

GROUNDWATER PROTECTION DETERMINATION

Form GW-2



Groundwater Advisory Unit

Date Issued:	18 May 2026	GAU Number:	409697
Attention:	EXXONMOBIL LOW C SOL ON ATTN RICHARD REDUS S2.3A. SPRING, TX 77389	API Number:	24532932
Operator No.:	101256	County:	JEFFERSON
		Lease Name:	Sunflower INJ 2
		Lease Number:	
		Well Number:	2
		Total Vertical:	8500
		Latitude:	30.048328
		Longitude:	-94.421807
		Datum:	NAD27

Purpose: Class VI Injection (CCS)
Location: Survey-T&NO RR CO; Abstract-231; Section-91

To protect usable-quality groundwater at this location, the Groundwater Advisory Unit of the Railroad Commission of Texas recommends:

This recommendation letter applies to the Area of Review (AOR) of approximately 6 square-mile area mapped and attached to this application and applies to two specific wells: Sunflower INJ #2 with API# 245-32932 (30.0485414, -94.4219994 NAD83), and Sunflower INJ #3 with API# 245-32931 (30.0487361, -94.4054694 NAD83) within the AOR in Jefferson County. If additional CCS injection wells are to be drilled at this Facility (AOR), a new endangerment statement letter will need to be issued before new permits to inject can be issued.

The subsurface injection interval ranging from 3,588 to 7,775 feet TVD among the two wells, as proposed in the submitted Geological Storage of CO₂ Data Sheet (Class VI) application dated May 15th of 2026, is more than 1,500 feet below the underground source of drinking water (USDW, 1950 ft TVD) and the usable-quality water (UQW, 1700 ft TVD), and sufficiently geologically isolated by primary (Upper Confining Zone with about 200 ft in thickness) and secondary (Burkeville Shale with about 200 ft within thickness) seals from strata containing such protected waters. As such, our review of this application and the available hydrogeologic, geological and 3D seismic data (no faults penetrate the primary seal in AOR) indicates, if otherwise compliant with Railroad Commission of Texas rules and guidelines, that injection of CO₂ into this proposed interval WILL NOT ENDANGER the PROTECTED WATER STRATA at these wells within the AOR (for SIP Purpose Only).

Note: Unless stated otherwise, this recommendation is intended to apply to all wells drilled within 200 feet of the subject well. Unless stated otherwise, this recommendation is for normal drilling, production, and plugging operations only.

This determination is based on information provided when the application was submitted on 05/15/2026. If the location information has changed, you must contact the Groundwater Advisory Unit, and submit a new application if necessary. If you have questions, please contact us at 512-463-2741 or gau@rrc.texas.gov.

Groundwater Advisory Unit, Oil and Gas Division