

Net-Zero Richardton LLC Output Audit Report – Q4 2025

For Puro.Earth

CO ₂ Removal Supplier	Net-Zero Richardton LLC
CO ₂ Removal Method	Geologically Stored Carbon
Production Facility Name	Gevo North Dakota
Production Facility ID	353054
Location	3682 Hwy 8S Richardton, ND 58652
Location	Lat 46.883, Long -102.313
Net Volume of CO ₂ Removal	29,475.74 CORCs
Removal Period	October 1, 2025 – November 30,
Nemovat Penou	2025
Lead Auditor	Bill Chatterton
Version	2.0

Issued: December 18, 2025





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Removal Method: Geologically Stored Carbon	Jodi Johnson, CFO	* Bill Chatterton
Report Date: December 17, 2025		Kelly Inder-Nesbitt
Document No: 350VR-NZ-PU2510_Q4-2025		
Rev: v2.0		

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1. Introduction

350Solutions, Inc. was contracted to perform an audit of carbon dioxide removal credit (CORC) claims for Net-Zero Richardton LLC geologically stored carbon process. 350Solutions declares that we are an impartial auditor, free from any conflicts of interest, capable, and qualified to complete this audit according to Puro Standard and related Validation and Verification Body Requirements.

In June 2023, 350Solutions conducted a Production Facility audit of the process, lifecycle CO_2 emissions assessment (LCA), and other administrative details to verify compliance with the requirements of the Puro.Earth Puro Standard General Rules v3.1 and Geologically Stored Carbon Methodology (Edition 2021) [1], [2]. The Production Facility audit (conducted while the facility was under ownership of Red Trail Energy (RTE)) remains valid until June 2027. This follow-up output audit was conducted to verify reported CORCs from the facility under new ownership of Gevo Inc. for the period of October 1st, 2025 - November 30th, 2025.

The audit and verification included a detailed document review and audit beginning December 16, 2025

Table 1: Output Audit Summary

	Verification Summary
CO₂ Removal Supplier	Net-Zero Richardton LLC
Removal Method	Geologically Stored Carbon
Verification Type	Output Audit; Puro Standard General Rules v3.1 and Geologically Stored Carbon Methodology (Edition 2021)
Production Facility Name and Registry	Gevo North Dakota Facility ID: 353054
Production Facility Locations	3682 Hwy 8S, Richardton, ND 58652 Lat 46.883, Long -102.313
Crediting Period	June 30, 2022 – June 29, 2027
Reporting Period	October 1, 2025 – November 30, 2025
Supplier Claimed CORCs	29,475.74 tonne CO2 -eq
Verified CORCs	29,475.74 tonne CO2 -eq
CORC Factor (net removed/gross stored)	0.998
Audit Kickoff Date	December 16, 2025
Audit Report Date	December 18, 2025



2. Technology Description

Gevo, Inc. owns and operates Net-Zero Richardton (NZR) ethanol production plant and Richardton CCS (RCCS) carbon capture and storage facility near Richardton, North Dakota. The plant complex is situated inside a footprint of approximately 25 acres of land which is part of an approximately 135-acre parcel. The plant was placed into service in January 2007 and can produce more than its name-plate production capacity of 50 million gallons of ethanol per year. NZR uses corn as feedstock to produce ethanol at the plant.

The combined NZR and RCCS facilities are designed to ultimately inject about nominal 180,000 tonnes CO_2 annually more than a mile below facility property for permanent storage. In partnership with the North Dakota Industrial Commission Renewable Energy Program and the U.S. Department of Energy (DOE), the RCCS CCS Project was determined a technically viable option for the significant reduction of CO_2 emissions from ethanol production. The project was also supported by the Energy & Environmental Research Center -led Plains CO_2 Reduction (PCOR) Partnership https://pcor.undeerc.org/. The process is summarized in Figure 1.

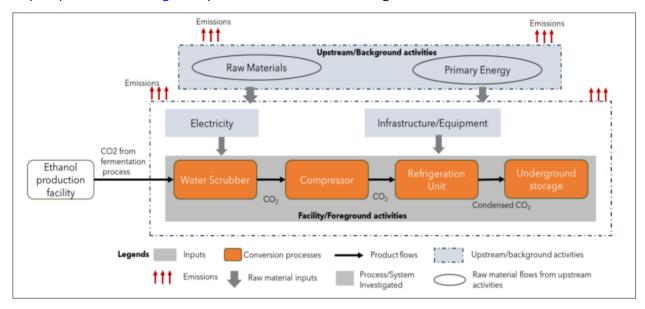


Figure 1: RCCS Facility Process

2.1. Process Inputs & Outputs

The system boundary for the RCCS process starts at the gate of the CO_2 processing facility, first treating the exhaust gas received from the ethanol plant. The ethanol production facility is outside of the system boundary considered for this project. Furthermore, the LCA is carried out considering both (a) upstream or background systems, which are responsible for producing and supplying raw materials (e.g., equipment, infrastructures, fuels) to the CCS-facility, and (b) facility or foreground systems, where actual processing of fermented CO_2 takes place and of which this evaluation is carried upon.



For geologically stored carbon CORCs, the functional unit is 1 kg of CO_2 captured and stored in a compliant storage site. The injected CO_2 is greater than 99.9% purity and contains some trace quantities of nitrogen and oxygen. The process uses electricity only for operation of equipment.

RCCS's process produces very little to no waste products and has very limited emissions of any kind from the facility. Waste produced from the RCCS process (primarily water removed from the captured CO_2 stream) are recycled back to the fermentation process. There are no air emission points outside of process bypass equipment which is not used during normal operations. No bypass or venting events were recorded during the reporting period. All CO_2 capture is processed (water removal, trace organic and inorganic contaminant removal, compression, and liquefaction) and injected at the wellhead. Table 2 summarizes the observed inputs and outputs from the process and typical rates from supplied operational data.

Table 2: Verified Production Facility Inputs & Outputs

Input or Output	Item	Verified Amount Over Monitoring Period ¹	Notes (Specifications, source, etc.)
	Water	N/A	Water removed from captured CO ₂ ; recycled to fermentation process.
Inputs	Inputs Electricity use (Blowers, pumps, compressors, chillers, controls) 5,381 MWh (metered)	Utility revenue-grade metering. For Oct–Nov 2025 the grid electricity emission factor for North Dakota (eGRID MROW2023 920 lb/MWh ≈ 417 g/kWh) is replaced with wind REC factor 9.59 g/kWh from LCA 'database' sheet. Resulting CCS process emissions from electricity: 51.6 tCO₂e.	
Outputo	CO ₂ injected (C _{injected})	29,527.34 t CO ₂	Biogenic CO_2 from fermentation captured and injected Oct–Nov 2025; measured at wellhead (dry basis).
Outputs	CCS process emissions ³	51.60 tCO₂e	From electricity consumption using wind REC factor 9.59 g/kWh per LCA spreadsheet 'database' sheet.

¹ CORC calculations are based on the net CO₂ emission rate determined and verified in the LCA for RCCS by EcoEngineers. The values of inputs during the reporting period are verified and reported here for completeness.

3. Audit Summary

3.1. Audit Approach

A planned series of audit activities were conducted by 350Solutions to independently verify production and output data, and CORC claims for the reporting period. The audit was conducted following the specifications of Puro General Rules v3.1 and Geologically Stored Carbon Methodology (Edition 2021). Specific audit activities conducted are summarized in Table 3. Auditor qualifications are attached as Appendix 1.

² The materials required for the wellbore construction are estimated based on the wellbore design. For the wellbore construction, carbon resistant cement is assumed as raw materials being used. As the EFs of such materials are not available, the EF of the Portland cement is assumed as a substitute data. Due to the lack of EF data for specific steel grades, generic steel production data for the U.S. is used for pipeline construction and skid production. For the wellbore tubing chromium steel 18-8 data is used in place of 13 Cr.80. ³For the Oct–Nov 2025 grid electricity emission factor for North Dakota 417 g/kwh (eGRID MROW2023 920 lb/MWh) is replaced with wind energy 9.59 g/kWh.



Table 3: Audit Activities

Date(s)	Verification Activity	Verification Tasks	Documents Reviewed
December 16, 2025	Introductory Document Review	- Opening meeting and review of operational and procedural changes - Review of LCA and supporting documentation - Review of Puro CORC calculations - Review of product properties - Review of product end use	 Audit Document Index - GSC.xlsx Disclosure since last audit - Red Trail Energy.xlsx RCCS Information Q4_10.2025-11.2025_v1.xls Calibration Records.pdf CO2 Sample Analysis April 2025.pdf MRETs Retirement ID 00197560e-351f.pdf puro_LCA_RCCS_Q4_10.2025_11.2025_v1.xlsm
December 16 – 17, 2025	Data Review	- Review of LCA and supporting documentation - Review of Puro CORC calculations - Review of facility registries and permits - Review of raw material sources and sustainability - Review of system inputs and outputs - Review evidence of product output - Review of product properties - Review of product end use - Review of equipment and calibrations - Completion of verifier checklist for Puro Standard and Methodology requirements	- Q4_Oct_Nov 2025_RCCS_LCA Report_v1.pdf - RCCS CO2 Tonnes Injected Q4_10.2025- 11.2025_v1.xls - RCCS Information Q4_10.2025-11.2025_v1.xlsx - 37229 Class VI Injection Permit.pdf - Form 15 RTE 10 signed 1.14.25.pdf - October 2025 RR Electric Invoice RCCS.pdf - RCCS Geologically_Stored_Carbon_2024_3.pdf
December 17-18, 2025	Report Writing	- Compose Verification Report - Internal quality control	No additional documents reviewed following data review

3.2. Verified Output & CORCs

Table 4 includes the specific CORCs claimed by Net-Zero for their Richardton facility during the reporting period, as well as the level verified by 350Solutions during data review.

Table 4: Verified CORCs for Gevo North Dakota - Oct 1, 2025 - Nov 30, 2025

Performance Metric Name / Verified Value Description		Data Sources	Reporting Period
Net CO₂ Removal Factor¹	-0.998 (with RECs + wind Scope 3) (embodied)		
CO ₂ Captured (C _{injected})	29,527.34 tonne	- Q4_Oct_Nov 2025_RCCS_LCA	
CCS Process emissions ($E_{capture}$, $E_{transport}$, and $E_{injection}$) ²	51.60 tonne CO ₂₀		
Emissions from construction of CCS equipment (Eequipment)	0 (emissions already accounted for in previous auditing period)	Q4_10.2025_11.2025_v1.xlsm - RCCS CO2 Tonnes Injected Q4_10.2025_11.2025_v1.xls - October 2025 RR Electric	October 1 – November 30, 2025
CORCs	29,475.74 tonne CO _{2e}	Invoice RCCS.pdf - MRETs Retirement ID	
CORCs Retired	20,697.31 tonne CO _{2e}	00197560e-351f.pdf	
CORCs available for VCM 8,778.43 tonne CO _{2e}			

¹Defined in LCA as carbon intensity (CI): as how many grams of carbon dioxide (CO₂) are released in the entire process of capturing and storing 1 kg of CO₂. A negative number means that carbon is removed/injected more than released/emitted.

 $^{^2}C_{loss}$ is defined as zero for the CCS process, with CO₂ flow monitoring conducted at the capture point (CO₂ capture at fermentation) and the wellhead injection point.



RCCS reports the amount of CO₂ injected each month to the North Dakota Industrial Commission (NDIC) for Class VI well compliance. During this reporting period, a total of **29,527.34 tonnes** of CO₂ was injected. To determine the net CO₂ removal, project emissions— **51.60 tonnes** of CO₂— are subtracted, resulting in **29,475.74 tonnes net CO₂ removal** which are eligible for issuance as Carbon Dioxide Removal Credits (CORCs).

The CORCs are allocated between two markets:

- 1. **Low Carbon Fuel Standard (LCFS) markets** where CO₂ removal is linked to ethanol sales in jurisdictions with LCFS programs.
- Voluntary Carbon Markets (VCM) where the remaining bio-CCS carbon sequestration credits are available for sale.

Ethanol sales are tracked monthly and categorized based on whether they are sold into LCFS or non-LCFS markets. The percentage of ethanol gallons sold into each category is used to proportionally allocate CORCs.

During this reporting period:

- 20,697.31 tonnes of CO₂ were allocated to LCFS markets and retired.
- The remaining 8,778.43 tonnes of net CO₂ injected are available for the VCM.

These allocations, along with supporting sales records, were documented in the file "RCCS CO2 Tonnes Injected _ Q4_10.2025_11.2025_v1.xls" and were reviewed and verified during the audit.

4. Audit Findings

below.

4.1. Summary of Audit Findings

350Solutions has reviewed and audited the documentation of the technology, the instrumentation, the procedures, performance and collected data and has found that the data presented in the Puro Audit Package:

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oxtimes Meets the requirements of the Puro General Rules V3.1 and Geologically Stored Carbon Methodology
\square Meets the requirements of the Puro General Rules V3.1 and Geologically Stored Carbon Methodology with minor modifications
\square Does Not Meet the requirements of the Puro General Rules V3.1 and Geologically Stored Carbon Methodology
350Solutions utilized a reasonable level of assurance in performance of the outputs audit. A summary of specific findings associated with each requirement of the Puro Standard and

Geologically Stored Carbon Methodology and any identified issues with the audit are summarized



Table 5: Audit Findings

Puro Standard GSC Method. Section Ref.	Audit Verification Topic	Final Findings	
1.1.	Eligible Activity Type	Acceptable – The site is suitable for geological sequestration of biogenic ${\sf CO}_2$ being injected in an NDIC compliant Class VI well.	
1.2.	Eligibility Requirements	Acceptable – NZR is an LLC registered with the Puro Registry for the listing of CO ₂ removal Certificates (CORCs). They achieve this by sequestering biogenic CO ₂ from the ethanol production process that would otherwise be vented to the atmosphere. Biogenic CO ₂ fraction via carbon isotope (C14) results 99%. NZR has demonstrated conformance to the EU directive RED II as a 1 st generation ethanol plant. Environmental assessments and historical records confirm corn as feedstock, and that the associated agricultural land was never previously an area of high biodiversity value, nor did it transition from regions with high carbon stock. NZR has documented committal to disclose fossil energy consumption and maintain level or reduced fossil energy consumption over time.	
1.3.	CO ₂ Removal	Acceptable – NZR has contracts with biomass suppliers to demonstrate feedstock	
5.1.2	Supplier	sustainability. The facility can record the mass of CO ₂ sequestered and demonstrate the mass injected. Facility maintains an NDIC permit showing that	
5.1.3		the Class VI UIC program meets or exceeds the stringency of the federal EPA Class VI program. The quantification of the CO_2 is finalized by third-party CO_2 purity analysis of representative injection gas samples.	
2.	Point of creation of the CO₂ Removal Certificate (CORC)	Acceptable – Verified accurate monitoring of CO_2 injection rates at point of removal. RCCS is the operator of the sequestration site and owner of the contracts for the carbon containing waste.	
3.1	Life-Cycle Analysis (LCA) Boundary	Acceptable - The activity boundary includes all activities existing solely for the purpose of CO_2 removal. The LCA boundary begins with the capture of the carbon containing wastes, includes emissions associated with all equipment and inputs utilized for CO_2 processing and transport, proceeding to the injection site, includes all onsite operations energy usage and emissions, and monitoring of the wells. The upstream production of the carbon containing ethanol product is not included in the LCA since they are not produced for the purpose of sequestration. This reporting period saw the use of RECs being used (5,381 RECs retired for the period).	
3.2 4.3.3	Activity emissions within the LCA boundary	Acceptable –Onsite energy consumption associated with capture, compression, water removal, liquefaction, and transport to the wellhead is measured and recorded. All emission factors used for associated equipment and activities are lifecycle based, include cradle-to-grave considerations, and are estimated using GREET 2022 and Ecoinvent v3.3.1 databases.	
3.3 4.2.1 – 4.2.5	Feedstock emissions within the LCA boundary	Acceptable – Feedstock emissions are associated with ethanol production and outside of the CCS boundary for CO_2 capture and storage.	
3.4	Equipment/Facility emissions within the LCA boundary	Acceptable – All emission factors used for associated equipment and activities are included in the LCA GREET 2022 and Ecoinvent v3.3.1 databases. Note that all equipment emissions were accounted for during a previous reporting period (June 2022 – July 2023).	



3.5	Emissions outside the LCA boundary	Acceptable – Emissions associated with operations not purpose built for CO_2 sequestration are outside the boundary.
4.1, 4.3.1, 4.3.2 4.4 5.2	Net Negative LCA	Acceptable - NZR has demonstrated an appropriate basis for CORCs according to the Puro Methodology. The LCA was completed and independently verified. The LCA utilizes appropriate system boundaries and results in a net negative LCA.
4.5	Uncertainty assessment	Acceptable - The Oct–Nov 2025 LCA report applies conservative point estimates from GREET 2022 and Ecoinvent v3.3.1 but does not include a quantitative uncertainty analysis or parameter uncertainty ranges. Activity data for CO_2 capture, injection rates, and gas purity continue to be measured using high-quality procedures and best practices. Scenario comparisons (with/without RECs, with/without Scope 3) are presented. Given the demonstrated operational stability of the verified system and inherent high-level accuracy and stability of the primary process measurement (CO2 injection rate via calibrated coriolis meter), data quality is assessed as acceptable with minimal levels of data uncertainty (demonstrated < 1%).
5.3	Permanence	Acceptable – The injection well and storage site are properly permitted and permit compliance demonstrated, including permanence and monitoring requirements (RCCS utilizes state permitted Class VI well for injection of liquid CO ₂).
5.4	Evidence against double counting	Acceptable – Attestations of NZR sole ownership of CO ₂ claims provided. No claims of ownership by other parties can be made. Carbon market allocations for ethanol sale compliance obligation claims are quantified, tracked, and reported.

4.2. Audit Issues

No audit issues are noted for the reporting period.

4.3. Recommendations for Improvement

No recommendations for improvement are noted at this time.

5. Revision History

Version	Date Issued	Noted Changes	
Draft v1.0 December 17, 2025		Initial Draft	
Draft v1.1 December 17, 2025		350Solutions internal QA review, minor edits	
Final v2.0 December 18, 2025		Minor edits from Puro.Earth review	



6. Auditor Signatures

Bill Chatterton December 18, 2025

Bill Chatterton (Lead Auditor) Carbon Removal Verification Manager 350Solutions, Inc.

Kelly Inder-Nesbitt (Quality Assurance) Carbon Removal Verification Engineer 350Solutions, Inc.

7. References

[1] Puro.Earth, *Puro Standard General Rules, Version 3.1, Edition 2023.* https://puro.earth/puro-standard-carbon-removal-credits/

[2] Puro.Earth, *Geologically Stored Carbon Methodology, Edition 2021*. https://puro.earth/articles/beccs-and-geologically-stored-carbon-methodology-webinar-1-616?type=webinars-and-videos

[3] World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD). *GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard*, 2015. https://ghgprotocol.org/scope_2_guidance



Appendix 1: Verifier Qualifications

Supporting documentation, including verifier resumes, and verifier or corporate accreditations are also included in this appendix.

Verifier Qualifications			
Company Name:	Net-Zero Richardton		
Date:	11/11/2025		
Verifier Name:	Bill Chatterton		
Company Name (where applicable):		350Solutions	
Verifier Contact Information:		bill@350solutions.com, 984-215-0585	
Verifier Address:		1053 E. Whitaker Mill Rd. Suite 115, Raleigh, NC 27604	
Verifier Scope of Activities:	Output Audit documentation	through review of key technology components, operational data, and on.	
		Evidence / Notes	
Verifier Qualifications	Criteria Met?	(note how the criteria was met, specific documents - resume/CV, publications, certifications, etc.).	
Verifier has relevant technical knowledge of the typ	e of technology	being evaluated and carbon removal processes in general	
A) Does Verifier have:			
An in-depth technical knowledge of the technology type under verification;	Y	350Solutions is accredited to ISO/IEC 17020:2012 and ISO 14034 Environmental Technology Verification (ETV) as a Type A (third party) Inspection Body (ANAB Certificate Number: Al-2618). The technical scope of 350's accreditation includes verification of performance and environmental	
Knowledge of specific risk areas associated with performance of such technologies (i.e. common failure points, performance issues, barriers to scaleup);	V	impact as it relates to design, materials, equipment, installation and operations of technologies in the categories of Energy, Clean Production and Process, and Air Pollution Monitoring and Abatement. As documented in 350Solutions' ETV Standard Operating Procedure (ETV QPM 350-223-03), and Quality Systems Procedures for verifier qualifications (QSP-350-005-02), 350Solutions conforms	
3. Knowledge of the environmental implications related to the use of the technology from a life cycle perspective, such as impact of the technology on lifecycle CO2 emissions and carbon removal;	V	to the requirements of ISO 17020 Annex A with respect to verifier qualifications and procedures. These procedures and quality management programs are generally relevant to verification under the Puro.Earth General Standard. Note that verifications completed for Puro.Earth are not equivalent to ISO 14034 verifications.	
Knowledge of relevant applicable test methods and standards for evaluating performance or impact of the technology;	V	350 staff have participated in the evaluation and verification of novel technologies that sequester carbon via various methods, including biomass conversion to liquids, solids, and other products which are then permanantly stored in ways such as land application or geologic storage, conversion of	
5. Knowledge of relevant calculation, modeling, and statistical methods in order to assess test results and calculations of performance metrics and uncertainty, as applicable;	V	captured CO2 into building materials and co-products, and the production of chemicals, fuels, and products via biomass pyrolysis and gasification. 350 also served as lead verifier for the Carbon XPrize competition and contributed to the development of procedures and processes for verification of relevant	
Knowledge of data quality and data validation approaches, including QA/QC procedures, for example.	•	calculations, modeling, and statistical methods in order to assess team results and calculations of performance metrics and uncertainty. 350 has demonstrated knowledge of data quality and data validation approaches and execution in supporting verification of performance claims and results.	
	a credible inde	pendent 3 rd party	
B) Is Verifier:			
third-party body independent of the team registered for the Puro Earth CORCs;	•		
Not directly involved in the design, manufacture or construction, marketing, installation, use or maintenance of the specific technologies submitted to Puro.Eargh for verification, or represent the parties engaged in those activities.	V	350Solutions is accredited to ISO/IEC 17020:2012 and ISO 14034 ETV as a Type A (third party) Inspection Body. As documented in 350Solutions ETV Polic Manual (ETV QPM 350-200-03), 350Solutions conforms to the requirements of ISO 17020 Annex A with respect to impartiality for Type A inspections, pursuant	
Not part of a legal entity that is engaged in design, manufacture, supply, installation, purchase, ownership, use or maintenance of the items inspected.	✓	to ISO 14034 activities.	



Bill Chatterton Senior Verification Scientist, 350Solutions

EDUCATION:

B.S. Environmental Science, SUNY at Plattsburgh, 1982 A.A.S. Environmental Technology, Paul Smith College, 1979 Certified Measurement and Verification Professional (CMVP), 2019

EXPERIENCE SUMMARY:

Mr. Chatterton has over 30 years of experience in management of energy and environmental technology development and demonstration projects and programs, as well as multimedia environmental engineering efforts. The majority of his recent work has focused on the evaluation of innovative carbon capture, utilization, and removal technologies. Mr. Chatterton has supported the development and management of large technology evaluation programs in the advanced energy, transportation, and climate change areas.

RESEARCH AND PROFESSIONAL EXPERIENCE:

2019-Present Sr Verification Scientist – 350Solutions, Inc.

Owns and operates a small cleantech engineering consulting business focused on the independent evaluation of new cleantech innovations and their impact on the environment and carbon emissions. Provides engineering consulting, testing and evaluation, techno-economic assessment, and other support to companies developing, using, or investing in new clean technology innovations. Manages administrative, business development, and project activities for 350Solutions.

2010-2019: Program Manager - Energy and Environment, Southern Research Managed scientific and technical staff performing research, development, and evaluation of innovative clean energy technologies. Projects range from \$25,000 to \$6million in size, and are funded by the US Department of Energy, Department of Defense, and commercial partners. Technical focus areas are conversion of biomass to fuels and chemicals, carbon capture and utilization, energy efficient building technologies and renewable energy generation.

2000-2009 Sr. Project Leader, Environmental Engineer, Southern Research

PROJECT EXPERIENCE:

Mr. Chatterton has executed several independent technology performance verifications of emerging carbon, energy and transportation technologies for 350Solutions and previously at Southern Research Institute. Mr. Chatterton has completed clean technology evaluations for the Department of Defense, state energy agencies, commercial clients, investors, and technology developers, involving evaluation of commercial feasibility, economic and environmental impacts, and technology performance. Mr. Chatterton served as a Lead Verifier for the NRG COSIA Carbon XPrize – a \$20M prize competition for technologies that capture and beneficially utilize CO₂. Mr. Chatterton is also a Certified Measurement and Verification Professional, issued in 2019.



Kelly Inder-Nesbitt Senior Carbon Removal Verification Engineer, 350Solutions

Education:

- Master of Science in Geography, Archaeology, and Environmental Studies, University of the Witwatersrand, 2014
- Bachelor of Science with Honors in Geography, University of the Witwatersrand, 2011
- Bachelor of Arts in Geography and Archaeology, University of the Witwatersrand, 2010

Experience Summary:

At 350Solutions, Kelly specializes in verifying carbon removal projects to ensure compliance with ISO 14034 standards and carbon registry requirements. With over a decade of experience in environmental compliance and carbon management, she brings extensive expertise in operational compliance and MRV framework implementation, enhancing accuracy, transparency and integrity in the voluntary carbon market.

Kelly's career spans multiple sectors, including aquaculture, mining, and carbon removal technology, where she has developed and audited environmental management systems that promote sustainable practices and attract investor finance. At 350Solutions, she leads the validation of diverse carbon removal pathways, including biochar, BECCS, DAC and direct ocean capture and biomass burial. Her responsibilities encompass site audits and rigorous evaluation of MRV systems to ensure scientifically validated project claims.

Previously Kelly led the development of Brilliant Planet's carbon dioxide removal methodology protocol for algal biomass burial and contributed as an author. She was also responsible for developing and implementing an ISO 14001 compliant EHSS Management System for the FirstWave Group, who are aquaculture industry leaders in Southern and Eastern Africa. This system is also aligned with IFC World Bank Best Practices and leveraged software tools to streamline compliance monitoring and enhance ESG reporting for investor and regulatory alignment.

Throughout her career, Kelly has consistently collaborated with project developers, communities, regulators, and clients to enhance the credibility of environmental initiatives through rigorous documentation and alignment with international standards. Her approach emphasizes precise data management and actionable reporting, elevating compliance practices into a strategic, value-adding process that drives sustainable business growth.

Kelly's strong communication skills and commitment to fostering collaboration enable her to manage complex compliance initiatives effectively. Her ability to bridge the gap between technical requirements and stakeholder expectations continues to advance science-driven, impactful solutions in the carbon removal industry.