



EQUITABLE  
ORIGIN  
CERTIFIED



northeast  
NATURAL ENERGY

## Site Overview

<b>Certificate Issuer:</b>	<a href="#">Equitable Origin, Inc.</a>
<b>Certificate Number:</b>	<b>EO100-28102024-US</b>
<b>Operator:</b>	<a href="#">Northeast Natural Energy</a>
<b>Certifiable Unit Name:</b>	<b><i>Monongalia County 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>	Monongalia County, West Virginia, USA
<b>Area:</b>	60,000 net acres
<b>Production Volume:</b>	Approximately 700 mmcf/d
<b>Number of Employees:</b>	Approximately 60
<b>Segments of Supply Chain Covered:</b>	Natural Gas Production
<b>Re-Certification Date:</b>	28 October 2024
<b>Re-Verification Date:</b>	28 October 2025
<b>Expiration Date:</b>	27 October 2027
<b>Assessment Period:</b>	September 2024
<b>Assessment Body:</b>	<a href="#">Responsible Energy Solutions, LLC</a>

## ABOUT THIS REPORT

The purpose of this report is to publicly document the EO100™ Certification assessment conducted of Northeast Natural Energy, LLC (NNE) natural gas operations in Monongalia County, West Virginia, USA. The assessment scope covered NNE's *Monongalia County Operations*, detailed below, which were treated as one Certifiable Unit.

The EO100™ Standard for Responsible Energy Development is a set of rigorous performance standards for energy development projects. Developed through an extensive multi-year, and multi-stakeholder [engagement process](#), the EO100™ Standard is the product of extensive consultation with over 1,000 representatives from the energy industry, international NGOs, Indigenous Rightsholders, financial institutions, government officials, and communities affected by energy projects. The Standard establishes metrics and performance targets that aim to objectively and independently evaluate environmental, social and governance (ESG) impacts of energy development projects. The EO100™ Standard includes a Technical Supplement for Natural Gas and Light Oil Production that was originally released in 2017 and updated in 2022.

In selecting the management obligations, metrics and performance targets to represent under these Principles, the EO100™ Standard synthesizes leading international and sectoral Environmental, Social and Governance Performance 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, the Task Force on Climate Related Financial Disclosure, and the Extractives Industries Transparency Initiative. These global and sectoral good practice benchmarks are selected and codified as specific and auditable indicators, with the guidance of a multi-stakeholder expert Advisory Committee. Standards are reviewed periodically to remain consistent with evolving guidelines, benchmarks and expectations.

A total of over 500 metrics are incorporated in the EO100™ Standard and associated project-related Supplement that are grouped under the following Principles:

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

The EO100™ Standard allocates over 500 of these metrics across three successive levels of Performance Targets (PTs):

- PT1 targets “meet” global or sectoral “good practice” benchmarks;
- PT2 targets “exceed” or go beyond these benchmarks in terms of transparency, management or stringency, or operational performance;
- PT3 targets represent “leadership” and achievement of sector best practices in this area of management or operational performance.

Scoring of an Energy Development Project against the EO100™ Standard and relevant Supplements is undertaken annually by an expert Assessment Body based on representative sampling of a cross section of observation points following documented procedures and international assurance good practice, including periodic site visits and interviews. The Assessor is required to substantiate their recommended scoring based on evidence provided by the Operator, and on their observations gathered onsite, through interviews and document review. The Assessment Body’s findings are subject to expert peer review and periodic Witness Assessment by EO, to ensure consistency of interpretation across sites and assessors.

Participating Producers must at least partially meet all applicable ~270 PT1 targets to achieve certification under the Standard, score a minimum of 70% overall, and commit to fully meet all applicable PT1s by the end of the first 3-year certification cycle. Additional points are awarded for achieving PT2s and PT3s, which indicate that the producer has gone beyond industry good practice to demonstrate leadership and innovation.

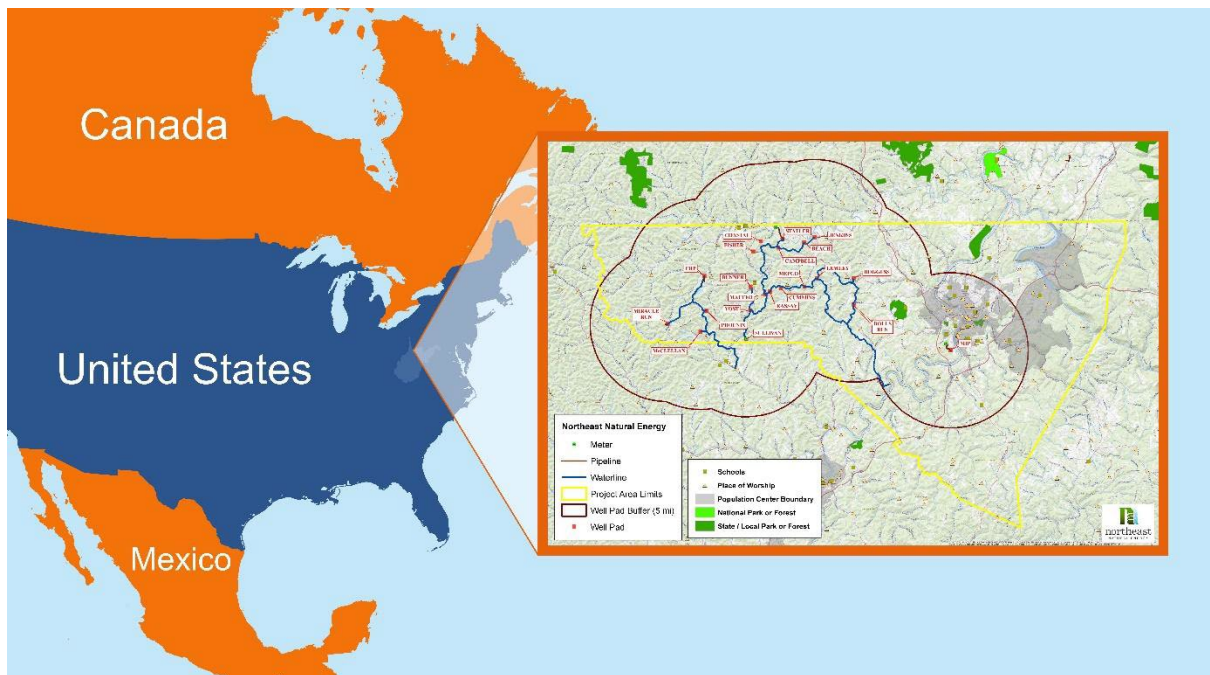
Established in 2009, Equitable Origin is a non-profit 501(c)3 charity based in the US that partners with business, communities and government to incent and reward more transparent, equitable, and sustainable development of energy resources through standards and certification. Our mission is to protect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

**Read more about our Standards here:**

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

## Site Profile

Founded in 2009, Northeast Natural Energy, LLC (NNE) is a West Virginia-focused producer of dry, pipeline quality natural gas from the Marcellus Shale. The company is a private equity backed operator, headquartered in Charleston, West Virginia, with a Morgantown office supporting field operations. The Unit for certification represents the entirety of the company's WV operations, primarily located in Monongalia County, West Virginia, where they currently operate 158 wells on 21 well pads within a region of over 40,000 contiguous acres. NNE also maintains a site for above ground storage of produced water for use in operations and two measuring and regulating (M&R) sites. At the time of the assessment average daily production from operations was approximately 700 mmcf/d.



In 2021, NNE first achieved certification of its Monongalia County Operations in West Virginia under the EO100™ Standard for Responsible Energy Development (2017) and the EO100™ Technical Supplement: Onshore Natural Gas and Light Oil Production (2022).

## Stakeholders

In the course of operating this Certified Unit, NNE engages with:

- Mineral Rights Owner Representative
- Local Landowners
- Suppliers and service providers
- Office of Emergency Management, MECCA 911
- West Virginia Department of Environmental Protection, Oil and Gas Division
- West Virginia Department of Highways
- West Virginia University Research Projects including MSEEL, WVVRI, STEAM/TANKS, Geothermal lab, and others

Principle 3, Indigenous Peoples' Rights, was evaluated by the Assessor as having limited applicability to this particular assessment . Additional details on this finding are detailed below.

The Assessor noted that the presence of the nearest federally or state recognized Indigenous Territory is the Seneca Nation Tribal Territory in Cattaraugus County, New York to the north of the NNE operating area. However, due to the separation of the area of operations from these Indigenous territories, natural water movement and air currents, as well as identified North American whitetail deer migration patterns, the Assessors concluded that, based on the evidence reviewed, NNE operations would likely have minimal impact on those territories.

## Assessment Activities

NNE engaged Equitable Origin-approved independent assessors, Responsible Energy Solutions, LLC, to conduct its recertification assessment in September 2024.

To assess conformance of the Certifiable Unit to the associated performance obligations, the Assessment Team conducted verification activities using desk research and site investigation, focused on assessing improvements that were to be made in conformance with NNE's Continuous Improvement Plan that was a condition of initial certification.

Specific verification activities undertaken as part of this assessment included an on-site visit for environmental, health and safety and community impact observations. Further activities included a review of NNE's documentation and reports (internal and external), interviews with relevant staff and internal stakeholders, discussion with key personnel and site operators.

As part of this work, Responsible Energy Solutions' process included document review and discussion with NNE personnel, interviews, field assessment and report preparation conducted over an approximate six-week period. The Assessors spent 2 days performing field assessments, 11 days performing desk review, reviewed 129 documents, conducted 13 interviews with internal stakeholders, and of the requested 6 interviews with external stakeholders, conducted 3 for this assessment and conducted 13 interviews with internal stakeholders. RES identified several themes that required verification from external stakeholders including water management, collective bargaining, emergency response, workplace grievance process, and more.

All supporting assessment documents are confidential.

## Certification Results

Based on the information obtained, Responsible Energy Solutions finds that NNE has met the requirements for the continued certification of its *Monongalia County Operations* in Monongalia County, West Virginia, to the EO100™ Standard for Responsible Energy Development (2017) and the EO100™ Technical Supplement: Onshore Natural Gas and Light Oil Production (2022).

This recertification assessment concludes that NNE has succeeded in meeting or partially meeting all the applicable Level 1 Performance Targets (see Figure 1, below). During this recertification assessment, the Assessor found that NNE continues to perform in accordance with the standard and has made improvements in scores across Performance Targets at Levels 1, 2 and 3.

NNE's scores have improved year to year since the initial assessment in 2021, and in the Assessor's view, the 2024 recertification results demonstrate that NNE has maintained commitment to improving practices and transparency.

NNE has been provided with a list of gaps identified by the Assessor during this recertification assurance process, for incorporation into the Continuous Improvement Plan that will guide performance improvement efforts for the Certified Unit during the period 2024-2027.

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

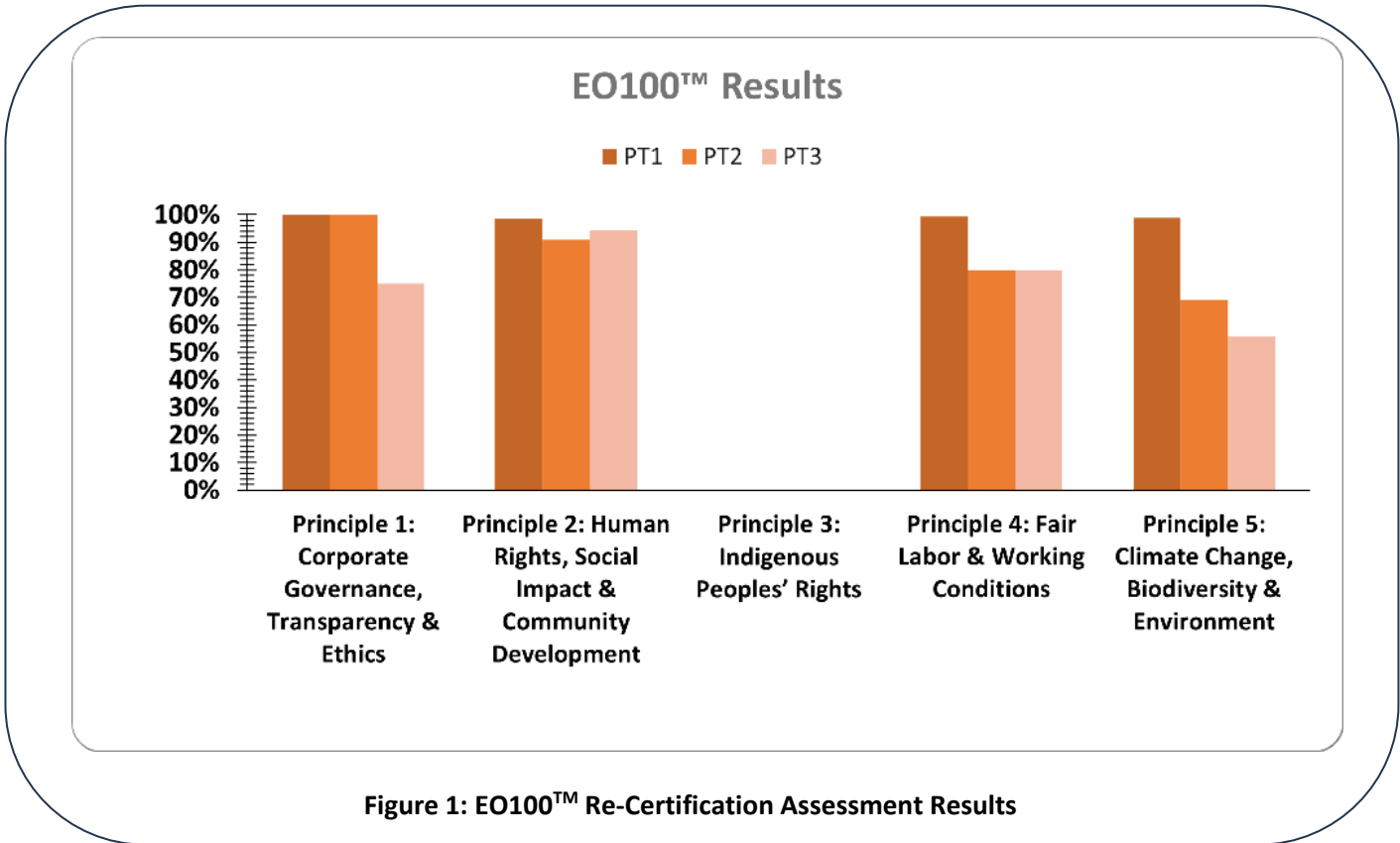


**Table 1: Summary Results by Principle**

A

Letter  
Grade

Principle	2024 Re-Certification Assessment
1: Corporate Governance, Transparency & Ethics	100%
2: Human Rights, Social Impact & Community Development	99%
3: Indigenous Peoples' Rights	-
4: Fair Labor & Working Conditions	99%
5: Climate Change, Biodiversity & Environment	99%



**Figure 1: EO100™ Re-Certification Assessment Results**

## EO100™ Certificate



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**A**  
Letter Grade

# Certificate

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<b>Assessor:</b>	Responsible Energy Solutions, LLC



Jason Switzer  
CEO, Equitable Origin

### Contact Information:

Northeast Natural Energy: [info@nne-llc.com](mailto:info@nne-llc.com)

If organizations or individuals have concerns, complaints, or comments about the operator's EO100™ Certification, they should first contact the Certified Operator directly: 304-414-7060.

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).