

From: [Steve Pattee](#)
To: [Goetze, Phillip, EMNRD](#)
Cc: [Harris, Anthony, EMNRD](#); [Wrinkle, Justin, EMNRD](#); [Dana S. Hardy](#); [Ramona Hovey](#); [Powell, Brandon, EMNRD](#)
Subject: [EXTERNAL] RE: Case No. 25480: Kings Landing AGI Nos. 1 and 2 - Seismic Survey Update Discussion
Date: Thursday, February 12, 2026 2:53:54 PM

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Phil, Thanks for getting back to us.

Here are our answers to address the three items you listed.

1. Per the AOR review provided in the updated submission, we confirm that there are no new wells that penetrate the injection zone in the updated AOR.
2. We planned to drill only 30' into the Simpson to allow for sufficient rathole for logging the entire Montoya interval. We are good with plugging that back to the base of the Montoya.
3. Because of the expectation of the redundant well requirement, we included the second well as part of the complete permit application, with the understanding that a cumulative maximum rate will be set. The expectation is that we will drill the second well within 12-18 months after evaluating the data obtained from the first well, updating the reservoir models, etc. If it is simpler to drop the redundant well for now and permit it administratively at a later time, that would be fine by Frontier.

If you are available for a call during the times proposed (Monday after 1 pm MST or Tuesday before 10 am MST), we will send out a Teams invite. If those times do not work, please propose an alternative time.

Thanks again.

Regards,

Stephen Pattee, P.G.

Senior Vice President



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From: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>
Sent: Thursday, February 12, 2026 12:06 PM
To: Steve Pattee <steve@lonquist.com>
Cc: Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>; Wrinkle, Justin, EMNRD <Justin.Wrinkle@emnrd.nm.gov>; Dana S. Hardy <dhardy@hardymclean.com>; Ramona Hovey <ramona@lonquist.com>; Powell, Brandon, EMNRD <Brandon.Powell@emnrd.nm.gov>
Subject: Case No. 25480: Kings Landing AGI Nos. 1 and 2 - Seismic Survey Update Discussion

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Good afternoon, Steve. Thank you for providing the information and the resulting modifications that are the outcome of the new seismic information. OCD will review the submittal and will probably arrange for a short meeting to make sure all matters have been addressed. With that, there are three items to address:

1. Additional statement on the change in BH location and penetrating wells. You have provided one of the two elements OCD required when relocating either the surface location or the bottomhole location and the corresponding new AOR. The affected persons/notification element is addressed, but Lonquist will need to include a statement on changes (or lack of) for penetrating wells within the new AOR.
2. With the review of your new findings as well as the information provided at hearing, OCD will be discussing the TD of the proposed well. The current inclusion of the Montoya and Simpson leaves a lower confining zone that is extremely questionable. The use is of the Ellenburger as confining is not supported by both the reservoirs occurrence in New Mexico and the experiences of the TRRC in the Midland Basin with disposal in that basin. Though the injection fluid is “buoyant”, its properties and impact on the injection reservoir still includes effects on the lower confining zone. The total depth will be reduced in order to increase the separation not only from the Precambrian, but also the Ellenburger.
3. Timing of UIC permits. You may wish to have a discussion with your attorney on this matter. Typically, only one UIC permit for an AGI well to be drilled immediately while the second well, the redundant well in most cases, is usually drill subsequently and would be handled administratively for the second permit as the operator got closer to drilling this well. The case requests two UIC permits concurrently which raises the question on your client’s plan. These permits have a limited time limit. OCD is requesting that the operator provide a realistic scope or general timeline for the completion of the wells. This will accommodate the proposed schedule while avoiding excessive extension orders or possible re-hearing for expired UIC permits.

Please provide the information on scheduling as this can be covered in the meeting. Thank you and contact me with any questions on this content. PRG

From: Steve Pattee <steve@lonquist.com>

Sent: Thursday, February 12, 2026 7:59 AM

To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>

Cc: Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>; Wrinkle, Justin, EMNRD <Justin.Wrinkle@emnrd.nm.gov>; Dana S. Hardy <dhardy@hardymclean.com>; Ramona Hovey <ramona@lonquist.com>

Subject: [EXTERNAL] RE: Case No. 25480: Kings Landing AGI Nos. 1 and 2 - Seismic Survey Update Discussion

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Good morning Phil.

Thanks so much for getting back to us on this application. Glad to hear the permit is being finalized. In response to your two questions, as follows:

1. Is the presentation's intent to relocate the bottomhole of the well, or
2. Is the presentation to re-affirm the location of the wells?

In summary, Frontier plans to:

- Keep the surface locations unchanged
- Move the proposed bottomhole locations approximately 1,825 ft to the southeast for each well. The surface hole locations will not change from the original application.

This move was made after the evaluation of the 3D seismic over the area. In line with guidance from Anthony Harris as the best way to maintain the timeline, we submitted an updated submission package on January 26, 2026. A copy of this email thread and submission is attached. A summary of the 3D evaluation is provided in Section 4.2.6 (page 41). A fault was identified to the west of the original location, prompting the move to ensure the CO2 plume does not reach the identified fault.

The updated submission also includes revised AOR maps around both the surface and new bottomhole locations. No new affected parties were identified in this review. The affected parties listed in the application were sent copies of the updated submission and support document package by certified mail on January 28, 2026.

Hopefully, this answers your questions above and helps maintain your timeline for approving this application. We are happy to get on a call to discuss any open issues either Monday after 1 pm MST or Tuesday before 10 am MST. Please let us know if either of these times works for your team, or feel free to suggest an alternative within the next week.

Regards,

Stephen Pattee, P.G.
Senior Vice President



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From: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>

Sent: Wednesday, February 11, 2026 11:44 AM
To: Steve Pattee <steve@lonquist.com>
Cc: Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>; Wrinkle, Justin, EMNRD <Justin.Wrinkle@emnrd.nm.gov>
Subject: Case No. 25480: Kings Landing AGI Nos. 1 and 2 - Seismic Survey Update Discussion

Good afternoon, Steve. The UIC group is preparing a final order for these wells. Though a meeting had been requested, this item produces two questions: 1. Is the presentation's intent to relocate the bottomhole of the well or 2. Is the presentation to re-affirm the location of the wells? If no change in location is being proposed, is it possible to provide a summary of your findings (without the inclusion of proprietary data) that can be included in the record? Please provide a response when possible. Thank you. PRG

From: Steve Pattee <steve@lonquist.com>
Sent: Friday, January 9, 2026 3:29 PM
To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>
Subject: [EXTERNAL] Brief Meeting Request: Kings Landing AGI Nos. 1 and 2 - Seismic Survey Update Discussion

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Good afternoon Phil and Happy New Year.

I would like to schedule a brief Teams meeting with you to discuss our findings on the seismic survey interpretations that were requested as part of the public hearing for these wells. Please let me know if you have a few time slots next week to consider and we will do our best to accommodate your schedule. I anticipate that it will be myself and Luis Canales, our geophysicist that performed the review on the call.

Thank you for this consideration and I look forward to hearing back from you.

Regards,

Stephen Pattee, P.G.
Senior Vice President



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