



Vaulted Deep Isometric Standard Project Verification Report

Client	Isometric
Company / GHG Removal Supplier	Vaulted Deep
Facility or Project Name	Great Plains Facility
Facility Address	7513 KS-14 Hutchinson, KS 67501
Greenhouse Gas Statement ID	ggs_1M0ACXCDY1S0E6YC
Net Greenhouse Gas Removals	3,610.88 tonnes CO ₂ e
Removal Method	Biomass Geological Storage
Removal Period	July 11, 2026 – August 10, 2026
Verification Opinion	Meets the requirements with Isometric-Approved Exemptions or Deviations
Verifier/Validation and Verification Body	Kelly Inder-Nesbitt Zoe Sandwith 350Solutions, Inc.

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ISOMETRIC STANDARD VERIFICATION REPORT

Company: Vaulted Deep	Company Contact:	Verification Team:
Removal Method: Biomass Geological Storage	*Mattie Friday	*Kelly Inder-Nesbitt
Report Date: August 28, 2026	Jose Ubillus	Zoe Sandwith
Document No: IS.VAU.GP.04 - VR	Adriana Ovalle	
Rev: v1.2		

* Primary contact/lead author

1. Key Project Data

Table 1: Vaulted Deep Verification Summary

Title	Great Plains Biomass Sequestration (01P4)
Location	7513 KS-14 Hutchinson, KS 67501
Reporting Period	July 11, 2026 – August 10, 2026
Crediting Period	August 20 th , 2023 – August 19 th , 2028
Greenhouse Gas Statement ID	ggs_1M0ACXCDY1S0E6YC
Project Proponents	CDR Supplier: Vaulted Deep Feedstock Suppliers: ██████████ manure waste supplier 10 ██████████ – manure waste supplier 12 ██████████ – biosolids waste supplier 17 ██████████ – manure waste supplier 18 ██████████ – manure waste supplier 22 ██████████ manure supplier 20 Regulatory Agency: Kansas Department of Health and Environment (KDHE)
Legal Ownership of the CDRs	Vaulted Deep
Removals in Reporting Period	3610.88 tonnes CO ₂ e
Removal Method	Biomass Geological Storage: Underground injection
Verification Report Date	August 28, 2026
GHG Removal Supplier	Vaulted Deep
Verification Type	Isometric Standard Verification for ongoing deliveries of carbon removal credits by Vaulted in accordance with the documents used during project validation: • Isometric Standard v1.7 • Biomass Geological Storage Protocol v1.1 • Biomass Feedstock Accounting Module v1.3 • Biomass or Bio-oil Storage in Salt Caverns Module v1.1 • Energy Use Accounting v1.2 • Transportation Emissions Accounting v1.1 • Embodied Emissions Accounting v1.0

1.1. Verification Summary

350Solutions was contracted to perform a verification of the greenhouse gas (GHG) statement for Vaulted Deep's biomass geological storage operations at the Great Plains Facility for the reporting period of July 11, 2026 – August 10, 2026. The validation process (VP), concluded on December 22nd, 2023, remains active for this reporting period and included a site visit, observation of operations, and review of data collection and handling procedures to confirm alignment with the Isometric Standard v1.7, Biomass Geological Storage Protocol v1.0, and Biomass Feedstock Accounting Module v1.3. Further details are available in the public validation listing found https://registry.isometric.com/project/prj_1HHYZFVGW1S044ZY. The Project has since updated to Biomass Geological Storage Protocol v1.1, corresponding to the update from Biomass or Bio-oil Storage in Salt Caverns Module v1.0 to v1.1.

In August 2026, 350Solutions conducted an independent verification of Vaulted's GHG removal claims for the specified reporting period. The verification assessed submitted GHG statements, supporting documentation, and monitoring records provided between July 11, 2026 – August 10, 2026. The review was performed in accordance with all applicable Isometric protocols and modules. This verification did not include a site visit.

As required by Section 6.2.2 of the Biomass Geological Storage Protocol v1.1, a biennial on-site review of operational infrastructure and data collection systems was conducted on August 11th, 2025. The review confirmed that monitoring systems, injection equipment, and recordkeeping remained consistent with protocol requirements and project validation, with the exception of a few minor document revision updates identified for completion. These document revisions have since been closed out.

During the Feb-March 2026 reporting period, 350Solutions identified certain non-compliances related primarily to gas monitoring and alarm investigation requirements. Isometric has granted a time-bound exemption and approved an updated gas monitoring plan, allowing Vaulted additional time to implement revised procedures and restore full compliance with applicable protocol requirements. Isometric has issued an exemption for the relevant module section on the basis that alternative monitoring approaches and flaring sufficiently quantify and limit the release of greenhouse gases. Further discussion of these matters is provided later in this report.

The quantity of **3610.88 tonnes** of net carbon removals has been verified with a reasonable level of assurance and are eligible for crediting under the referenced Isometric Standard and Protocol.

350Solutions Inc. declares that it is an impartial verification body, approved by Isometric for verifications in the required technical area, free from any conflicts of interest, capable, and qualified to complete this verification for the current reporting period according to the Isometric Standard v1.7, Biomass Geological Storage Protocol v1.1, Biomass Feedstock Accounting Module v1.3, Biomass or Bio-oil Storage in Salt Caverns Module v1.1, Embodied Emissions Accounting v1.0, Transportation Emissions Accounting v1.1, and Energy Use Accounting v1.2.

Verifier Information		
Verification Body	Verifier	Verification ID No.
350Solutions, Inc.	Kelly Inder-Nesbitt	IS.VAU.GP.04 - VR
350Solutions, Inc.	Zoe Sandwith	

**Kelly
Inder-
Nesbitt**

Digitally signed
by Kelly Inder-
Nesbitt
Date: 2026.08.28
12:18:31 -04'00'

Signed: Kelly Inder-Nesbitt (Lead Verifier)

**Zoe
Sandwith**

Digitally signed
by Zoe Sandwith
Date: 2026.08.28
09:29:37 -07'00'

Signed: Zoe Sandwith (Quality Assurance)



2. Verification Details

2.1. Verification Objectives

A series of verification activities were conducted by 350Solutions to independently verify the claimed removals of the GHG statement submitted by Vaulted Deep for operations conducted at the Great Plains production facility for the time-period July 11, 2026 – August 10, 2026. The verification was conducted following the specifications of Isometric Standard v1.7, Biomass Geological Storage Protocol v1.1, Biomass Feedstock Accounting Module v1.3, Biomass or Bio-oil Storage in Salt Caverns Module v1.1, Embodied Emissions Accounting v1.0, Transportation Emissions Accounting v1.1, and Energy Use Accounting v1.2. The verification is based on the provision and fair presentation of a complete and accurate GHG Statement by Vaulted Deep and Isometric. This is confirmed and verified by 350Solutions based on supporting evidence in accordance with the Isometric criteria (Table 1, Section 3.2).

2.2. Responsibilities

The project proponent, Vaulted Deep, is responsible for the fair presentation of the GHG Statement in accordance with Isometric criteria.

It is the responsibility of 350Solutions to express an opinion as to whether the GHG Statement and supporting documents support verification under the relevant Isometric standard, protocol, and modules.

2.3. Level of Assurance & Materiality

The verification was conducted with a reasonable level of assurance. Any discrepancies between the claimed removals of the project and the removals estimated by the verification process for the reporting period are less than the materiality threshold of 5%.

2.4. Validation and Verification Body Details

350Solutions Inc. declares that we are an impartial verifying body, free from any conflicts of interest, capable, and qualified to complete this verification for the current operational period according to the Isometric Standard v1.7 and applicable protocols and modules utilizing a reasonable level of assurance.

350Solutions is an accredited inspection & verification body by ANAB under ISO 17020 for completion of ISO 14034 Technology Verifications. 350Solutions is based out of Raleigh, North Carolina, USA. This verification was led by Kelly Inder-Nesbitt, Senior Carbon Removal Verification Engineer. Quality assurance was provided by Zoe Sandwith. Complete verifier qualifications are included in Appendix 4.

2.5. Verification Approach and Audit Process

The verification was conducted using an evidence-based, risk-informed approach consistent with ANAB-accredited inspection and verification practice. The objective was to obtain sufficient and

appropriate evidence to support the verification opinion through targeted review and professional judgement.

A documented sampling methodology was applied to select representative removals and supporting records for detailed testing based on the population reported for the verification period. In parallel, key operational controls—including monitoring, permit compliance, and durability-related requirements—were reviewed on a targeted basis to ensure appropriate coverage across verification periods. The project’s GHG Statement was reviewed on a sampled basis, with targeted spot-checks performed to assess consistency and alignment with supporting evidence and applicable Isometric requirements.

The verification activities undertaken, documents reviewed, and timing of audit tasks are summarized in Table 2. Detailed findings, responses, and conclusions are documented in Appendix 2, with supporting evidence listed in Appendix 1.

Table 2. Verification Activities

Date(s)	Verification Activity	Verification Tasks
Aug 19, 2026	Review of Reporting Period Modifications	- Review of updated PDD & GHG statement report - Monthly KDHE reporting compliance - Additional reporting compliance checks
Aug 19-20, 2026	Review of Current Validation and GHG Statement Applicability; Verification of Removals	- Review of Validation Report - Review of prior Verification Report - Identification of major and minor process steps, measurements, and calculations - Review of Standards / Protocols/ Modules required for Verification - Generation of a checklist of verification issues, recommendations, and opportunities for improvement - Verify changes to the system - Review of measurements and calculations - Review of durability/permit requirement monitoring data - Review of GHG statement
Aug 21-24, 2026	Write Report	- Revised template update and inclusion of findings and recommendations
Aug 27, 2026	Report QA	- Review of findings, recommendations and CO₂e net removals figures

3. Technical Aspects

3.1 Project Details

Vaulted Deep operates a Class V-permitted injection facility (Figure 1) in Hutchinson, Kansas, known as the Great Plains Facility, which utilizes proprietary slurry injection technology to geologically sequester organic waste for permanent carbon removal. The site encompasses 60 existing salt caverns, originally developed for propane storage, repurposed by Vaulted in 2023 for dedicated carbon sequestration. The caverns are situated 500–800 feet below ground and are filled with saturated brine, with a total site capacity of 2–3 million metric tons of organic waste.

Vaulted sources organic waste—including livestock manure, biosolids, and woody biomass—from regional suppliers under sustainable sourcing agreements. The feedstocks meet the eligibility criteria outlined in the Isometric Biomass Feedstock Accounting Module v1.3. For this reporting period manure from commercial feedlots and biosolids were used and found to be eligible.

Delivered by dump truck, feedstocks are unloaded into a mixing area where every tenth load is sampled for analysis in accordance with Method B of the Biomass Geological Storage Protocol sampling guidance. Recovered brine from the salt caverns is added to the biomass to form a slurry, which is then ground in a slurry processing unit until all particles pass through a specified screen. The prepared slurry is injected into the salt caverns at low wellhead pressures (~80 psi), displacing cavern brine in a controlled process. The displaced brine is stored in tanks and either reused in slurry mixing or, when in excess, routed to a Class I injection well for disposal.

Vaulted's injection wells are monitored in real time through pressure gauges and data acquisition systems. Monitoring activities include regular sonar surveys, well integrity checks, and return brine analysis to confirm containment. The site's monitoring framework meets the durability and MRV requirements of the Biomass Geological Storage Protocol v1.1. Injected carbon is expected to remain durably sequestered for over thousands of years, with the impermeable salt formation acting as a primary containment barrier.

Vaulted submits monthly and quarterly reports to the Kansas Department of Health and Environment (KDHE), including data on injection volumes, brine displacement, groundwater quality, and subsurface stability. The facility does not store waste above ground—material is injected the same day it arrives, minimizing the risk of temporary surface storage emissions.

As of August 2025, Vaulted completed a set of infrastructure upgrades outlined in the Facility Expansion and Modification Plan submitted earlier in 2025. These upgrades were designed to expand capacity, improve brine containment, and enhance safety and monitoring systems to support future scale-up and long-term operational durability. Additional description and photos of the Vaulted Deep process can be found in validation report 350VR-VAULTED-ISO2304.

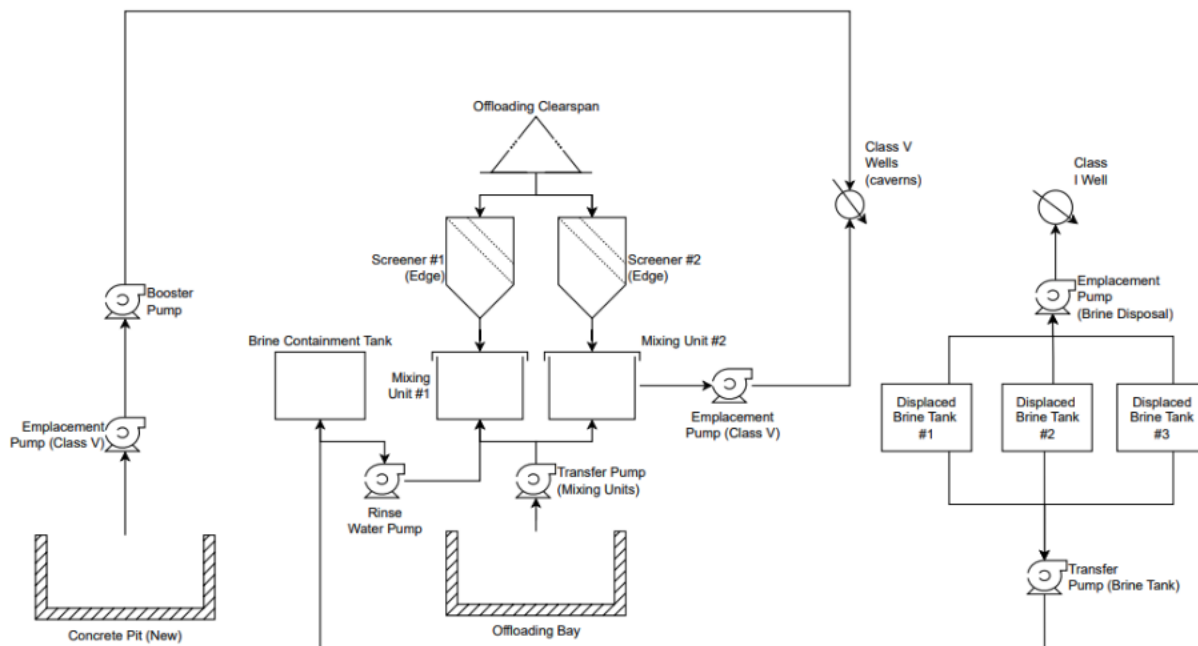


Figure 1. Vaulted Deep's process at the Great Plains Facility

3.2 Protocols and Modules Applied

The verification was conducted following the specifications of the following standards, protocols, and modules:

- Isometric Standard v1.7
- Biomass Geological Storage Protocol v1.1
- Biomass Feedstock Accounting Module v1.3
- Biomass or Bio-oil Storage in Salt Caverns Module v1.1
- Embodied Emissions Accounting v1.0
- Transportation Emissions Accounting v1.1
- Energy Use Accounting v1.2

3.3 Applicability of Applied Protocol and Modules

The Project continues to source biomass feedstocks exclusively from suppliers previously reviewed and verified under the Isometric Biomass Feedstock Accounting Module v1.3. No new feedstock type was introduced during this reporting period. The feedstocks — biosolids and manure used remain consistent with the eligibility pathways established in prior verifications.

Across all suppliers, the feedstocks continue to meet the Module's requirements for market-leakage safeguards, counterfactual storage, and non-energy feedstock criteria. Documentation reviewed confirms each feedstock is a residual by-product of existing municipal or livestock operations, with no evidence of increased production, altered management practices, or new competing uses that would affect prior eligibility determinations. Attestations further support that

all materials remain non-marketable wastes with short-term counterfactual decomposition pathways, aligning with Module expectations.

Based on the evidence provided and the absence of changes in sourcing or material characteristics, the application of the Module remains appropriate, and all feedstocks continue to qualify as eligible for use under the applied Protocol.

3.4 Project Boundary

The boundaries of the project include the delivery of the pre-processed feedstock to the biomass processing site (Great Plains Facility), the processing of the feedstock onsite, and then the underground storage in one of the ~60 salt caverns onsite. Continuous monitoring is conducted primarily onsite, with samples sent to an offsite laboratory.

3.5 Changes From Previous Verifications

- No changes for the reporting period.

4 Crediting Details

4.1 Project Reporting Period

This verification covers the emplacement of biomass between July 11, 2026 – August 10, 2026. While the reporting period is defined by the dates of physical emplacement, associated activities—including biomass procurement, transportation, slurry processing, monitoring, and other operational procedures—may have occurred outside this timeframe. These activities have been properly accounted for and allocated to the emplaced material within the reporting period.

4.2 Crediting Period

The 5-year crediting period for the Vaulted Great Plains Organic Waste Sequestration Project began on August 20, 2023, and will continue through August 19, 2028. All claimed removals associated with this reporting period, July 11, 2026 – August 10, 2026, fall within the current crediting period.

5. GHG Statement Verification

5.1. Accuracy of the Statement

The values represented in the GHG statement have been evaluated, cross-referenced with supporting evidence, and confirmed through the following verification activities:

1. Duplication of calculations of total biomass and CO₂ equivalent injected for removals found in ggs_1M0ACXDY1S0E6YC Isometrics removals spreadsheet (ggs_1M0APA59J1S0D6KP), including:
 - Recalculation of total slurry volume and associated CO₂e removals for emplacement during the reporting period.
 - Review of feedstock eligibility, including confirmation of compliance with applicable criteria under the Biomass Feedstock Accounting Module v1.3 (e.g., EC4, EC6, EC12, EC15 and C1 exemption).

- Verification of delivery and sourcing records, including weigh scale tickets, sampling logs, and supporting documentation for manure and biosolid classification.
- Cross-checking injection data, including flowmeter logs and wellhead pressure readings to confirm emplacement volumes.
- Verification of brine management, including return volumes, storage tank levels, and Class I disposal well records.
- Review of site energy usage, including diesel and electricity consumption for on-site processing and injection operations.
- Evaluation of monitoring data, including annular pressure logs and sonar surveys.
- Confirmation of on-site control, ensuring all biomass was received, processed, and emplaced within Vaulted's operational boundary.
- Review of monitoring data as required for salt cavern injection / emplacement and post injection monitoring to ensure ongoing compliance with Class V permit.

6. Verification Opinion

350Solutions has reviewed the documentation of the technology, the instrumentation, the procedures, performance and collected data and has found that the data presented in the greenhouse gas removal statement indicates that the claims fall within the 5% materiality threshold for greenhouse gas emissions and removals as required by the Isometric Standard:

☐ **Meets the requirements of the Isometric Standard v1.7, Biomass Geological Storage Protocol v1.1, Biomass Feedstock Accounting Module v1.3, and Biomass or Bio-oil Storage in Salt Caverns Module v1.1 for Verification**

☒ **Meets the requirements with Isometric-Approved Exemptions or Deviations from the Isometric Standard v1.7, Biomass Geological Storage Protocol v1.1, Biomass Feedstock Accounting Module v1.3, and Biomass or Bio-oil Storage in Salt Caverns Module v1.1 for Verification**

☐ **Meets the requirements with minor revisions of the Isometric Standard v1.7, Biomass Geological Storage Protocol v1.1, Biomass Feedstock Accounting Module v1.3, and Biomass or Bio-oil Storage in Salt Caverns Module v1.1 for Verification**

☐ **Does Not Meet the requirements of the Isometric Standard v1.7, Biomass Geological Storage Protocol v1.1, Biomass Feedstock Accounting Module v1.3, and Biomass or Bio-oil Storage in Salt Caverns Module v1.1 for Verification**

By adhering to the requirements of the Isometric standard, protocols and modules, removals of 3610.88 tonnes CO₂e from Vaulted's Great Plains Project have been verified in accordance with the validated PDD and the criteria listed in Section 3.2 with a reasonable level of assurance.

6.1. Verification Results Summary

A summary of verification results and compliance with relevant requirements of the Isometric Standard, Biomass Geological Storage Protocol, Biomass Feedstock Accounting Module, and Biomass or Bio-oil Storage in Salt Caverns Module are summarized below.

Table 3: Verification Results

Isometric Standard Section Ref.	Verification Topic	Changed since Project Validation? (Y/N)	Final Findings
2.1	<i>Validated against approved Protocols</i>	N	Acceptable – The following Isometric approved protocols were used: Biomass Geological Storage Protocol
2.5.1	<i>Boundaries</i>	Y	Acceptable – Project Boundaries are defined geographically at the point of ownership of the biomass until it is emplaced at as the Great Plains Facility in Hutchinson, KS. No changes were noted for this reporting period.
2.5.2	<i>Baseline</i>	Y	Acceptable – See Biomass Feedstock Accounting Module Requirements.
2.5.3	<i>Additionality - Financial</i>	Y	Acceptable – It has been stated that no other income streams indicated, project pays a fee for biomass feedstock.
2.5.3	<i>Additionality - Environmental</i>	N	Acceptable – Project is net negative relative to the counterfactual case where feedstock is left on site to decay. Project only buys feedstock that would be left to decay.
2.5.3	<i>Additionality - Regulatory</i>	N	Acceptable – There are no regulatory requirements calling for disposal of biomass wastes in salt caverns in the local, state, nor national jurisdictions.
2.5.4	<i>Leakage</i>	N	Acceptable – Leakage points have been identified as on-site decomposition due to above ground storage of biomass, below ground decomposition of biomass escaping in vapor form in displaced brine. Above ground leakage is expected to be minimized by injecting the solids upon arrival the same day, while below ground leakage is monitored using a gas sensor and deducted from totals. Pre-processing energy usage at supplier could be a source of leakage.
2.5.5	<i>Default Emission Factors, Proxies, and Models</i>	Y	Acceptable – Carbon content measurement of every delivery batch is cost prohibitive; therefore, a conservative determination of content is made following instructions in the Biomass Geological Storage Protocol. Conservative values for items such as transportation fuel efficiency, equipment sizes for embodied carbon calculation were used. Default emission factors citations include literature citations. New feedstocks are tested every batch for at least 30 samples.
2.5.6	<i>Common Calculation Factors</i>	N	Acceptable – All non-metric values are converted to the equivalent metric basis. All emission factors are properly cited.
2.5.7	<i>Uncertainty</i>	N	Acceptable – Sensitivity analysis provided. Carbon content was identified as the only parameter contributing to a >1% change in Removal.
2.5.8	<i>Durability and Monitoring</i>	N	Acceptable with Isometric-provided exemption and forward Actions required/noted – Peer reviewed literature indicates durable removal of >1000 years. Operating Permit requires post decommissioning monitoring. Gas detections during the reporting period were reviewed and deemed acceptable for this reporting period under Isometric-approved exemptions,

			with follow-up monitoring and assessment to be completed in future reporting periods.
2.5.9	<i>Risk of Reversal</i>	N	Acceptable – Risk Assessment Questionnaire score was 2 which indicates a Low (1-3) – 5% risk. Observations match the responses provided in the submitted questionnaire.
2.5.10, 3.7	<i>Environmental and Socioeconomic Impacts</i>	N	Applicable permits and reporting records were reviewed. No reportable parameter exceedances were identified in the records reviewed for this period. Gas-monitoring and permit-update matters remain subject to the open FARs and the Isometric-approved exemptions described in Sections 6.2 and 6.3. Second quarterly monitoring reports for AR01, 03, 04, 06, 07 & Class 1 were provided.
2.5.11	<i>Life Cycle Assessment (LCA) Policies</i>	Y	Acceptable – Revisions and updates to the LCA are captured when operations change.
3.1	<i>Ownership</i>	N	Acceptable – Feedstock acquisition contract states transfer of rights to “monetization of environmental benefits and attributes”.
3.2	<i>Documentation</i>	Y	Acceptable – PPD completed / updated appropriately and submitted.
3.3	<i>Eligibility</i>	Y (GHG Statement Updated)	Acceptable – Project registered with Isometric and reporting period GHG Statement properly submitted to Certify
3.4	<i>Project Crediting</i>	Y (GHG Statement Updated)	Acceptable – New reporting period GHG Statement is complete, and all removals have been verified. Reporting period is within current validation crediting period
3.5	<i>Stakeholder Input Process</i>	N	Acceptable – A stakeholder Engagement Plan and Grievance Mechanism have been drafted. Stakeholder Engagement will be captured in the software “Monday” for proof of consultation. No grievances were received during this reporting period.
3.6	<i>Regulatory Compliance</i>	Y	Acceptable – Required monthly data submission to KDHE is complete.
Biomass Feedstock Accounting Module			
2.1	<i>Eligibility Criteria for Market Leakage</i>	N	Acceptable – No change since validation
2.2	<i>Counterfactual Storage Eligibility</i>	N	Acceptable – No change since validation
2.3	<i>Dedicated Energy Feedstock Eligibility</i>	N	Acceptable – No change since validation
3.0	<i>Counterfactual Definition</i>	N	Acceptable – No change since validation
3.1	<i>Counterfactual Energy Definition</i>	N	Acceptable – No energy associated.
3.2	<i>Counterfactual Replacement Definition</i>	N	Acceptable – No change since validation
4.0	<i>Replacement Calculation for Manure</i>	Y	Acceptable – Calculations accurately accounted for all replacement activities including fertilizer transport, production, and spreading.
Biomass or Bio-oil Storage in Salt Caverns Module			
1.0, 2.2	<i>Salt Cavern Characterization – Cavern Dimensions</i>	Y	Acceptable – Cavern dimensions determined by sonar in accordance with KDHE and the Class V Permit.

1.0, 2.2	<i>Salt Cavern Characterization – Integrity</i>	Y	Acceptable – Cavern integrity determined by sonar and brine hydrostatic testing, in accordance with KDHE and the Class V Permit.
1.0, 2.2	<i>Salt Cavern Characterization – Permeability</i>	Y	Acceptable – Cavern permeability determined by pressure testing, confirmed by addition of new wells by KDHE to the Class V Permit.
1.0, 2.2	<i>Salt Cavern Characterization – Porosity & permeability</i>	Y	Acceptable – Cavern porosity and permeability characteristics measured and found to be in accordance with KDHE and the Class V Permit.
1.0, 2.2	<i>Salt Cavern Characterization – Subsurface Features</i>	Y	Acceptable – Cavern subsurface features measured and found to be in accordance with KDHE and the Class V Permit. Injection into reopened AR-06 well approved by KDHE.
1.0	<i>Salt Cavern Characterization – Temperature, pH, conductivity/Cl- conc.</i>	Y (Required Monitoring Updated)	Acceptable – No exceedances noted for the reporting period.
1.0	<i>Salt Cavern Characterization – Brine TOC</i>	Y (Required Monitoring Updated)	Acceptable – Brine TOC measured prior to emplacement, as required by Class V permit. Confirmed via updated TOC data. Isometric added new TOC monitoring requirements.
1.0	<i>Salt Cavern Characterization – d¹³C analysis (where applicable)</i>	N/A	Not Applicable.
1.0, 3.1.3	<i>Salt Cavern Characterization – Surface Subsistence</i>	N/A	Acceptable – No change since validation
1.0	<i>Salt Cavern Characterization – Displaced Brine Injection location</i>	N/A	Acceptable – No change since validation
1.0, 2.3	<i>Emplacement Infrastructure</i>	Y	Acceptable – No change since previous verification
1.0	<i>Emplacement Monitoring</i>	Y (Required Monitoring Updated)	Monitoring completed and updated as required by Class V well permit. Groundwater Monitoring Plan has been developed for site.
1.0, 3.2	<i>Well Closure and Post Closure Requirements</i>	N	Acceptable – KDHE permit outlines closure requirements and abandonment monitoring requirements. Monitoring report provided.
2.1	<i>Permit for Operation</i>	N	Acceptable – No change since validation
3.1.1	<i>Injection Pressure</i>	Y (Required Monitoring Updated)	Acceptable – Pressure is continuously monitored and reported to KDHE monthly.
3.1.1	<i>Volume monitoring</i>	Y (Required Monitoring Updated)	Acceptable – Monitoring of injected material measured daily and reported monthly, confirmed by sonar quarterly.
3.1.1	<i>Injectate monitoring</i>	Y (Required Monitoring Updated)	Acceptable – monitoring undertaken in accordance with KDHE issued permits.
3.1.1	<i>Sampling Frequency</i>	N	Acceptable – Samples taken every 10 th batch.
3.1.1	<i>Safety Monitoring</i>	N	Acceptable – No change since validation
3.1.2	<i>Mechanical Integrity</i>	N	Acceptable – No change since validation

3.1.3	<i>Well Pressure Monitoring</i>	Y (Required Monitoring Updated)	Acceptable – Well pressure measured continuously with safety interlock. Daily pressure reported to KDHE monthly.
3.1.3	<i>Sonar Survey</i>	Y (Required Monitoring Updated)	Acceptable – Quarterly sonar survey undertaken and reported to KDHE
3.1.3	<i>Fill Volume</i>	Y (Required Monitoring Updated)	Acceptable – Cavern fill volume is tracked based upon volume of emplaced material, with estimates reported monthly and verified through quarterly sonar surveys. Historical cavern volumes have been reviewed against recent Sonar Surveys data (2020–2026) to support reconciliation of operational volume tracking with updated cavern geometry and capacity assessments
3.1.3	<i>Return Brine Monitoring</i>	Y (Required Monitoring Updated)	Acceptable – monitoring undertaken in accordance with KDHE and Isometric requirements.
3.1.3	<i>Volatile Gas Monitoring</i>	Y (Required Monitoring Updated)	Acceptable with Isometric exemption. Continuous LEL monitoring with monthly grab samples collected for gas speciation.
3.3	<i>Reversal Risk</i>	Y (Required Monitoring Updated)	Acceptable with Isometric exemption. Vaulted deducts a conservative estimate of CO ₂ and CH ₄ release from wellheads using a mass flux model described in §6.3 of this report. Reversal risk assessment has not changed since validation.
3.3.1	<i>Attribution of Reversals</i>	N	Acceptable – No change since validation
3.4	<i>Calculation of CO₂e, Storage Monitoring, Project</i>	N	Acceptable – No change since validation

6.2. Critical Findings and Forward Action Requests

No critical findings were identified during this reporting period. For the full list of audit findings, please see Appendix 2. Prior, open findings are listed below in **Table 4**.

Table 4: Prior Findings

Type	Protocol Reference	Finding/Issue	Conclusion/Resolution
FAR	Bio-oil Storage in Salt Caverns v1.0, Section 3.1.3 – Migration and Storage Reversal Monitoring	Recurring gas excursions were observed but compositional follow-up sampling was not consistently undertaken or documented for each relevant event. This is especially relevant given the reported CO ₂ spikes and repeated LEL alarm excursions.	Open. KDHE has determined they will update the permit such that: - LEL spikes above 10% at the wellhead must be reported - If LEL spikes to 10-25%, personnel should avoid the wellhead - If LEL is detected above 25%, injection should stop until LEL decreases below the limit - A flare system must be connected to the active brine storage tank and used as needed during operational hours to ensure the brine tank LEL readings remain under 25% - Continuous gas detection readings must be recorded/monitored, and summary data submitted to KDHE quarterly This finding will be closed when Vaulted provides a finalized updated permit.
FAR	Bio-oil Storage in Salt Caverns v1.0, Section 3.1.1 – Injectate and Operational Monitoring	Multiple daily gas release events / alarm excursions occurred without documented investigation of cause and without timely notification to the VVB.	Open. Installation of flare system required by KDHE will prevent gas release alarms because LEL will be kept under 25%. This finding will be closed when Vaulted demonstrates installation of the flare system and provides data indicating the LEL stays below 25%.
FAR	Biomass Geological Storage v1.0, Section 4.0 – Applicability	Verified gas detections / excursions occurred and were potentially not handled in line with permit reporting and investigation requirements.	Open. Reporting requirements with KDHE were clarified and the permit will be updated. This finding will be closed when Vaulted provides a finalized updated permit.

6.3. Exemptions from Isometric

Table 5 states the requirements that have been deemed not applicable to the Vaulted Great Plains Project and as a result have received an ad-hoc waiver or exemption from Isometric. These exemptions have resulted from discussions between Isometric and Vaulted and communicated to 350. Copies of the Isometric exemptions can be found in Appendix 5.

Table 5: Exemptions From Isometric

Requirement / Waiver / Description	Standard	Waiver, Exemption or Not Applicable
In accordance with Isometric policy, this verification was performed using draft monitoring reports substantiated by primary data records (e.g., sensor data, weigh tickets and DAS logs), as final regulatory sign-off is not a prerequisite for completing a verification. Should a regulator subsequently reject data or removals contained within these draft reports, Isometric's protocol guardrails require the supplier to compensate for the exact CO₂e value of the affected removals through subsequent verification adjustments or the buffer pool. • If a local regulator (such as the KDHE) determines that a previously verified monitoring period failed to meet permit requirements, or if they identify a loss of cavern integrity that occurred during that time, this will be handled by Isometric in this order: ○ A penalty discount from a subsequent verification ○ A new project emission in subsequent GHG statement ○ A reversal, where credits are pulled from the buffer pool	Isometric Standard Sections 3.9, 4.2, and 5.6	Waiver
Protocol requirement. Section 3.1.1 of the Biomass or Bio-oil Storage in Salt Caverns Module (v1.1) requires that if gas detection alarms are activated, the operator must immediately investigate and identify the cause of the alarm and report the instance to the VVB. Current non-compliance. Vaulted is not investigating every gas detection alarm activation. LEL alarms at the site have been increasing in frequency, and Vaulted is not conducting a cause investigation following each event. Exemption. During active injection, Isometric is exempting Vaulted from the requirement to investigate every gas detection alarm activation. In place of per-alarm investigation, Vaulted is subject to the ongoing monthly grab sampling program and the reactive sampling plan (minimum 3 grab samples per rolling 6-month period following alarm events) described in the forward action request. Following site closure, Vaulted must comply with the standard post-closure monitoring requirements set out in Section 3.2 of the module. Rationale. A previous LEL alarm was investigated, and the gas composition was determined to be predominantly propane, consistent with the cavern's history of hydrocarbon storage. Given	Bio-oil Storage in Salt Caverns v1.0, Section 3.1.3 3.1.1– Migration and Storage Reversal Monitoring	Exemption

this known and expected source, per-alarm investigation of every event is not proportionate. In place of per-alarm investigation, Isometric is issuing a forward action request for Vaulted to maintain reactive grab sampling capacity to sample gas composition following alarm events, at a recommended cadence of a minimum of 3 samples per rolling 6-month period. This maintains ongoing oversight of the gas composition and would detect any material change, such as the emergence of CH₄ or CO₂ from biodegradation of the injectate.

7. Revision History

Original date of issue: August 27, 2026

Version	Date Issued	Noted Changes
Draft Version (V1.0)	August 26, 2026	Initial Version
Draft Version Peer Reviewed (V1.1)	August 27, 2026	Edits following internal review
V1.2	August 28, 2026	Edits following external review

8. References

Isometric. (2026). *Biomass Geological Storage (Version 1.1)*. Isometric Registry. Retrieved from <https://registry.isometric.com/protocol/biomass-geological-storage/1.0?tag=1.0.1> Isometric+1

Isometric. (n.d.). *Modules: GHG Accounting (Version 1.0)*. Isometric Registry. Retrieved from <https://registry.isometric.com/modules> Isometric

Isometric. (n.d.). *Modules: Transportation Emissions Accounting (Version 1.1)*. Isometric Registry. Retrieved from <https://registry.isometric.com/modules> Isometric+1

Isometric. (n.d.). *Module: Biomass Storage in Permeable Reservoirs (Version 1.0)*. Isometric Registry. Retrieved from <https://registry.isometric.com/modules> Isometric+1

Isometric. (n.d.). *Module: Biomass or Bio-oil Storage in Salt Caverns (Version 1.1)*. Isometric Registry. Retrieved from <https://registry.isometric.com/modules> Isometric+2Isometric+2

Isometric. (n.d.). *Module: Energy Use Accounting (Version 1.2)*. Isometric Registry. Retrieved from <https://registry.isometric.com/modules> Isometric+1

Isometric. (n.d.). *Module: Embodied Emissions Accounting (Version 1.0)*. Isometric Registry. Retrieved from <https://registry.isometric.com/modules> Isometric+1

Isometric. (n.d.). *Module: Biomass Feedstock Accounting (Version 1.3)*. Isometric Registry. Retrieved from <https://registry.isometric.com/module/biomass-feedstock-accounting/1.2>
Isometric

Vaulted Deep Isometric Standard Project Validation and Verification Report:
https://storage.googleapis.com/isometric--production--eu--public-documents/spl_1H43SYY631S0Z8YR/prj_1HHYZFVGW1S044ZY/pjd_1HJ9EJ2K91S0MYZM/validation_and_verification_report_2023-12-22.pdf

Appendix 1: Documents Submitted for Review

Lab equipment calibration.xlsx
Resistivity meter - FANN 88C.pdf
Density meter - Fann 140 Mud
Balance.pdf
pH and Temp meter - Hanna 98191.pdf
Estimate6409547 Vaulted Deep MSA
X5000 NH3 and CO2 4-17-25.pdf
Gas certificate .pdf
purchase-order - 3025051B.pdf
Ultima X5000 gas monitor data sheet-
EN.pdf
05172026 edited - Calibration
Certificates Summary.xlsx
2026 Q2 Monitoring Wells Report.pdf
USDW Monitoring Well Data.xlsx
SW-12 KOLAR August 2026.pdf
TOC Schedule_AR06.xlsx
AR-06 Displaced brine 6-25-26 (1).pdf
AR-01 Testing Schedule.xlsx
AR01 Displace Brine 7-20-2026.pdf
AR01, 03, 04, 06, 07 & Class 1 Second
Quarterly report provided
V9-vaulted-82-
initial_process_energy_use-111194.jpg
V9-vaulted-2026-08-10-18990-
not_integrated_feed_organic-111274.jpg
V9-vaulted-2026-08-10-18990-
not_integrated_feed_organic-111272.jpg
ggs_1M0ACXCDY1S0E6YC_sources

Appendix 2: Verification Audit Findings and Responses

Table 6. Findings raised during this verification

Issue Code	Date Issued	Type	Body	Status	Responses	Resolution	Date Resolved
ISS-119	29 Jul 2026	Nonconformity	Please submit calibration certificates for offline measurements (temp, chloride, pH) with the next verification (July/Aug 2026 reporting period).	Resolved		Calibration certificates were copied into folders for all applicable sensors on site. Sampled calibration certificates were found to be compliant. Vaulted has also developed a tracker for its sensors requiring calibration. The auditor made a recommendation to include an expiry date column so that this can easily be tracked going forward.	19 Aug 2026
ISS 125	Mar 2026	FAR	Recurring gas excursions were observed but compositional follow-up sampling was not consistently undertaken or documented for each relevant event. This is especially relevant given the reported CO₂ spikes and repeated LEL alarm excursions. KDHE has determined they will update the permit such that: - LEL spikes above 10% at the wellhead must be reported - If LEL spikes to 10-25%, personnel should avoid the wellhead	Open	Update 21 Aug 2026: Vaulted is following KDHE's initial direction on updated monitoring and reporting, and are meeting those requirements. We are still awaiting a finalized timeline for the associated permit updates from KDHE. We will share KDHE's correspondence and the timeline with you once received.		

			- If LEL is detected above 25%, injection should stop until LEL decreases below the limit - A flare system must be connected to the active brine storage tank and used as needed during operational hours to ensure the brine tank LEL readings remain under 25% - Continuous gas detection readings must be recorded/monitored, and summary data submitted to KDHE quarterly This finding will be closed when Vaulted provides a finalized updated permit.				
ISS 123	Mar 2026	FAR	Multiple daily gas release events / alarm excursions occurred without documented investigation of cause and without timely notification to the VVB. Installation of flare system required by KDHE will prevent gas release alarms because LEL will be kept under 25%. This finding will be closed when Vaulted demonstrates installation of the flare system and provides data indicating the LEL stays below 25%.	Open	Update 21 Aug 2026: There are very few MGS manufacturers globally, and rental is not a viable option, so we have obtained quotes for both new and refurbished units. The pacing item is engineering: installing the MGS requires redesigning part of the surface system between the wellhead and the brine tanks, and we are securing a qualified engineering firm to complete that design before committing to equipment. The first design meeting is scheduled for next week. We also evaluated pulling gas off the brine tank headspace as an alternative, but vendor assessments indicated the volume and variability make that approach impractical, so a conventional MGS with flare remains the preferred path. We will share the design scope and schedule once the engineering work is underway.		
ISS 125	Mar 2026	FAR	Verified gas detections / excursions occurred and were potentially not handled in line with permit reporting	Open	Update 21 Aug 2026: Vaulted is following KDHE's initial direction on updated monitoring and reporting, and		

			and investigation requirements. Reporting requirements with KDHE were clarified and the permit will be updated. This finding will be closed when Vaulted provides a finalized updated permit.		are meeting those requirements. We are still awaiting a finalized timeline for the associated permit updates from KDHE. We will share KDHE's correspondence and the timeline with you once received.	
ISS 124	19 Aug 2026	Rec	RE calibration certificates summary, add a column for the calibrations expiry	Resolved	The operations team will add this column to the calibration certificates summary excel file.	23 Aug 2026
ISS 122	19 Aug 2026	Clarification	Is there a mechanism in place to track reviews/updates of feedstock suppliers changes to the originally signed affidavits? (eg. changes that may affect additionality or other important inputs)	Resolved	We are in frequent contact with active suppliers through routine operations, and we will notify Isometric if we become aware of a change in ownership or a significant change in management practice at a supplier. Independently of that, each supplier undergoes a full review and re-evidencing two years after initial certification.	23 Aug 2026
ISS 121	19 Aug 2026	FAR	Please advise if revisions to the most up to date emissions factors have been made in the LCA as noted in the previous reporting period? If not when are these amendments planned?	Open	Vaulted review's and updates the LCAs annually. The last update was October 2025. We are reviewing the current LCA and will have that completed by August 28 2026.	The auditor will review the revised LCA during October's reporting period. A review and update of the LCA should be undertaken annually. In the event vaulted make changes to their operations or any other items that may affect the LCA that these are reviewed on an ad hoc basis / as needed.
ISS 132	19 Aug 2026	FAR	Please provide a copy of your Lab SOP for the transportation of samples to third party labs for review. Id like to review the process to rule out any issues identified in the water monitoring well sample undertaken for Q2 (MW 1: 2280.26) (HT Qualifier in the Midwest lab result) It is also my understanding that Midwest labs undertakes the sampling for SDK labs, is this correct?	Open	We will provide an SOP for lab sampling and transportation of samples to third party labs. SDK and Midwest both perform analyses.	

Appendix 3: Changes to System/Process

- June 2024 - New Equipment installed: New displacement pumps, new wellhead manifold on SW-12
- June 2024 - New well introduced: AR-05 brought online
- July 2024 - New Brine Characterization: Well AR-05 Results provided in 350VR-VAULTED-ISO2404.01.pdf
- August 2024 - New Feedstock Introduced: Manure
- August – September 2024 – New Feedstocks Introduced: Manure and Biosolids
- September 2024 – No new changes reported.
- October 2024 – Emissions from a) additional biomass screening performed by suppliers and b) returned biomass loads were added to the GHG Statement.
- November 2024 – No change
- December 1-13 – New Manure Feedstock supplier introduced
- December 14, 2024 – January 10, 2025, No change
- January 11 – February 10, 2025, No change
- February 11 – March 10, 2025, No change
- March 11-April 10, 2025 - New Manure Feedstock supplier introduced, suspended use of AR05 and began emplacement procedures at AR04
- April 11 – May 10, 2025 - New Manure Feedstock supplier introduced. Allowances/updates made by Isometric for missing TOC samples
- May 11 – June 10, 2025- New Manure Feedstock supplier introduced. New guidance provided by Isometric for late brine results for emplaced/displaced brine.
- June 11 – July 10, 2025 – No change
- July 12 – August 10, 2025 - Facility upgrades including new biosolids handling pits, expanded slurry processing tanks with containment systems, enhanced return brine management, upgraded instrumentation and SCADA monitoring, and improvements to feedstock handling and preprocessing capacity. A change in TOC testing lab also occurred.
- August 11 – September 10, 2025 – New feedstock suppliers added and revisions to the PDD pertaining to SEP, GM and Groundwater monitoring.
- September 11 – 10 Oct 2025 - New feedstock suppliers added and revisions to the PDD pertaining to SEP, GM and Groundwater monitoring. Final SEP, GM and GWMP received.
- October 11-November 10, 2025 – New well opened for emplacement (AR03)
- November 11-December 10, 2025 – New well added for emplacement (AR09) (already opened), Woody biomass feedstock added, Chloride sampling SOP developed
- December 11, 2025 - January 10, 2026, No Change
- January 10 – 11 February 2026 – Embodied emissions approach amended until June 2026
- February 10 – March 11, 2026 – GHG Statement revised to include a one-time deduction of emissions to conservatively address prior potential emissions identified via investigation of gas monitoring data. The LCA will also include a line item for emissions occurring during emplacement going forward.
- March 10 – April 11, 2026: Emplacement at new well: AR07

- April 10 – May 11, 2026: A new manure feedstock supplier was added during this reporting period
- May 10- June 11, 2026: No change.
- June 11 – July 10, 2026: Emplacement at new well: AR06
- July 11- August 10, 2026: No change.

Appendix 4: Verifier Qualifications

Kelly Inder-Nesbitt

Senior Carbon Removal Verification Engineer, 350Solutions Inc

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.

Zoe Sandwith
Research & Verification Associate, 350Solutions

EDUCATION:

BSc. Combined Biology & Earth Science, University of Victoria, 2011

EXPERIENCE SUMMARY:

Zoe Sandwith is an observational ocean scientist with expertise in ocean chemistry, biogeochemical cycles, oceanographic instrumentation, and field- and lab-based analytical methodologies. Zoe works on verifying carbon dioxide removal (CDR) technologies, with a focus on marine and open systems. Previously, Zoe conducted academic research on topics including dissolved oxygen in dynamic coastal settings and constraining the error associated with different measurement techniques; the use of dissolved oxygen isotopes for understanding net community productivity and potential export efficiency; the analysis of the marine carbonate cycle and ocean acidification; and the development and testing of novel instrumentation. In addition to her research, Zoe has experience managing large, long-term observational research infrastructure at the marine interface.

SELECTED RESEARCH AND PROFESSIONAL EXPERIENCE:

Jun 2025 – Present: Research & Verification Associate, 350Solutions

Verify CDR technologies on behalf of registries and individual clients. Specializes in marine and open system pathways, instrumentation, carbonate system chemistry, and data quality

2021-2024: Scientist, Hakai Institute

Analyzed high-frequency, high resolution oceanographic data from field programs and autonomous platforms and synthesized in a regional context. Focused on dissolved oxygen dynamics, regional hypoxia, ocean acidification, and climatological linkages. Participated in field monitoring programs and developed and trialed low-cost autonomous sensors and sampling platforms.

2011-2020: Manager & Research Assistant III, Woods Hole Oceanographic Institution

Managed daily operations for the Martha's Vineyard Coastal Observatory and spearheaded infrastructure retrofit and upgrades and permitting review. Conducted research on biogeochemical cycles using gas tracers, specializing in dissolved oxygen isotopes and the dissolved oxygen to argon ratio for measuring Net Community Production, and high-quality analysis of the isotopes of the nitrogen cycle and carbonate system. Methodologies included underway continuous sampling, moored systems, novel autonomous samplers, and discrete sampling methods. Operated in open and coastal ocean, estuarine, lacustrine and marsh systems. Managed multiple analytical laboratories.

SELECTED PUBLICATIONS:

- Evans W, Campbell K, Weekes C, [...] **Sandwith Z**, and Jackson J. 2025. Variability in Storm season intensity modulates ocean acidification conditions in the northern Strait of Georgia. *Nature Sci Reports* 15(4505). <https://doi.org/10.1038/s41598-025-88241-8>
- Nicholson D, Michel APM, [...] **Sandwith Z**, Monk S. 2018. Rapid mapping of methane and carbon dioxide in coastal ecosystems using the ChemYak, an autonomous surface vehicle. *Env Sci Tech*. <https://doi.org/10.1021/acs.est.8b04190>
- Smith WO, Zhang WG, [...] **Sandwith Z**, [...] McGillicuddy DJ. 2021. A regional, early spring bloom of *Phaeocystis pouchetti* on the New England continental shelf. *JGR Oceans* 126(2). <https://doi.org/10.1029/2020JC016856>

Appendix 5: Approved Exemptions and Gas Monitoring Plan

A5.1. Explanatory Note for Current Reporting Period

Logged: July 27th, 2026

Explanatory note ID	Supplier / Project	Pathway & Protocol/Module	Req ID
1HHYZFVGW1S044ZY-R-C165-1-0-1	Vaulted Deep: Great Plains Organic Waste Sequestration	Biomass or Bio-oil Storage in Salt Caverns Module (v1.1)	R-C165-1
Summary			
Requirement R-C165-1 of the Biomass or Bio-oil Storage in Salt Caverns Module (v1.1) requires that "Wells must have species-specific gas detectors (or equivalent sensors/imaging) capable of detecting, at minimum, CO₂, CH₄ and propane (C₃H₈), with alarms and injection shut-off systems." In the context of Vaulted's Great Plains project, this requirement is not being met in the exact way the module intends. The wells are equipped with continuous LEL (lower explosive limit) detectors that provide the required alarm and injection shut-off function but cannot speciate gases, so they cannot distinguish CH₄ from the propane present at these wells. Installing continuous species-specific CH₄ detection is not operationally or technically feasible at this site. Available field-deployable instrumentation cannot reliably distinguish trace CH₄ from the dominant propane background, and retrofitting such a system into the existing closed-loop configuration is not practical. This explanatory note sets out the project circumstances and how the intent of the requirement will be met. For the current 11 June 2026 to 10 July 2026 verification, and for future verifications until the fall 2026 Salt Caverns Module batch update takes effect, this explanatory note remains in effect.			
Additional context			

The intent of Section 3.1.1.1 is to ensure any CH₄ generation is reliably detected and conservatively accounted for in the project LCA. The following circumstances are relevant.

Gas composition data from wellhead grab samples analysed monthly, showing the displaced gas is overwhelmingly legacy propane, at 30.6% to 91.41% mol, against CH₄ at 0.019% to 0.096% mol. That is a propane-to-methane ratio of roughly 320:1 to 3,900:1. Because propane's LEL (2.1%) is less than half methane's (5.0%) and propane is present in vastly greater quantities, propane drives essentially the entire LEL signal. Methane accounts for only about 0.01% to 0.13% of any LEL reading and cannot itself trigger an alarm at these compositions.

Alternative approach agreed: Vaulted will not comply with the specific wording of Section 3.1.1.1 (continuous species-specific detection). The spirit of the requirement is met via four measures. First, the retained continuous LEL detection provides the alarm and injection shut-off function required by 3.1.1.1. Second, monthly wellhead grab-sample composition analysis is consistent with the monthly composition monitoring described in the following section (Section 3.2). Third, a conservative CH₄ deduction is computed from a rolling six-month record of monthly grab samples, using a mean-plus-three-standard-deviations concentration applied to a mass-flux model that vaulted uses to estimate CO₂ losses from the system. Fourth, the to-be-installed KDHE-required flaring system combusts vented gas at 10% LEL; because propane always drives the flare trigger, the flare bounds wellhead CH₄ to under about 7 ppm before combustion, several orders of magnitude below any level that could represent a material reversal.

Protocol update pending: A forthcoming update to the Salt Caverns Module is planned in the fall 2026 batch certification, after which the module will explicitly provide a continuous-measurement-or-conservative-discount election, consistent with Isometric's methane measurement requirements in other domains (for example landfill or diverted organic waste). In the interim, Vaulted is aligned with the intent of the requirement via the approach above.

Conclusion

Isometric approves this explanatory note for Vaulted on the Great Plains project in respect of Section 3.1.1.1 of the Salt Caverns Module (v1.1), for the current 11 June 2026 to 10 July 2026 verification and future verifications until the fall 2026 module update takes effect, on the basis that the project meets the intent of the requirement as described above.

A5.2. Explanatory Notes from Previous Reporting Periods Still in Effect

Summary of Gas Monitoring Requirements

The Isometric Biomass Geological Storage Protocol (v1.1) requires CH₄ to be monitored and included in the project's GHG Statement. The specific technical requirements for gas monitoring at the storage site are set out in the Biomass or Bio-oil Storage in Salt Caverns Module (v1.1).

The module establishes the following requirements for gas composition monitoring:

- **Gas detection and alarms (Section 3.1.1).** Wells must have gas detectors (or equivalent sensors/imaging) with alarms and injection shut-off systems, including for a gaseous release of CO₂, hydrocarbons, or other GHGs. If gas detection alarms are activated, the operator must immediately investigate and identify the cause and report the instance to the VVB.
- **Gas composition monitoring (Section 3.1.3).** Gas monitoring must include CO₂, CH₄, and VOCs via gas monitors with a resolution of at least 0.01 vol%. When concentrations above background atmospheric levels are detected, a sample must be taken to establish the chemical composition of the displaced gases, including CO₂, CH₄, N₂, O₂, and VOCs.
- **Monitoring frequency (Appendix 1).** Gas composition analysis of CO₂, N₂, O₂, CH₄, and VOC levels in the well headspace (at a resolution of at least 0.01 vol%) is required monthly during operations and as specified in the permit post-injection. The measurement method is described as wellhead gas sampling, with gas monitors deployed if limits are breached.

Forward Action Plan

To bring monitoring into compliance with the module, the following actions are proposed:

1. **Monthly grab samples.** Implement a monthly wellhead grab sampling program with samples submitted for laboratory analysis capable of reporting CO₂, CH₄, N₂, O₂, and VOC concentrations at or above the required 0.01 vol% resolution. This satisfies the operational monitoring frequency specified in Appendix 1 of the module.
2. **Reactive sampling following LEL alarms.** Retain the existing LEL system as a continuous safety measure, consistent with the Section 3.1.1 requirement for gas detectors with alarms and shut-off systems. Establish on-site capacity to collect a grab sample immediately following any LEL alarm event, submitted for the same species-level analysis as the monthly sampling. We recommend a minimum of three reactive grab samples be collected in each rolling six-month period. Where concentrations above background are indicated, samples should also be submitted for GC-MS and, if source attribution is required, IRMS analysis (per Sections 3.1.3 and 3.2).
3. **Baseline establishment.** Use the initial months of grab sample data to establish a baseline range for each monitored gas species. This baseline is required under Section 3.1.3 to determine whether future readings fall outside normal ranges and therefore trigger enhanced monitoring.

Exemption Note: Gas Detection Alarm Investigation

Protocol requirement. Section 3.1.1 of the Biomass or Bio-oil Storage in Salt Caverns Module (v1.1) requires that if gas detection alarms are activated, the operator must immediately investigate and identify the cause of the alarm and report the instance to the VVB.

Current non-compliance. Vaulted is not investigating every gas detection alarm activation. LEL alarms at the site have been increasing in frequency, and Vaulted is not conducting a cause investigation following each event.

Exemption. During active injection, Isometric is exempting Vaulted from the requirement to investigate every gas detection alarm activation. In place of per-alarm investigation, Vaulted is subject to the ongoing monthly grab sampling program and the reactive sampling plan (minimum 3 grab samples per rolling 6-month period following alarm events) described in the forward action request. Following site closure, Vaulted must comply with the standard post-closure monitoring requirements set out in Section 3.2 of the module.

Rationale. A previous LEL alarm was investigated, and the gas composition was determined to be predominantly propane, consistent with the cavern's history of hydrocarbon storage. Given this known and expected source, per-alarm investigation of every event is not proportionate. In place of per-alarm investigation, Isometric is issuing a forward action request for Vaulted to maintain reactive grab sampling capacity to sample gas composition following alarm events, at a recommended cadence of a minimum of 3 samples per rolling 6-month period. This maintains ongoing oversight of the gas composition and would detect any material change, such as the emergence of CH₄ or CO₂ from biodegradation of the injectate.