

# FOUNDATIONS for **SUSTAINABLE GROWTH**

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2023 Sustainability  
Report

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Photos included in this report are a representation of the diverse and visually striking landscapes found in Texas, where we live and work.





# OVERVIEW

Milestone Environmental Services (Milestone) is pleased to present this update on our mission to Clean Up Energy<sup>SM</sup>. This year's report highlights the progress made since the issuance of our [2022 Sustainability Report](#).

Our website contains a wealth of information that complements all sections of this Sustainability Report. There, we provide extensive background on our service offerings and valuable insights into how we responsibly reduce our customers' carbon impact. Please refer to the relevant links provided throughout this report for more details.



**Gabriel Rio**  
President and CEO



## A Message from the President and CEO

Milestone has celebrated many successes over the past nine years, and 2023 was another year of profound transformation that sets us up for a new phase of growth and development.

With this in mind, I am proud to present our 2023 Sustainability Report, *Foundations for Sustainable Growth*, which shares how we have evolved—and continue to expand—from an energy waste management provider to a leading environmental infrastructure company.

We began 2023 by building on our network and reach, announcing the opening of our first energy waste facility outside of Texas. The momentum persisted and, before long, Milestone Carbon announced the development of a CO<sub>2</sub> sequestration hub in the southwestern Midland Basin, including approval of a Class II injection well permit and notice of an administratively complete Class VI injection well permit application. Later in the year, Milestone Carbon announced an agreement with Texas Pacific Land Corporation to lease more than 22,000 acres of land and pore space in the Permian Basin for permanent CO<sub>2</sub> sequestration.



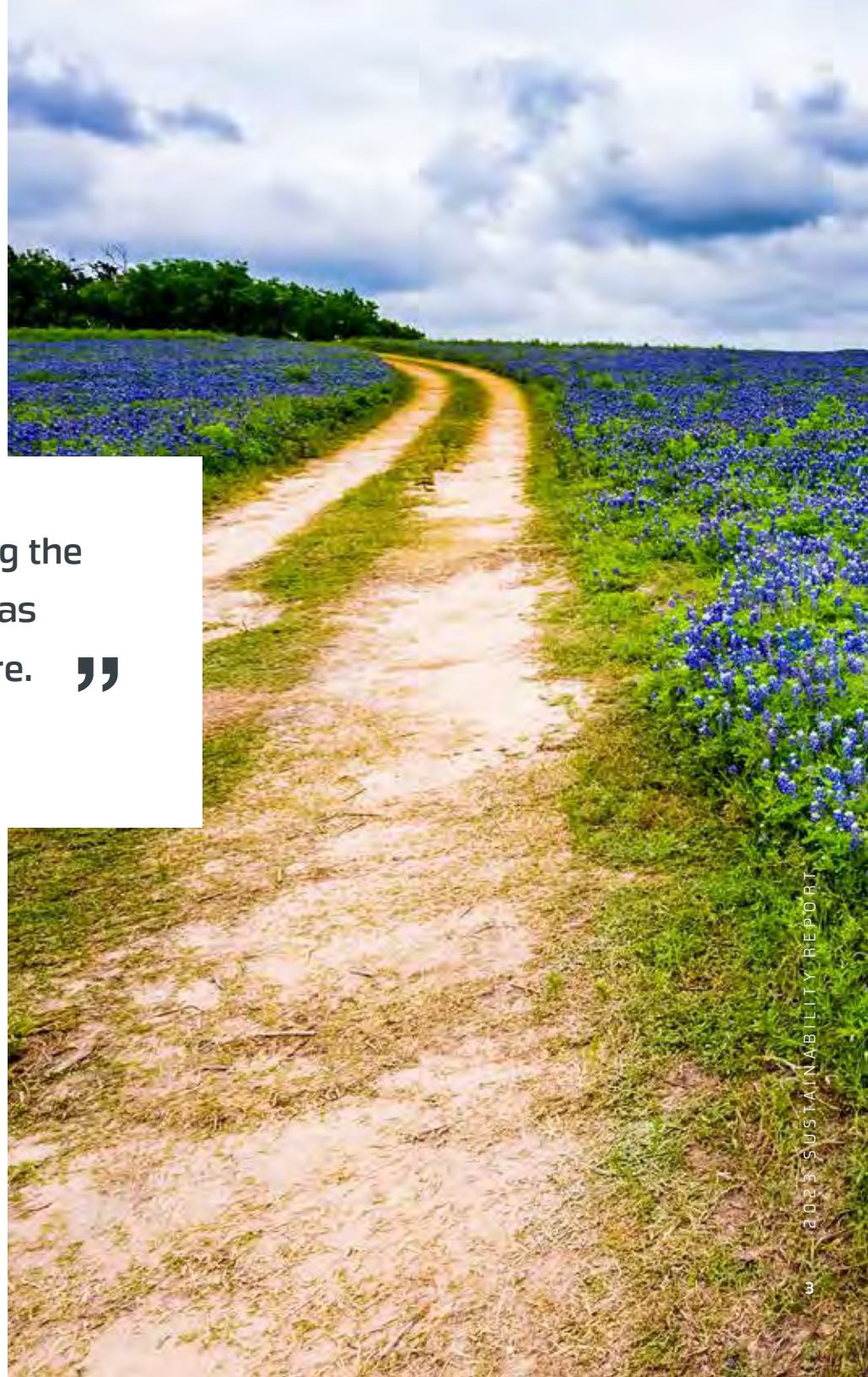
Our continued growth in the energy waste management business and Milestone Carbon's meaningful progress in carbon storage activity, coupled with our market-leading, sustainability-driven business proved impressive to investors, culminating with the October acquisition of Milestone by SK Capital, a New York-based private investment firm focused on the specialty materials, ingredients, and life sciences sectors. Our partnership with SK Capital will open doors to further growth. Milestone's quest to provide sustainable environmental infrastructure for customers across various industrial sectors is unwavering, just like our continued desire to demonstrate value creation through our sustainability strategy.

**“ Milestone is keenly focused on shaping the future, and we are excited to be seen as the impending powerhouse that we are. ”**

**- GABRIEL RIO, PRESIDENT AND CEO**

Similarly, as we move ahead, we are committed to elevating our robust Health and Safety program. Milestone and our management team are concentrated on improving management systems and continuously making the work we do ever safer.

Through our trajectory we have maintained the high level of operational excellence our customers and stakeholders expect from Milestone. We've demonstrated strong financial discipline and courageous entrepreneurship since our founding. With the robust foundations we established in 2023, we are paving the road to further sustainable growth. I am proud of the work our team has achieved in so little time. And I am eager to become a leading environmental infrastructure powerhouse. Thank you for supporting us on this journey. We look forward to what's ahead.





**Carolina Ortega**  
VP of Sustainability  
and Communications

## A Message from the VP of Sustainability and Communications

At Milestone we believe that a key ingredient of a successful sustainability program is its ability to adapt alongside the company's growth. That is why we focused our resources in 2023 on establishing robust programmatic foundations that could guide and support the sustainable growth we continue to experience.



Our foundations are centered on four pillars: Value Creation, Carbon Accounting, Health, Safety, and Environment (HSE) Systems, and Stakeholder Engagement.

“ We hold firm to the belief that  
adaptability is crucial for success. ”

- CAROLINA ORTEGA, VP OF SUSTAINABILITY AND COMMUNICATIONS

Our *Foundations for Sustainable Growth* serve as the bedrock for our growth trajectory. As we move forward, we are eager to delve deeper into the initiatives and advancements showcasing our dedication to sustainable practices and transparent performance.

This Sustainability Report examines each of these four foundations and sheds light on how our sustainability program is designed with value-creation objectives in mind. We are also proud of the improvements we achieved in our Environmental, Social, and Governance metrics, which are featured in the second half of the report.

We are excited to share our progress in our sustainability journey in this report.



## Value Creation

Our ability to create value through sustainability was well-established in our 2022 Sustainability Report. This year we elevated our value-creation endeavors by fine-tuning our analysis and collaborating with third parties. We were honored to partner with CohnReznick and New York University Stern Center for Sustainable Business to further identify and monetize the returns created by our sustainability initiatives.

## Stakeholder Engagement

We understand that sustainable growth needs to be accompanied by solid relationships with our key stakeholders. Since our founding, we've built close ties with our landowners, trade associations, government representatives, and non-profit organizations. But the growth we are realizing and will continue to experience requires us to have a disciplined engagement approach that guides us towards mutually beneficial solutions with our host communities and other stakeholders.

## Carbon Accounting

Milestone's methodology to measure the carbon sequestered through slurry injection at our facilities is unparalleled in our sector. Yet, we persist in enhancing the strength, systematization, and comprehensiveness of our approach, to fulfill our commitment to be the partner of choice for oil and gas producers in the energy transition. Moreover, this year we had the privilege of partnering with BeZero Carbon, as we envisioned our tons of carbon sequestered becoming carbon credits and conducted a risk assessment on the likelihood of a carbon credit achieving a ton of CO<sub>2</sub>e avoided or removed. Read more about BeZero Carbon on [Page 18](#).

## HSE Management Systems

Effective and comprehensive Health, Safety, and Environment (HSE) management systems that grow with our business are essential to the safety of our employees, contractors, communities, and our success. Our continuous journey in self-improvement led us to conduct a gap analysis on our HSE management system against best-in-class industry standards.

Our *Foundations for Sustainable Growth* serve as the bedrock for our growth trajectory. As we move forward, we are eager to delve deeper into the initiatives and showcase our dedication to sustainable practices.











## 2023 Awards & Highlights

VP of Sustainability and Communications Carolina Ortega was recognized as one of the “2024 Influential Women in Energy” by Hart Energy

Houston Chronicle Top Workplace

CohnReznick Gamechangers in ESG Awards –  
“Gamechanger to Watch”

Environmental Business Review (EBR) –  
2023 Top 10 Waste Management Services Provider

Houston Business Marketers Alliance (HBMA)  
2023 Lantern Award – Sustainability Report

Houston Business Marketers Alliance (HBMA)  
2023 Award of Excellence – Social Media Campaign

BUILD Environmental Sustainability Awards –  
Carbon Capture & Sequestration 2023 - Southern USA

American Marketing Association Houston Chapter  
Crystal Award Finalist – B2B Marketing “Sludgie” Campaign





+ Milestone Carbon

+ Foundations for Sustainable Growth

# ABOUT MILESTONE





# RESOURCES



How We Manage Waste  
in the Energy Lifecycle



Our Carbon Capture &  
Sequestration Process



Our Slurry  
Injection Process



Our Landfill  
Carbon Storage

2021  
TOTAL CARBON  
SEQUESTERED\*

342,870  
MT CO<sub>2</sub>e

2022  
TOTAL CARBON  
SEQUESTERED

416,732  
MT CO<sub>2</sub>e

2023  
TOTAL CARBON  
SEQUESTERED

390,820  
MT CO<sub>2</sub>e

2023  
AVOIDED  
EMISSIONS

280,693  
MT CO<sub>2</sub>e

\* In this report, total carbon sequestered represents the total mass of theoretical CO<sub>2</sub> from degradation of the total mass of injected hydrocarbons. The units of CO<sub>2</sub>e are used to represent CO<sub>2</sub> conversion. No global warming potentials have been applied to calculate CO<sub>2</sub>e emissions.



“ Establishing carbon hubs in the Permian Basin, underpinned by over 40,000 acres of land, significantly expands our ability to provide lower-cost CCS solutions to heavy industry and energy producers in the region. ”

- CHRIS DAVIS, SVP MILESTONE CARBON







## Milestone Carbon

Milestone Carbon had a busy and motivating year. In 2023, it accomplished several strategic goals and made headlines across multiple media outlets and geographies.

In October, the company was in the news when it announced the development of carbon sequestration hubs in the Midland and Delaware Basins of West Texas. In connection with the hub developments, the company made headlines again with the announcement of land agreements with Texas Pacific Land Corporation (TPL) in Midland and Loving counties for 22,000 acres.

As part of the Midland carbon hub, Milestone Carbon announced it had acquired the rights to more than 10,000 acres of land and pore space in Upton and Midland counties for the purpose of permanent CO<sub>2</sub> sequestration. Additionally, the company confirmed receipt of a Class II injection well permit from the Texas Railroad Commission and submission of a Class VI injection well permit application, which the U.S. Environmental Protection Agency approved as administratively complete.

Based on the geological investigation completed as of mid-year 2023, Milestone Carbon estimates the Midland Basin hub should have sufficient capacity to store approximately 30 million metric tons of carbon dioxide over its life, which is roughly equivalent to the annual carbon emissions from 6.5 million U.S. passenger cars and trucks<sup>1</sup>.

For the Delaware carbon hub, the company acquired more than 30,000 acres of land and pore space in Loving County. The estimated initial sequestration capacity is 60 million metric tons of carbon dioxide, with potential expansions up to 100 million metric tons.

Both carbon hubs will support carbon capture and storage (CCS) projects for energy and heavy industrial facilities in West Texas, including hydrocarbon processing, cement manufacturing, and electricity generation. Capturing carbon emissions from local natural gas processing facilities reduces carbon intensity for Permian Basin oil and gas production, an increasingly important environmental performance metric in global energy markets.

Overall, 2023 saw Milestone Carbon elevate its reputation as an experienced thought leader in the carbon sequestration industry and its credibility as a longstanding and reliable partner in an emerging market that is poised to significantly support the reduction of global climate change.

<sup>1</sup> Carbon equivalencies calculated as per [guidance from the EPA](#).



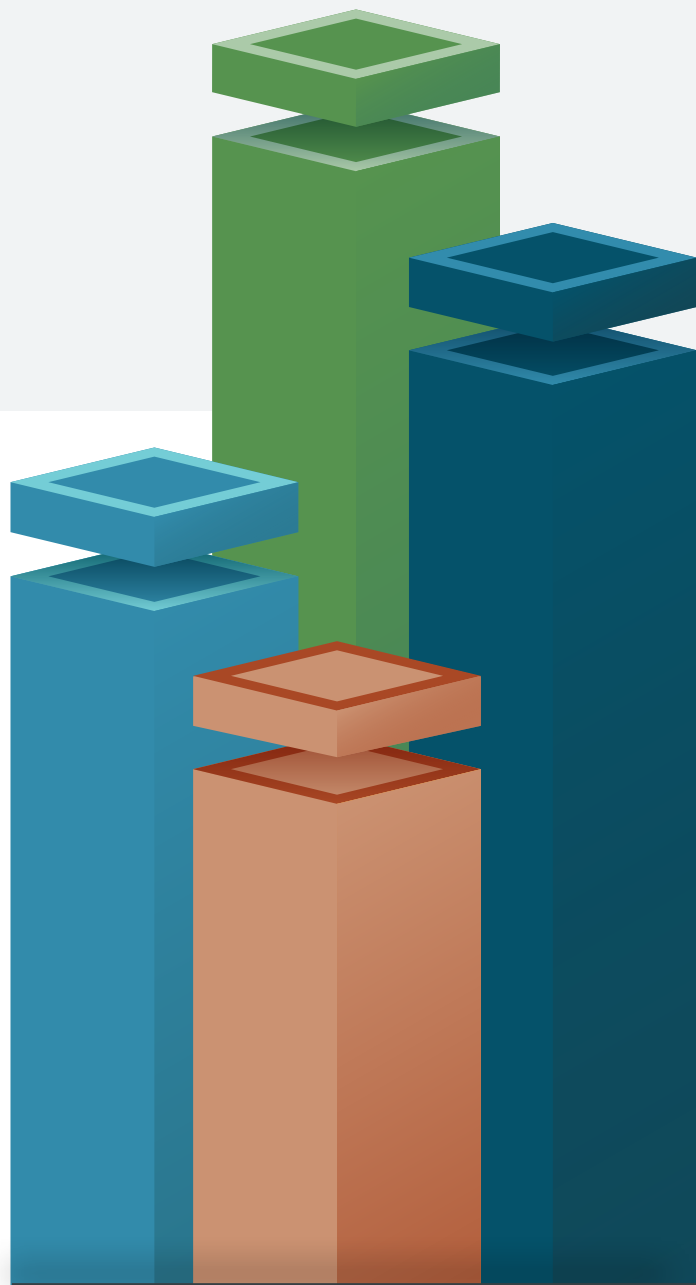
# Foundations for Sustainable Growth

The market for carbon sequestration has experienced remarkable growth, driven by a recognition of the urgent need to address climate change through diverse technologies and innovative solutions.

2023 was a transformational year for Milestone. We devoted significant efforts to the persistent development of our energy waste infrastructure, which further enables our customers to move away from using onsite disposal methods, always steadfast in implementing our innovative sustainability program. Milestone's Energy Waste business unit saw the expansion of our Upton and Orla landfills through the construction of three new landfill cells. In 2023, we also began construction of our newest landfill in Glasscock County, co-located with our existing Stanton facility, which opened in the first quarter of 2024. In addition, we made significant progress with Milestone Carbon, as discussed on [Page 11](#).

In October 2023, Milestone was acquired by SK Capital Partners (SK Capital), which further strengthened our strategy to expand our leadership position in existing and new markets (see further discussion in the Governance section on [Page 34](#)). Our new ownership brought exciting changes, including the relocation of our corporate headquarters to a LEED-certified building and refinement of our internal policies and procedures.





Our commitment to sustainable value creation remained core to Milestone's identity. In this report, we highlight our efforts to establish *Foundations for Sustainable Growth* throughout 2023. These will help us continue our expansion and sustain our ability to replicate success in operational excellence, project execution, and sustainability performance. Our *Foundations for Sustainable Growth* are based on the four key pillars below.



### **SUSTAINED VALUE CREATION**

Evaluate the financial impact of our sustainability initiatives to demonstrate their ability to strategically create value for our company and our stakeholders.



### **ELEVATED STAKEHOLDER ENGAGEMENT**

Commit to mutually beneficial, transparent, and inclusive engagement on priority issues with our stakeholders.



### **OPTIMIZED CARBON ACCOUNTING & TRANSPARENCY**

Continue our leadership in Scope 3 carbon accounting by validating our transparent and robust methodology with third parties.



### **ENHANCED TOP-TIER HSE SYSTEMS**

Solidify our HSE program as a best-in-class, scalable system that supports operational excellence, enhances accountability and ownership, and grows with our expanding operations.



## Sustained Value Creation

In our 2022 Sustainability Report, Milestone outlined how our sustainability initiatives created and protected value by either reducing costs, increasing profits, or managing risk. We listed the financial, environmental, and sustainable development value created and identified the relevant beneficiaries. Please see the Value Creation section in our [2022 Sustainability Report](#).





During 2023, we expanded our analysis by partnering with the New York University Stern School of Business Center for Sustainable Business (CSB) and CohnReznick, to monetize Milestone's impact through our sustainability initiatives. Our partners used CSB's Return on Sustainability Investment (ROSI™) framework and methodology to quantify and monetize the value created through three main sustainability initiatives. Milestone's sustainability practices were analyzed, including stakeholder engagement, talent management, supplier relations, and innovation. Each possible driver of sustainable value was quantified across the following matrices of benefit to our business: revenue growth, profitability, or higher overall corporate valuation.



Center for  
Sustainable Business

The NYU Stern CSB was founded on the principle that sustainable business is good business. CSB's Return on Sustainability Investment (ROSI™) methodology demonstrates how embedding sustainability into business strategy and decision-making can ultimately drive business growth, improve financial performance, and create value. For more information, visit [www.stern.nyu.edu/sustainability](https://www.stern.nyu.edu/sustainability).



CohnReznick performs advisory, assurance, and tax services aimed at helping businesses advance ESG initiatives centered on driving shareholder value and capitalizing on opportunities to build resiliency. To learn more, please visit <https://www.cohnreznick.com/services/advisory/sustainability-advisory>.

The outcome of this analysis focused on increased value creation across three main initiatives, resulting in a total impact of over \$65M of monetized benefits:



### IMPROVED LAND VALUE

Milestone's solution helped to prevent **19,600 ACRES OF LAND** from being used for alternative waste disposal methods like landfarming and reserve pits, over the last five years, which resulted in a 10% compound annual growth rate of the nominal land value.

Additionally, Milestone's partnership with a landowner provided revenue in excess of 3,645% on a small percentage of their cotton farm in 2023.



### LOWER COST OF CAPITAL DUE TO SUSTAINABILITY TARGETS

Due to our sustainability performance, Milestone's ability to sequester over 200,000 MT CO<sub>2</sub>e per year enabled us to lower our cumulative interest payments by approximately **8%** from February 2022 to October 2023. See [Page 25](#) for more information on our sustainability-linked loan.



### SAVINGS FROM AVOIDED COST OF CARBON

Exploration and Production (E&P) companies who work with Milestone save an average of **12% OF ON-SITE DISPOSAL COSTS** due to the avoided additional cost of carbon offsets.



## Elevated Stakeholder Engagement

Stakeholder engagement with a dedicated focus on environmental impact has been an integral aspect of our longstanding business practices.

### OUR STAKEHOLDER ENGAGEMENT PLANNING PROCESS

STEP 1: PREPARE

STEP 2: PLAN

STEP 3: DESIGN

STEP 4: ENGAGE

STEP 5: EVALUATE

STEP 6: APPLY

We recognize the influence our operations can have on the environment and communities, and we understand the importance of actively considering issues important to our stakeholders in our decision-making processes. Milestone defined an engagement process to guide us in our dialogue with stakeholders on important issues. This process centers our engagement efforts on a series of principles while following six-steps to foster action-oriented and mutually beneficial outcomes. This commitment to stakeholder engagement complements our dedication to sustainable practices and minimizing our environmental footprint.

This process proactively considers the needs of our stakeholders to foster connection, trust, confidence, and alignment with our organization's efforts to Clean Up Energy.<sup>SM</sup> As our business grows, continuing to meet the needs of our stakeholder groups will be an essential part of our strategic planning.



1

## PREPARE

1. Identify stakeholder categories
2. Identify and research stakeholders
3. Identify issues of concern
4. Prioritize issues of concern

2

## PLAN

1. Identify objectives, scope and accountability
2. Map stakeholders
3. Determine engagement mode

3

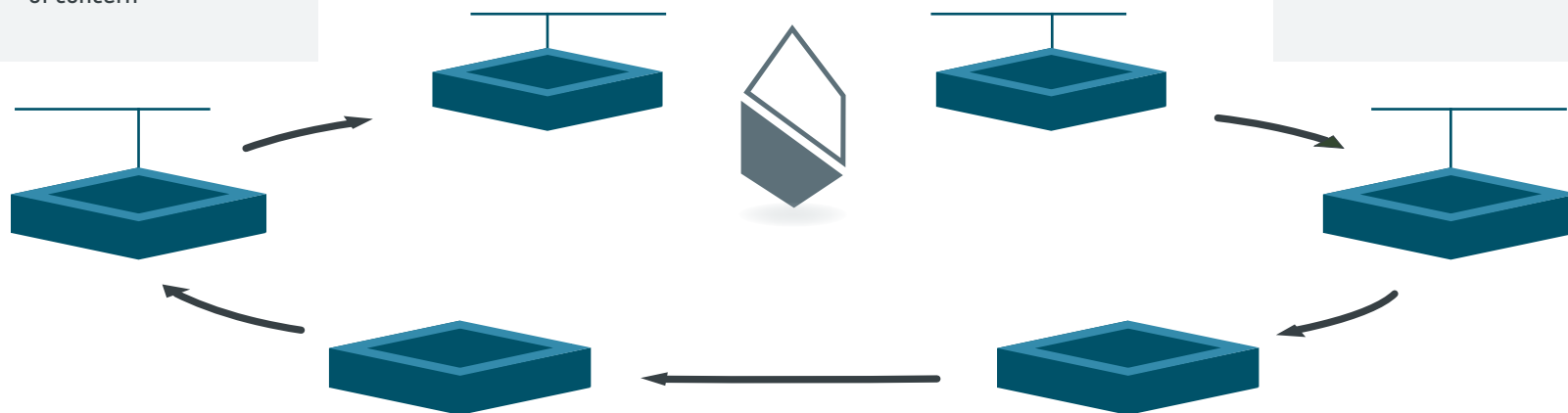
## DESIGN

1. Conduct initial outreach
2. Establish mutual objectives
3. Evaluate need for facilitation

4

## ENGAGE

1. Conduct engagement
2. Confirm next steps



6

## APPLY

1. Share learnings internally and integrate action items into business strategy and timeline
2. Report back to stakeholders

5

## EVALUATE

1. Evaluate process and results against objectives and scope

### ENGAGEMENT PRINCIPLES

INVOLVEMENT

CANDOR

MATERIALITY

LEARNING

ACTION



## Optimized Carbon Accounting & Transparency

Over the last several years, Milestone has worked diligently to develop transparent and robust carbon accounting methodologies for our sequestration processes.



BeZero Carbon is a carbon ratings agency. It equips world-leading organizations with the knowledge, tools, and confidence to make better climate decisions.

BeZero has a 150+ strong team made up of climate scientists, geospatial experts, data scientists, financial analysts, and policy specialists, and has global partnerships with local experts and world-leading research institutions. BeZero's ratings and risk tools can help companies make risk-informed decisions on carbon projects of any type, at any stage, anywhere in the world.

For more details, see <https://bezerocarbon.com>.





Since Milestone's 2021 Sustainability Report, we have comprehensively reported on our efforts to develop innovative and transparent carbon accounting methodologies that help our customers understand the positive carbon impact of our carbon sequestration processes. During 2023, we enhanced the rigor of our processes by incorporating an additional layer into our methodology, facilitated by a partnership with BeZero Carbon. BeZero reviewed Milestone's carbon sequestration technology and carbon accounting methodology against certain factors used to assess the level of risk to a carbon credit achieving CO<sub>2</sub>e avoidance or removal. This collaboration sheds light on Milestone's quest to further demonstrate the value we bring to our customers by helping them reduce emissions throughout their value chain.

“ We have a commitment to environmental stewardship and have deployed significant resources to develop robust carbon accounting methodologies. ”

- CAROLINA ORTEGA, VP OF SUSTAINABILITY AND COMMUNICATIONS

The results of our analysis were favorable and affirm that Milestone's sequestration processes showcase low-level risks for both non-permanence<sup>2</sup> and project execution<sup>3</sup>.

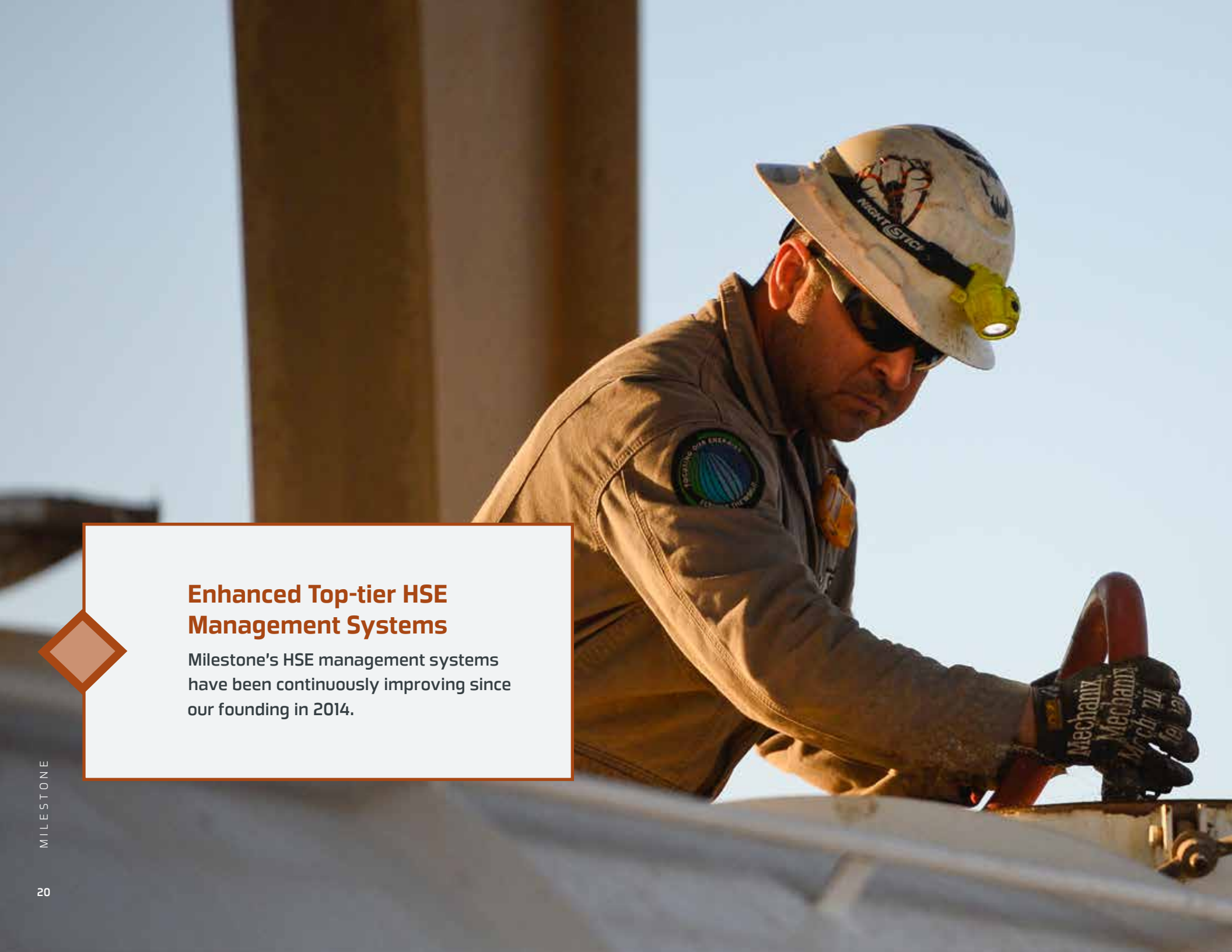
Non-permanence is the risk that a ton of carbon avoided or removed is reversed. The analysis confirmed that there is low risk that once an emission has been avoided it cannot be unavoids, as there is no risk surrounding release after storage. The analysis also found Milestone's carbon storage and related accounting to have low project execution risk based on low technical and financial risk associated with our experience in implementing these activities. This underscores our commitment to environmental stewardship and validates our efforts to develop robust carbon accounting methodologies.

The risk assessment helped us uncover further opportunities to optimize our methodology, and we will work in 2024 to implement them.

<sup>2</sup> Milestone received the lowest possible risk score of “aaa” for the non-permanence risk category.

<sup>3</sup> Project execution is the risk that a project will fail to be implemented and become operational as planned. Milestone received a low risk score of “a” for this category.





## Enhanced Top-tier HSE Management Systems

Milestone's HSE management systems have been continuously improving since our founding in 2014.



As our business continues to expand, we are continually enhancing our HSE management systems to make them more effective and robust. This will enable us to uphold our commitment to the highest safety standards, while always protecting the environment and improving our sustainability performance. During the fourth quarter of 2023, Milestone engaged an external firm to conduct a comprehensive gap analysis of our existing health and safety processes and procedures against best industry practices.

“ We are committed to elevating our robust Health and Safety program. ”

- GABRIEL RIO, PRESIDENT AND CEO

Our internal cross-functional team partnered and collaborated with this external firm to conduct site visits and review Milestone's training programs, communications, guidance, documentation, policies, and procedures on all relevant Environmental and Safety topics. We identified opportunities for improvement and assigned roles and responsibilities for each item. We will work on the developed action plan throughout 2024.

In addition to boosting our ability to replicate success in operational excellence, this will provide a blueprint for systematic sustainability performance throughout our new facilities and projects and will also enable future mergers and acquisitions. We look forward to reporting on our progress in our 2024 Sustainability Report.



**HEALTH**



**SAFETY**



**ENVIRONMENT**

**MANAGEMENT  
SYSTEMS**



- 
- + Helping Customers Achieve Net Zero
  - + Milestone's Negative Carbon Impact Goal
  - + Milestone's Net Negative Carbon Footprint
  - + Air Quality
  - + Ecological Impacts

# ENVIRONMENTAL



## RESOURCES

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Managing Emissions  
Across the Value Chain



Milestone's Carbon  
Accounting Methodology  
As reported in 2021 and 2022



Independent  
Accountant's Report on  
Milestone's Sequestered  
Carbon Calculations



## Helping Customers Achieve Net Zero

Over the last few years, we have worked towards refining our carbon accounting and data collection methods to accurately measure and communicate the benefits we provide to customers. Milestone is a key partner in the energy value chain by helping our customers achieve their net zero commitments and emission reduction targets. By investing in Milestone's carbon sequestration solutions, companies can effectively offset their indirect Scope 3 emissions, enabling them to meet net-zero commitments and emerging regulatory requirements while satisfying the expectations of investors.

### GLOBAL GREENHOUSE GAS EMISSIONS IN METRIC TONS OF CO<sub>2</sub>e

Emissions avoided through carbon sequestration <sup>4, 5, 6</sup>	(280,693)
Scope 1 direct emissions	2,552
Scope 2 indirect emissions from electricity consumed	4,748
Scope 3 other indirect emissions	3,765
Net Carbon Benefit	(269,628)

<sup>4</sup> See discussion of methods used to calculate avoided emissions in the Carbon Accounting & Data Integrity section of [Milestone's 2022 Sustainability Report](#).

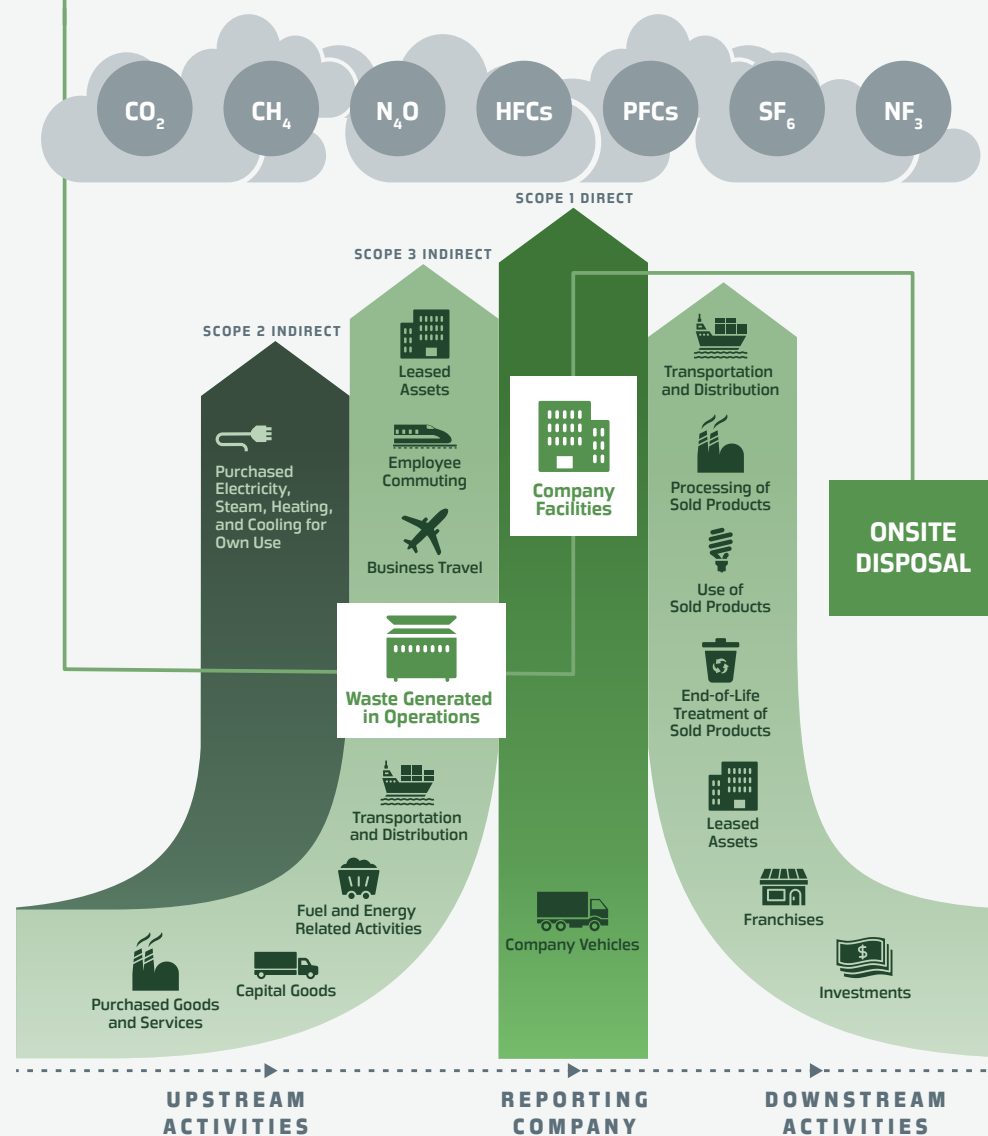
<sup>5</sup> Total Avoided Emissions based on the avoided CO<sub>2</sub> emissions from degradation of hydrocarbons that would have occurred if E&P waste was disposed of via landfarming or reserve pit.

<sup>6</sup> Peer companies utilizing technologies based on similar hydrocarbon degradation principles refer to their carbon savings as carbon removal or displaced carbon. Milestone is currently performing a critical review of our process to determine the applicability of these terms to Milestone's hydrocarbon sequestration process. Terminology used in future reporting may be altered based on this critical review.



### OVERVIEW OF GHG PROTOCOL SCOPES AND EMISSIONS ACROSS THE VALUE CHAIN\*

By partnering with Milestone, our customers can reduce their value chain emissions and move Scope 1 emissions associated with onsite slurry disposal to Scope 3.



\*Greenhouse Gas Protocol, Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

## Milestone's Negative Carbon Impact Goal

Motivated by our desire to align our financial strategy with our sustainability objectives, Milestone partnered with leading financial institutions known for their commitment to responsible investing and secured our first sustainability-linked loan in 2022. Our loan agreement included a commitment to sequester a minimum of 200,000 MT CO<sub>2</sub>e annually in order to benefit from a lower interest rate. Our performance has surpassed these goals year-over-year, resulting in an overall improvement of 102% above our target since 2022. This is a testament to the profound impact of Milestone's progress towards a more sustainable future.

## Milestone's Net Negative Carbon Footprint

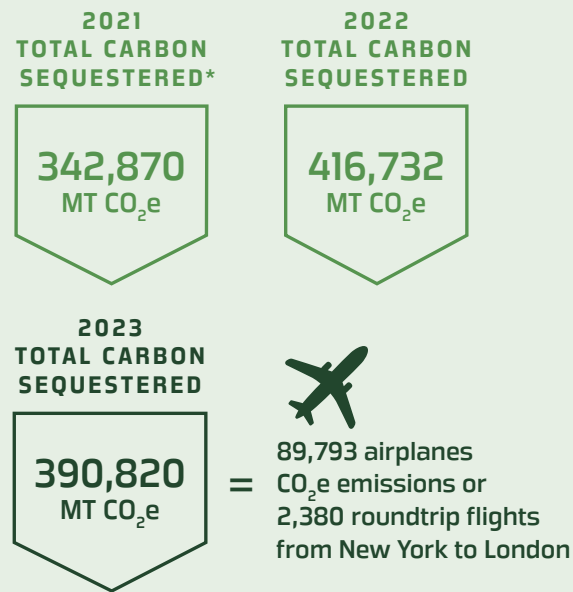
Milestone operates the largest network of slurry injection facilities in the U.S. Compared to traditional E&P waste disposal practices such as landfarming or reserve pits, Milestone's slurry injection disposal process eliminates the release of carbon dioxide into the atmosphere from the degradation of hydrocarbons found in E&P waste. Whereas reserve pits or landfarming of slurry-based E&P waste results in the biodegradation of hydrocarbons and release of CO<sub>2</sub> into the atmosphere, E&P waste received at Milestone facilities is sequestered into deep injection wells. The net carbon benefit of the avoided emissions from our waste sequestration technology far outpaces our operating emissions.

In 2023, we sequestered a total of 390,820 metric tons of CO<sub>2</sub>e emissions<sup>7</sup>, which is equivalent to the amount of carbon dioxide emissions from roughly 2,380 roundtrip flights from New York to London. This calculation methodology was developed and implemented by an independent third-party consultant, Geosyntec Consultants, in accordance with a calculation standard developed in 2022, outlined in last year's Sustainability Report. The standard is based on annual sampling and laboratory analysis for hydrocarbon content of E&P waste received at Milestone facilities.

Despite an increase in total E&P waste managed at Milestone's facilities in 2023, our sequestration estimate is less than the 2022 estimate due to an observed decrease in the hydrocarbon content from waste samples collected in 2023. This decrease is not unusual given the natural variability in hydrocarbon content of waste streams managed at our facilities. Milestone remains committed to advancing our methodology for estimating sequestered

<sup>7</sup>In this report, total carbon sequestered represents the total mass of theoretical CO<sub>2</sub> from degradation of the total mass of injected hydrocarbons. The units of CO<sub>2</sub>e are used to represent CO<sub>2</sub> conversion. No global warming potentials have been applied to calculate CO<sub>2</sub>e emissions.

carbon. We are currently collaborating with Geosyntec's carbon accounting and lifecycle assessment team to refine the sampling and calculation methodology used to estimate our carbon sequestration impact. This refinement will be informed by the hydrocarbon sampling results collected by Milestone over the past three years and will serve to enhance the accuracy and reliability of our sequestration estimates.



\*The 2021 total carbon sequestered values were amended for our [2022 Sustainability Report](#) using revised density values for E&P waste derived from the EPA report, [Management of Exploration, Development and Production Wastes: Factors Informing a Decision on the Need for Regulatory Action \(April 2019\)](#). These densities were also used to calculate our 2022 and 2023 total carbon sequestered values. The 2021 total carbon sequestered values were also amended to eliminate consideration of hydrocarbon content contained in drying slab solids and sold oil as there is no difference in the final disposition of these hydrocarbons in comparing Milestone's process with landfarming.



## Air Quality

Milestone complies with all federal, state, and local legislation on air emissions and ensures any hazardous air pollutants (HAPs) are appropriately captured during the handling of our customers' waste. Milestone's air emissions include relatively small amounts of non-methane volatile organic compounds and other hazardous air pollutants emitted during the receipt, handling, temporary storage, processing, and disposal of waste at our slurry facilities and landfills. The table to the right shows air emissions by compound for the year ending December 31, 2023.

## Ecological Impacts

At Milestone, we seek to meet and exceed all applicable environmental regulations and permit requirements, and to maintain a focus on mitigating ecological impacts in all phases of waste streams, including the E&P lifecycle and other forms of waste subject to federal regulations. Sustainability is integrated into every element of Milestone's business, and our highly dedicated environmental compliance team ensures our processes and facilities are designed to have minimal environmental impact and provide one-stop waste management solutions for our customers' solid and liquid wastes.

We protect water resources through the responsible handling of waste. Our landfills are designed with sophisticated liners and modern, automated leak detection systems to protect against leachate leaks. They also are equipped with advanced technology to monitor groundwater. Water is an important component in Milestone's operations. We make every effort to reuse water from appropriate sources while minimizing the use of fresh water. Most of the water we utilize in our slurry injection operations is produced from saltwater and flow back from our E&P customers.

## AIR EMISSIONS IN METRIC TONS

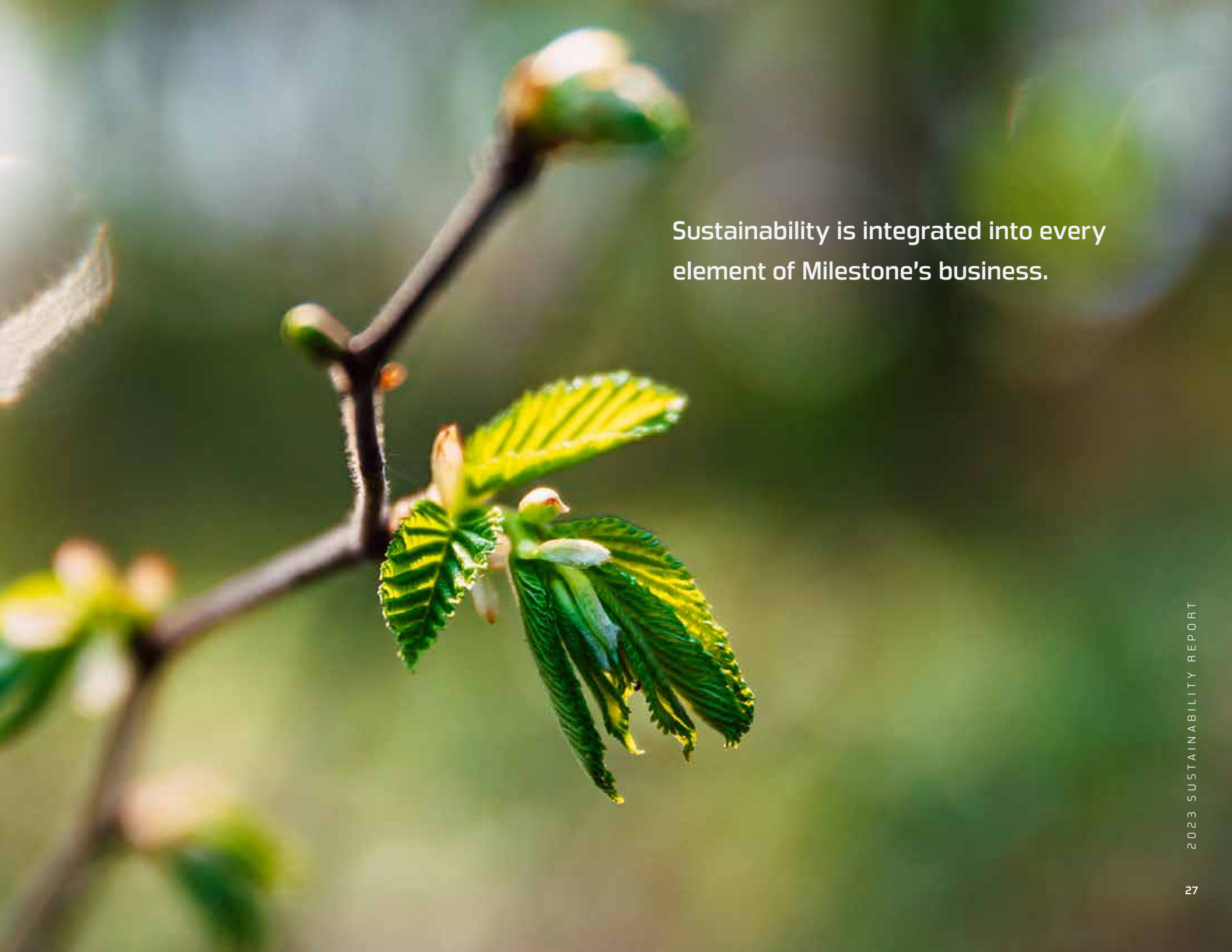
Nitrogen oxide	Not meaningful
Sulfur oxide	Not meaningful
Volatile organic compounds	52.02
Hazardous air pollutants	4.38

0

**Zero incidents of ecological impacts**

## UNDERSTANDING MILESTONE'S SOURCES OF EMISSIONS

Direct Emissions	Indirect Emissions	
GHG emissions from sources that are owned or controlled by a company.	GHG emissions that are a consequence of the operations of a company but occur at sources owned or controlled by another company.	
Scope 1	Scope 2	Scope 3
<ul style="list-style-type: none"> <li><b>Slurry Facilities</b> Minor fugitive emissions resulting from general operations, including the receipt, handling, and temporary storage of customer waste prior to injection.</li> <li><b>Landfills</b> Fugitive emissions resulting from aggregated customer-specified waste in our landfills.</li> <li><b>Vehicles</b> Emissions resulting from diesel-fueled pickup trucks and other construction or offroad equipment (i.e., "yellow iron") used by operations personnel.</li> </ul>	Emissions generated by utility companies that provide the electricity we use in our operations.	Upstream and downstream emissions that occur throughout our value chain.



Sustainability is integrated into every  
element of Milestone's business.



- 
- A photograph of a desert landscape. In the foreground, there are several bright yellow flowers with multiple petals, some in full bloom and others as buds. The flowers are growing on thin green stems. In the background, there are large, spiky agave plants (possibly Sotol) and a hazy, mountainous horizon under a blue sky with some clouds. The overall scene is bright and sunny.
- + Workforce Health & Safety
  - + Investing in Our People
  - + Employee Inclusion & Diversity
  - + Community Engagement

# SOCIAL



## RESOURCES

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Investing in  
Our People



Our  
Safety Culture



Our Community  
Engagement Initiatives



# Workforce Health & Safety

Milestone is committed to the health and safety of our workforce and the communities where we operate. Our goal is to ensure everyone, everywhere, is safe every day. Our commitment to safety is embedded in our values, and our safety culture is continuously reinforced by executive leadership and management.

During 2023, we experienced four recordable incidents, which increased our Total Recordable Incident Rate (TRIR) to 1.5. Adhering to our established Safety Protocol, leadership teams across Milestone collaborated closely with employees to thoroughly investigate these occurrences. It was determined that these incidents stemmed not from faulty processes, but from our growth and integration of new personnel. Our dedication to safety is evident in the regular safety discussions conducted at various locations and management levels, fostering heightened safety awareness and facilitating the exchange of lessons learned. Our goal is to gain insights from every hazard and safety incident, promptly implement corrective measures, and share valuable lessons throughout our organization. As we continue to grow, recognizing the importance of continuous monitoring and reassessment of our policies, we aim to adapt mitigation strategies as needed to uphold and enhance our commitment to safety.

Additionally, during the fourth quarter of 2023, Milestone engaged an external firm to conduct a comprehensive review of our existing health and safety processes and procedures (see further discussion on [Page 20](#)). Aligning ourselves with best industry practices will fortify our Health, Safety, and Environmental management systems, guiding the continued success and growth of our company. Looking ahead, we are committed to dedicating time and resources to identify and address high-priority gaps.

“ We are working diligently to continuously improve our Health and Safety management systems ”

- RICHARD LEAPER, EVP ENERGY WASTE

## MILESTONE'S SAFETY FOCUS AREAS

### PERFORMANCE

### OPERATIONAL DISCIPLINE

### SAFETY CULTURE & LEADERSHIP

### PROCESS SAFETY PROGRAMS & SYSTEMS

## Investing in Our People

Milestone always strives to be a great place to work, and we are committed to constantly seeking ways to improve. During 2023, we hired a new Learning and Development Manager to assist with identifying and addressing the evolving learning needs of our team so our workforce remains equipped with the skills and knowledge necessary as our business continues to grow. This Learning and Development Manager will play a pivotal role in designing and implementing tailored training programs, fostering employee engagement, and aligning professional development initiatives with our organizational goals in mind. This reflects our dedication to investing in our greatest asset – our people – ensuring they are empowered to thrive in our dynamic and growing market.

### **DURING 2023, WE HIRED A NEW LEARNING AND DEVELOPMENT MANAGER AND HELD THE FOLLOWING COMPANY-WIDE TRAININGS:**

DE&I and Harassment

Progressive Discipline Process Training for Managers

Professional Conduct and Anti-Harassment Training

Interviewing Skills for Hiring

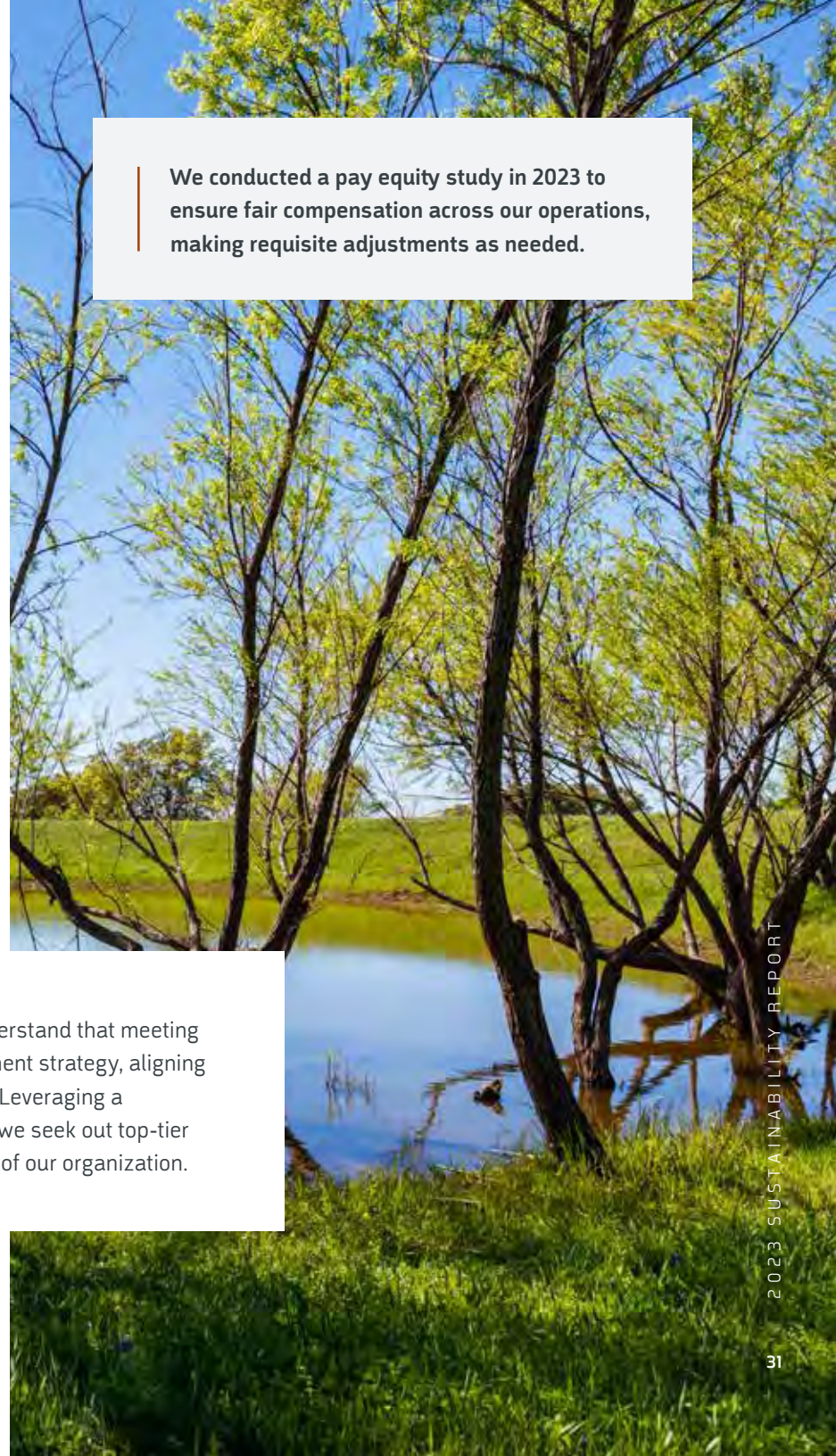
Managing Conflict

**We conducted a pay equity study in 2023 to ensure fair compensation across our operations, making requisite adjustments as needed.**

Milestone's workforce grew by 9% in 2023. As our company prepares for future growth, we understand that meeting our hiring needs is a strategic imperative. We approach this challenge with a proactive recruitment strategy, aligning our talent acquisition efforts with the evolving demands of our expanding business landscape. Leveraging a combination of targeted outreach, innovative recruitment methods, and strategic partnerships, we seek out top-tier talent who will not only fulfill their current role but will also contribute to the long-term success of our organization.



**In 2023, Milestone earned the Top Workplaces 2023 honor by the Houston Chronicle.**







## Employee Inclusion & Diversity

At Milestone, we believe a diverse and inclusive workplace where every employee can thrive and be their authentic selves is essential to our success. We remain committed to treating every employee with dignity and respect.

The combination of our employees' unique differences, life experiences, knowledge, capabilities, and talent doesn't just shape our corporate culture; it profoundly influences our reputation and accomplishments. During 2022, Milestone took proactive steps by introducing monthly diversity, equity, and inclusion (DE&I) meetings, spearheaded by management. These sessions were dedicated to assessing internal progress and delving into ongoing initiatives aimed at enhancing our DE&I measures.

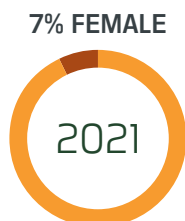
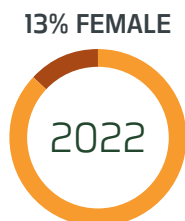
In 2023, we continued with our monthly meetings and expanded our commitment to DE&I by evaluating employee feedback and insights. These sessions served as a dynamic platform for fostering a culture of inclusivity and as a means to identify areas of improvement to further refine our DE&I strategies. This ongoing commitment reflects our steadfast belief that a diverse and inclusive workplace is integral to our success.

## Community Engagement

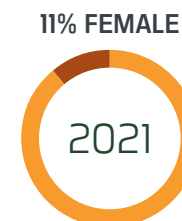
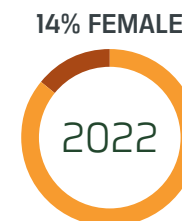
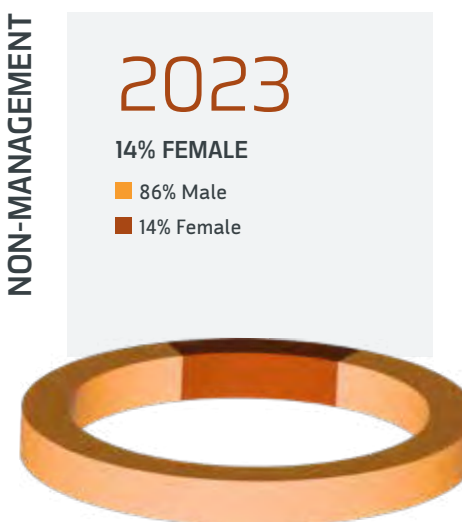
Milestone remains committed to giving back to the communities in which we live and operate; and to make a lasting impact in the neighborhoods our customers, employees, and other stakeholders call home. Through direct monetary donations, sponsorships, and community event participation, we partner with a variety of nonprofit organizations to help tackle hunger, support first responders and veterans, and assist families in need. We also support community STEAM (Science, Technology, Engineering, Art, and Math) education events for children and multiple other children's charities. For further details of our community involvement, [please refer to resources on our website.](#)

## GENDER DIVERSITY

### MANAGEMENT

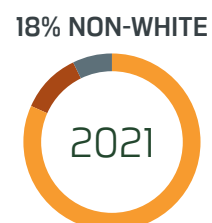
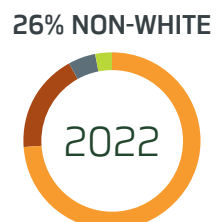
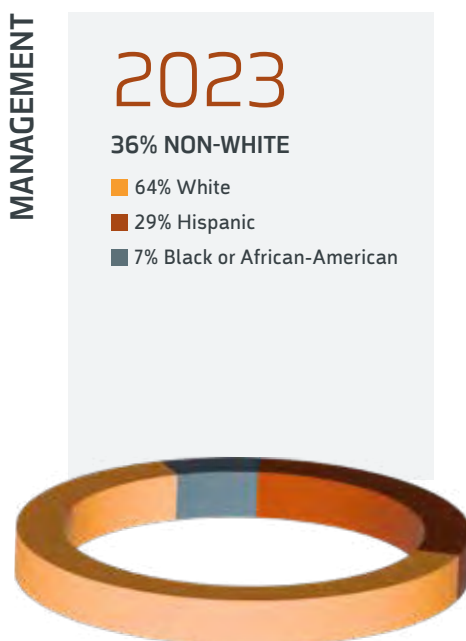


### NON-MANAGEMENT

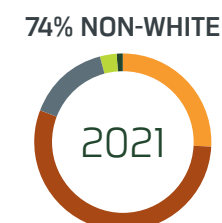
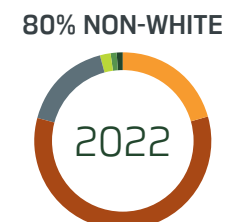
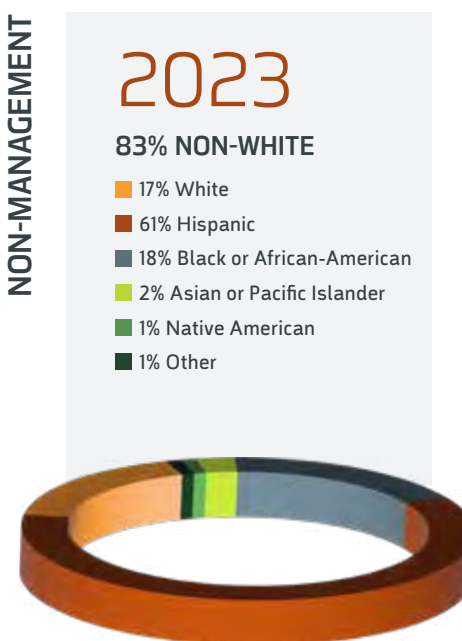


## RACIAL & ETHNIC DIVERSITY

### MANAGEMENT



### NON-MANAGEMENT







+ Risk Management

+ Management of the Legal & Regulatory Environment

# GOVERNANCE





## RESOURCES

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ESG Materiality Analysis  
& Risk Assessment



Assessment of  
Climate-Related Risks  
& Opportunities



Critical Incident  
Risk Management





In October 2023, Milestone was acquired by SK Capital, a New York-based private investment firm focused on the specialty materials, ingredients, and life sciences sectors. With a fresh infusion of capital and strategic insight, the stage is set for a dynamic phase of growth and innovation. SK Capital brings not only financial backing but also a wealth of experience, positioning our company for expansion and the ability to implement additional technologies. The synergy between our existing strengths and SK's vision promises a transformative journey ahead, one that is sure to propel us to new heights of success in the growing carbon sequestration market. This marks an exhilarating chapter in our company's history and a solid *Foundation for Sustainable Growth*.

Our change in ownership also marked changes in the composition of our Board of Directors (Board), which comprises seven members, including two independent members<sup>8</sup>. Our Board continues to have oversight of our sustainability efforts and disclosures, as well as our overall financial performance and risk management processes. Milestone's management team reports on material ESG issues monthly, and this information is used by our Board to evaluate our performance and overall value creation.

## Risk Management

Our risk management practices play a pivotal role in our commitment to sustainability performance. We identify material issues across our operations and then proceed to prioritize, assess, and mitigate risks related to these material issues. Our risk management approach incorporates the evaluation of environmental impact, social performance, and governance practices to stress transparency and accountability in our decision-making processes.

### BOARD DIVERSITY

■ 79% Male ■ 21% Female



Our approach to risk management was evaluated in 2022 to ensure it is disciplined, systematic, comprehensive, and aligned with international sustainability frameworks. We conducted a sustainability materiality and risk assessment exercise to identify the most material issues in our industry and to clearly evaluate and rank the risks these issues pose to our value-creation efforts. For further information, see our 2022 Sustainability Report.

<sup>8</sup> Board composition is as of June 18, 2024.

## TRIPLE-VERIFIED FRAMEWORK OVERSIGHT & HIERARCHY OF DATA REVIEW

Milestone's commitment to transparency, accuracy, and robust ESG metrics remains central to our sustainability strategy. Beginning in 2020, we established a leading-edge, multi-tiered data integrity approach within our sector. In 2022 and 2023, we strengthened this commitment by engaging third parties to assist with the reporting, measurement, and verification of our data. This step ensures the seamless alignment of our ESG metrics with industry standards and the delivery of precise, reliable data pertaining to the comprehensive impact of our waste sequestration process.



Geosyntec Consultants executed the carbon sequestration data procedures that they developed in 2022 for waste received and managed in 2023.



Our financial auditors, CRI, performed certain agreed-upon procedures on the Avoided CO<sub>2</sub> and Sequestered Carbon Calculations of Milestone for the year ended December 31, 2023.

## Management of the Legal & Regulatory Environment

Managing the legal and regulatory environment is integral to our ESG strategy and to ensuring compliance with applicable laws and standards. Our proactive approach involves continuous monitoring of evolving regulations, engaging with stakeholders to address concerns, and fostering a culture of ethical conduct throughout our operations.

By staying abreast of legal developments and actively participating in industry dialogues, we aim not only to mitigate legal risks but also to contribute positively to the broader legal and regulatory ecosystem. This conscientious management is a cornerstone of our commitment to responsible and sustainable business practices.

### UPDATES TO OIL & GAS WASTE RULES IN TEXAS

In October 2023, the Railroad Commission (RRC) of Texas published proposed changes to Statewide Rule 8, which is the primary rule for protecting water and regulating the management of oil and gas waste. These changes are intended to better reflect modern waste management practices and advancements in production methods since Rule 8's last update in 1984. [Click here for further details on these proposed changes.](#)

Milestone understands the potential impact of the proposed changes on the systems and methods by which our customers manage waste. We are continuously monitoring how our business can help customers remain in compliance with any changes to existing regulations.



ESG Lynk was engaged to assist in the alignment of our ESG metrics with SASB standards.









## About this Report

The information in this report has been subjected to the company's policies surrounding the disclosure of financial and non-financial data. Unless otherwise noted, the information is as of and for the year ended December 31, 2023. Any financial information and all non-financial data included in this report were not subject to a third-party audit verification process.

ESG Lynk, a Consultant Content Program Member of the International Financial Reporting Standards (IFRS) Foundation, was engaged to support Milestone in the development of this Sustainability Report to aid with the alignment of topics included in the Waste Management and Oil & Gas Services SASB Standards of the IFRS Foundation, where such topics are considered relevant to Milestone's operations. Milestone's management is responsible for publishing this report. ESG Lynk can make no representation regarding the accuracy or completeness of the information included in this Sustainability Report for any decision-making purposes.

## Forward-Looking Statements

Certain information included in this Sustainability Report may constitute forward-looking statements within the meaning of applicable securities laws, including but not limited to statements regarding Milestone's plans to move forward with identified environmental, social, or governance opportunities. Readers are cautioned not to place undue reliance on forward-looking statements as they are subject to a number of assumptions and known and unknown risks and uncertainties that may cause the actual results, performance, or achievements of the company to be materially different from any future results, performance, or achievements expressed or implied by such forward-looking statements. The forward-looking statements contained herein are made as of the date of this document. Milestone assumes no obligation to update or otherwise revise these forward-looking statements, whether as a result of new information, future events, or otherwise.



## Appendix I: Performance Data Tables

### GREENHOUSE GAS EMISSIONS

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
Direct Scope 1 GHG emissions <sup>1</sup>	Metric tons CO <sub>2</sub> e	IF-WM-110a.1	2,552	2,439	2,029
Indirect Scope 2 emissions from electricity consumption	Metric tons CO <sub>2</sub> e		4,748	4,157	3,564
Other indirect Scope 3 emissions	Metric tons CO <sub>2</sub> e		3,765	3,639	1,153
<b>Total Operated Direct + Indirect GHG Emissions</b>	Metric tons CO <sub>2</sub> e		11,065	10,235	6,746
Emissions avoided through carbon sequestration <sup>2</sup>	Metric tons CO <sub>2</sub> e		(280,693)	(306,085)	(241,541) <sup>3</sup>
<b>Net Negative Carbon Footprint</b>	Metric tons CO <sub>2</sub> e		(269,628)	(295,850)	(234,795)
Scope 1 emissions intensity <sup>4</sup>	kg CO <sub>2</sub> e/bbl		0.140	0.136	0.169
Scope 2 emissions intensity <sup>4</sup>	w CO <sub>2</sub> e/bbl		0.260	0.231	0.297
Scope 3 emissions intensity <sup>4</sup>	kg CO <sub>2</sub> e/bbl		0.206	0.202	0.096
<b>Total Operated Direct + Indirect GHG Emissions Intensity</b>	kg CO <sub>2</sub> e/bbl		0.605	0.569	0.562
Total sequestered	kg CO <sub>2</sub> e/bbl		(390,820)	(416,732)	(342,870) <sup>3</sup>
Total fuel consumed in vehicles and equipment	Gigajoules	EM-SV-110a.1	33,310	32,009	26,171
Total fuel consumed in vehicles and equipment	Metric tons CO <sub>2</sub> e	EM-SV-110a.1	2,364	2,259	1,847

<sup>1</sup> Direct Scope 1 emissions include MT CO<sub>2</sub>e for SASB code EM-SV-110a.1 "Total Fuel Consumed".

<sup>2</sup> Total Avoided Emissions based on the avoided CO<sub>2</sub> emissions from degradation of hydrocarbons that would have occurred if waste was disposed of via traditional methods.

<sup>3</sup> The 2021 total carbon sequestered values were amended for this report using revised density values for E&P waste derived from the EPA report, [Management of Exploration, Development and Production Wastes: Factors Informing a Decision on the Need for Regulatory Action \(April 2019\)](#). These densities were also used to calculate our 2022 and 2023 total carbon sequestered values. The 2021 total carbon sequestered values were also amended to eliminate consideration of hydrocarbon content contained in drying slab solids and sold oil as there is no difference in the final disposition of these hydrocarbons in comparing Milestone's process with landfarming.

<sup>4</sup> Emissions intensity calculated as follows: [Emissions ÷ (Liquids managed + Solids managed)]. Solids converted from cubic yards to barrels using 4.81 bbl/yd<sup>3</sup>.

## ENERGY MANAGEMENT

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
Total energy consumed	Gigajoules		44,715	40,460	32,498
Total energy consumed	Metric tons CO <sub>2</sub> e		4,748	4,157	3,564

## AIR QUALITY

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
Nitrogen Oxide (NO <sub>x</sub> ) emissions	Metric tons	IF-WM-120a.1	not meaningful	not meaningful	not meaningful
Sulfur Oxide (SO <sub>2</sub> ) emissions	Metric tons	IF-WM-120a.1	not meaningful	not meaningful	not meaningful
Volatile organic compounds	Metric tons	IF-WM-120a.1	52.02	49.51	49.56
Hazardous air pollutants	Metric tons	IF-WM-120a.1	4.38	4.28	4.49
Slurry emissions	Metric tons CO <sub>2</sub> e		121.97	114.28	115.99
Landfill emissions	Metric tons CO <sub>2</sub> e		66.14	66.14	66.14
Number of facilities in or near areas of dense population	Number	IF-WM-120a.2	0	0	0
Number of incidents of non-compliance associated with air emissions	Number	IF-WM-120a.3	0	0	0

## MANAGEMENT OF LEACHATE AND HAZARDOUS WASTE

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
Number of correction actions implemented for landfill releases	Number	IF-WM-150a.2	0	0	0
Number of incidents of non-compliance associated with environmental impacts	Number	IF-WM-150a.3	0	0	0



## WORKFORCE HEALTH AND SAFETY

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
Total recordable incident rate (TRIR)	Rate	IF-WM-320a.1 EM-SV-320a.1	1.5	0.83	0
Fatality rate	Rate	IF-WM-320a.1 EM-SV-320a.1	0	0	0
Near miss frequency rate (NMFR)	Rate	IF-WM-320a.1 EM-SV-320a.1	0	0	0
Number of road accidents and incidents	Number	IF-WM-320a.3	0	0	0
Average hours of health, safety & emergency response training for full-time employees	Number	EM-SV-320a.1	20 hrs/year/ employee	20 hrs/year/ employee	20 hrs/year/ employee
Average hours of health, safety & emergency response training for contract employees	Number	EM-SV-320a.1	20 hrs/year/ employee	20 hrs/year/ employee	not provided
Average hours of health, safety & emergency response training for short-service employees (less than 6 months on the job)	Number	EM-SV-320a.1	23 hrs/year/ employee	23 hrs/year/ employee	not provided

## ACTIVITY METRICS

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
Number of customers	Number	IF-WM-000.A	893	1,142	736
Active landfills	Number	IF-WM-000.C	2	2	2
Active slurry injection facilities	Number	IF-WM-000.C	8	8	8
Total volume of liquids managed	Barrels	IF-WM-000.D	15,935,589	15,785,952	10,772,319
Total volume of solids managed	Cubic yards	IF-WM-000.D	486,259	457,959	256,175

## DIVERSITY

METRIC	UNIT OF MEASURE	SASB CODE	2023	2022	2021
<b>MANAGEMENT</b>					
<i>Gender Representation</i>					
Female	%		20%	13%	7%
Male	%		80%	87%	93%
<i>Racial/Ethnic Group Representation</i>					
White	%		64%	74%	82%
Hispanic	%		29%	18%	11%
Black or African American	%		7%	5%	7%
Asian or Pacific Islander	%		0%	3%	0%
Native American	%		0%	0%	0%
Two or more races & Other	%		0%	0%	0%
<b>NON-MANAGEMENT</b>					
<i>Gender Representation</i>					
Female	%		14%	14%	11%
Male	%		86%	86%	89%
<i>Racial/Ethnic Group Representation</i>					
White	%		17%	20%	26%
Hispanic	%		61%	59%	55%
Black or African American	%		18%	17%	15%
Asian or Pacific Islander	%		2%	3%	3%
Native American	%		1%	1%	0%
Two or more races & Other	%		1%	1%	1%



## Appendix II: CRI Report



Carr, Riggs & Ingram, LLC  
Two Riverway, 15th Floor  
Houston, TX 77056

(713) 621-8090  
(713) 621-6907 (fax)  
[www.cricpa.com](http://www.cricpa.com)

### INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Board of Directors and Management  
Milestone Environmental Services, LLC  
Houston, Texas

We have performed the procedures enumerated below on the Avoided CO<sub>2</sub> and Sequestered Carbon Calculations of Milestone Environmental Services, LLC for the year ended December 31, 2023. Milestone Environmental Service LLC's management is responsible for the Avoided CO<sub>2</sub> and Sequestered Carbon Calculations.

Milestone Environmental Services, LLC has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of comparing and recalculating certain information contained in the Avoided CO<sub>2</sub> and Sequestered Carbon Calculations for the year ended December 31, 2023. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings are included in the attached Schedule of Procedures and Associated Findings.

We were engaged by Milestone Environmental Services, LLC to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the AICPA. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the Avoided CO<sub>2</sub> and Sequestered Carbon Calculations for the year ended December 31, 2023. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Milestone Environmental Services, LLC and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Board of Directors and management of Milestone Environmental Services, LLC, and is not intended to be and should not be used by anyone other than those specified parties.

*Carr, Riggs & Ingram, L.L.C.*

Houston, Texas  
June 20, 2024

## Milestone Environmental Services, LLC Schedule of Procedures and Associated Findings

### Obtained the following from Geosyntec Consultants, Inc.

- Milestone 2023 Carbon Sequestration Calculation worksheet (Worksheet) from the 2023 Avoided CO2 Production and Sequestration Carbon Calculations workbook
- Hydrocarbon Sequestration and Avoided Carbon Dioxide Emissions Process and Calculation Standard dated March 2023 (Standard)
- 2023 Straight Average Total Petroleum Hydrocarbon Calculation Memorandum dated May 16, 2024 (Memorandum)

### Performed the following procedures with respect to the sample data on the Worksheet

- Compared the 2023 Volume (bbl) for each waste stream to the detail report of waste volumes delivered to Milestone waste disposal facilities (Volume) and noted no differences.
- Compared the average total petroleum hydrocarbon content (TPH Content) for each carbon chain length for each waste stream to the Memorandum and noted no differences.

### Performed the following procedures with respect to each Hydrocarbon Group on the Worksheet

- Compared the waste stream density (kg/bbl) (Density), percent weight of carbon (PWC), and relative molecular weight ratio (MWR) to Table 2, Table 3, and Equation 3, respectively, in the Standard and noted no differences.

### Performed the following procedures with respect to the Total Sequestered Carbon and Total Potential Avoided CO2 Production from Hydrocarbon Degradation data on the Worksheet

- Recalculated the sequestered carbon chain (kg) (SCC) for each waste stream using the volume, density, TPH Content, and PWC included in the Worksheet and noted no differences.
- Recalculated the total potential avoided carbon dioxide production (PACDP) for each waste stream using the SCC and relative MWR included in the Worksheet and noted no differences.

### Performed the following procedures with respect to the Avoided CO2 Production from Hydrocarbon Degradation Relative to Landfarming Scenario data on the Worksheet

- For each hydrocarbon group compared the mass percent degraded to carbon dioxide during land farming operations (MPD) to the Standard and noted no differences.
- Recalculated the avoided carbon dioxide production (ACDP) for each waste stream using Volume, Density, TPH Content, PWC, MPD and relative MWR compared to the Worksheet, and noted no differences.

### Performed the following procedures to the Summary of Analysis on the Worksheet

- Totaled the SCC for each waste stream and compared it to the Summary of Analysis.
- Totaled the PACDP for each waste stream and compared it to the Summary of Analysis.
- Totaled the ACDP for each waste stream and compared it to the Summary of Analysis.

#### CRI Totals

Total SCC – 106,587  
Total PACDP – 390,820  
Total ACDP – 280,693

#### Summary of Analysis

Total SCC – 106,587  
Total PACDP – 390,820  
Total ACDP – 280,693

No differences noted.





Contact Milestone and find out more.

832-739-6700 | [Milestone-ES.com](http://Milestone-ES.com)