

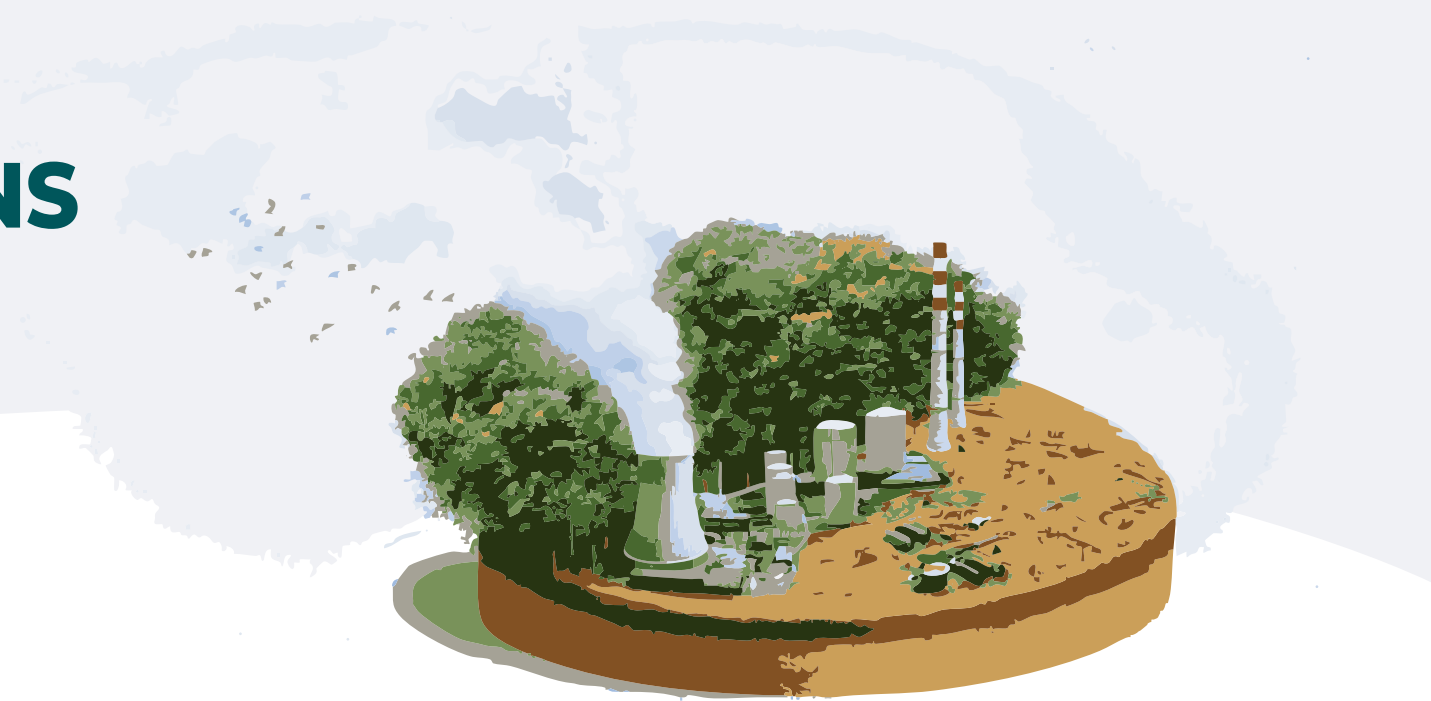
# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

Disclosure Analysis



# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

DISCLOSURE ANALYSIS



## Background

In June 2023, the Extractive Industries Transparency Initiative (EITI) updated its Standard to include mandatory disclosures on greenhouse gas (GHG) emissions and climate risks, aligning extractive governance with global climate goals. Nigeria, through Nigeria Extractives Industries Transparency Initiative (NEITI), became an early adopter by integrating these requirements—particularly those on GHG emissions, into its 2022 and 2023 oil and gas audit report. In collaboration with NRGi, NEITI developed a standardized template requiring companies to report their GHG emissions. These efforts pioneered the first-ever inclusion of methane and greenhouse gas disclosures in NEITI's audit report with 15 of 62 companies disclosing emissions data in 2022 and 2023.



# 15/62

**companies disclosing emissions data in 2022 and 2023.**



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# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

## DISCLOSURE ANALYSIS



The disclosure of emissions data by 15 companies is a milestone with immense potential for climate accountability, despite its gaps. If validated and published without delay, this baseline can anchor Nigeria's climate finance positioning, inform post-COP28 engagements, and support enforcement of its NDCs.

## Potential uses for disaggregated emissions data

1

### DEBATE ON CLIMATE AND EXTRACTIVES:

Understand links between extractives and climate goals

2

### ECONOMIC RISKS:

Understand project competitiveness and public finance risks

3

### NDCs AND UNFCCC REPORTING:

Inform national climate commitments and emissions reporting

4

### MARKET DEMAND:

Respond to customer and investor demand, especially in mineral value chains

5

### METHANE ABATEMENT:

Prioritise and attract financing for methane reduction in the fossil fuel sector



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This emerging progress is undermined by the alarming non-compliance of 76% of listed companies who failed to disclose any emissions data. Compounding this are structural transparency failures: a lack of asset-level disclosures obscures high-emission OMLs, methodological gaps raise risks of greenwashing.

Civil society must now respond with urgency: demand intensity disclosures, compel asset-level data via FOI, publicly expose non-compliant actors, and independently verify reported figures using tools like Methane Alert and Response System (MARS), Country Methane Abatement Tool (COMAT), International Methane Emissions Observatory (IMEO) Data Portal, Emission Compliance Monitoring and Accountability Tool (ECMAT) GHGSat and VIIRS. The opportunity to turn these first disclosures into a transformative accountability mechanism will not wait



# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

DISCLOSURE ANALYSIS



## Overview of companies that disclosed emissions data in NEITI's 2022/2023 Oil and Gas Audit Report

Company	2022 GHGs	2022 Intensity	2023 GHGs	2023 Intensity
ARADEL	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	No	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	No
CHEVRON	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	No	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O	No
ESSO - OML 133_ERHA	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	Yes	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	Yes
ESSO - OML 138_USAN	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	Yes	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	Yes
FRONTIER OIL	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	Yes	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	Yes
HEIRS	None	No	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	Yes
PLATFORM	CO <sub>2</sub>	No	CO <sub>2</sub>	No
MIDWESTERN	CO <sub>2</sub>	No	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O	No



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## Overview of companies that disclosed emissions data in NEITI's 2022/2023 Oil and Gas Audit Report

Company	2022 GHGs	2022 Intensity	2023 GHGs	2023 Intensity
MOBIL	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub>	Yes	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub>	Yes
NAE	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	No	CO <sub>2</sub>	No
NETWORK E & P	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	No	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	No
ORIENTAL ENERGY	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	Yes	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO	Yes
PILLAR	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	Yes	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	Yes
SNEPCO	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	No	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	No
SPDC	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, Halons	No	CO <sub>2</sub> , CH <sub>4</sub> , CO, N <sub>2</sub> O, NO, SO <sub>2</sub> , Halons	No

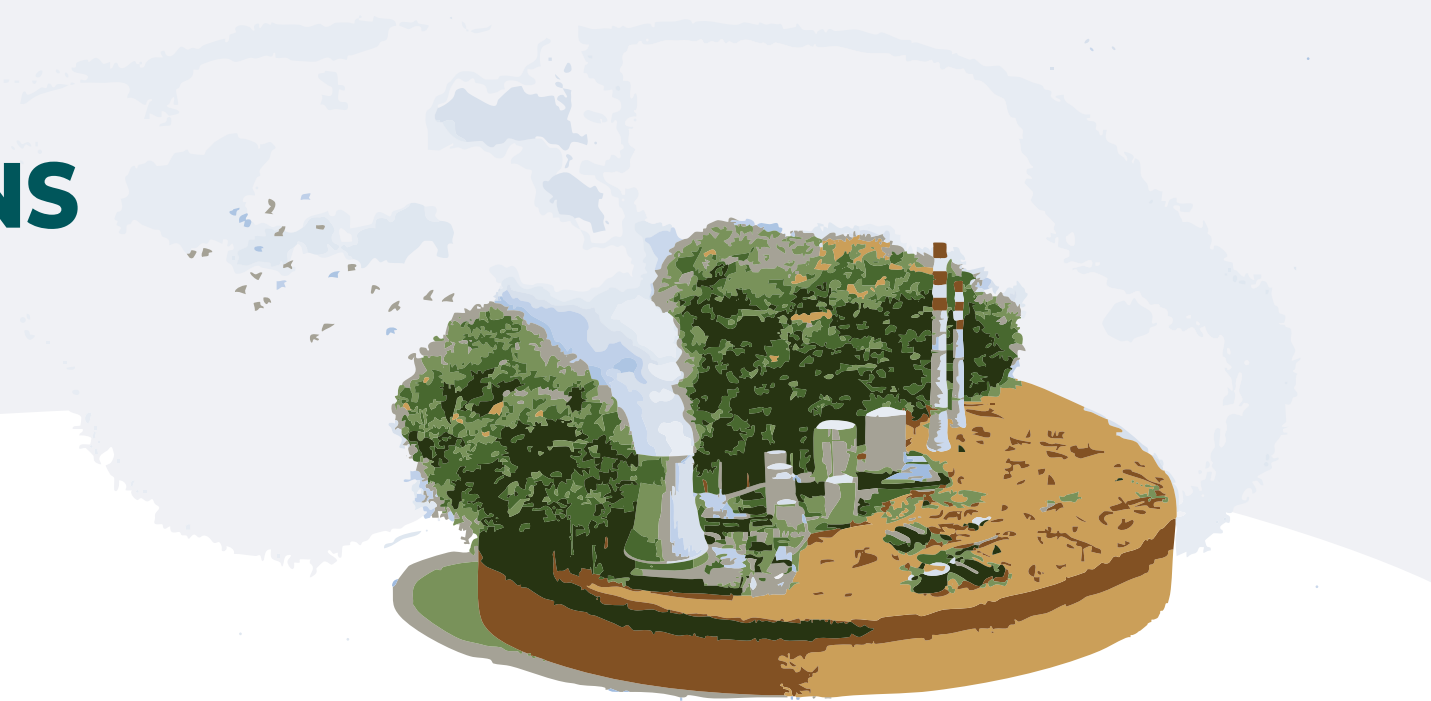


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# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

DISCLOSURE ANALYSIS



## 1. Compliance: Progress & Gaps

# 24%

**Disclosed:** Just 15 out of 62 companies (24%). Baseline set, but grossly inadequate.

### Non-Disclosers (47):

Notable absentees:

- **Flaring Hotspots:** AITEO (Nembe Creek), SEPLAT (Oben), ENI (NAOC).
- **Offshore Exemptions:** First E&P, Equinor.

### Critical Gaps



**Scope 3 Emissions:** 0% compliance (violates EITI 3.4).

**Asset-Level Data:** 0% disaggregation (violates EITI 4.7).

**CHEVRON:** 99.8% CH<sub>4</sub> drop (173M → 0.27M kg) unexplained.

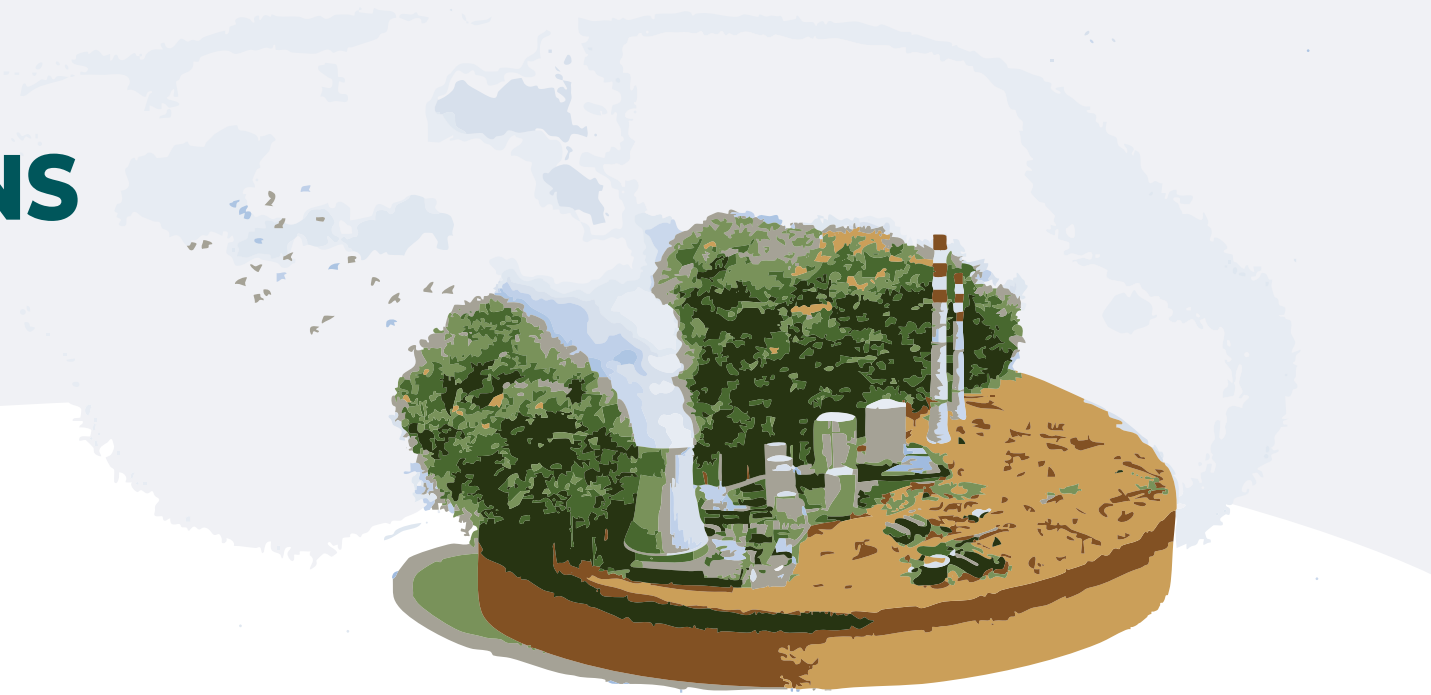
**HEIRS:** Disclosed only 2023 (217M kg CH<sub>4</sub>). OML 17 acquisition suggests historic data exists.

The value of absolute emissions (kgCO<sub>2</sub>-eq) must be complemented by emission intensity metrics (kgCO<sub>2</sub>-eq per barrel), to allow fair, scale-neutral comparisons



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## 2. Methane (CH<sub>4</sub>) Focus

A climate threat –  
84x CO<sub>2</sub>'s warming  
power.



Company	2022 CH <sub>4</sub> (kg)	2023 CH <sub>4</sub> (kg)	Trend
CHEVRON	173.6M	0.27M	▼99.8%
SPDC	173.6M	135.5M	▼22%
HEIRS Holdings	Not Disclosed	217.4M	New
MOBIL	223.6M	256.3M	▲15%
FRONTIER OIL	41.0M	24.4M	▼40%



# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

DISCLOSURE ANALYSIS



## Red Flags



**MOBIL:** 15% rise contradicts net-zero pledges. Demand leak detection audit.

**HEIRS:** Nigeria's new top CH<sub>4</sub> emitter (217M kg). Must disclose 2022 data.

**CHEVRON:** Reduction aligns with Agbami gas injection. Requires third-party verification.



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## 3. Emission Intensity ( $\text{kg CO}_2\text{e}$ per barrel): Efficiency vs Anomalies

### Least Efficient (2023)

**HEIRS (20.91)** →

Onshore legacy assets?

**ORIENTAL ENERGY**

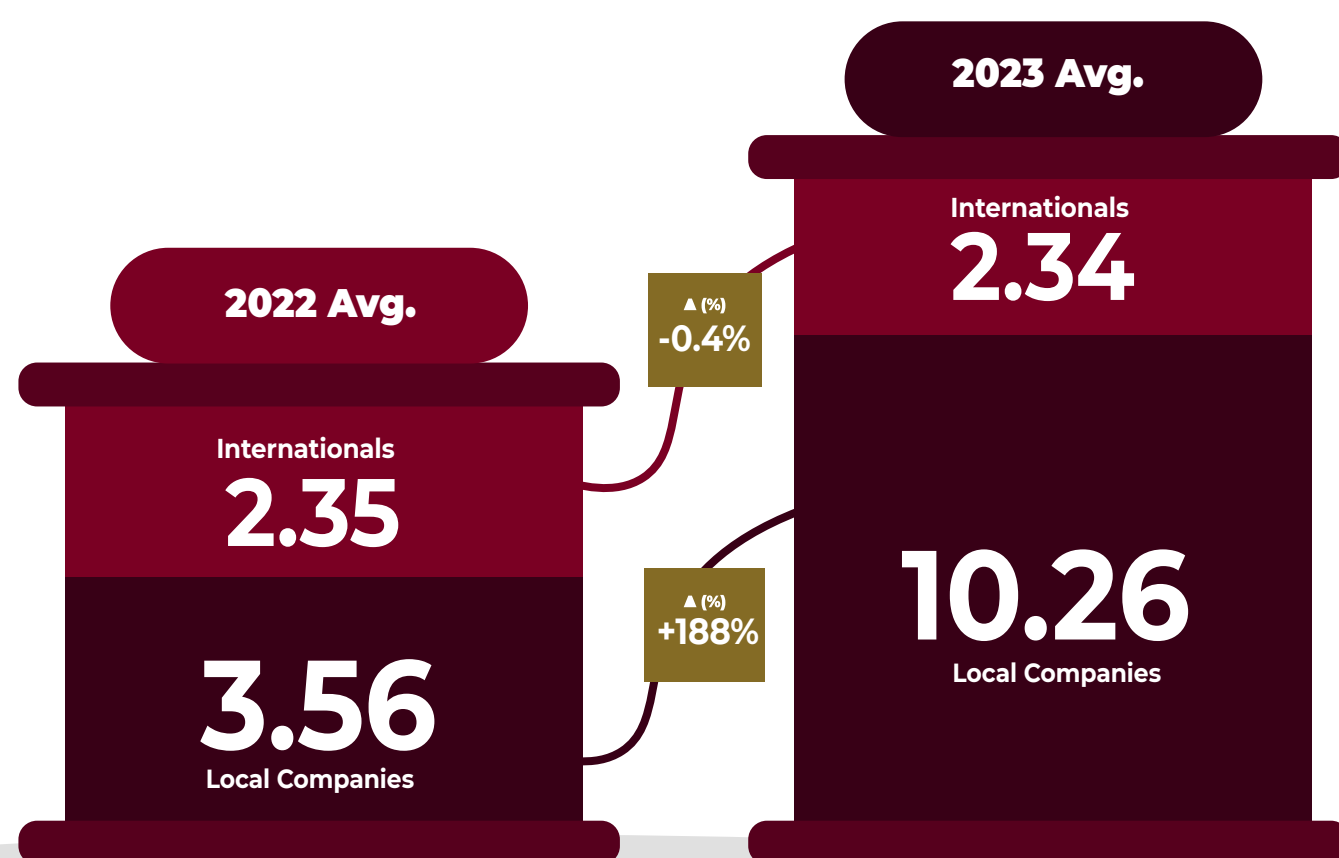
**(7.11)** → Ebok field aging infrastructure?

**ESSO-OML 138**

**(2.82)** → Usan field decline?

## Emission Intensity Benchmarking

### I. Peer Group Analysis ( $\text{kgCO}_2\text{-eq/bbl}$ )



### Notable Performers

**Top Reducer:**  
**FRONTIER OIL** (4.59 → 3.09, -32.7%)

**Slow Mover:**  
**HEIRS** (new entry at 20.91 in 2023)



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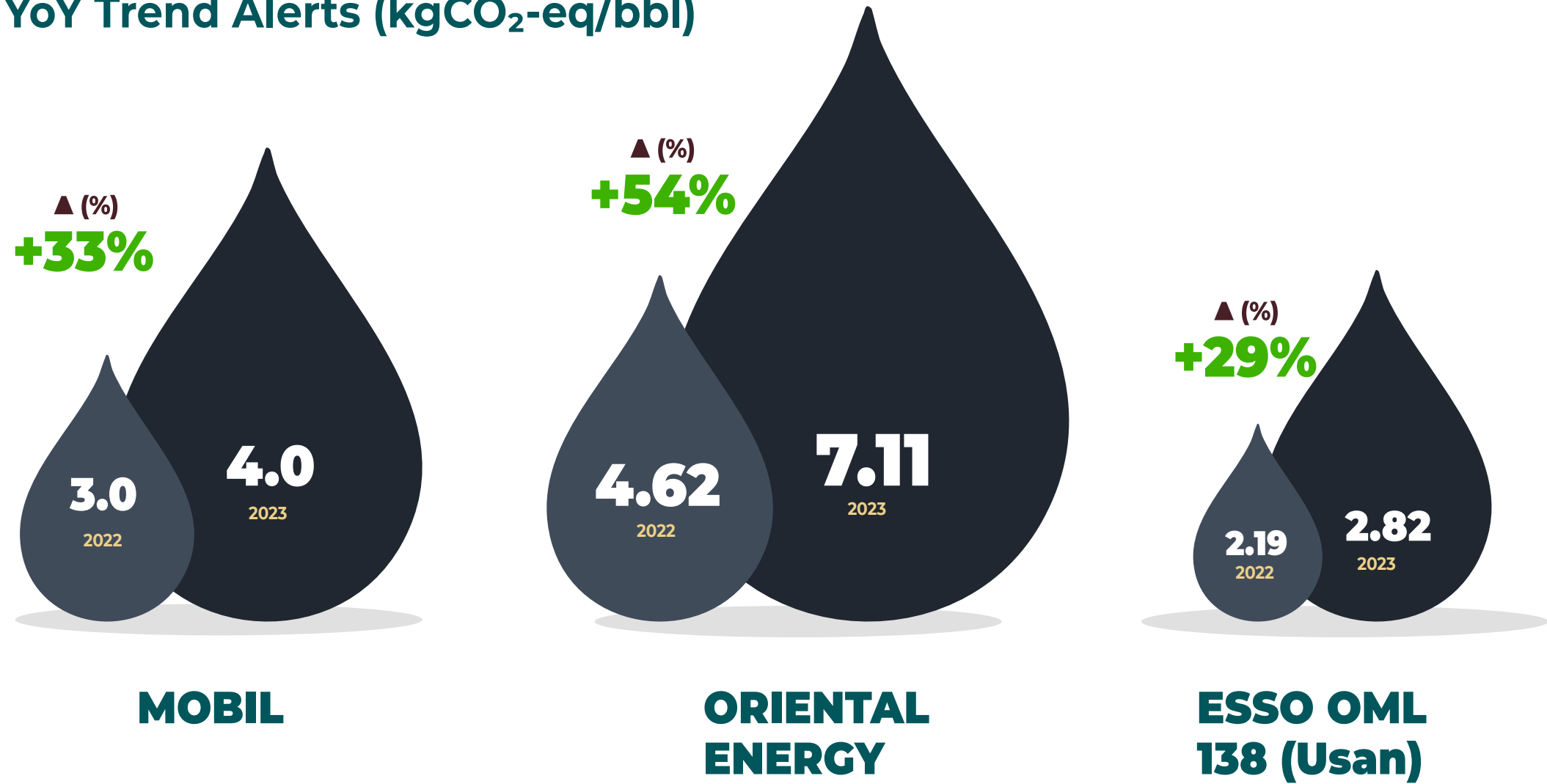
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## II. Asset-Type Intensity (kgCO<sub>2</sub>-eq/bbl)

Asset Type	Example	2023 Intensity
Deepwater	ESSO OML 133 (Erha)	1.85
Onshore	ORIENTAL ENERGY	7.11
Marginal	PILLAR	1.70

## III. YoY Trend Alerts (kgCO<sub>2</sub>-eq/bbl)



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## Data Quality and Credibility Flags

**PILLAR OIL: 1.46 → 1,678.58 (+114,900%).** Probable error/flaring event. Validate methodology.

**SNEPCO (6.19) & ESSO-OML 133 (1.85): Offshore advantage.** Not "leadership" without reduction targets. Reduction targets needed

**NAE: Zero non-CO<sub>2</sub> emissions (2022)** → Omitted 2023 data.

**NETWORK E&P: 112 kg CH<sub>4</sub>.** Physically impossible.

### Production-Emissions Mismatch:

**SPDC: 30% output, 70% less GHGs vs MOBIL.** Offshore vs onshore bias?

**CHEVRON's CH<sub>4</sub> Emissions: 173M kg (2022) → 266k kg (2023) (-99.8%).** Requires verification.

**Asset-Level Data: Cannot analyze OML-specific hotspots** (e.g., SPDC's highest-emitting field).

**Production Data: Missing for 8/15 companies** → Intensity approximations used.

**Scope 3 Emissions: 0 companies reported** (violates EITI 3.4).



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## Targeted Accountability Pathways For CSOs/Media

Company	Ask	Legal Leverage
CHEVRON	Verify 99.8% CH <sub>4</sub> drop via independent audit of Agbami (OML 127/128).	EITI 3.4 (Methodology disclosure).
HEIRS	Disclose 2022 data & justify 217M kg CH <sub>4</sub> (OML 17).	NEITI Act S2(e) (Full disclosure).
MOBIL	Explain 15% CH <sub>4</sub> rise; publish methane action plan.	EITI 4.8 (Timeliness).
PILLAR	Rectify emission intensity (1,678.58) or declare flaring event.	EITI 4.7 (Data accuracy).
Non-Disclosers (AITEO/SEPLAT/ENI)	Immediate disclosure.	EITI Requirement 3.4



# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

DISCLOSURE ANALYSIS



## Gaps in Super-Emitter Reporting

The Overview of Nigeria's Super-emitter Flares (OPM Report) by EnergyCC (pp. 6–46) identifies Nigeria's 19 largest flares, including five offshore "super-emitters" (Agbami, Yoho, Usan, Abo, Bonga) and onshore assets like Ebendo. These flares collectively contribute 47–64% of Nigeria's total flared gas (OPM Report, p. 30), with severe climate, health, and economic costs.<sup>1</sup>



Linking the OPM Report with NEITI disclosures is critical because:

### **Accountability:**

Satellite data (e.g., VIIRS Nightfire/VNF) in the OPM Report objectively measures flaring, enabling verification of operator-reported data.

### **Regulatory Action:**

NEITI's self-reported data can be cross-checked against independent observations to identify non-compliance or underreporting.

### **OGMP 2.0 Alignment:**

Companies committed to the Oil & Gas Methane Partnership (OGMP) should disclose asset-level emissions, yet gaps persist.

1. Additional reading: <https://energycc.com/news/energycc-major-studies-on-nigeria-super-emitters-published-by-oxford-policy-management.html>



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## Analysis of Disclosure Gaps

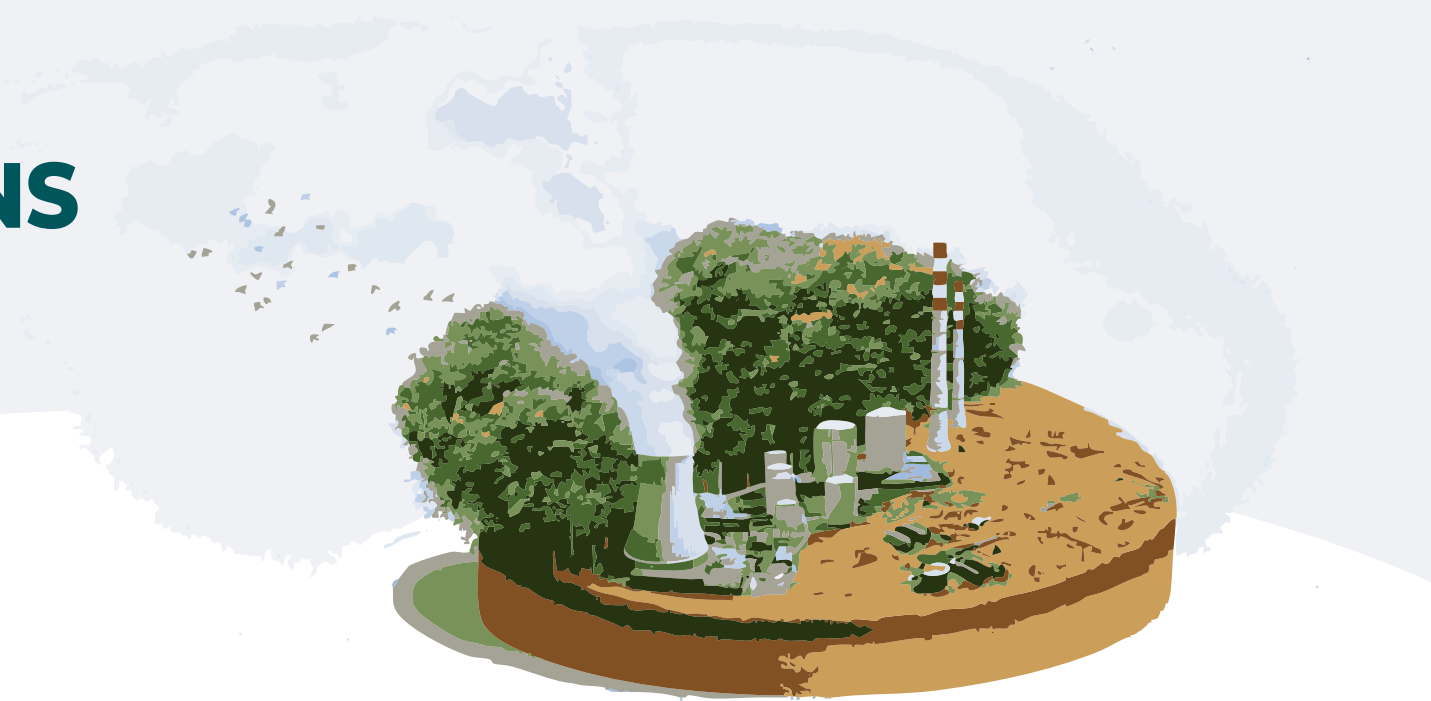
The table below cross-references OPM-identified super-emitters against NEITI submissions and OGMP 2.0 membership:

Super-Emitter Asset (OPM Report)	Operator	Global Rank (2020)	NEITI CH <sub>4</sub> Disclosure (2023)	OGMP 2.0 Member
Agbami	Chevron	#39	No	Yes (Chevron)
Yoho	ExxonMobil	#119	No	Yes (ExxonMobil)
Usan	Total/Exxon	#130	Partial (OML 138 reported)	Yes (Total SA)
Abo	Eni (NAOC)	#206	No (NAOC not in NEITI)	Yes (Eni)
Bonga	Shell (SNEPCO)	#348	Partial (SNEPCO reported)	Yes (Shell)
Ebendo Flow Station	Energia	#124	No (Energia not in NEITI)	No



# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

DISCLOSURE ANALYSIS

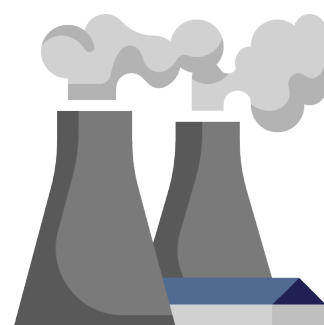


## Key Findings

### 1. Non-Disclosure by OGMP Members



The National Oil Company, NNPC, a signatory to OGMP, did not disclose emissions data in the NEITI report

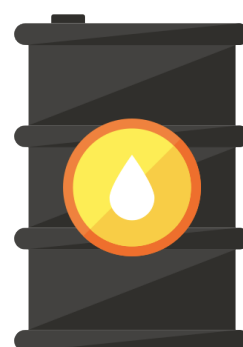


Other OGMP members in Nigeria such as NLNG and Asharami also did not disclose emissions data in the NEITI report



**2+ billion  
m<sup>3</sup> gas**

Chevron (Agbami #39), ExxonMobil (Yoho #119), and Eni (Abo #206) – all OGMP signatories – failed to disclose asset-specific emission in NEITI despite flaring 2+ billion m<sup>3</sup> gas cumulatively (OPM Report, p. 23).



Shell (Bonga) reported under "SNEPCO" but omitted Bonga-specific data, masking its status as a super-emitter.



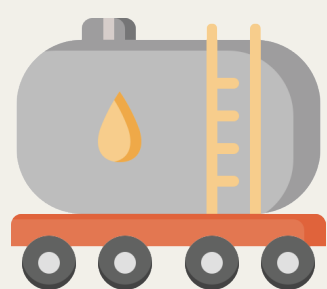
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## Key Findings

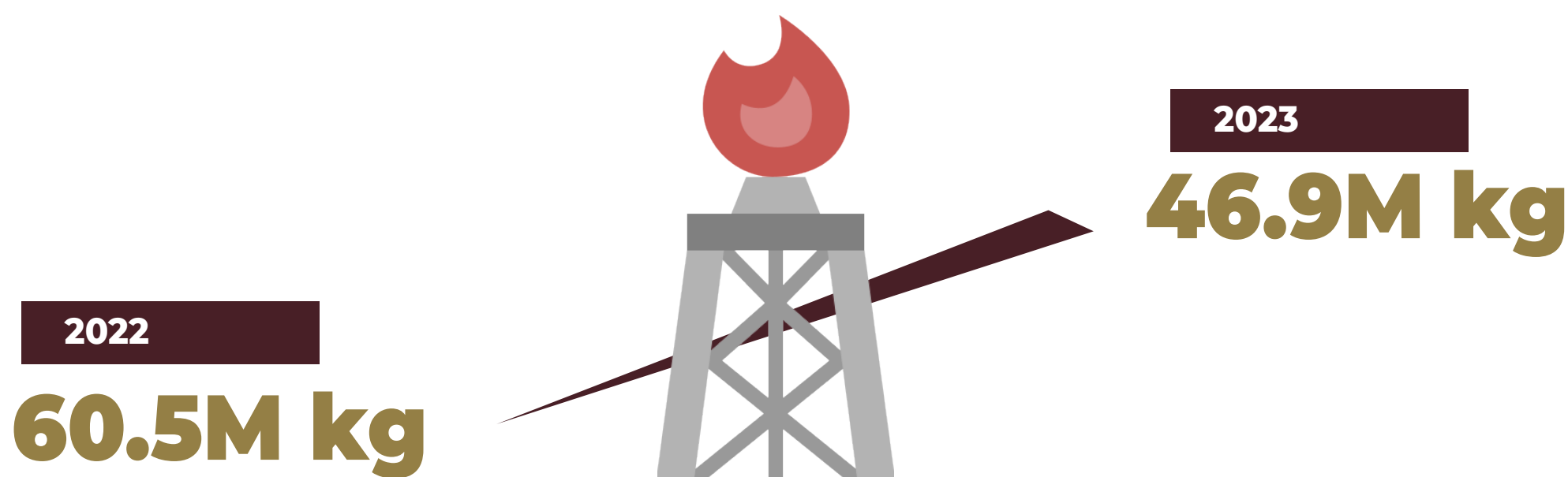
### 2. Non-submitters



**#124  
globally**

Marginal field operators like Energia (Ebendo) and NAOC (Eni) did not submit NEITI data, despite Ebendo ranking #124 globally (OPM Report, p. 12).

### 3. Inconsistent Reporting

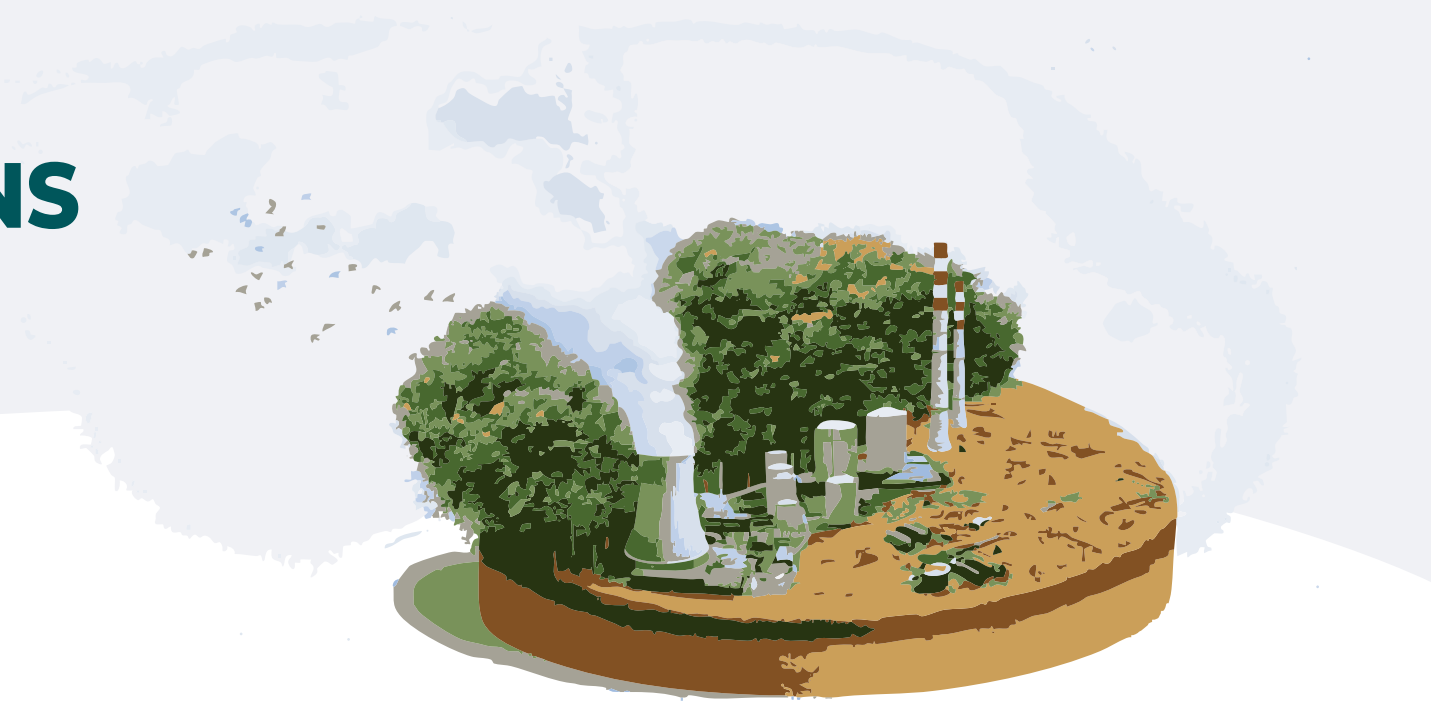


ESSO (Exxon) reported for OML 138 (Usan) but excluded flaring from other assets like Yoho. NEITI data shows ESSO's CH<sub>4</sub> emissions rose from 60.5M kg (2022) to 46.9M kg (2023) – **contradicting satellite-observed increases at Usan (OPM Report, p. 37).**



# NEITI OIL AND GAS COMPANIES' GHG EMISSIONS

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## Recommendations

1

**Mandate disaggregated Asset-Level Data:**  
Per EITI 4.7

2

Disclose all company decarbonisation and energy transition targets

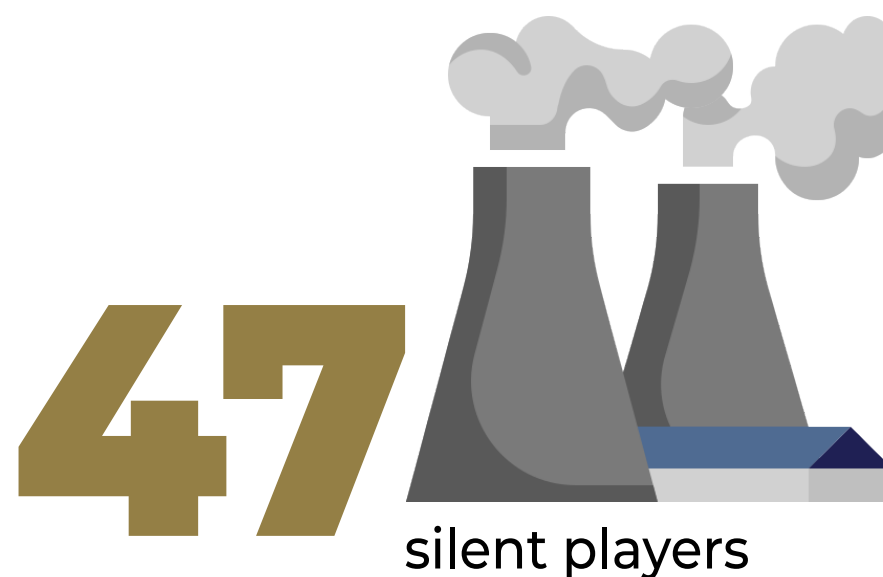
3

**Enforce Scope 3 Reporting:** Value chain emissions (e.g., gas exports).

4

**Independent Audits:** For outliers (Chevron, Pillar, HEIRS).

Nigeria cannot balance "gas expansion" and "emissions reduction" without asset-level transparency. Target rising emitters and the 47 silent players.



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