



EQUITABLE  
ORIGIN  
CERTIFIED



 SENECA  
RESOURCES

## Site Overview

<b>Certificate Issuer:</b>	<a href="#">Equitable Origin, Inc.</a>
<b>Certificate Number:</b>	<b>EO100-20122021-US</b>
<b>Operator:</b>	<a href="#">Seneca Resources Company, LLC</a>
<b>Certifiable Unit Name:</b>	<b><i>Pennsylvania Operations</i></b>
<b>Certification Standard:</b>	EO100™ Standard for Responsible Energy Development (2017) and the EO100™ Technical Supplement: Onshore Natural Gas and Light Oil Production (2022)
<b>Location of Certified Unit:</b>	Elk, Cameron, McKean, Tioga and Lycoming counties, Pennsylvania, USA
<b>Area:</b>	1.2 million acres
<b>Production Volume:</b>	~1 bcf/d dry natural gas
<b>Number of Employees:</b>	~270
<b>Production Phase:</b>	Active production
<b>Certification Date:</b>	20 December 2021
<b>Re-verification Date:</b>	20 December 2023
<b>Expiration Date:</b>	20 December 2024
<b>Assessment Period:</b>	November 2023
<b>Assessment Body:</b>	<a href="#">Geosyntec Consultants Inc.</a>

## ABOUT THE EO SUMMARY REPORT

The purpose of this report is to document the EO100™ Certification and annual re-verification assessments conducted for Seneca Resources Company, LLC (Seneca Resources) natural gas operations focused in Elk, Cameron, McKean, Tioga and Lycoming counties, Pennsylvania. The assessment scope included Seneca Resources' *Pennsylvania Operations* which were treated as the Certified Unit.

The EO100™ Standard for Responsible Energy Development is a set of rigorous performance standards for energy development projects. Developed through a three-year, multi-stakeholder engagement process, the EO100™ Standard is the product of extensive consultation with the energy industry, international NGOs, Indigenous organizations, financial institutions, government, and communities affected by energy projects. The Standard establishes metrics and performance targets to objectively and independently evaluate the environmental, social and governance (ESG) impacts of energy development projects. The EO100™ Standard includes a technical supplement for natural gas and light oil production.

The EO100™ Standard and associated Supplements encompass the following Principles:

1. Corporate Governance, Transparency & Ethics
2. Human Rights, Social Impact & Community Development
3. Indigenous People's Rights
4. Fair Labor & Working Conditions
5. Climate Change, Biodiversity & Environment

The EO100™ Standard incorporates and references other leading international ESG standards, initiatives and reporting frameworks, including: international human rights standards and conventions (Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights), IFC Performance Standards, Global Reporting Initiative, ISO 26000, AA1000 Assurance Standard, ISO 14001, ISO 45001, Oil and Gas Methane Partnership, Taskforce on Climate Related Financial Disclosure, and the Extractives Industries Transparency Initiative. Best practices have been converted into specific and auditable indicators based on the experiences of and feedback from companies and stakeholders in the energy sector. Standards are reviewed and updated on a 5-7 year cycle.

The EO100™ Standard incorporates a scoring system based on three levels of Performance Targets (PTs).

- PT1 indicates that a site's performance meets industry best practices;
- PT2 indicates that a site's performance exceeds industry best practices; and
- PT3 indicates that a site's performance leads industry best practices.



Producers must satisfy all provisions at the level of PT1 to achieve certification under the Standard. Additional points are awarded for achieving PT2s and PT3s, which indicate that the producer goes beyond industry best practices or demonstrates leadership and innovation.

Established in 2009, Equitable Origin is a non-profit 501(c)3 charity based in the US that partners with business, communities and government to incent and reward more transparent, equitable, and sustainable development of energy resources through standards and certification. Our mission is to protect people and the environment by ensuring that energy development is conducted to the highest social and environmental standards.

**Read more about our Standards here:**

<https://energystandards.org/responsible-energy-development/>

## Site Profile

Seneca Resources corporate headquarters are in Houston, Texas, and its parent company, National Fuel Gas Company, is headquartered in Williamsville, New York. In 2021, Seneca Resources first achieved certification of its *Pennsylvania Operations*, in Pennsylvania under the EO100™ Standard for Responsible Energy Development (2017) and the EO100™ Technical Supplement: Onshore Natural Gas and Light Oil Production (2022).

Seneca Resources is an energy developer that produces natural gas at its operations in the Appalachian Region of the United States. The company is an exploration and production entity with operations located in the stacked rock formations of the Marcellus and Utica Shales.



The *Pennsylvania Operations* includes all facilities owned and operated by Seneca Resources in northwestern and central Pennsylvania, known as their East Division. The *Pennsylvania Operations* include their Marcellus and Utica development in Elk, Cameron, and McKean counties in the western portion of its Pennsylvania acreage, and Tioga and Lycoming counties in the eastern portion.

The *Pennsylvania Operations* includes all facilities owned and operated by Seneca Resources in their Marcellus and Utica development and includes an estimated: i) 360 well pads; ii) 13 water storage/treatment/injection facilities; iii) 26 impoundments; iv) ~100 other facilities (i.e., seven M&R facilities/interconnects/meter stations, two staging areas, 64 communications towers, 21

water withdrawal points/groundwater wells, over 180 miles of produced fluid and freshwater lines, and four compressor stations); and v) four field offices.

## Stakeholders and Communities

Seneca Resources engages and consults with its stakeholders based on regulatory requirements and their respective interests. These include:

- Employees
- Local communities
- Government (local, state, and federal)
- Landowners
- Contractors, suppliers, and service providers
- Shareholders and capital providers

Seneca Resources engages with its stakeholder groups in different capacities depending on their respective interests and responsibilities. The company works with stakeholders to assess potential environmental and social impacts as well as health, safety, and operational impacts of its activities throughout a project's lifecycle.

Seneca Resources incorporates a Stakeholder and Community Engagement Plan to engage and communicate with its internal and external stakeholders. Additionally, the Plan provides a detailed approach for interacting with stakeholders throughout all phases of a project's lifecycle, including entry, construction, operations, and exit/closure.

While Seneca Resources does not conduct its operations on federally recognized Indigenous lands, Seneca Resources is aware of the proximity of one Indigenous community across the New York state border, the Seneca Nation of Indians (Seneca Nation), with whom it has had prior engagements. Equitable Origin-approved independent assessors, Geosyntec Consultants Inc. reviewed Seneca Resources' past engagement activities for the purpose of this assessment report.

## Document Review and Stakeholder Interviews

Seneca Resources engaged Equitable Origin-approved independent assessors, Geosyntec Consultants Inc., to conduct its reverification assessment in November 2023.

To assess conformance of the Certifiable Unit to the associated performance obligations, the Assessment Team conducted verification activities using desk research, focused on assessing improvements that were to be made in conformance with Seneca Resources' Continuous Improvement Plan that was a condition of initial certification. Additionally, selected performance targets were checked to ensure no regression in performance occurred. Where warranted, areas of sector outperformance (Performance Target at Level 2), and sector leadership (Performance Target at Level 3) were verified.

Specific verification activities undertaken as part of this assessment included review of Seneca Resources' documentation and reports (internal and external), interviews with relevant staff and external stakeholders, discussion with key personnel and site operators. As a part of the review process in 2023, multiple targets that received full scores in 2022 were followed-up on and discussed during the interview process to confirm best practices remain in place.

As part of this work, Geosyntec spent 28 days performing desk review, reviewed 120 documents, and conducted more than 14 interviews with internal and external stakeholders. Interview discussion topics included business practices, grievance mechanisms and processes for contractors, environmental performance, and emissions management.

All supporting assessment documents are confidential.

## Certification Results

Based on the information obtained, Geosyntec finds that Seneca Resources' *Pennsylvania Operations* have met the requirements for recertification under the EO100™ Standard for Responsible Energy Development (2017) and the EO100™ Technical Supplement for Onshore Natural Gas and Light Oil Production (2022).

This reverification assessment concludes that Seneca Resources has succeeded in meeting or partially meeting all the applicable Level 1 Performance Targets (See Table 1). It finds that the company continues to perform in accordance with the Standard and has made improvements in scores across Performance Targets at Levels 1, 2 and 3 across Principles 1, 2, 3, 4, and 5. The reverification assessment also identified areas in need of continued improvement to fully meet level 2 and 3 Performance Targets. These areas were identified for consideration in the 2024 CIP or action plan.

The Assessors find that Seneca Resources has continued its performance in meeting all Level 1 Performance Targets defined by Principle 1. A spot check on some of the objectives that received a full score were evaluated and confirmed to have no regression in performance over the year 2023.

Company documents reviewed as part of the reverification for Principle 2 evidenced that Seneca Resources has continued to enhance its documents to demonstrate the Company's commitment to human rights, stakeholder engagement, and community development.

Seneca Resources continues to implement policies and procedures to fully meet all the Level 1 Performance Targets in Principle 3. As part of the initial certification assessment conducted in 2021, it was noted that while there are no federally recognized Indigenous Peoples' in Pennsylvania, the Seneca Nation of Indians is nearby some of Seneca Resources' operations, across the New York State line. As such, it was determined that several Level 1 Performance Targets in Principle 3 were applicable and required in the assessment.

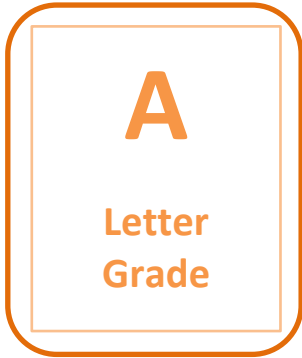
With respect to Principle 4, the Assessors found that Seneca Resources' policies, procedures, and strategies were further developed or revised in 2023 in line with performance objectives. The Assessors found Seneca Resources showed improvements in or maintained conformity with across objectives in Principle 5.

Seneca Resources has been provided with a list of the remaining gaps identified during this reverification for incorporation into the Continuous Improvement planning process initiated following the first year's certification assessment.

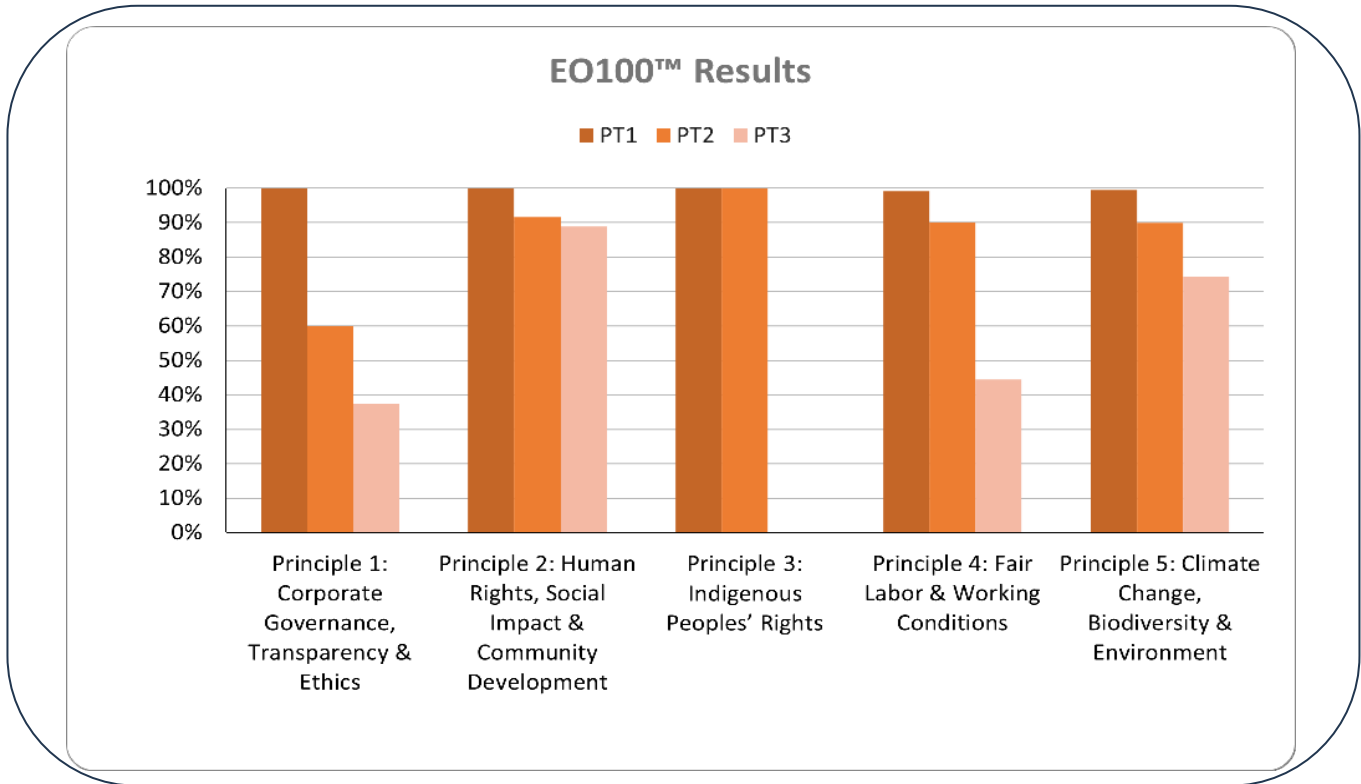
Table 1 below shows the results summarized by Principle for each Performance Target level.



**Table 1: Summary Results by Principle**



Principle	2023 Re-Verification Assessment
<b>1: Corporate Governance, Transparency &amp; Ethics</b>	100%
<b>2: Human Rights, Social Impact &amp; Community Development</b>	100%
<b>3: Indigenous Peoples’ Rights</b>	100%
<b>4: Fair Labor &amp; Working Conditions</b>	99%
<b>5: Climate Change, Biodiversity &amp; Environment</b>	99%



**Figure 1: EO100™ 2023 Re-Verification Assessment Results**

## EO100™ Certificate



EQUITABLE  
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**A**  
Letter Grade

**Certificate**  
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**Assessor:** Geosyntec Consultants Inc.



Jason Switzer  
CEO, Equitable Origin

### Contact Information:

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If organizations or individuals have concerns, complaints, or comments about the operator's EO100™ Certification, they should first contact the Certified Operator directly: 412-548-2572.

Equitable Origin: [contact@equitableorigin.org](mailto:contact@equitableorigin.org)

For more information on Equitable Origin's Certification System Comments, Complaints and Appeals processes, please visit our website: [www.energystandards.org](http://www.energystandards.org).