamber at risk of re-emissions, like water pooling, erosion, or settling.	
This table is filled-in by the supplier and verified by the auditor.	

Optionally, the following documents may be made available in the Puro Registry once the facility has completed its first Output Audit:

Can the monitoring plan and procedures be made available in the Puro Registry?	
Answer	☐ Yes, entirely. ☐ Yes, in a redacted version. [X] No. If no, please provide a reason: Proprietary approach and R&D investment.
Filename(s) to be made public	File to be added upon final version and converted to redacted version.

This table is filled-in by the supplier.

Supply-chain emissions

The determination of the supply-chain emissions of the removal activity shall be based on a project-specific life cycle assessment, made of a report and calculations. Calculations are updated at least annually, during the Output Audits, with data captured through above-described monitoring.

Instructions	*Please provide a summary or an abstract of the LCA performed. Word limit: 500 words.*
Summary of life cycle assessment	
The Lifecycle Assessment (LCA) of the Mast Wood Preserve MT1 project provides a comprehensive evaluation to quantify GHG emissions and net carbon removal of the MT1 facility. The LCA follows established international standards, such as following GHG accounting practices in the ISO 14040/44 standard, and applies defined system boundaries encompassing site establishment, chamber construction, biomass sourcing and handling operations, primary fossil fuel use (diesel and gasoline), material use, post-closure land remediation and long-term monitoring. The LCA applies global warming potentials (GWP) over a 100-year time horizon, with a 20-year methane sensitivity check, consistent with the Intergovernmental Panel on Climate Change (IPCC). This enables characterization of emissions from fossil, biogenic, and land use change sources in terms of their relative climate impact in the short and long term. Additional sensitivity analyses were undertaken to evaluate uncertainties related to re-emissions, equipment use, and methane oxidation assumptions. In summary, the GHG LCA provides a structured, transparent, and comprehensive evaluation of the net carbon removal performance at the Mast Wood Preserve MT1 facility.	
This table is filled-in by the supplier and verified by the auditor.	

Optionally, the following documents may be made available in the Puro Registry once the facility has completed its first Output Audit:

Can the LCA report be made available in the Puro Registry?	
Answer	[X] Yes, entirely. ☐ Yes, in a redacted version. ☐ No. If no, please provide a reason:
Filename(s) to be made public	To be completed for first output audit
This table is filled-in by the supplier.	

5 Social and environmental safeguards

The information in this section provides a summary of the project-specific measures taken to avoid and minimize negative social and environmental effects, as well as maximize positive impacts contributing to the sustainable development goals (SDGs).

5.1 Stakeholder engagement

In line with the Puro General Rules, the CO_2 Removal Supplier must have conducted a stakeholder engagement process and reported its outcome in a written format.

Instructions	*Please reproduce the summary of the stakeholder engagement report. Word limit: 500 words.*
Summary of stakeholder engagement	
The stakeholders for a project on private land in the United States are the landowner and the local government. There are no indigenous land rights on the property. We have established a legal contract with the landowner that complies with local and state laws. Our agreement with the landowner includes mechanisms for grievance redressal. Through collaborative consultation with various Montana state departments and programs, the project has received the necessary regulatory clearances, demonstrating a commitment to full state compliance. These regulatory groups include the Montana Department of Environmental Quality and Montana Sage Grouse Habitat Conservation Program. We have also notified mineral rights holders about filing the easement for the project in the local county records office. Mast completed a State of Montana Environmental Assessment as part of the Montana Environmental Policy Act (MEPA). The primary form of communication with stakeholders is digital, including phone calls and email, or analog, with paper letters mailed and documentation filed as appropriate.	
This table is filled-in by the supplier and verified by the auditor.	

In addition, the following documents are made available in the Puro Registry once the facility has completed its first Output Audit:

Stakeholder Engagement Report (required)	Filename	FA Puro Stakeholder Engagement Report.pdf
	Description	Stakeholder engagement report
The filename shall be the exact filename as provided in the audit documentation. This table is filled-in by the supplier.		

5.2 Environmental and social safeguards

In line with the Puro General Rules, the CO_2 Removal Supplier must ensure that environmental and social safeguards are in place.

Instructions	*Please summarize the environmental and social impacts relevant to the project, based on the answers provided to the corresponding questionnaire in the audit documentation. Word limit: 500 words.*
Summary of environmental and social safeguards questionnaire	

Mast's Wood Preserve MT1 is not expected to have a significant economic or social impact in the broader community. Mast does expect short-term positive impacts through hiring regional and local contractors for implementation. Local employment is not expected to change long-term as a result of this project; however, during site construction, we deem the project as additional for local employment and economic activity. The nearest businesses are located in Hardin and Billings, MT, approximately 24 and 71 miles away, respectively. Short-term construction impacts at this remote location, which is 3 miles from the nearest county road, include noise, vibration, and dust, but these are temporary. Equipment operation is limited to daylight hours, and dust suppression may be used to minimize air pollution. The project does not produce hazardous waste. The project follows strict labor standards to ensure worker safety. Employees receive OSHA-compliant training, and personal protective equipment (PPE) is mandatory. Occupational hazards such as heat stress, dust exposure, and heavy machinery risks are mitigated through safety protocols and worksite monitoring.

Mast is notifying stakeholders about the project through written communication (digital and print) including the landowner, local government, and mineral rights holders. We have established a legal contract with the landowner that complies with local (state) laws and establishes compensation for the project, in the form of financial compensation and complementary reforestation services. Any operational permitting will be completed by Mast and its contractors, such as the geotechnical engineering firm, in compliance with local regulations. An environmental assessment was also completed, and will be kept on file.

Long term soil disturbance is minimal. The project protects soil and water resources by using low-permeability compacted soil chamber caps. Hydrology assessments confirm that the project does not affect local water systems, and a Stormwater Pollution Prevention Plan (SWPPP) was completed in consultation with Tetra Tech geotechnical engineers and submitted for recording with the state of Montana. This includes the implementation of stormwater runoff best management practices. Regular inspections of the site's stormwater protection systems were conducted by a Mast employee who is a certified Qualified Preparer of such systems. Revegetation efforts will stabilize soil, reduce erosion, and restore habitat. The site was selected to avoid flood-prone or erosion-sensitive areas, ensuring long-term stability. Sites previously impacted by fire and salvage operations were selected to minimize habitat disruption. This property is a savanna type ecosystem with a low density stands of ponderosa pine trees (35 stems per acre). These open woodlands are interspersed with open grassland ecosystems including grasses, herbs, and forbs. The trees grow slowly due to low precipitation levels (13-15 inches per year), therefore, the ecosystem is dominated by grass and forbs. Trees will not be permitted to grow on top of the storage site to prevent tap roots from breaching the burial chamber. This fact will not alter the overall ecosystem since the burial vault is located in a previously nonforested area.
The project consulted with the Montana Sage Grouse Habitat Conservation Program to ensure compliance. The biomass storage site and surrounding staging area will be restored to native grasses with conditions that will provide feed for grazing animals as well as physical protection of the burial cap from erosion.

Fire risk reduction and air quality improvement are positive impacts of the project. Burying fire-damaged wood eliminates a fuel source for future fires. The project will mean that the cut-and-decked wood is not pile-burned. Pile-burning can reduce air quality in rural areas. When burn bans are lifted in the fall and winter, many rural residents burn their piles simultaneously.

This table is filled-in by the supplier and verified by the auditor.

In addition, the following document is made available in the Puro Registry once the facility has completed its first Output Audit:

Stakeholder Engagement Report (required)	Filename	FA Puro Environmental and social safeguards questionnaire.pdf
	Description	Questionnaire based on a template provided by Puro, to ensure compliance with the Puro General Rules, regarding social and environmental safeguards.
The filename shall be the exact filename as provided in the audit documentation. This table is filled-in by the supplier.		

5.3 Permits, risk assessments and impact assessments

Depending on the nature and scale of the removal activity, the CO_2 Removal Supplier may have obtained permits or conducted specific environmental assessments (e.g. Environmental and Social Impact Assessment, Environmental Risk Assessment) for compliance with local laws and regulations.

Were the obtention of one or several construction or environmental permits required for the removal activity, for compliance with local laws and regulations?	
Answer	[X] Yes, permits were required and successfully obtained. ☐ No, permits were not required.
Permits obtained	Name of permit: Stormwater Pollution Prevention Plan ID of permit: SWC-GP MTR111280 Issuer of permit: Montana Department of Environmental Quality Date of issuance: April 30th,2025 Permit file (.pdf): Permit URL (if available):
If several permits were obtained, provide the information for each of them. This table is filled-in by the supplier and verified by the auditor.	

Was an environmental and social impact assessment study (EIA) conducted?	
Answer	[X] Yes, an EIA was legally required and thereby is being conducted. ☐Yes, an EIA was not legally required but conducted voluntarily. ☐ No, an EIA was not legally required and not conducted.
EIA Report (if conducted)	Title of study: MT1-Environmental-Checklist-and-Instructions Filename of report: MT1-Environmental-Checklist-and-Instructions_Signed JC 5-12-25.pdf Can the report be published in the Puro Registry: No
This table is filled-in by the supplier and verified by the auditor.	

Was an environmental risk assessment study (ERA) conducted?	
Answer	☐ Yes, an ERA was legally required and thereby conducted. ☐ Yes, an ERA was not legally required but conducted voluntarily. [X] No, an ERA was not legally required and not conducted.
ERA Report (if conducted)	Title of study: N/A Filename of report: N/A Can the report be published in the Puro Registry: Yes/No
This table is filled-in by the supplier and verified by the auditor.	

5.4 Positive impacts on SDGs

Depending on the nature of the removal activity, the activity may have positive impacts on the UN Sustainable Development Goals (SDGs).

Instructions	*Please provide a summary of the positive impacts on the SDGs that the removal activity has or plans to has. This summary shall be project-specific and based on related evidence pieces that were submitted in the audit documentation (SDG Reporting files). Word limit: 150 words.*
Summary	SDG 13 - Climate Action: Stores fire-killed wood in sealed underground chambers to prevent decay and re-emissions for 100+ years. Funding non-credited native reforestation, enhancing carbon uptake and ecosystem restoration.
This table is filled-in by the supplier and verified by the auditor.	

In addition, the following document is made available in the Puro Registry once the facility has completed its first Output Audit:

SDG Reporting (required)	Filename	FA MT1 Mast Puro SDG Report.pdf
	Description	SDG Reporting based on a template provided by Puro, disclosing which SDG indicators are reported and how they are or will be demonstrated. The only submitted SDG is #13: Climate Action.
The filename shall be the exact filename as provided in the audit documentation. This table is filled-in by the supplier.		

6 Other documents available in the Puro Registry

Alongside this project description, several other documents are made available in the Puro Registry for more details.

The documents referenced in this project description are compiled in the following table:

Instructions	To finalize the project description, please list the names of all the public documents to be made available in the Puro Registry, in the order they appear, specifying the number of pages of each document. Add rows as necessary.	
#	**Document names**	**No of pages**
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
This table is filled-in by the supplier.		

Besides the documents referenced in this project description, the 3rd-party auditor has reviewed a complete audit package containing numerous documents, performed a site visit, and prepared an audit report and statement.

The facility described here will further be audited annually, in Output Audits, to verify the performance of the removal activity, resulting in the issuance of CORCs. All audits lead to audit reports and statements, which will be available in the Puro Registry, alongside further details on CORC quantification for each monitoring period.

Baseline and Additionality Assessment

The baseline and additionality assessment is a requirement for eligibility under the Puro Standard. The assessment is made by the CO2 Removal Supplier and verified by the independent 3rd party auditor. **The assessment made in this document will be publicly available in the Puro Registry.**

The Puro Standard only certifies durable carbon removals from the atmosphere that are net-negative and does not certify emissions reductions or avoidance. The CORCs (Carbon dioxide removal certificates), issued therefore represent a net carbon removal (1 $tCO_2eq.$ net) from the atmosphere to a durable storage of minimum 100 years, and for mineralization and geological storage minimum 1000 years. Net carbon removal is determined from stored gross CO_2 volume by subtracting supply-chain emissions from the project, any re-emissions over the guaranteed storage time, any baseline removals taking place in a baseline scenario, and any negative indirect leakage effects relative to the baseline scenario.

The CO_2 Removal Supplier must in this assessment:

- **Define** and quantify all reasonable **baseline alternatives** to the proposed project activity to remove carbon with carbon financing. A baseline is a scenario that reasonably represents the natural and anthropogenic carbon removals to a permanent storage (storage durability over 100 or 1000 years) in the absence of the carbon removal activity proposed by the CO_2 Removal Supplier. Although anthropogenic emissions may take place in the baseline scenarios, these emissions do not constitute a reference point for the quantification of CORCs (only the baseline removals do).
- Demonstrate **carbon additionality to the baseline**, meaning that the project must convincingly demonstrate that it is resulting to higher volumes of carbon removals than the likely baseline alternatives (question A1 and A2.).
- Demonstrate **regulatory additionality,** meaning that the project is not required by existing laws, regulations, or other binding obligations (question A4.).
- Demonstrate **prior consideration of carbon credits** through documentation demonstrating that the time period between the commitment date and production facility audit is max. 3 years. (question A5)
- Demonstrate **financial additionality,** meaning that the CO_2 removals achieved are a result of carbon finance. This means that the CO_2 Removal Supplier must show that the carbon credits were needed to secure the investment or to overcome specific barriers to the investment.
- To support the claim the of financial additionality, the project activity cannot already be *common practice* without carbon finance (question A6).

Reference documents: Puro Standard general Rules v4.0, section 6.5 and Additionality Assessment requirements v2.0.

1. General questions to all CO_2 Removal Suppliers

A1. Baseline Determination			
Activity name	**Activity description**	**Removals to storage (100+ yr) due to project activity (human activity)**	**Natural removals to storage (100+ yr), not man-made**
Baseline: B: Sourced from burned forests that are not managed for production of materials or energy	Wood was cut and decked as part of forest restoration work, in this case, reforestation after fire. The decked wood is stacked throughout the site and represents a small fraction of the total burned woody biomass. The burial site covers approximately 0.50 hectares (1.24 acres) of open space on the landowner's 3204-acre property. This land is used for grazing and hunting leases, and will continue to be used this way post cap closure.	None / Some *(please quantify)* None	None / Some *(please quantify)* None
Project activity: Mast Wood Preserve MT 1 Biomass burial	Site preparation and storage chamber construction. The storage vault is excavated to design depth. Fire-damaged wood is moved from the log decks to the engineered burial site. Logs are carefully stacked in the open vault, which is then capped with specialized materials and compaction layers to ensure anaerobic conditions.	None / Some *(please quantify)* Some Gross ~6,978 CORCs. This is based on 3,460 tonnes of dry equivalent ponderosa pine buried and 55% carbon content.	None / Some *(please quantify)* None
Alternative scenarios Pile burn dead wood	*(Other likely activities in this market that can replace the baseline activity, if none leave blank)* Pile burning is a common practice for disposing of fire-damaged wood in Montana, where salvage logging or other utilization is not feasible. Mast has provided an Intent to Burn Attestation, signed by the landowner, to demonstrate this as the counterfactual for this project.	None / Some *(please quantify)* None	None / Some *(please quantify)* None

A2. Does the project lead to higher volumes of durable carbon removal than the baseline?	Yes / No
As per the Puro TSB methodology baseline set to zero.	Yes

A3. Is the project scenario aligned with net-zero transition? The following activities are considered not to be aligned with net-zero transition: a) directly leading to an increase in the	Yes / No

extraction of fossil fuels, b) relating to coal-fired electricity generation, or c) involving other unabated fossil fuel-powered electricity generation, other than new gas-fired generation that is part of increased zero-emissions generation capacity in support of national low carbon energy transitions	
The biomass burial project is not linked to any other projects relating to fossil fuel power production of any type.	Yes

A4. Is the project required by existing laws, regulations, or other binding obligations?	Yes / No
The project is not required by any USA state or federal law, regulation, or other binding obligation.	No

A5. What was the Commitment Date of this facility? Commitment Date is defined as "The calendar date on which the CO_2 Removal Supplier committed to implementing the CO_2 Removal activity (e.g., the date when contracts for the purchase or installation of equipment required for the mitigation activity were signed). In the case where a mitigation activity does not involve capital expenditure, it refers to the date when the first physical actions were taken to implement the mitigation activity." If an exception listed in clause 2.1.3 of the Additionality Assessment Requirement applies, describe the situation here.	Date
The signing of the Notice to Proceed Carbon Project and Open Space Easement and Servitude Agreement was our Commitment Date for this facility, and was signed 2025-04-01.	2025-04-01

A6. Is the Technological Readiness Level of the Methodology 8 or 9?	Yes/No
Given the use of established technologies of basic landfill design and off the shelf components, materials, and machinery, but not proven at scale, we are listing our technological readiness level at 7 based on the US Department of Energy TRL scale (PDF file linked).	No

If the answer to question A6 is Yes, please answer question A6.1 to A6.3. Questions A6.2 and A6.3 are different based on whether you are applying a distributed technology (such as enhanced rock weathering) or more centralized technology based on plants/factories producing something. See clauses 3.2.5 and 3.2.6 in the Puro Additionality Assessment Requirements with references for more information.

A6.1. Please define the region being considered and explain why it is relevant level of aggregation for the assessment if different from the host country.
Answered no to question A6 thus N/A.

A6.2. Market size or current installations
Distributed technology: What is your estimate for a realistic target market size and what constraints to the market size growth have you identified?
Centralized technology (plants): What projects have you identified that fulfil the criteria in Additionality Assessment Requirements clause 3.2.6?
a) output range of +/- 50% of the project,
b) located in the same region,
c) applying the same measure,
d) produce comparable goods or services in terms of quality, properties, and applications,
e) started commercial operation before the proposed start date of the project, and
f) are not registered in a carbon crediting program.

How many of them apply a different technology? **Please mention or link to any sources you have.**
Answered no to question A6 thus N/A.

A6.3. Market penetration rate **Distributed technology:** What is your estimate of the market penetration rate of the activity? How common or widespread is the project activity or similar activities in the relevant sector and region, and what is the trend of adoption over time? **Centralized technology (plants):** Provide your calculation of market penetration rate based on the formula in clause 3.2.6 in Additionality Assessment Requirements.
Answered no to question A6 thus N/A.

A7. Does the carbon removal project have other income sources besides carbon finance? Include also information about any subsidies you receive or expect to receive. Please describe your business model here, in a short answer (max. 100 words).	**Yes / No**
N/A. No other income sources besides carbon finance. Mast's business model revolves around generating and selling high-quality carbon removal credits through biomass burial, certified under the Puro Terrestrial Storage of Biomass Methodology. These carbon removal credit sales serve as the sole revenue stream for our projects, enabling long-term climate impact. Following wildfire damage, Mast also offers complimentary reforestation services to landowners who supply biomass for the project. This approach not only supports carbon sequestration efforts but also aids in ecosystem recovery, ensuring that fire-affected landscapes are restored while contributing to global climate goals.	No

Please note: Questions under headings '2. Simple cost analysis', '3. Investment analysis', and ' 4. Barrier Analysis' are mutually exclusive options.

2. Simple cost analysis or investment analysis

Some projects may demonstrate additionality through simple cost analysis: this is applicable for projects that have no other source of income besides carbon finance or where ex-ante investment analysis is not applicable, because capital expenditure (capex) is modest compared to operating expenditure (opex). This can include e.g. enhanced rock weathering projects.

B1. Describe how the criteria above applies to your project
No other income sources besides carbon finance.

B Simple cost analysis	**Project response**
B2. Please describe your cost structure here and include evidence in attachment.	The budget is nearly finalized as actuals with some outstanding numbers that are still being finalized. Primary costs are incurred before the biomass is buried, secondary costs occur after the biomass is buried.
B3. Please summarize the simple cost analysis here. Please include any public subsidies received or expected. Compare with alternative scenarios, if relevant.	No subsidies are received or expected. The most likely alternative to burial is pile burning. Pile burning typically occurs during winter to avoid fire risk. Compared to the $1.3M burial project budget, the cost of pile burning is negligible.

	The largest cost center on the project is related to supplying monitoring equipment (line item: Monitoring) and funding 100 years of monitoring activities (line item: Endowment/Insurance). The next largest expense is earth moving (line item: Excavation, Fill & Cap). Forwarding of biomass into the excavated chamber is carried at the line item: Forestry. Line item "Landowner Offering" is money and forestry services provided to the Landowner as compensation for their participation in the pilot. Testing and geoengineering includes soil sampling and chamber design.
B4. Please provide an additional calculation spreadsheet in attachment. All formulas used in the spreadsheet shall be readable to the verifier and all relevant cells shall be viewable and unprotected. Mark confidential when needed.	A working financial spreadsheet is provided in the 02. Additionality Folder and titled, "[Confidential] Mast Wood Preserve MT 1 Financial Model - Puro FA".
B5. Are you willing to provide a full calculation spreadsheet to be visible in the Puro Registry? If yes, please specify the name of the file that has been provided. If not, please ensure that there is sufficient information provided in your answers in this document.	No. Mast is willing to provide a full calculation spreadsheet to potential buyers under NDA. Mast's additional component of supporting landowner reforestation introduces added costs and resolutions to our finances that we prefer to maintain as proprietary.
B6. Is the information shared here consistent with information presented to the company's decision-making management, investors or lenders?	Yes
B7. Is the information shared here consistent with the information in the audit documentation presented to Puro and its verifiers (e.g. LCA model)? If not, please explain why there are differences.	Yes

3. Investment Analysis [Mast note: Section excluded due to Puro note on page 4]

CO_2 Removal Suppliers can be guided by the CDM Methodological Tool 27 of the UNFCCC Clean Development Mechanism "Investment Analysis" to demonstrate financial additionality with Investment Analysis.

C. Financial Additionality – Investment analysis	Project response
C1. Describe the relevant alternative scenarios in terms of investments analysis. **If the only alternative scenario is to carry out the project without CORCs, please answer the following questions:** **Please show your calculations to determine the benchmark rate for either equity IRR or WACC, whichever you are using. Please include documentation of how the rate is suitable for the technology and region. Please specify the currency and whether the rate is nominal or real.**	
C2. Please state how CORC revenues change the expected IRR or NPV of the project.	
C3. Please conduct a sensitivity analysis in relation to the investment analysis and summarize the results here.	
C4. Is the information shared here consistent with information presented to the company's decision-making management, investors, or lenders?	
C5. Is the information shared here consistent with the information in the audit documentation presented to Puro and its verifiers (e.g. LCA model)? If not, please explain why there are differences.	
C6. Are you willing to provide full calculation spreadsheet to be visible in Puro Registry? If yes, please specify the name of the file that has been provided.	
C7. If you are not willing to disclose the full spreadsheet, please provide here a summary of the confidential file that has been provided to the Auditor and Puro.earth. Please include: • **Overall description of the spreadsheet, including type of terms (real/nominal), currency, forecasting periodicity** • **Capital structure, if the measure is based on equity return** • **Information sources on main revenues and costs** • **Expected breakdown of income from the different sources** • **Expected or already received public subsidies** • **Growth assumptions** • **Model duration and a comparison with expected lifetime**	

4. Barrier Analysis [Mast note: Section excluded due to Puro note on page 4]

In Barrier Analysis only one barrier needs to be demonstrated but there needs to be clear, objective, and verifiable evidence to demonstrate its existence. If possible, please provide quantitative estimates for the barrier.

D. Barrier Analysis	No/yes	Project response
D1. Are there financial barriers? (e.g., financing is not accessible for the type of activity in the country due to the risks)		
D2. Are there institutional barriers? (e.g., the investor not being the beneficiary of cost savings associated with the investment)		
D3. Are there information barriers? (e.g., lack of awareness of the financial benefits of by-products)		
D4. Please explain how CORC revenues are crucial element in overcoming identified barrier(s)		
D5. Are there subsidies for the carbon removal activity? If yes, please explain how they are not sufficient to overcome the barrier.		
D6. Please attach verifiable evidence for the existence of the barrier and describe the evidence here. If the file can be included publicly in the Puro registry, please specify the name of the file here. If the evidence is not public, please ensure that you describe it in sufficient detail.		
D7. Please demonstrate that at least one other alternative in baseline determination (first question) does not face any significant barriers, including the barriers faced by your project.		

I hereby declare that all information provided is truthful and precise to the best of my knowledge.

X Grant Canary 11/17/2025 | 18:36:34 PST

November 17, 2025, Seattle, WA

Representative name, title, organization

Grant Canary, CEO

DroneSeed Co. a Delaware Corporation dba Mast Reforestation

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Tiffani Manteuffel-Ross Tiffani.M@mastreforest.com Security Level: Email, Account Authentication (None)	COPIED	Sent: 11/17/2025 6:23:22 PM Viewed: 11/17/2025 6:28:35 PM

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Envelope Sent	Hashed/Encrypted	11/17/2025 6:23:22 PM
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Completed	Security Checked	11/17/2025 6:36:34 PM

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Environmental and social safeguards questionnaire

CO_2 Removal Supplier	Mast Reforestation
Production Facility	Mast Wood Preserve MT1
Production Facility ID	272514
Date of report last update (YYYY-MM-DD)	2025-09-15

Environmental and Social Safeguards Questionnaire

The purpose of this document is to provide a summary of how the CO_2 Removal Supplier complies with the environmental and social safeguards, as defined in Section 6.4 of the Puro General Rules 4.0. The responses from the supplier are expected to be commensurate with the identified impacts and risks.

This document consists of five sections, noting that the fifth section does not apply to all suppliers:

1. General overview and compliance
2. Labor practices and rights
3. Environmental impact and management
4. Social impact and community relations
5. Biomass sustainability

This document forms part of the evidence needed for the Production Facility Audit. It is corroborated by other documents and evidence provided by the supplier to Puro.earth and the 3rd-party auditors, demonstrating environmental and social safeguards. This questionnaire will be made **publicly available** in the Puro Registry.

1 General overview and compliance

Provide a description of your operations and the context where you are operating in, as relevant for environmental and social safeguards.
The Mast Wood Preserve MT1 (MT1) project is located on private property in Big Horn County, Montana. The property is a family-owned and operated ranch with grassland and ponderosa pine forest that hosts hunting and grazing leases. A high-severity fire in 2021 resulted in a majority loss of their ponderosa pine forest. The unmerchantable, dead wood was cleared and piled prior to Mast's involvement in order to decrease hazardous wildfire fuel on their property. This decked wood is the primary biomass source in MT1. A minority of the biomass was standing dead wood, located in proximity to the storage site, that was directly felled and stored in MT1. The project development agreement (PDA) with the landowner for MT1 grants necessary land access and establishes restrictions on land use for the biomass burial site and related project activities. Project activities are structured into key phases—Preconstruction, Construction, Post-Construction, and Reforestation – for the project. The MT1 project activities are in full compliance with Montana's land-use and environmental regulations. This was confirmed through consultation with the Montana Department of Environmental Quality (MDEQ), which provided a written notice stating that no specific permits are required for the burial chamber, provided the biomass is sourced from a single private property. Additionally, the project has secured a Storm Water Pollution Prevention Permit and has consulted with the Sage Grouse Habitat Protection Plan. The preconstruction phase, running from Q4 2024 to Q1 2025, focused on ensuring project feasibility and effectiveness. Site assessments included geotechnical surveys to measure attributes such as soil texture and water conductivity, and to confirm appropriate conditions for long-term carbon storage. Hydrology evaluations using the HELP (Hydrologic Evaluation of Landfill Performance) model analyzed surface and subsurface water movement to ensure site stability and minimal environmental impact. Fire severity maps and historic forest cover GIS data were used to identify optimal planting locations, prioritizing areas most suitable for reforestation efforts. Legal easements were finalized to protect the burial site for 100 years. Regulatory requirements were

confirmed under Montana law, which included an authorization for a Storm Water Pollution Protection Plan and consultation and implementation of best practices with the Sage Grouse Habitat Conservation Program. A Montana Environmental Assessment was also completed.

The construction phase, Q2 to Q3 2025, focused on implementing biomass burial. Wood cut-and-decked on the property from the 2021 Poverty Flats Fire was buried in an engineered burial site. The burial process involved site preparation, including earth-moving and excavation. The process ultimately involved stacking biomass and covering it with an engineered cap. The chamber is designed to prevent decomposition and methane emissions, effectively locking carbon into the subsurface environment. Monitoring equipment is installed to track GHG emissions, ensuring compliance with long-term storage requirements.

The post-construction phase began in Q3 2025 and focuses on long-term site stability, monitoring, and ecosystem restoration. The stabilization period, lasting 3 months, ensures initial structural integrity through site inspection, emissions monitoring, and chamber condition monitoring. Following this period, ongoing monitoring and maintenance activities will include emissions tracking, repair, and reporting activities for 100 years, funded by a dedicated endowment fund. The burial site will be revegetated with shallow-rooted grasses and forbs characteristic of the surrounding savanna ecosystem to ensure ecological continuity and natural landscape integration. In 2026, reforestation will be conducted on approximately 50 hectares (125 acres) with native ponderosa pine.

Provide an overview of the material environmental and social impacts and risks in your operations, and how they were determined.

Material environmental and social risks were determined through the following structured approach, which ensured that all material risks were identified, assessed, and proactively mitigated through documented best management practices (BMPs) and regulatory oversight.

1. Environmental Assessment (EA): Mast voluntarily completed the Montana state EA checklist to systematically evaluate potential social and environmental impacts.
2. Regulatory Compliance and Permitting:
    - Mast consulted with and received authorization from the Montana Department of Environmental Quality (DEQ), Water Protection Bureau, which manages the Montana Pollutant Discharge Elimination System (MPDES) Program. This is the state-level equivalent of the federal NPDES program under the Clean Water Act. In compliance with the MPDES, Mast developed a Storm Water Pollution Prevention Plan (SWPPP) for MT1 and has conducted inspections and regular reporting no less than bi-weekly for the duration of the MT1 construction phase. Ongoing inspections and reporting will continue until vegetation is re-established on the site.
    - Mast consulted with and received authorization from the Montana Department of Environmental Quality (DEQ), Waste Management Bureau, Hazardous Waste Section. No permit for hazardous waste was required.
    - Mast consulted with and received authorization from the Montana Department of Natural Resources (DNRC), Montana Sage Grouse Habitat Conservation Program, for species and habitat protection.
    - Mast consulted with the Montana Department of Natural Resources and Conservation (DNRC), Forestry Division, regarding the potential need for a hazardous reduction agreement. No hazardous reduction agreement was required.
    - Compliance with all federal, state, and local laws, including worker safety and labor standards.
3. Site Selection and Design: Selection of the site based on avoidance criteria (e.g., avoiding flood-prone or erosion-sensitive areas) and minimization criteria (e.g., selecting sites previously impacted by fire and salvage operations).
4. Specialized Technical Assessments: Completion of hydrology assessments to confirm no impact on local water systems and ecological consultation to determine appropriate post-construction revegetation (e.g., suitable species, Streamside Management Zones/SMZs).

This comprehensive process, combined with ongoing stakeholder consultation and operational permitting, established the project's risk profile.

The determination of material environmental and social risks was based on the completion of the Montana Environmental Assessment checklist (the state's EA). The purpose of the EA is to analyze a proposed action's potential effects and determine whether a more detailed Environmental Impact Statement (EIS) is required.

Environmental Risks

Impact/Risk Category	Determination and Mitigation	Materiality
Air Quality & Noise	Short-term impacts from noise, vibration, and dust emissions during construction were identified. These were temporary and highly localized due to the site's remote location (approx. 3	Low (Short-Term); High (Positive)

	miles from the nearest county road). Equipment operation was limited to daylight hours. Positive impact: By burying fire-damaged wood, the project eliminates the need for pile-burning, a common practice that reduces air quality in rural areas during the fall/winter burn season.	
Water & Soil Resources	Risks of erosion and stormwater runoff were identified. Mitigation is through the implementation of a Storm Water Pollution Prevention Plan (SWPPP), authorized under the Montana Department of Environmental Quality (DEQ) Water Control Board's General Permit for Storm Water Discharges Associated with Construction Activity (SWC-GP). During construction, contractors followed best management practices (BMPs) regarding Streamside Management Zones (SMZs). The project site was selected to avoid flood-prone or erosion-sensitive areas. Post-construction, the re-vegetated cover soil (evapo-transpirative cover) will stabilize the soil, provide long-term protection from erosion, and restore habitat. Hydrology assessments confirm no expected impact on local water systems.	Low (Mitigated)
Habitat & Biodiversity	Potential risks included habitat loss and soil disturbance. This was minimized through the site selection process, which prioritized areas previously impacted by fire and salvage operations to minimize disruption. This property is part of a savanna biome with patchy, low-density stands of ponderosa pine trees (35 stems per acre), and complete coverage of grasses, herbs, and forbs. The trees grow slowly due to low precipitation levels (13-15 inches per year), resulting in an ecosystem co-dominated by trees, grasses, and forbs. The storage site will not be permitted to grow trees to prevent tap roots from breaching the burial chamber. This fact will not alter the overall ecosystem since the forested areas are interspersed with pure grassland ecosystems. The biomass storage site and surrounding staging area will be restored to grassland that will provide feed for grazing animals as well as physical protection for the burial cap from erosion. The project complies with the Montana Sage Grouse Habitat Conservation Program, using recommended best practices for species protection and post-construction revegetation. Revegetation with suitable species will stabilize soil, reduce erosion, and restore habitat.	Low (Minimal & Mitigated)
Waste & Hazardous Materials	The project does not produce hazardous waste.	None

Social Risks

Impact/Risk Category	Determination and Mitigation	Materiality
Local Employment & Economic	Short-term positive impacts through the hiring of regional and local contractors for implementation. While local employment is not expected to change long-term, the construction and	Medium (Positive)

Activity	operational phases are deemed additional for local employment and economic activity. The project is located 50 miles from the nearest businesses in Billings, MT, minimizing direct business impact.	
Health & Safety	Potential occupational hazards such as heat stress, dust exposure, and heavy machinery risks were identified. Mitigation involves mandatory, OSHA-compliant training and the provision of Personal Protective Equipment (PPE) for all employees, contractors, and visitors. Strict labor standards and worksite monitoring are in place.	Low (Mitigated)
Community Engagement & Stakeholders	Risk of uninformed stakeholders. Stakeholders, including the landowner, governmental agencies, and mineral rights holders, were notified early in the process via written communication (digital and print). Ongoing inspection and reporting to the MDEQ Water Quality Board will continue until full site stabilization through revegetation. A legal contract with the landowner complies with state laws and establishes compensation.	Low (Managed)

Requirement: Abide by national and local laws, objectives, programs, and regulations and, where relevant, international conventions and agreements.	**Rule** 6.4.1.1.i
Do you comply with the requirement?	[x] Yes ☐ No
If not, how and why do you not comply? If yes, how do you know that you comply with the requirement? Please provide details considering the laws and regulations that are most relevant to your operations. Also, include any regulations that are specifically related to your carbon removal activities.	

Our operations comply with national and local laws, regulations, and industry standards relevant to our activities at MT1. We ensure adherence to the following key regulations and guidelines:

1. **EPA Clean Air Act** – We mitigate methane emissions through engineered storage, so that any methane generation is negligible and below EPA's reporting thresholds (25,000 metric tons CO_2e per year). We monitor for methane and CO_2 levels if any unexpected emissions were to occur, ensuring compliance with the EPA Greenhouse Gas Reporting Program. Regular emissions monitoring and data logging confirm adherence.
2. **EPA Best Practices for Landfill Slope Reinforcement** –While MT1 is not classified as a landfill, Mast voluntarily ensured the design follows EPA-recommended slope reinforcement practices: layered compaction of soil, proper grading of slopes, and ongoing stability monitoring. Geotechnical evaluations were performed to confirm that slope factors of safety meet or exceed recommended values.
3. **Montana DNRC Forestry Best Management Practices (BMP)** – The project implemented relevant DNRC Forestry BMPs, such as access roads that were stabilized and improved to drain properly, erosion control measures (such as water bars and

seeding) were applied on disturbed soils, and biomass transport followed BMP recommendations to prevent spills or dust. Compliance with these BMPs was documented through regular field inspections and reporting.

4. **Federal Clean Water Act (CWA) and Montana Water Quality Act (WQA)** – The project is designed to prevent runoff and leachate formation, ensuring no direct discharge to regulated water sources. Erosion control measures (silt fences, straw wattles, re-vegetation) and a Storm Water Pollution Prevention Plan (SWPPP) were in place during construction. Erosion control measures, regular inspections of erosion controls,record-keeping, and reporting were conducted throughout the construction phase and will continue until vegetation is reestablished at the site to ensure water quality protection.
5. **Montana Solid Waste Management Act** – Although the biomass burial site is not a traditional landfill, it was engineered with similar safeguards: low-permeability soil liners, a layered cap, and gravel for gas diffusion. Montana DEQ was consulted and confirmed that this wood burial does not meet the definition of a regulated landfill under the Act, so no solid waste facility license was required for the project.
6. **OSHA Excavation & Trenching Safety (29 CFR 1926 Subpart P)** – Excavation depth was limited to 4–5 meters, and trenches were monitored for stability. Compacted soil layers prevent subsidence, ensuring compliance with OSHA safety regulations.
7. **Open Space Easement** – Landowner agreement, easement recording with local government (county), and notification of mineral rights holders confirm compliance with land-use regulations.
8. **Montana Environmental Checklist** – The Montana State Environmental Checklist was completed, and confirmed that there is no significant impact on wetlands or endangered species. There are no known cultural records filed for the site.
9. **Montana Sage Grouse Habitat Conservation Program (SGHCP)** – Mast consulted with the conservation program, submitted GIS data for review, and implemented mitigation measures and best management practices to limit habitat disturbance.
10. **Montana Streamside Management Zone (SMZ) Law** – The project adhered to SMZ requirements. No heavy machinery entered any Stream Management Zones. These practices ensured that the project's forestry operations did not violate the SMZ law and rules, and kept sediment out of waterways.

Identify any documents or other records that you rely upon to verify compliance.

Storm Water Pollution Prevention Plan inspections
Project Reporting Spreadsheet (gas monitoring)
HELP (hydrology) modelling
Geotechnical engineering as-built plans
BMP compliance records
OSHA safety monitoring logs
Geotechnical operational plans
Environmental Checklist Review approval
GIS documentation for habitat conservation compliance
Landowner agreements and easement records

Requirement: Respect for **human rights** and avoiding discrimination; abiding by the International Bill of Human Rights and universal instruments ratified by the host country.	**Rule** 6.4.1.1.ii

Do you comply with the requirement? Motivate below.	[x] Yes ☐ No
To prevent forced labor, child labor, and trafficking, the project enforces compliance with the 1510-52.222-70 Migrant Seasonal Agricultural Workers Protection Act Registration Maintenance. Contractors and subcontractors are required to maintain valid U.S. Department of Labor registrations, with audits and third-party reviews ensuring adherence to labor laws. By embedding these standards into contracts and maintaining strict oversight, the project upholds robust protections for third-party workers while fostering a safe and equitable work environment.	

Requirement: Recognize, respect, and promote the protection of the rights of IPs & LCs (**indigenous peoples and local communities**) in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and International Labor Organization (ILO) Convention 169 on Indigenous and Tribal Peoples.	**Rule** 6.4.1.1.iii
Do you comply with the requirement? Motivate below.	[x] Yes ☐ No
Mast Reforestation recognizes, respects, and promotes the protection of the rights of Indigenous Peoples and Local Communities through several key actions and principles that guide our carbon removal projects. We have a history of actively engaging and partnering with Tribal Nations on past projects. For example, Mast partnered with the Maidu Summit Consortium to restore part of their ancestral land impacted by the Dixie Fire and was awarded a Post-Fire Restoration grant from Cal Fire. Mast has also worked with Tribal Nations through local forestry demonstrations and by hiring tribal members. Mast projects aim to contribute to healing local communities affected by wildfires, and we collaborate with local contractors throughout several stages of the project, such as surveying, site preparation, planting, and monitoring. This creates local employment opportunities, helping those affected by wildfire regain financial stability and stimulating the local economy. In Cascade County, MT, Mast's partnerships have created employment opportunities in a rural community considered economically disadvantaged. Mast also hosts community events like Tree Seed Summits to address reforestation challenges, inviting academics, practitioners, tribal nations, and local community members.	

Note that there is an additional question on free, prior, informed consent below (section 4), and there is a requirement to publish a separate stakeholder engagement report based on a Puro template.

2 Labor practices and rights

Requirement: Labor rights and working conditions, including prohibiting forced labour, child labour or trafficked persons whether in own operations or employed by third parties, fair treatment of employees.	**Rule** 6.4.1.1.iv
Do you comply with the requirement?	[x] Yes ☐ No

If not, how and why do you not comply? If yes, how do you know that you comply with the requirement?
Mast Reforestation upholds high standards of labor rights and working conditions for all individuals employed in our operations, including those engaged by third parties. This commitment aligns with our organizational values and regulatory frameworks, ensuring safe, equitable, and fair employment practices throughout all project phases. Mast Reforestation ensures safe and healthy working conditions for internal employees by adhering to stringent safety protocols and complying with all relevant state and federal regulations, such as OSHA standards. The Mast Reforestation Employee Handbook emphasizes proactive measures, including the reporting of hazards and unsafe conditions, with procedures for addressing on-the-job injuries and implementing preventative accident strategies. Specific protections are in place for outdoor heat exposure, with mandatory cool-down breaks, access to shade, and adequate hydration. Fair treatment and equal opportunities are guaranteed through Mast's Equal Employment Opportunity policy, which prohibits discrimination based on race, gender, disability, and other protected categories. Harassment and retaliation are strictly prohibited, and employees are provided access to a robust grievance and reporting system through PeopleOps and management. These policies foster an inclusive environment, reinforced by flexible work arrangements and accommodations for disabilities and personal circumstances.
Identify any documents or other records that you rely upon to verify compliance.
• Employee Handbook: outline rights, including fair wages, safe working conditions, and grievance procedures. Employee Handbook acknowledgments are available upon request. • Internal Surveying channels: Quarterly Engagement Survey and individual employee Pulse Conversations (stay interviews) to surface concerns. • Annual Market Reviews: Immediately address unfair compensation gaps, if any.

Requirement: Ensuring a safe working environment and mitigating occupational health and safety hazards.	**Rule** 6.4.1.1.iv
Describe occupational health and safety hazards that you have identified.	

Physical Hazards
 	
• Slips, Trips, and Falls:
  ○ Risk Description: Workers may be exposed to various hazards due to uneven surfaces, wet conditions from rain, or loose debris in the biomass collection, transport, or burial areas.
  ○ Potential Impact: Injuries such as sprains, fractures, or head trauma.
• Injuries from Heavy Machinery and Equipment:	

- Risk Description: Heavy machinery (e.g., excavators, backhoes, trucks) used for material transport and burial poses a risk of crush injuries, collisions, or contact with moving parts.
- Potential Impact: Serious injuries or fatalities due to accidents involving equipment.

- Exposure to Falling Objects:
  - Risk Description: Objects such as rocks, tools, or debris may fall from equipment or trench edges during excavation and burial activities.
  - Potential Impact: Head injuries or bruising.

Environmental Hazards

- Temperature Extremes (Heat and Cold Stress):
  - Risk Description: Exposure to extreme temperatures, particularly during summer or winter months, could lead to heat stress, dehydration, or hypothermia.
  - Potential Impact: Worker fatigue, heat stroke, dehydration, frostbite, or hypothermia.
- Dust Exposure (Particulate Matter):
  - Risk Description: During the handling, transport, and burial of biomass, dust and particulate matter may become airborne, leading to respiratory issues.
  - Potential Impact: Respiratory issues such as coughing, throat irritation, or long-term lung diseases (e.g., silicosis or asthma).

Ergonomic Hazards

- Repetitive Strain and Overexertion:
  - Risk Description: Workers may experience muscle strain or repetitive stress injuries from lifting, digging, or operating equipment for extended periods.
  - Potential Impact: Musculoskeletal injuries such as back strains, joint pain, or tendonitis.

Describe the measures undertaken to mitigate the hazards.

Physical Hazards

- Slips, Trips, and Falls:
  - Mitigation Strategies:
    - Regular site inspections to identify and address hazards.
    - Regular tailgate meetings to discuss close calls and safety improvements
    - Regular housekeeping practices to keep the site free of debris.
    - Use of slip-resistant footwear for all workers.
- Injuries from Heavy Machinery and Equipment:
  - Mitigation Strategies:
    - Workers must receive proper training in the safe operation of heavy machinery or be able to demonstrate their experience in safe practices.
    - Equipment must be regularly inspected and maintained to ensure safe operation.
    - Use of back-up alarms, cameras, and warning lights on equipment to reduce collision risk.
    - The use of spotters or flaggers during equipment operation in busy areas.
- Exposure to Falling Objects:

- Mitigation Strategies:
  - Use of hard hats for all workers in areas where falling objects or overhead machinery are a concern.
  - Barricading or securing areas around excavation zones.
  - Regular safety audits to identify potential hazards from overhead activity.

Environmental Hazards

- Temperature Extremes (Heat and Cold Stress):
  - Mitigation Strategies:
    - Scheduling work during cooler times of the day or providing shaded work areas, and taking breaks in temperature controlled vehicles during hot weather.
    - Providing water and frequent hydration breaks.
    - In cold weather, workers are required to wear warm clothing and take regular breaks in heated vehicles.
    - Acclimatization programs for workers to prevent temperature-related illnesses.
- Dust Exposure (Particulate Matter):
  - Mitigation Strategies:
    - Dust did not reach levels necessary for mitigation. Workers will be required to wear dust masks or respirators where dust levels exceed safe limits.
    - Work practices will be implemented to reduce dust exposure (e.g., minimizing the disturbance of dry biomass, using tarps to cover materials during transport).

Ergonomic Hazards

- Repetitive Strain and Overexertion:
  - Mitigation Strategies:
    - Ergonomic work practices will be introduced, including proper lifting techniques and the use of lifting aids (e.g., hoists, dollies).
    - Job rotation and regular breaks to prevent fatigue and reduce the risk of repetitive strain injuries.
    - Regular stretches and flexibility exercises to reduce muscle strain.

Mitigation and Control Measures

- For each identified hazard, the following mitigation and control measures were implemented:
  - Engineering Controls: These include site design modifications, equipment improvements (e.g., gas detection systems, ventilation), and environmental controls.
  - Administrative Controls: These involve procedural changes, such as safety protocols, tailgate meetings, worker training, and job rotation.
  - Personal Protective Equipment (PPE): Specific PPE (e.g., gloves, respiratory protection, hard hats) was required based on the risks associated with each task.

Requirement: Providing for equal opportunities in the context of gender; providing equal pay for equal work and protecting against and appropriately responding to violence against women and girls.	**Rule** 6.4.1.1.v
Do you comply with the requirement?	[x] Yes ☐ No
If not, how and why do you not comply? If yes, how do you know that you comply with the requirement?	
At Mast Reforestation, we ensure compliance with gender equality through a multi-layered approach. To uphold equal pay for equal work, we conduct an annual market review to uncover any pay inequity. Looking at each role and the incumbent's gender, we can proactively identify and address disparities. For protection against violence and harassment, we enforce strict zero-tolerance policies outlined in our Employee Handbook, which explicitly prohibit discrimination, harassment, and gender-based violence. All people managers at Mast and its entities completed their Harassment Prevention Training, and Mast's employees completed the same mandatory training in Q2 2025. To empower employees to report concerns safely, we provide an open-door policy and the regular employee survey (an anonymous channel), alongside a guaranteed no-retaliation policy for all complaints. Gender equity in hiring and promotions is prioritized through ongoing tracking of gender representation in recruitment, promotions, and leadership roles. We actively recruit on job boards catering to hiring under-represented demographics, which has been fostering a pipeline for underrepresented groups into leadership positions.	
Identify any documents or other records that you rely upon to verify compliance.	
Evidence of compliance is demonstrated through documented internal market review reports (salary audit), training completion records, and Employee Handbook acknowledgment forms. Our leadership demographics, representing 50% female representation, further validate our commitment to gender equity. By integrating these measures into our operational framework, we ensure alignment with both internal standards and external regulatory requirements.	

3 Environmental impact and management

Requirement: Pollution prevention, including pollutant emissions to air, water, and soil as well as noise and vibration, and generation of waste and release of hazardous materials, chemical pesticides, and fertilizers.	**Rule** 6.4.1.1.vi
Does the carbon removal activity result in the following impacts? For **each potential impact**, please provide detailed information about its extent and the current measures in place to mitigate these negative impacts.	
a. Pollutant discharges to air	
Construction and hauling equipment emitted minor exhaust and dust during project operations. These are typical short-term construction-related emissions and were minimized by best practices such as limited idling.	
b. Pollutant discharges to water	

During construction operations there were potential short term risks for soil sedimentation into proximal intermittent watercourses. These were mitigated through the use of Best Management Practices (BMPs) such as straw wattles, silt fencing, and berms as identified in the MT1 Stormwater Pollution Prevention Plan (SWPPP), which was approved by the Montana MDEQ Water Control Board. There is a very low risk of pollutant discharges to water. The burial chamber is designed to have very low-permeability sides, floor, and ceiling, and is sited high on the terrain to avoid groundwater inflow or outflow. The burial chamber cap is engineered to absorb and release the majority of precipitation that manages to percolate into the soil. It does this using the topmost layer of uncompacted soil (cover soil) and the short-rooted vegetation growing on it to store, then evapotranspire, the water back into the atmosphere. Surface water will only create overland flow during brief, extreme rainfall events. There is no expected discharge of any contaminants because the wood itself is not chemically treated, and the project does not involve chemicals that could leach into runoff.
c. Pollutant discharges to soil
The buried biomass is untreated wood, so there is no chemical pollutant to leach. The leachate produced would be alkaline and rich in natural minerals, but not considered harmful. The risk of major, long-term groundwater pollution is negligible. To prevent erosion or inadvertent soil mixing, the burial chambers was capped with compacted, low-permeability soils. Post-construction, straw waddles and coarse woody debris were placed to prevent erosion on the cap until the area is re-vegetated (native grass/forb species).
d. Noise
Construction-phase noise (excavators, loaders) will last a few weeks, and the site is remote with no nearby residences. Noise created during construction is not expected to be heard by people who are not on-site. Long-term, the burial site is inert and not a source of noise.
e. Vibration
Similar to noise, any vibration is limited to brief construction activities with typical earth-moving equipment. Vibrations will not have enough energy to travel to off-site residences in the area. Once buried, there is no ongoing vibration source.
f. Waste
The “waste” in this project is non-merchantable burned wood that would otherwise be pile-burned. Instead, it is permanently stored below ground in a sealed chamber. No other solid or liquid wastes are generated by the burial process. Typical construction debris is minimal, and any that arises (e.g., packaging, scrap) is disposed of appropriately off-site.
g. Release of hazardous materials
No hazardous materials are used or stored on-site. Equipment fueling is standard practice with diesel/fuel tanks in work trucks (typical construction scenario). The wood is not treated with any chemical preservatives, so there is no risk of leaching hazardous substances.
h. Chemical pesticides and fertilizers

Chemical pesticides are not used. A limited, targeted herbicide (spot spraying) may be applied for tree-planting site prep and control of competing vegetation around the burial cap, following standard forestry best practices. No fertilizers are applied. The vegetation plan for the cap relies on regionally adapted native grass or forb seed.

Requirement: Biodiversity conservation and sustainable management of natural resources, including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity.	**Rule** 6.4.1.1.viii
Is the activity taking place in or near environmentally sensitive areas, including protected areas (e.g. nature reserve or national park), or other areas included in a conservation plan? Describe where the nearest such areas are.	
The project site is not located near any areas protected by the state or federal government but does fall within the Northern Great Plains ecoregion, an ecologically significant landscape recognized for its biodiversity and unique ecosystems (Samson & Knopf, 1994; US EPA). This area features rolling plains interspersed with buttes, badlands, and intermittent streams, including pine buttes where ponderosa pine woodlands and mixed-grass prairie thrive. These ecosystems provide essential services such as soil stabilization, carbon cycling, and water regulation, supporting biodiversity and ecosystem function. The Great Plains Ponderosa Pine Woodland and Savanna ecosystem within the project area serves as a vital habitat for cavity-nesting birds like Lewis's Woodpecker (*Melanerpes lewis*) and raptors such as the Red-tailed Hawk (*Buteo jamaicensis*). It also provides critical habitat connectivity for large mammals, including mule deer (*Odocoileus hemionus*) and elk (*Cervus canadensis*), enabling seasonal movement and genetic exchange. Additionally, the region includes habitats for species of concern, such as sage grouse, which rely on undisturbed shrublands for survival. Hydrologically, the project lies within the Yellowstone River watershed, which sustains aquatic ecosystems, agriculture, and local communities. Ponderosa pine woodlands in the uplands of this watershed regulate water flow, improve soil infiltration, and reduce sedimentation, enhancing water quality and resilience. While there is some potential for minor, indirect, and short-term localized adverse impacts to terrestrial and avian habitat from burial activities, the area will be promptly reseeded with native vegetation, and erosion control measures will stabilize the site until vegetation is established. The native vegetation used to reseed disturbed areas will restore forage availability and cover for species such as sage-grouse and small mammals. Prairie dog colonies remain undisturbed, with project activities avoiding high-density areas and preserving existing burrows. Reforestation efforts will focus on restoring ponderosa pine habitat and providing long-term benefits for wildlife that rely on forest structure for nesting, foraging, and shelter. Thus, this is expected to result in short-term minimal disturbances while providing long-term habitat benefits, supporting the recovery of native species and maintaining the ecological integrity of the area.	
Describe impacts and risks that you have identified	
Mast has identified the following potential environmental impacts and risks, ● Burial Site Impacts	

- Temporary habitat loss and soil disturbance may occur at the biomass burial site and wood sourcing areas, though fire-impacted areas and previously harvested biomass are selected to minimize disruption.

- Erosion and Drainage
  - There is a risk of erosion, slope failure, or water pooling at the burial site, which could impact the surrounding land and potentially lead to the release of buried biomass or altered drainage patterns. However, Mast expects this risk to be marginal due to appropriate site selection, drainage considerations, and temporary use of slope stabilization measures until vegetation is established.
- Reforestation Impacts
  - Reforestation efforts could potentially impact existing grassland ecosystems if not carefully planned, although the MT1 project site is compatible with the existing savanna-grassland ecosystem. Additionally, only previously forested areas will be considered for reforestation.
- Herbicide Impacts
  - Herbicides used in reforestation site preparation could run off into waterways if not applied carefully. Only minimal impact spot spraying may be applied, with adherence to identified no-spray buffer zones around sensitive areas like springs and streams. Compliance with Montana Forestry Best Management Practices, the Montana Water Quality Act, and Montana SMZ Law will occur.
- Biomass Management
  - Removal of standing dead trees alters the post-fire environment and could impact species that rely on deadwood habitats. However, many trees killed in the fire were cut and decked prior to Mast's involvement. There are numerous piles of decked wood, which is an unnatural characteristic of the ecosystem. The activity of removing or burning them is necessary for reducing future fire risk and will improve overall long-term wildlife habitat. Additionally, biomass management activities will occur in areas that have already been disturbed during previous salvage operations.

Describe the measures undertaken to minimize and address the impacts and the risks.

Mast will implement the following measures to minimize any potential environmental impacts or risks:

- Measures for Biomass Burial
  - The Mast Wood Preserve MT1 project strategically selected a site previously impacted by fire and near existing wood decks to minimize habitat loss and soil disturbance.
  - Geotechnical surveys were performed to measure soil texture and water conductivity to confirm appropriate conditions for long-term carbon storage and minimize environmental impact.
  - Hydrology evaluations using the HELP (Hydrologic Evaluation of Landfill Performance) model analyzed surface and subsurface water movement to ensure site stability and minimal environmental impact.
  - Mast employed topographic site selection and specific chamber design to prevent water penetration. The Mast Wood Preserve MT1 chamber site is located on high terrain, avoiding areas prone to groundwater flows and heavy snow accumulation, such as valleys or coulees.
  - The burial site is designed with appropriate considerations for slope and drainage areas to minimize the risk of erosion.

- A Working Zone was established around the burial site during the construction phase to further minimize soil erosion and limit disturbance to adjacent areas.
- After the biomass is buried, the burial site will be restored to a state that mimics the surrounding grassland ecosystem. In the case of the Mast Wood Preserve MT1 project, the site will be restored to grassland conditions using sage grouse habitat-appropriate seed mix.
- As part of the long-term monitoring and maintenance plan, the physical condition of the site (soil settlement, surface vegetation, water pooling, erosion, and vault integrity) will be monitored through periodic site visits.

- Environmental Assessments and Compliance
  - The Mast Wood Preserve MT1 project completed the Montana State Environmental Checklist, a comprehensive assessment addressing potential impacts for wetlands, endangered species, and archaeological and cultural resources. This assessment confirmed no significant environmental, archeological, or cultural resource impacts.
  - The project adheres to Montana DNRC Forestry BMPs for road construction, sediment control, and transportation efficiency.
  - Compliance measures are followed with the EPA Clean Air Act for methane monitoring, the Montana Water Quality Act to prevent runoff, and the Montana Solid Waste Management Act for engineered site stability, although no specific permits are required for biomass burial on private land in Montana.
  - The project adheres to the Storm Water Pollution Prevention Plan, Cultural Records request, and Montana Sage Grouse Habitat Conservation Program consultation to minimize stormwater, cultural resource, and wildlife habitat impact.
  - Tetra Tech, a geotechnical engineering firm, was contracted to design the storage site and oversee operations to ensure compliance with all environmental and safety standards.
- Reforestation Practices
  - Targeted spot spraying of herbicide may be used to manage competing vegetation for planted trees surrounding the burial site, with "no-spray" buffer zones established around sensitive areas like springs and streams. Fertilizers and subsoiling will not be used to minimize soil disruption and maintain ecological balance.
  - The tailored reforestation prescription selects native tree species grown from locally sourced seed appropriate for the reforestation of this site (distinct from the biomass burial site). Trees will be planted at densities designed for future resiliency against fire and pests.
  - The reforestation prescription is designed to mimic natural forest biodiversity, restoring natural ecosystem functions and increasing habitat diversity.
  - Standing dead biomass will be assessed for potential hazards to planting crews. These areas will be avoided.
  - A portion of existing standing and lying charred biomass will be left on the site for wildlife habitat, soil moisture retention, and erosion prevention.

Requirement: Minimizing soil degradation and soil erosion.	**Rule 6.4.1.1.viii**

Describe impacts and risks to soil that you have identified.

Identified Potential Risks to Soil

- Temporary Excavation and Soil Disturbance
    - During construction, heavy equipment (excavators, loaders) will disturb soil to create the burial chamber and staging areas. This can compact topsoil and expose subsoil, temporarily increasing vulnerability to erosion from wind or precipitation.
- Soil Compaction Risk
    - The use of heavy equipment on site can compact the soil in work areas. Compacted soil can reduce water infiltration and root penetration, potentially limiting vegetation re-growth post-construction.
- Potential Loss of Topsoil
    - If topsoil is not properly stripped and stored during excavation, valuable nutrient-rich topsoil may be lost or mixed with subsoil, affecting future vegetation establishment.

Describe the measures undertaken to minimize and address the impacts and the risks.

Measures to Minimize and Address Soil Impacts

- Targeted Site Selection & Engineering Design
    - The burial chamber is located on terrain with moderate slopes (less than 10%) to reduce the likelihood of significant runoff-related erosion.
    - Low-permeability soils are used for cap construction, minimizing water infiltration that could undermine slopes or cause subsurface erosion.
- Topsoil Removal and Stockpiling
    - Prior to excavation, topsoil was carefully removed and stored in stockpiles on-site.
    - After the burial chamber was capped and construction was completed, topsoil was reapplied to the surface, preserving soil fertility and aiding revegetation.
- Erosion and Sediment Control Practices
    - Silt fences and straw wattles were installed downhill of disturbed areas to prevent sediment-laden runoff where necessary.
    - Temporary check dams and swales were used where necessary to slow water flow and prevent rilling and gullying.
    - Excessively exposed soil was stabilized with slender wheatgrass, part of the native grass/forb seed mix, as soon as was practical, reducing the time that soil is exposed. This will be followed by seeding with additional habitat-appropriate seed mix.
- Controlled Equipment Movement

- Construction access roads and staging areas were planned and delineated to confine heavy equipment traffic to specific corridors, reducing widespread compaction.
- Operators follow best management practices for soil handling, avoiding unnecessary driving or turning in sensitive areas.

- Soil Compaction Alleviation
  - Where compaction was unavoidable (e.g., staging areas), the soil was lightly tilled or scarified post-construction to break up compaction and aid root and water penetration.

Requirement: Minimizing water consumption and stress.	**Rule** 6.4.1.1.viii
Are you located in an area impacted with water stress?	**[x]** Yes ☐ No
If yes, describe local conditions in terms of water stress and any risk analysis done on the impacts of the CO_2 removal activity on water stress	
Big Horn County has periodically experienced moderate to severe drought conditions, as indicated by drought.gov. However, our CO_2 removal activity does not require meaningful volumes of water. We do not pump groundwater or rely on irrigation. Based on these factors and our assessment of local precipitation levels, there is no indication that our operations will exacerbate existing drought trends or water stress in this county.	
Describe any agreements and/or regulations relating to water sourcing.	
Because our activity does not involve significant water withdrawals, we have not pursued specialized permits or water rights allocations. We comply with Montana's environmental regulations, which have confirmed that our limited water needs pose no measurable risk to local supplies. As a result, no additional agreements or regulatory filings related to water sourcing were deemed necessary.	
Describe the measures undertaken to minimize water consumption.	
We have designed the project to avoid any reliance on irrigation, and we do not extract groundwater during excavation. By employing work practices that conserve soil moisture naturally and by choosing methods that do not involve active irrigation, we ensure that local water resources remain unaffected by our project.	

Requirement: The CO_2 Removal Supplier shall not convert **natural forests or high conservation value habitats.**	**Rule** 6.4.1.1.viii
Do you comply with the requirement?	**[x]** Yes ☐ No
If not, how and why do you not comply? If yes, how do you know that you comply with the requirement?	

Mast is not converting natural forests for the purpose of carbon removal through the terrestrial storage of biomass. The terrestrial storage of biomass we are performing involves the movement and storage of existing decks of fire-killed timber in an effort to prevent the dead and decked trees from being burned for fire mitigation and waste management.

The landowner's property experienced predominantly moderate and high-severity fire during the 2021 Poverty Flats Fire, resulting in extremely high tree mortality across the project area. Approximately 59% of the property, previously dominated by ponderosa pine (*Pinus ponderosa*) forest, now consists of dead or severely fire-damaged trees with extremely limited potential for natural regeneration. The remaining land, composed of approximately 37% grasslands and 2% sagebrush steppe, also sustained disturbance due to fire.

Reforestation at the landowner's property, which Mast will complete as part of their compensation for the Mast Wood Preserve MT1 biomass burial project, aims to re-establish ponderosa pine stands and restore areas damaged by fire. Reforestation operations begin with planting native ponderosa pine across ~50 hectares (125 acres). This will support a long-term goal of reaching a sustainable density of 14 trees per hectare (35 trees per acre), consistent with the natural conditions of the ponderosa pine savanna ecosystem.

Identify any documents or other records that you rely upon to verify compliance.

N/A

4 Social impact and community relations

Requirement: Avoiding or minimizing adverse impacts **to community health and safety**.	**Rule** 6.4.1.1.vii

Describe potential sources of impact, taking into account all relevant factors in the given context. Consider both routine and non-routine circumstances.

Potential Sources of Impact

- Equipment Operation and Road Traffic
  - Routine: The use of heavy machinery (excavators, trucks) could raise local traffic, dust, and noise levels around the site.
  - Non-Routine: Equipment malfunction or traffic collisions might affect public roads or nearby communities.

- Dust and Air Emissions
  - Routine: Earthmoving and hauling may generate dust, potentially affecting nearby air quality.
  - Non-Routine: High winds or equipment failures could temporarily spread dust beyond typical boundaries.

- Soil Disturbance and Stormwater
    - Routine: Construction may disturb soils and may alter some local runoff or sedimentation patterns.
    - Non-Routine: Heavy storms might lead to unexpected erosion or pooling at the burial site however, appropriate slope grades on the cap are to be implemented.

- Gas Accumulation (Methane, CO_2) in Storage Pits
    - Routine: Under burial conditions, methane generation is expected to be very low, but water infiltration remains a risk.
    - Non-Routine: Cap failures or severe weather could allow moisture in, creating conditions for methane production; however, repair is funded through an endowment.

- Fire Risk
    - Routine: Residual fire debris or fueling processes are potential ignition sources.
    - Non-Routine: Mechanical operation during high fire danger periods might spark brush fires, but will not impact the storage chamber.

- Community Nuisances
    - Routine: Noise, lighting, or dust near the property line.
    - Non-Routine: Extended work hours or staging locations too close to neighboring properties.

Describe the measures undertaken to minimize and address the impacts and the risks.

Measures to Minimize and Address Impacts

- Health & Safety Plan
    - Includes at least OSHA Level D PPE.
    - Spells out procedures for fire safety, first-aid, and emergency response.

- Dust Suppression and Air Quality
    - Watering haul roads and excavation areas as necessary.
    - Monitoring dust levels, adjusting work timing for adverse weather.

- Traffic and Equipment Protocols
    - Obey speed limits on local roads.
    - Coordinate deliveries to avoid sensitive times (e.g., school schedules).

- Site Containment and Stormwater Management
    - Adhere to the Montana DEQ Water Control Board approved BMPs for erosion-control measures (silt fences, wattles).

- Monitoring of Gas and Burial Vault Integrity
    - Regular sensor checks as per our measuring, monitoring, and verification plan.
    - Fund and authorize a 100-year endowment for monitoring, maintenance and repairs.

- Fire Prevention and Response
    - Carry standard equipment for quick fire suppression (extinguishers, water truck).

- Observe local burn bans, handle fueling away from open grass or brush.

- Community Outreach and Engagement
  - Notify neighbors and local officials about schedules and dust/noise management.

Requirement: Preserves and protects **cultural heritage** and cultural and religious sites.	**Rule** 6.4.1.1.ix
Describe the impacts and the risks to cultural heritage and cultural and religious sites that you have identified.	
The Mast Wood Preserve MT1 project has identified and considered potential impacts and risks to cultural heritage. There is a historic homestead on the property that is outside of the biomass storage site project area. In addition, we have conducted a cultural resources file search, and no known cultural resources are recorded. Due to the nature of excavation on the site, it was possible that cultural resources or remains could have been discovered during construction. Construction is now complete and no cultural resources or remains were discovered.	
Describe the measures undertaken to minimize and address the impacts and the risks.	
An environmental assessment (Montana Environmental Checklist) was completed for the project in the State of Montana, which includes an evaluation of the storage site for cultural resources, and Mast created an SOP to comply with relevant regulations in Montana in the event that protected habitat or cultural resources are discovered during the environmental assessment or project operations. Contractors and subcontractors in the project have contracts that require their compliance with all local, state, and federal laws.	

Requirement: Avoiding **forced physical** and/or **economic displacement**. If avoidance is not feasible, CO_2 Removal Suppliers shall minimize physical and/or economic displacement. This applies also to any access restrictions to lands, territories, or resources, and any customary rights of local right holders.	**Rule** 6.4.1.1.x
Did/does the activity result either in forced physical or economic displacement?	☐ Yes **[x]** No
If yes, describe the impact to local communities and how it was assessed?	
Click or tap here to enter text.	
Provide a comprehensive description of the process that was undertaken, compensation arrangements and measures to mitigate the negative impacts.	
Click or tap here to enter text.	
Also describe in detail how you minimized forced physical or economic displacement.	

Click or tap here to enter text.

Requirement: When the activity directly or indirectly impacts **indigenous peoples** or their livelihoods, ancestral knowledge or cultural heritage, the CO_2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).	**Rule** 6.4.2
Is the CO_2 removal activity taking place in an area inhabited by or claimed by indigenous people, or does it influence such an area?	☐ Yes **[x]** No
If yes: does the activity directly or indirectly impact indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage? How was that determined?	
Click or tap here to enter text.	
If there is a direct or indirect impact:	
a. Provide a description of the impact and the measures that were taken to minimize the impact.	
Click or tap here to enter text.	
b. Describe how and when the indigenous communities were identified and approached for the FPIC process.	
Click or tap here to enter text.	
c. Describe the mutually agreed process for the negotiations.	
Click or tap here to enter text.	
d. Describe how the indigenous communities were informed about the potential impacts of the activity on their livelihoods, ancestral knowledge, or cultural heritage.	
Click or tap here to enter text.	
e. Describe the outcome of the negotiations.	
Click or tap here to enter text.	

f. Describe how the ongoing consent process is managed to ensure that the indigenous communities continue to agree with the activity as it progresses.
Click or tap here to enter text.
g. Describe grievance mechanisms that are in place for the indigenous communities.
Click or tap here to enter text.
h. Describe how the impacts on the indigenous communities are monitored and addressed during the operation of the Production Facility.
Click or tap here to enter text.

5 Biomass sustainability

Puro methodologies require that whenever biomass feedstock is used in the carbon removal activity, it must be sourced in a sustainable manner.	
Is your carbon removal activity based on using biomass feedstock?	**[x]** Yes ☐ No
Describe how you ensure that it is sourced sustainably.	
The carbon removal activity utilizes forest biomass. The woody biomass is wildfire-killed trees that were previously felled and decked or were standing dead trees near the burial site. This cut-and-decked woody biomass, as well as the standing dead wood near the site, did not have any viable economic pathway for use, as the landowner would have pursued those for monetary gain. The logs piled in decks on the landowner's property were done so with the intention to pile-burn them in place in the absence of the carbon credit project.	

Note that additional evidence will be required to demonstrate adequate biomass sourcing as per the Puro Biomass Sourcing Criteria, where applicable.

Stakeholder Engagement Report

CO_2 Removal Supplier	Mast Reforestation
Production Facility	Mast Wood Preserve MT1
Production Facility ID	272514
Date of report last update (YYYY-MM-DD)	2025-09-11

Stakeholder Engagement Report

The purpose of this document is to gather results of the Stakeholder Engagement that has been conducted by the CO_2 Removal Supplier, for its Production Facility, in line with Section 6.4 of the Puro General Rules 4.0 and the Puro Stakeholder Engagement Requirements.

This report is divided in the following sections:

1 Identified stakeholders
2 Consultation activities and outcomes
3 Plans for continued consultation during crediting period
4 Summary

This report will be made **publicly available** in the Puro Registry. It shall not contain information about private individuals (e.g. name, personal address) for privacy reasons. Such information shall be provided separately (e.g. list of participants to the consultation activity, as an appendix to the report).

1 Identified stakeholders

Provide an overview of the stakeholders that have been identified as relevant to include in the stakeholder engagement process, following the categories defined below:

Stakeholder categories	Identified stakeholders
Local Stakeholders, i.e. stakeholders in the immediate environment of the facility of the CO2 Removal Supplier, and most prone to experience direct or indirect effects of the respective carbon removal activity.	The private landowners for MT1 are a primary local stakeholder. Mast and the landowner have a project development agreement in place. The Project Development Agreement (PDA) with the landowner specifies installment payments and complementary reforestation in exchange for proceeding with a biomass burial project. The PDA specifies that the Project Developer (Mast) notifies the landowner that we will proceed with the biomass burial carbon project. Once notified, they are entitled to reforestation services as part of the landowner compensation package. This landowner agreement was developed in collaboration with the landowner over a 6-month process and was signed in January 2025. The PDA grants all necessary land access and establishes restrictions on land use for the biomass burial site and related project activities. At MT1, there are also parties who hold mineral rights on the property in parcels where project activities occurred. The open space easement as part of the PDA includes a subsurface use agreement (extending to 25' below surface) to protect the storage site from being disturbed by mineral rights being exercised. This is on file with the local county records office. We have notified mineral rights holders of the filing through letters sent by certified mail. These notifications also included a 30-day comment period during which these stakeholders could reach out to Mast with any comments or questions. No responses were received.

Stakeholders with **land-tenure rights** within the vicinity of the project boundary	N/A
Representatives of relevant **local authorities** and relevant **local politicians**	The mission of the Montana Department of Environmental Quality (DEQ) is to "protect, preserve, and improve the state's natural resources." As such, it is a stakeholder of the project. There are three programs under the responsibility of the DEQ which work in a coordinated way to ensure that development projects are reviewed comprehensively, addressing all potential environmental impacts, from habitat conservation to water quality and waste management. While each program has a distinct set of responsibilities and regulations, they are all part of the overarching mission of the Montana DEQ. **Sage Grouse Habitat Conservation Program:** This program's main objective is to sustain viable sage grouse populations and conserve their habitat. It operates under a state Executive Order and the Greater Sage Grouse Stewardship Act. The program's role is primarily consultative. It does not have the authority to approve or deny a project outright. The Sage Grouse Habitat Conservation Program staff were consulted via emails and video conferencing. Detailed materials such as project information, location, and operational plans were provided. Mast implemented the program requirements which were received via email, and will communicate with the Program when the revegetation stage is completed. **Stormwater Pollution Prevention Program:** This program, administered by DEQ's Water Protection Bureau, is responsible for regulating pollutants that are discharged into state waters through stormwater runoff. To get a permit, a project operator must submit a Stormwater Pollution Prevention Plan (SWPPP), which outlines how they will control erosion and prevent other pollutants from leaving the site during rain or snowmelt events. The goal is to protect water quality from the sediment and other contaminants that can be carried by stormwater. The Stormwater Pollution Prevention Program is a stakeholder because MT1 is required to comply with the General Permit for Storm Water Discharges Associated with Construction Activity (SWC-GP) and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Mast consulted with the program staff, submitted documentation on the construction activity through a website, and received authorization via letter to proceed with best management practices, regular inspections, and reporting, no less than biweekly, in compliance with the SWPPP. Mast will continue to communicate with the MDEQ until the project area is revegetated.

	Solid Waste Program: This program manages the proper handling, storage, transport, and disposal of solid waste in Montana. Its regulations are based on federal and state law and aim to prevent environmental contamination and protect human health. This program issues permits to facilities that treat, store, or dispose of solid waste and provides guidance and assistance to waste generators. The Solid Waste Program staff were consulted regarding permitting requirements. Detailed information on the project was provided for their review via email and phone calls. DEQ provided notification via email that MT1 did not require further regulatory review and no solid waste permit was required for MT1. **The Forestry Division**, within the **Montana Department of Natural Resources and Conservation (DNRC)** is another stakeholder. The Forestry Division's mission is focused on the sustainable management of Montana's forests, wildland fire protection, and promoting a healthy forest-based economy. The Montana Department of Natural Resources (DNRC) was notified through email about the project. The stakeholder engagement package, which contained project information,was shared with the DNRC. Mast received confirmation that a Hazard Reduction Agreement was not required for the project. Mast communicated with foresters from the DNRC throughout the project operational phases. Foresters visited the site twice during operations and were given site tours. The Big Horn County commissioner's office was notified voluntarily over voicemail. Mast offered to provide additional information, but did not hear back from the administrative staff..
Local **non-governmental organizations** (NGOs) or international NGOs who are active in the region and relevant to the topic	N/A
Representatives of relevant **working groups** or **vulnerable** and **marginalized** groups within the vicinity of the project boundary	N/A
Relevant **industry experts**, given there are any in the near environment	N/A
Other, please specify:	N/A
Answers are to be written in the second column without disclosing private information. For instance, instead of the name of a specific resident, use terminology like "local residents". Likewise, instead of naming specific public employees, prefer to mention the roles and departments. *In case there are no identified stakeholders in a given category, provide a brief justification instead.*	

Activity directly or indirectly impacting indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage:

Question	Answer
Does the list of identified stakeholders include any indigenous peoples or communities?	☐ Yes X No
If answer is "Yes" to the question above, has the free, prior and informed consent (FPIC) been obtained from those indigenous peoples or communities?	☐ Yes. Please provide evidence of the obtention of the FPIC in a separate document.
As per rule 2.1.6 in the Puro Stakeholder Engagement Requirements, note that "FPIC is distinct from stakeholder engagement in that it is derived from indigenous peoples' right to self-determination. While stakeholder engagement involves consultation and collaboration with all parties affected by a project, FPIC goes a step further by requiring the explicit consent of indigenous peoples before proceeding with activities that impact them."	

2 Consultation activities and outcomes

Provide an exhaustive list of all the **stakeholder consultation activities** that have been conducted. Add as many rows as necessary. The activity categories can for instance be one of the following (but not limited to these ones): public meeting, online webinar, paper questionnaire, electronic questionnaire, interviews, focus group, site visit, door-to-door visits, etc.

Activity categories	Activity name	Activity date (YYYY-MM-DD)
Notice letter	Notification to mineral rights holders occurred with a letter sent via certified mail.	2025-02-20
Email with PDF	Emails with an attached project overview were sent to the State of Montana Department of Natural Resources.	2025-02-24 to 2025-02-25
Voicemail	Notification of the project provided to Big Horn County Admin Assistant for Commissioners.	2025-04-14
Video call	Sage Grouse Habitat Conservation Program was consulted over video call.	2025-04-28
Email letter and PDF	Sage Grouse Habitat Conservation Program project summary was submitted on their web form and program letter received in PDF.	2025-04-29
Website form	Montana Department of Environmental Quality Storm Water Pollution Prevention Plan authorization letter received after completing website form.	2025-04-30
Phone calls and emails	Montana Department of Environmental Quality Solid Waste Program consultation on the project including determination no additional regulatory review was required.	2025-07-09 To 2025-08–25
Online forms	Communications with Montana Department of Environmental Quality on Storm Water Pollution Protection Plan (SWPPP) inspections.	2025-05-14 through 2025-09-23

Provide a list of all the **stakeholder invitations** that have been sent out, grouping whenever relevant the invitations (e.g., for all local residents as one row). Add as many rows as necessary. The

invitation format can be one of the followings (but not limited to these ones): postal letters, email, social media publication, public board information, telephone calls, verbal communication, etc.

Invitation format	Invitation name	Invitation date (YYYY-MM-DD)
Postal letter	Notification letter to mineral rights holders includes the option to provide feedback on the project through a specified date. No responses received.	2025-03-31
Email with PDF	Stakeholder engagement package sent to state of Montana Department of Natural Resources to confirm no forestry permits were required and ask for comment or feedback.	2025-02-24
Voicemail	Message left with Big Horn County commissioners offering information on the project. No response received.	2025-04-14
Social media and news publications (various)	News articles and social media publications as part of Mast's Marketing and Communications	2025-02-01 to 2025-09-30

As **supporting evidence** to this report, please provide in a separate subfolder, the following:

- Example of invitations sent out, for different consultation activities (e.g. letters, emails, website announcements).
- Lists of all stakeholders invited to the consultation activities and stakeholders participating in the consultation activities. The lists will not be made public, as they can contain private information.

In case identified relevant stakeholders (section 1) were not invited to the consultation activities, please provide clear **reasons for not inviting** them. Add as many row as necessary. Leave blank if not applicable.

Identified stakeholders	Reasons for not inviting
N/A	N/A

Provide an extensive summary of i) the **information that was provided to stakeholders** during the consultation activities, ii) the **feedback received** during the consultation activities (with a particular focus on concerns, potential issues and critiques), and iii) the **responses provided to stakeholders** about their feedback.

Summary of the feedback received during the consultation activities
<u>Information provided to stakeholders</u>: Mast provides an overview of the project's purpose, where it is located on the property, confirmation of landowner permissions, and information about the easement filed for the project for the mineral rights holders, as appropriate. Mast also provides an overview of the project, its purpose, its forestry methods, timeline of expected activities, and its construction activities, as appropriate. Local governments that provided consultation or authorization were provided with additional project specific information as requested, such as, but not limited to, maps of road upgrades or engineering plans. Mast has shown exceptional commitment to transparency and stakeholder engagement throughout the MT1 project. This includes monthly blog posts, a dedicated project page, and over 50 LinkedIn updates featuring

visual and written status reports, project explainers, wildlife snapshots, and the people behind the project. Mast also ensured that all social media feedback related to MT1 was addressed promptly, reinforcing its commitment to open communication.

Feedback received from stakeholders:
We have not received feedback from mineral rights holders at time of this submission.

The State of Montana Department of Natural Resources (DNRC) provided positive feedback on the phone. They also confirmed that this project did not require regulatory authorizations.

The Department of Environmental Quality Storm Water Pollution Prevention Plan authorization was received which provides requirements for storm water management on the construction site. This also includes reporting and inspection requirements.

The Montana Sage Grouse Habitat Conservation Program provided consultation over video call and in a letter received over email after submitting a webform with overview of the project, its operations plan, and location. This consultation provides recommendations and requirements for mitigation of project activities.

The Montana Department of Environmental Quality Enforcement Program provided consultation that there were no additional regulatory requirements. We provided an additional overview of the project's purpose, operational plan, timeline, and location, as well as the other regulatory consultations and permits received, on their request.

Responses provided to stakeholders:
We provide regular inspections and reporting to Montana Department of Environmental Quality as part of the Storm Water Pollution Prevention Plan until the project site attains final stabilization and notice of termination is provided to the department.

In case any relevant stakeholders **could not take part** in the consultation activities due to reasons such as lack of mobile access or physical disability, please describe and summarize how you engaged with them, what their specific feedback was, and how it was answered. Leave blank if not applicable.

Consultation of stakeholders that could not take part in the scheduled consultation activities

N/A

As **supporting evidence** to this report, please provide in a separate subfolder, the following:

- Materials presented during the consultation activities (e.g. presentations)
- Documentation of the feedback received (e.g. meeting notes, questionnaire answers)
- Documentation of the responses provided to stakeholders (e.g. consultation reports)

Provide an extensive description of the **changes made to the project** plans to address the concerns and issues raised during the consultation activities.

Description of the changes made to the project for addressing concerns and issues

We implemented the Storm Water Pollution Prevention Plan Best Management Practices in response to meet regulatory requirements for the construction activity.

We mitigated impact from the project based on consultation with the Sage Grouse Habitat Conservation Program. This includes revegetation with sage grouse-appropriate seed mix on the project area.

3 Plans for continued consultation during crediting period

Provide a description of the current plans for maintaining a continued engagement of the stakeholders during the crediting period.

Description of the plans for continued consultation of stakeholders during the crediting period

Mast's legal contract with the landowner includes mechanisms for grievance redressal and Mast continues to engage with the landowner through phone, text, email, and site visits, to maintain the relationship.

Reporting and site visits for inspection are required and in progress by Mast until grass seed establishment according to the MT Department of Environmental Quality Storm Water Pollution Prevention Plan.

Additionally, Mast has a grievance redressal mechanism available for any stakeholder through a contact form on Mast's website for the MT1 project, here https://www.mastreforest.com/projects/mt1. In this page, there is a section that states "Questions or concerns about this project? Please let us know." with a link to a short contact form. A submitted form will be forwarded to the correct team or person for response.

4 Summary

Based on all the information provided above and the evidence provided separately, write an overall summary of the stakeholder engagement. This summary must follow the structure of this report, tackling identified stakeholders, consultation activities and outcome, and plans for continued consultation. This summary is limited to 500 words. This summary must be re-used in the Project Description.

Overall summary (500-word limit)

The stakeholders for a project on private land in the United States are the landowner and the local government. There are no indigenous land rights on the property. We have established a legal contract with the landowner that complies with local (state) laws. Our agreement with the landowner includes mechanisms for grievance redressal. We have consulted with departments and programs of the state of Montana to ensure regulatory compliance through authorization and consultation received on the project. These regulatory groups include Montana Department of Environmental Quality and Montana Sage Grouse Habitat Conservation Program. We have also notified mineral rights holders about filing the easement for the project in the local county records office. Mast has completed a State of Montana Environmental Checklist. The primary form of communication with stakeholders is digital, including phone calls and email, or analog, with paper letters mailed and documentation filed as appropriate. In addition, Mast has a grievance redressal mechanism available to any stakeholder on the project at any time through a contact form on Mast's website for the project.