



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 3, 2026

Anthony McGlown, Water Resources Manager I
New Mexico Environment Department
1190 St. Francis Drive
Santa Fe, NM 87505

RE: Draft Discharge Permit, DP-2006, Tucumcari Truck Terminal

Dear Anthony McGlown:

The New Mexico Environment Department (NMED) hereby provides notice to you of the proposed approval of Ground Water Discharge Permit, DP-2006, (copy enclosed), pursuant to Subsection H of 20.6.2.3108 NMAC. NMED will publish notice of the availability of the draft Discharge Permit in the near future for public review and comment and will forward a copy of that notice to you.

Prior to making a final ruling on the proposed Discharge Permit, NMED will allow 30 days from the date the public notice is published in the newspaper for any interested party, including the Discharge Permit applicant, i.e., yourself, to submit written comments and/or a request a public hearing. A hearing request shall set forth the reasons why a hearing is requested. NMED will hold a hearing in response to a timely hearing request if the NMED Secretary determines there is substantial public interest in the proposed Discharge Permit.

Please review the enclosed draft Discharge Permit carefully. Please be aware that this Discharge Permit may contain conditions that require the permittee to implement operational, monitoring or closure actions by a specified deadline.

Please submit written comments or a request for hearing to my attention at the address below, via email to madison.buechter@env.nm.gov or to pps.general@env.nm.gov, or directly into the NMED Public Comment Portal at <https://nmed.commentinput.com/comment/search>. If NMED does not receive written comments or a request for hearing during the public comment period, the draft Discharge Permit will become final.

Thank you for your cooperation during the review process. Feel free to contact me with any questions at (505) 699-4293.

Sincerely,

Madison Buechter

Digitally signed by Madison
Buechter
Date: 2026.07.31 13:59:44 -06'00'

Madison Buechter, Senior Water Resource Professional

Encl: Draft Discharge Permit, DP-2006
cc: George Schuman, george.schuman@env.nm.gov
Patrice Feltman, pfeltman@geo-logic.com
John Bunch, jbunch@geo-logic.com

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Ground Water Quality Bureau | 1190 Saint Francis Drive, PO Box 5469, Santa Fe, New Mexico 87502-5469
Telephone (505) 827-2900 | www.env.nm.gov/gwqb/



**NEW MEXICO ENVIRONMENT DEPARTMENT GROUND
WATER QUALITY BUREAU**

UNDERGROUND INJECTION CONTROL

GENERAL DISCHARGE PERMIT



Certified Mail- Return Receipt Requested

Facility Name: Tucumcari Truck Terminal

Facility Location: 3700 W. Tucumcari Blvd. Tucumcari,
NM
Quay County

Legally Responsible Party: NMED GWQB
Remediation Oversight Section

Remediation Oversight Agency Contact: NMED GWQB
Anthony McGlown
505-660-9662
Anthony.McGlown@env.nm.gov

Remediation or Injection Plan Identification: Tucumcari Truck Terminal Site

Permitting Action: New DP-2006

PPS Contact Madison Buechter, Senior Water Resource Professional
(505) 699-4293/madison.buechter@env.nm.gov

EFFECTIVE DATE: **TERM ENDS:**

Justin D. Ball
Chief, Ground Water Quality Bureau

[Subsection H of 20.6.2.3109 NMAC, NMSA 1978, § 74-6-5.1]

I. UIC GENERAL DISCHARGE PERMIT

The New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) issues this Underground Injection Control General Discharge Permit (UIC Permit) for the subsurface emplacement of additive fluids through a Class V UIC injection well for the purpose of facilitating vadose zone or groundwater remediation. The GWQB issues this UIC Permit to NMED GWQB (Permittee) pursuant to the New Mexico Water Quality Act (WQA), NMSA 1978 §§74-6-1 through 74-6-17, and the New Mexico Water Quality Control Commission (WQCC) Ground and Surface Water Protection Regulations, 20.6.2 NMAC.

In issuing this UIC Permit, the GWQB has determined that the requirements of Subsection C of 20.6.2.3109 NMAC have been met. The activities authorized by this UIC Permit are principally governed by Tucumcari Truck Terminal Site Remedial Action Plan (Injection Plan), under the authority of NMED GWQB, with oversight by the ROS. Compliance with this UIC Permit requires compliance with the terms, requirements, and conditions of the Injection Plan. The term of this UIC Permit shall be no longer than five years from the effective date of this UIC Permit.

The injection activities, the location of the injection site, the type of injection and quantities of additives being used are briefly described as follows:

Injection Activities (summary: including injection well type, number of wells, and injection frequency)

Copy of the Injection Plan Attached (required): ☒

Summary of Injection Plan: Petroleum contaminated soil will be excavated in multiple areas at the site and disposed of at a licensed facility. The excavation will extend into the shallow aquifer approximately one foot. Gravel backfill will be mixed with 4,480 pounds ORC-Advanced in the excavation using the excavator bucket. Gravel and ORC-A will be placed from the base of the excavation to approximately one foot above the static water table. Clean soil from the excavation and imported clean fill will be used as backfill of the remaining excavation.

Injection Site Information

Depth to most shallow groundwater (required): 16 ft

Existing concentration of total dissolved solids (TDS) in groundwater (required): 1500mg/L

Location (required): 3700 W. Tucumcari Blvd., Tucumcari, NM

County (required): Valencia

Latitude: 35° 9'30.59"N

Longitude: 103°46'17.13"W

Map Showing Area of Injection Sites Attached (required): ☒

Additives Being Used (including volumes, manufacturer, and mixing ratios)

4,480 pounds of ORC-A, manufactured by Regenesis, will be mixed with gravel at the water table with the excavator bucket. The ORC-A will not be pre-mixed with water before placement. The ORC-A will be divided between excavations based on the area of each excavation.

Anticipated Precipitation, Dissolution, Adsorption, and Desorption Products

Upon contact with groundwater, this calcium oxy-hydroxide based material becomes hydrated, producing a controlled-release of molecular oxygen (17% by weight) for periods of up to 12 months on a single application. No significant precipitation or desorption effects from the amendment are expected.

Public Notice Posting Locations

2 inch by 3 inch Newspaper Ad required for Renewal applications.

Newspaper:

3 inch by 4 inch Newspaper Ad required for New, Modification, and Renewal/Modification applications.

Newspaper: Albuquerque Journal

2 feet by 3 feet sign posted for 30 days in a location conspicuous to the public at or near the facility required for New, Modification, and Renewal/Modification applications.

Sign Location: On the property line facing W. Tucumcari Blvd.

8.5 inch by 11 inch or larger posted off-site location conspicuous to the public (e.g. public library). Required for New, Modification, and Renewal/Modification applications.

Flyer Location: Tucumcari Public library, 333 Becker Ave., Belen, New Mexico 87002

This UIC Permit consists of the complete and accurate completion of this UIC Permit form as determined by the GWQB.

Issuance of this UIC Permit does not relieve the Permittee of the responsibility to comply with the WQA, WQCC Regulations, and any other applicable federal, state and/or local laws and regulations, such as zoning requirements and nuisance ordinances.

Signatures

Signature must be that of the person listed as the legally responsible party on this application.

I, the applicant, attest under penalty of law to the truth of the information and supporting documentation contained in this application for an Underground Injection Control General Discharge Permit.

Applicant's Signature

Signature:	<u>George Schuman</u> Digitally signed by George Schuman Date: 2026.08.03 10:29:40 -06'00'	Date:	<u>03/04/2026</u>
Printed Name:	<u>George Schuman</u>	Title:	<u>Manager, Water Resources</u>

Applicant Note that Submissions Must Include:

- 1- One electronic copy of the application delivered to the GWQB via email or other format
- 2- Two hardcopies of the application delivered to: Ground Water Quality Bureau
Harold Runnels Building
1190 Saint Francis Drive
P.O. Box 5469
Santa Fe, NM 87502-5469
- 3- Payment by check or electronic transfer of one application fee of \$100.00

II. FINDINGS

In issuing this UIC Permit, GWQB finds:

1. The Permittee is injecting fluids so that such injections will move directly or indirectly into groundwater within the meaning of Section 20.6.2.3104 NMAC.
2. The Permittee is injecting fluids so that such fluids will move into groundwater of the State of New Mexico which has an existing concentration of 10,000 mg/L or less of TDS within the meaning of Subsection A of 20.6.2.3101 NMAC.
3. The Permittee is using a Class V UIC well as described in 20.6.2.5002(B)(5)(d)(ii) NMAC for in situ groundwater remediation by injecting a fluid that facilitates vadose zone or groundwater remediation.
4. The Permittee is injecting fluids into groundwater in order to achieve the remediation goals identified in the Injection Plan.

III. AUTHORIZATION TO DISCHARGE

The Permittee is authorized to inject chemical additives into groundwater in accordance with this UIC Permit and the Injection Plan under the oversight of ROS.

[20.6.2.3104 NMAC, Subsection C of 20.6.2.3106 NMAC, Subsection C of 20.6.2.3109 NMAC]

IV. CONDITIONS

The conditions of this UIC Permit shall be complied with by the Permittee and are enforceable by GWQB.

1. The Permittee shall perform remediation activities in accordance with the Injection Plan and shall notify GWQB of any changes prior to making them.

[20.6.2.3107 NMAC]

2. The Permittee shall monitor the injection activities and their effects on groundwater quality as required by the Injection Plan and shall provide GWQB with electronic copies of the required reporting and any pertinent documentation of activities at the site.

[20.6.2.3107.A NMAC, 20.6.2.3109.A NMAC]

3. If the GWQB or the Permittee identifies any failure of the Injection Plan or this UIC Permit to comply with 20.6.2 NMAC not specifically noted herein, GWQB may require the Permittee to submit a corrective action plan and a schedule for completion of corrective actions to address the failure.

Additionally, the GWQB may require the Permittee to submit a proposed modification to the Injection Plan, this UIC Permit, or both.

[20.6.2.3107.A NMAC, 20.6.2.3109.E NMAC]

4. ADDITIONAL MONITORING REQUIREMENTS – (RESERVED) - Placeholder for any added monitoring and reporting requirements.
5. TERMINATION – Within 30 days of completion of activities authorized by this UIC Permit the Permittee shall submit a closure report and a request to terminate the UIC Permit to the GWQB for its approval. The closure report shall identify how the injection well(s) was (were) closed in accordance with the Injection Plan. The Permittee shall provide ROS with a copy of this closure report.

[20.6.2.5005 NMAC, 19.27.4 NMAC]

6. INSPECTION and ENTRY – The Permittee shall allow a representative of the NMED to inspect the facility and its operations subject to this UIC Permit and the WQCC regulations. The GWQB representative may, upon presentation of proper credentials, enter at reasonable times upon or through any premises in which a water contaminant source is located or in which are located any records required to be maintained by regulations of the federal government or the WQCC. The Permittee shall allow the GWQB representative to have access to, and reproduce for their use, any copy of the records, and to perform assessments, sampling or monitoring during an inspection for the purpose of evaluating compliance with this UIC Permit and the WQCC regulations.

Nothing in this UIC Permit shall be construed as limiting in any way the inspection and entry authority of GWQB under the WQA, the WQCC Regulations, or any other local, state, or federal regulations.

[20.6.2.3107.D NMAC, NMSA 1978, §§ 74-6-9.B and 74-6-9.E]

7. MODIFICATIONS and/or AMENDMENTS – In the event the Permittee proposes a change to the injection plan that would result in a change in the volume injected; the location of the injections; or the concentration of the additives being injected by the facility, the Permittee shall notify GWQB prior to implementing such changes. The Permittee shall obtain approval (which may require modification of this UIC Permit) by GWQB prior to implementing such changes.

[20.6.2.3107.C NMAC, 20.6.2.3109.E and G NMAC]

8. COMPLIANCE with OTHER LAWS – Nothing in this UIC Permit shall be construed in any way as relieving the Permittee of the obligation to comply with all applicable federal, state, and local laws, regulations, permits, or orders.

[NMSA 1978, § 74-6-5.L]

9. PERMIT FEES – Payment of permit fees is due at the time of UIC Permit approval. Permit fees shall be paid in a single payment remitted to GWQB no later than 30 days after the UIC Permit effective date.

Permit fees are associated with issuance of this UIC Permit. Nothing in this UIC Permit shall be construed as relieving the Permittee of the obligation to pay all permit fees assessed by GWQB. A Permittee that ceases injecting or does not commence injecting during the term of the UIC Permit shall pay all permit fees assessed by GWQB. An approved UIC Permit shall be suspended or terminated if the facility fails to remit a payment by its due date.

[20.6.2.3114.F NMAC, NMSA 1978, § 74-6-5.K]

Work Plan



February 3, 2026

John R. Bunch, PG
Daniel B. Stephens & Associates, Inc.
6501 Americas Parkway NE, Suite 200
Albuquerque, New Mexico 87110
Sent via email: jrbunch@geo-logic.com

Re: Notice to Proceed – Proposal for Remedial Action Activities at Tucumcari Truck Terminal Site in Tucumcari, NM
Work Order No: DBSA08-ROS-26
NMED Department Code: ZJ5203 (FY 26 NCS)
NMED Subaccount Code: ZGWQB
Contract #24-667-2030-27722

Dear John Bunch:

The New Mexico Environment Department (NMED) has reviewed the Technical and Cost Proposal submitted by Daniel B. Stephens & Associates, Inc., dated January 29, 2026, for the completion of remedial action activities at the Tucumcari Truck Terminal at 3700 W. Tucumcari Blvd. in Tucumcari, New Mexico. NMED approves the first two tasks of the Technical and Cost Proposal for this project as follows:

Task and Cost Summary

Task No.	Description	Cost
1	Project Planning/Preparing Remedial Action Plan	\$27,539.20
2	Permitting and Public Notice	\$7,559.40
Subtotal:		\$35,098.60
New Mexico Gross Receipts Tax @ 7.6250%		\$2,676.27
Total:		\$37,774.87

NMED has assigned work order # DBSA08-ROS-26 to this work. NMED has amended the purchase order associated with this contract to include the work tasks described above. The total budget approved for this work order under this Notice to Proceed shall not exceed \$37,774.87 including New Mexico Gross Receipts Tax. NMED will provide a separate Notice to Proceed to increase the approved budget for the remaining tasks in the proposal.

Prior approval from the NMED project manager is required before budget may be moved between tasks or different labor categories. The use of any staff or subcontractors not specified

in the approved Contractor Fee Schedule must be pre-approved in writing by NMED. Additional costs due to changes in the written technical proposal or task assignment must be approved by NMED in writing before the additional work commences.

Prior to submitting an invoice, Daniel B. Stephens & Associates, Inc. must first submit a summary of tasks performed or deliverables produced during the billing period. NMED will issue an acceptance of this summary and request an invoice for the costs incurred for the reported tasks or deliverables. Each summary and invoice must identify the work order number, NMED subaccount code, activity code, and contract number.

NMED has received written permission for access to this site and will provide this to you. Please contact Anthony McGlown at Anthony.McGlown@env.nm.gov or at (505) 660-9662 if you have any questions.

Sincerely,

George Schuman, Program Manager
Remediation Oversight Section
Ground Water Quality Bureau

cc: Justin Ball, Chief, GWQB
Lucas Gallegos, Financial Manager, GWQB
Anthony McGlown, Site Assessment Team Leader, GWQB-SOS
ROS Reading File



February 17, 2026

Mr. George Schuman
Remediation Oversight Section
New Mexico Environment Department
Ground Water Quality Bureau
1190 St. Francis Drive
Santa Fe, New Mexico 87502

Re: Scope of Services and Cost Estimate for Remedial Action Activities
Tucumcari Truck Terminal Site, Tucumcari, New Mexico
Work Order No: DBSA08-ROS-26
NMED Department Code: ZJ5203 (FY 26 NCS)
NMED Subaccount Code: ZGWQB
Contract No. 24-667-2030-27722

Dear Mr. Schuman:

As requested by the New Mexico Environment Department (NMED), Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this work plan outlining remedial action (RA) activities to be performed at the Tucumcari Truck Terminal (the site), located at 3700 W. Tucumcari Blvd in Tucumcari, New Mexico (Figure 1). This work plan details the implementation of the RA strategy, with the overall objective of excavating and disposing of contaminated soil at the site.

Background

The parcel of land has a total area of approximately 28 acres. The site is currently not in use, but was formerly used as a retail petroleum facility with convenience store and truck maintenance terminal. Due to past activities at the site, there is soil and groundwater contamination on the property.

The site is currently listed in the NMED Petroleum Storage Tank Bureau (PSTB) leaking underground storage tank (LUST) database (Release ID #730, Facility #31248). There are currently no activities being performed at the site for remediation or monitoring purposes.

According to previous site investigations and documentation, there was a previous diesel truck rollover at the site, as well as a truck accident involving one of the fuel dispensing pumps.

There is a large area of staining associated with two used oil tanks, approximately 1,500 gallons each, that extends from the east-central side of the historical service center to the generator building. There was pooled oil near the aboveground storage tanks (ASTs). NMED investigated the soil staining on September 20, 2023, and it was determined that

pipes had been cut and a valve at the base of one of the tanks had been forcibly separated from the tank wall, allowing the used oil to drain out. The oil flowed approximately 400 feet across the property and a further 30 feet parallel to the highway, where it flowed into a culvert and under the roadway. The oil flowed out of the culvert and into a surface water drainage between the highway and the railroad tracks, terminating in a vegetated area. During the investigation by NMED, actions were taken to clear the pools of oil and impacted soil and to block the culvert.

A Phase II environmental site assessment (ESA) was completed by Es² and Leaf Environmental in August 2024 and included the installation of 9 soil borings, which were all completed as temporary monitor wells at the site. Analytical results from soil and groundwater samples collected during the investigation confirmed both soil and groundwater contamination at concentrations above state regulatory standards in multiple locations across the site.

Four ASTs were permanently closed and removed from the site on February 27 and 28, 2025. The NMED PSTB inspector noted that fuel and water was flowing out of fuel conveyance lines, which were then removed; some soil and contaminated water was contained and removed by the contractor. The inspector also noted multiple areas of strong petroleum odor and staining associated with the conveyance lines and transition sumps. During the tank closure, multiple soil samples were collected within the AST containment, beneath the conveyance lines, and beneath the dispensers. Samples collected at the time of the tank and conveyance line removal had detections of petroleum contaminants. Most of the contaminants were associated with the conveyance lines from the former AST vault and the dispensers.

To prepare for the RA activities, DBS&A completed an additional site investigation in December 2025 that included the advancement of 50 soil borings. A total of 103 soil samples, including duplicates, were collected for laboratory analysis from the soil borings and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX), and for total petroleum hydrocarbons (TPH) gasoline range organics (GRO), motor oil range organics (MRO), and diesel range organics (DRO) using U.S. Environmental Protection Agency (EPA) methods 8021/8015M.

The DRO and minor GRO contamination in soil at the site is concentrated in three main areas as shown on Figure 2: (1) the former service station and convenience store located in the north-central portion of the site, (2) the tanker rollover area southeast of the large existing ASTs located in the south-central portion of the property, and (3) the former diesel truck stop located in the northwest portion of the site. There is also a smaller area of contamination behind the truck stop building where the lines were cut from the waste oil AST in 2023.

Scope of Services

The scope of services for this RA includes the following:

- Preparing a work plan and cost estimate
- Preparing a remedial action plan (RAP) following NMED guidelines, as well as a health and safety plan (HASP)
- Completing permitting and public notices
- Plugging and abandoning up to 20 existing groundwater and extraction wells
- Conducting the RA pursuant to the RAP, including excavation and disposal of approximately 17,000 cubic yards of contaminated soil from the site
- Preparing a summary report that outlines the results of the RA

Work Plan Preparation and Cost Estimate

DBS&A prepared and submitted this work plan following receipt of the task order and site reconnaissance using information from appropriate EPA and NMED guidance. This work plan includes a description of project tasks, project documentation, estimated costs, and project schedule.

Remedial Action Plan Preparation

Prior to initiation of the RA, a RAP will be prepared that addresses all field activities to be conducted by DBS&A and complies with NMED and EPA requirements. The RAP will address the excavation and removal of the contaminated soil from the site. The RAP will include the following:

- Goals of remediation and target concentrations to be achieved.
- A site plan, drawn to scale, showing all existing buildings, structures, and footprint of the proposed excavation areas.
- Description of pre-and post-RA topographic surveys.
- Implementation schedule.
- Description of permits required for plugging and abandonment of existing monitor and extraction wells.
- Public notices and traffic control plan.
- Outline of the excavation and backfill areas to include staging areas and safety measures, and a description of the ultimate disposal site of contaminated media.
- Description of amendment materials added to bottom of excavation pits.

- Description of excavation and backfill procedures. Standard methods of backfilling and compaction will be performed by the excavation contractor, EnviroWorks, LLC. Compaction testing of backfill material or placement will be performed by DBS&A.
- Description of measures that will be taken for site security, including access control and overnight security.

In accordance with 29 CFR 1910.120, DBS&A will prepare a HASP, which will include a discussion of the proposed tasks, likely hazards to be encountered, mitigation measures, and appropriate personal protective equipment to be used. Information regarding key contacts and the route to the nearest appropriate medical facility will also be included.

Permits and Public Notice

New Mexico Office of the State Engineer (OSE) approved plugging plans of operation will be required for plugging and abandoning groundwater monitor wells.

DBS&A will obtain a discharge permit from the NMED Ground Water Quality Bureau (GWQB) prior to application of amendment materials at the site. DBS&A will submit a groundwater discharge permit application and provide maps, figures, logs, tables, and other data necessary to ensure the application is administratively and technically complete. DBS&A will pay the application filing fee, and will pay for the initial public notice required by the NMED GWQB. To complete public notice, DBS&A will post a sign at the facility, post a flyer off-site at a location approved by GWQB, mail a public notice flyer to property owners within one-third mile, and post notice in a GWQB-approved newspaper.

Public notice will be required prior to remedial activities and will follow NMED Neglected Contaminated Site requirements including legal advertisement(s) and signage at the site. The public notice and sign will follow the provided NMED guidance and templates.

Implementation of Remedial Action

Subsequent to receipt of comments on the RAP and final approval by the NMED, DBS&A will perform field activities to oversee the excavation and disposal of the contaminated soil at the site. The anticipated activities are described in the following subsections.

Plugging and Abandonment of Existing Monitor and Extraction Wells

DBS&A will subcontract with EnviroWorks to plug and abandon up to 20 monitor and extraction wells at the site. This work will be completed following receipt of the approved plugging plan of operations from OSE.

Prior to abandoning the wells, DBS&A will gauge fluid levels using an electronic interface probe. The concrete pads and vaults will then be removed from each well, the casing will either be completely removed or cut off at a depth of 1 to 2 feet below ground surface (bgs),

and the remaining borehole will be tremie-grouted with a neat cement grout. Total depth of the wells is assumed to be approximately 20 to 25 feet bgs.

Soil Excavation, Backfill, and Disposal

Prior to excavation, the site will be secured with a combination of concrete barriers, signage, and temporary fencing. At the end of each day, entry points will be barricaded to deter vehicular traffic from entering the site, and open excavations will be flagged and secured with temporary fencing. Traffic control will be set up according to the approved traffic control plan, as needed. During all excavation activities, Occupational Safety and Health Administration (OSHA) regulations for excavations in 29 CFR 1926, Subpart P will be followed.

Where present and above the screening level, soil contamination was assumed to extend to the water table at approximately 16 feet bgs. The estimated volumes of contaminated soil above the 100 milligrams per kilogram (mg/kg) screening level for DRO in each of the identified release areas are as follows:

- Former service station and convenience store: 3,715 cubic yards
- Truck rollover area: 5,107 cubic yards
- Former diesel truck stop: 8,439 cubic yards
- Former waste oil AST: 277 cubic yards

The total volume of contaminated soil that will be accessible for excavation is preliminarily estimated to be approximately 17,000 cubic yards. This volume is slightly less than the estimated totals above because the dispenser island at the convenience store will not be removed; therefore, a certain amount of contaminated soil will remain in place. The waste soil volume described here is an estimate. Actual haulage will vary based on soil screening completed during excavation activities, and may include potentially impacted areas adjacent to those identified during the site investigations, as shown on Figure 2.

Excavation activities will focus on removal of contaminated soil in the four release areas. Depth of the excavation will vary due to required sloping for excavation safety and proximity to site structures. The deepest part of the excavations will be at the water table at approximately 16 feet bgs. Excavation within the roadway and under the former service station canopy is not included in this cleanup strategy. A full description of excavation methodology, staging, hauling and disposal, backfill (including any soil amendments), waste characterization sampling, and confirmation sampling will be provided in the RAP.

Site restoration will include backfill and compaction. In the excavation pits, a layer of gravel will be placed in the bottom of the excavation to approximately 1 foot above the static water table so that saturated soils can be appropriately compacted. Clean soils staged during the excavation and engineered fill imported to the site will be used as backfill.

Backfill materials in contact with groundwater will be amended with Oxygen Release Compound – Advanced (ORC-A®) provided by Regenesi Bioremediation, Inc. The backfill soils will be placed and compacted as directed in the RAP specifications.

A site survey, completed by a New Mexico-licensed land surveyor, will document final site conditions, including the final grade of the site.

The NMED project manager will be provided electronic weekly updates of project activities during the excavation phase via e-mail. Soil volumes, field screening results, compaction testing results, volume of ORC-A used to amend backfill, photographic documentation, and other details related to the excavation work will be documented in the summary report. DBS&A will notify the NMED project manager indicating when the excavation and backfill activities have been completed.

Reporting

A final report will be submitted to the NMED project manager after completion of RA activities in accordance with 20.5.119.1925.D NMAC. The report will document the soil excavation and include all supporting field screening results, field notes and field forms, laboratory analytical results from the confirmation and waste characterization samples, details of soil disposal including copies of the waste manifests, record drawings showing the areal extent of the soil excavation and finished grade, and photographic documentation of field activities.

Schedule

DBS&A recognizes that NMED is interested in completing this project before the end of June 2026. Upon approval of this work plan and notice to proceed, DBS&A will prepare the RAP within 10 working days for submittal to the NMED for review. After approval of the RAP, DBS&A will prepare and post the public notices. Public notices will be required prior to RA activities and will follow NMED Neglected Contaminated Site requirements, including legal advertisement(s) and signage at the site. The public notice and sign will follow the provided NMED guidance and templates.

The RA program can be initiated within 10 working days after completion of the public notice 30-day period. The excavation, disposal, and backfilling activities are estimated to take 12 weeks. A draft report will be completed within 10 working days after completion of field activities and receipt of final laboratory sample results. After receipt of NMED's final comments to the draft report and planning documents, the final report will be submitted within 10 working days, in accordance with the NMED Environmental Assessment Remediation Consulting Services contract. All work will be completed by June 29, 2026.

Mr. George Schuman
February 17, 2026
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Cost Estimate

DBS&A proposes to perform the scope of services described in this proposal in accordance with contract number 24-667-2030-27722 on a time-and-materials basis. The total cost of the project is estimated at \$4,571,383.60 including New Mexico gross receipts tax. We have provided a detailed breakdown of this cost estimate in Attachment 1.

Closing

We appreciate the opportunity to serve NMED on this project. If you have any questions regarding this scope of work or cost estimate, please call me at 505-822-9400.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.



John R. Bunch, P.G.
Senior Scientist



Gundar Peterson, P.E.
President

JRB/rpf

Attachments

cc: Anthony McGlown, NMED GWQB

Figures



Aerial image: Google Earth, 11/17/2024



0 2000 4000 ft



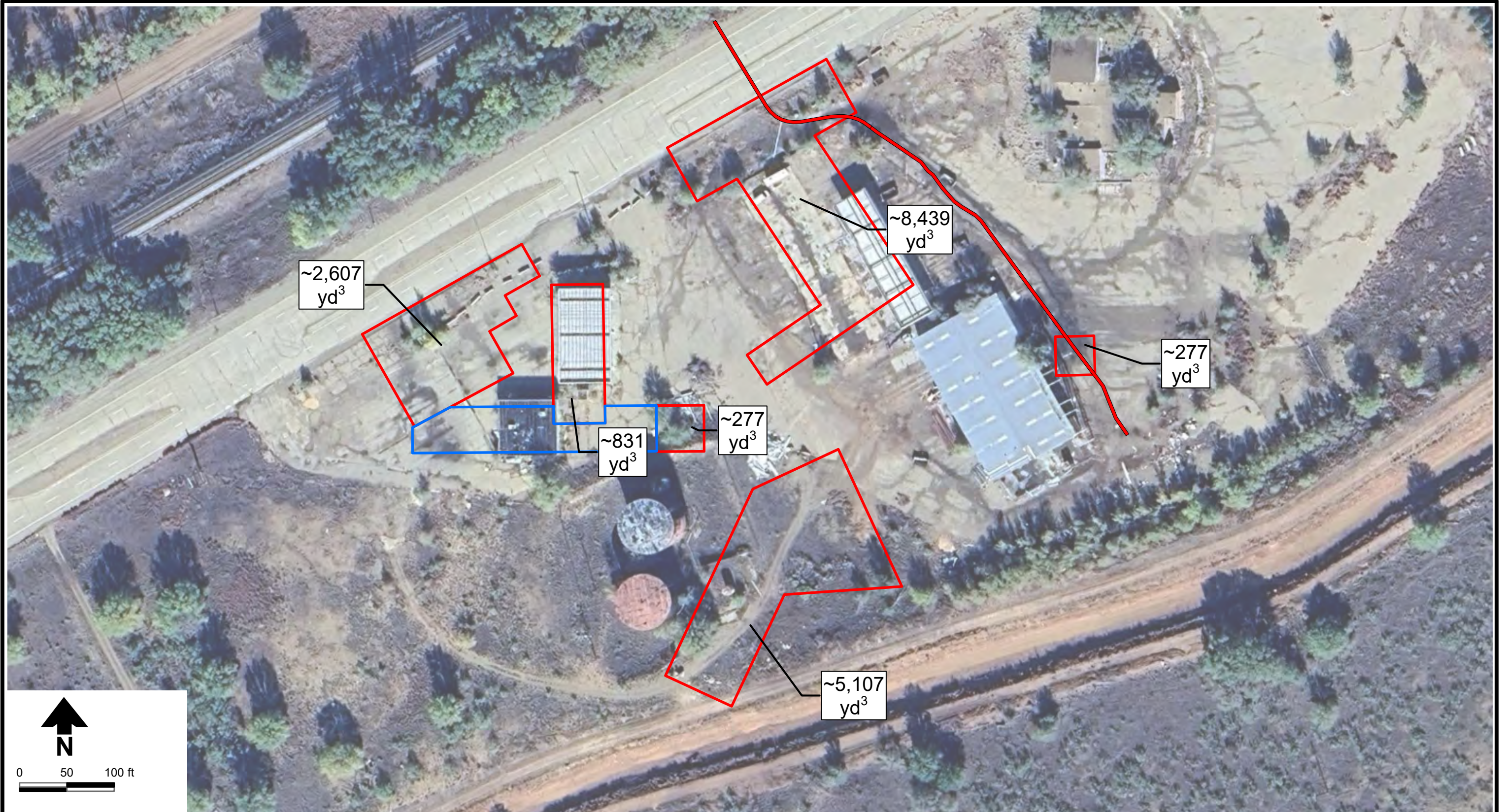
DBS&A

a Geo-Logic Company
DB24.1236

1/12/2026

**TUCUMCARI TRUCK TERMINAL
Area Map**

S:\PROJECTS\B24.1236_TUCUMCARI_TRUCK_STOP_UPDATE_PHASE_II\ESA\GIS\ARC\GIS_PROT\TUCUMCARI_TRUCK_TERMINAL\TUCUMCARI_TRUCK_TERMINAL_APRX_FIG 7 PHASE II STUDY ESTIMATED VOLUMES



Aerial image: Google Earth, 11/17/2024

Explanation

- Waste oil spill
- Approximate area of soil above NMED SSL for DRO in cubic yards
Total: ~17.815 yd³
- Potential excavation area likely to be impacted

Figure 2

Remedial Action Plan
Tucumcari Truck Stop
3700 West Tucumcari Boulevard
Tucumcari, New Mexico
Contract No. 24-667-2030-27722
NMED Subaccount Code: ZGWQB

Prepared for
New Mexico Environment Department
Ground Water Quality Bureau
Santa Fe, New Mexico

Prepared by



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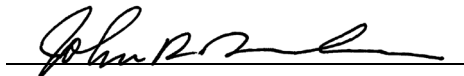
Approval Sheet

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1. Introduction

As requested by the New Mexico Environment Department (NMED), Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this remedial action plan (RAP) outlining remedial action (RA) activities to be performed at the Tucumcari Truck Stop property (the site), located at 3700 West Tucumcari Boulevard in Tucumcari, New Mexico (Figure 1). The RAP will be conducted in accordance with Contract #24-667-2030-27722 and work order number DBSA08-ROS-26 (NMED, 2026).

This RAP details the implementation of the RA strategy, with the overall objective being the excavation and disposal of contaminated soil at the site.

This RAP summarizes the tasks and procedures to complete the following:

- Install barriers for security and safety which will preclude public access to the excavation area during the RA
- Excavate and remove the contaminated soil
- Collect confirmation samples within the excavation for laboratory analysis
- Backfill the excavation to approximate pre-excavation grade with clean fill

Upon completion of the RA activities, an RA report will be prepared and submitted to NMED to document the completion of the soil removal, restoration activities, and waste disposal. DBS&A has prepared a health and safety plan (HASP) in accordance with 29 CFR 1910.120 for this RA to ensure the safety of field personnel during field implementation of the RAP (Appendix A).

This RAP is required to be reviewed by DBS&A staff, DBS&A's RA subcontractor EnviroWorks, LLC (EnviroWorks) and NMED staff participating in the work effort. This RAP will be in the possession of the RA field team for the duration of the RA activities. All involved contractors, subcontractors, and NMED staff will have access to this RAP and are required to comply with the procedures documented herein. DBS&A standard operating procedures (SOPs) will be referenced and followed for the appropriate RA tasks. The SOPs are provided in Appendix B.

1.1 Site Summary

The parcel of land has a total area of approximately 28 acres. The site is currently not in use, but was formerly used as a retail petroleum facility with convenience store and truck maintenance

terminal. Due to past activities at the site, there is soil and groundwater contamination on the property.

The site is currently listed in the NMED Petroleum Storage Tank Bureau (PSTB) leaking underground storage tank (LUST) database (Release ID #730, Facility #31248). There are currently no activities being performed at the site for remediation or monitoring purposes.

According to previous site investigations and documentation, there was a previous diesel truck rollover at the site, as well as a truck accident involving one of the fuel dispensing pumps.

There is a large area of staining associated with two used oil aboveground storage tanks (ASTs), approximately 1,500 gallons each, that extends from the east-central side of the historical service center to the generator building. There was pooled oil near the ASTs. NMED investigated the soil staining on September 20, 2023, and it was determined that pipes had been cut and a valve at the base of one of the tanks had been forcibly separated from the tank wall, allowing the used oil to drain out. The oil flowed approximately 400 feet across the property and a further 30 feet parallel to the highway, where it flowed into a culvert and under the roadway. The oil flowed out of the culvert and into a surface water drainage between the highway and the railroad tracks, terminating in a vegetated area. During the investigation by NMED, actions were taken to clear the pools of oil and impacted soil and to block the culvert.

A Phase II environmental site assessment (ESA) was completed by Es² and Leaf Environmental in August 2024 and included the installation of 9 soil borings, which were all completed as temporary monitor wells at the site. Analytical results from soil and groundwater samples collected during the investigation confirmed both soil and groundwater contamination at concentrations above state regulatory standards in multiple locations across the site.

Four ASTs were permanently closed and removed from the site on February 27 and 28, 2025. The NMED PSTB inspector noted that fuel and water was flowing out of fuel conveyance lines, which were then removed; some soil and contaminated water was contained and removed by the contractor. The inspector also noted multiple areas of strong petroleum odor and staining associated with the conveyance lines and transition sumps. During the tank closure, multiple soil samples were collected within the AST containment, beneath the conveyance lines, and beneath the dispensers. Samples collected at the time of the tank and conveyance line removal had detections of petroleum contaminants. Most of the contaminants were associated with the conveyance lines from the former AST vault and the dispensers.

To prepare for the RA activities, DBS&A completed an additional site investigation in December 2025 that included advancement of 50 soil borings. A total of 103 soil samples, including duplicates, were collected for laboratory analysis from the soil borings and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) and for total petroleum hydrocarbons (TPH) gasoline range organics (GRO), motor oil range organics (MRO) and diesel range organics (DRO) using U.S. Environmental Protection Agency (EPA) methods 8021/8015M.

The DRO and minor GRO contamination in soil at the site is concentrated in three main areas as shown on Figure 2: (1) the former service station and convenience store located in the north-central portion of the site, (2) the tanker rollover area southeast of the large existing ASTs located in the south-central portion of the property, and (3) the former diesel truck stop located in the northwest portion of the site. There is also a smaller area of contamination behind the truck stop building where the lines were cut from the waste oil AST in 2023.

1.2 Geology and Hydrogeology

Tucumcari is located in a region known as the "Canadian Breaks," where the Canadian River broke through the Ogallala Formation during the Pliocene (Chronic, 1987). The subject property lies on the western edge of Tucumcari with bedrock of Cretaceous to Jurassic age (Chronic, 1987).

The U.S. Geological Survey (USGS) 7.5-minute quadrangle for Liberty Mesa, New Mexico and adjacent to the east, Tucumcari, New Mexico indicates that the subject property is located in a valley adjacent to the north of Conchas Canal. The slope direction through the subject property is to the north, and the gradient is gently sloping, increasing in gradient to the north. The surface elevation is approximately 4,100 feet above mean sea level (feet msl).

Based on the surface topography as interpreted from the USGS 7.5-minute quadrangle for Liberty Mesa, New Mexico, regional groundwater in the vicinity of the subject property is anticipated to flow to the north; however, Conchas Canal is adjacent to the subject property.

Actual groundwater flow direction can be locally influenced by many factors, including underground structures, seasonal fluctuations, local variations in soil and geology, and production wells, among others. The actual groundwater flow direction under the subject property can only be accurately determined by installing groundwater monitor wells, which was beyond the scope of this project. No documentation was found that directly indicated groundwater flow direction at the subject property.

1.3 Contaminants of Concern

The primary contaminants of concern (COCs) in soil are gasoline and diesel constituents, as identified during the Phase II investigation, including BTEX and naphthalenes.

The DRO and GRO contamination in soil at the site is concentrated in three main areas as shown on Figure 2: (1) the former service station and convenience store located in the north-central portion of the subject property, (2) the tanker rollover area southeast of the large existing ASTs located in the south-central portion of the property, and (3) the former diesel truck stop located in the northwest portion of the subject property. There is also a smaller area of contamination behind the truck stop building where the lines were cut from the waste oil AST in 2023.

Where present and above the screening level of 100 milligrams per kilogram (mg/kg), soil contamination was assumed to extend to the water table at approximately 16 feet below ground surface (bgs). The estimated volumes of contaminated soil above the 100 mg/kg screening level for DRO in each of the identified release areas are as follows:

- Former service station and convenience store: 2,884 cubic yards
- Truck rollover area: 5,107 cubic yards
- Former diesel truck stop: 8,439 cubic yards
- Former AST: 277 cubic yards

Vertical distribution of DRO contamination in soil at 4-foot intervals is shown in Figures 3 through 6 for the 0- to 4-foot interval, 4- to 8-foot interval, 8- to 12-foot interval, and 12- to 16-foot interval, respectively.

2. Contractor Qualifications

DBS&A is a licensed contractor in the state of New Mexico and holds a GS-29 license (License #89947). EnviroWorks of Edgewood, New Mexico has been selected to serve as the general contractor at the site, and will coordinate excavation work and utility relocation. All work will be performed under the supervision of a professional engineer licensed in New Mexico. EnviroWorks is a licensed General Contractor (License #81818) in the State of New Mexico and has extensive experience in contaminated soil excavation.

3. Purpose and Approach of the Remedial Action Plan

The goal of this project is to successfully implement the RA by excavating contaminated soil to the extent practicable. At the conclusion of work at the site, the project area will be restored as closely as possible to pre-entry conditions.

3.1 Project Description

This project encompasses plugging and abandonment of existing monitor and extraction wells, excavation and disposal of contaminated soil, and site restoration. Approximately 17,000 cubic yards of in-situ soil will be excavated, disposed of off-site, and replaced with clean backfill.

3.2 Project Purpose

The purpose of the project is to remediate the contaminated soil associated with the site. This will protect the public and make the site suitable for redevelopment.

3.3 Project Approach

To ensure that the project objectives are achieved, an authorized representative for DBS&A will have direct supervisory control over all aspects of the project. All excavation, backfill, and construction activities conducted during the project will be performed under the direction of John R. Bunch, P.G., with DBS&A, a New Mexico licensed GS-29 contractor. All activities proposed in this RAP will be conducted in accordance with the State of New Mexico Construction Industries Division (CID) Guidelines, DBS&A SOPs (Appendix B), and applicable federal and state regulations governing excavation, hauling and disposal, and backfill.

The following activities are proposed to accomplish the scope of work:

- Project planning
- Plugging and abandonment of up to 20 monitor wells
- Site control measures in excavation areas
- Excavation of contaminated soil
- Hauling and disposal
- Backfill
- Summary RA report

Details of each activity are provided in the following subsections.

3.3.1 Project Planning

The following activities will be performed by DBS&A prior to implementation of RA field activities:

- Develop a site-specific HASP (Appendix A)
- Obtain New Mexico Office of the State Engineer (OSE) permits
- Call for utility locates
- Conduct a site visit with the excavation contractor
- Develop a traffic control plan
- Negotiate subcontractor agreements and services, issue work orders
- Conduct a kickoff meeting

The excavation will be completed in accordance with applicable Occupational Safety and Health Administration (OSHA) regulations, including preparation and implementation of a site-specific HASP, conductance of daily health and safety meetings with all subcontractor and on-site personnel during field activities, monitoring of excavation sidewall stability, and monitoring ambient air quality. Personnel who may be in direct contact with contaminated soil will have a minimum of 24-hour OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training. Ambient air monitoring using a properly calibrated photoionization detector (PID) and five-gas meter will be performed by DBS&A on-site staff on an ongoing basis during excavation activities. All project personnel will have the authority to stop work if they deem unsafe conditions to be present. Work will not continue until the conditions have been mitigated.

Standard safety operating procedures, emergency communication procedures, and route(s) to hospitals are included in the HASP (Appendix A). A copy of the signed access agreement with the landowner is provided in Appendix C.

New Mexico One Call will be contacted and the appropriate companies will mark underground utilities. The one call will be updated prior to implementation of field activities and as necessary during the field activities.

DBS&A will conduct a site visit with the excavation subcontractor and the landowner and NMED Ground Water Quality Bureau (GWQB) to finalize utility locations, verify excavation clearances

and placement of necessary equipment, identify truck routing, and finalize locations for staging of excavated and backfill soils.

The excavation area is accessed by West Tucumcari Boulevard. Transportation of all equipment related to the haul of waste shall remain exclusively on West Tucumcari Boulevard and Interstate 40 (I-40) to the Town of Mountainair and New Mexico Highway 55 (NM 55).

Subcontractor services will be negotiated and agreements will be obtained by DBS&A prior to implementation of field activities for excavation, hauling, disposal, backfill, and laboratory analysis.

3.3.2 Permitting and Public Notice

OSE-approved plugging plans of operation will be required for plugging and abandoning groundwater monitor wells.

DBS&A will obtain a discharge permit from the NMED GWQB prior to application of amendment materials at the site. DBS&A will submit a groundwater discharge permit application and provide maps, figures, logs, tables, and other data necessary to ensure that the application is administratively and technically complete. DBS&A will pay the application filing fee, and will pay for the initial public notice required by the NMED GWQB. To complete public notice, DBS&A will post a sign at the facility, post a flyer off-site at a location approved by GWQB, mail a public notice flyer to property owners within $\frac{1}{3}$ mile, and post notice in the *Albuquerque Journal* and on the Quay County newspaper's website.

DBS&A will complete public notice for the RAP in accordance with 20.5.119.1923.D.10 NMAC. Two legal notices of the submission of a RAP will be published in the *Albuquerque Journal* and on the Quay County newspaper's website. We will send certified letters to adjacent property owners and, to the extent possible, we will conduct in-person meetings with these owners regarding traffic flow, noise, and vapor control. Notices of submittal of the remediation plan will be posted in a prominent location at the site, where they can be easily seen by the public.

All public notices will be in both Spanish and English, with the Spanish translation provided by NMED GWQB in advance of publishing.

3.3.3 Monitor Well Plugging and Abandonment

DBS&A will subcontract with Rogers Drilling in Albuquerque, New Mexico to plug and abandon up to 20 monitor wells and extraction wells at the site. This work will be completed following receipt of the approved plugging plan of operations from OSE.

Prior to abandoning the wells, DBS&A will gauge fluid levels using an electronic interface probe. The concrete pads and vaults will then be removed from each well, the casing will either be completely removed or cut off at a depth of 1 to 2 feet bgs, and the remaining borehole will be tremie-grouted with a neat cement grout. Total depth of the wells is assumed to be approximately 20 to 25 feet bgs.

3.3.4 Site Control Measures in Removal Areas

Prior to the start of RA field activities, the following site control zones will be established, as needed, and will change as the working excavations are completed in accordance with the RAP and HASP (Appendix A):

- Exclusion zone (EZ)
- Contamination reduction zone (CRZ)
- Support zone (SZ)

Soil excavation areas will be designated as being within the EZ. The RA site size allows minimum clearance for heavy equipment; therefore, all unnecessary personnel will be prevented from entering the EZ unless authorized by the RA Site Supervisor. The EZ will be marked with hazard tape or other easily identifiable material. These markers should be placed to minimize limitations on heavy equipment movement between the excavation area and the loading area. Authorized entry to the EZ will be limited to personnel wearing the proper personal protective equipment (PPE) as required by the HASP. Adjustments may be made in the field to maintain the safety of site workers and any persons near the site.

CRZs will be established at the outer boundary of the exclusion zone. RA personnel will remove or decontaminate protective clothing and equipment that may have been in contact with affected soils or other materials containing elevated COC concentrations within the CRZs.

Areas of the site not marked as EZs or CRZs will be designated as support zones.

Excavations that need to be left unattended will be fenced off with construction fencing to minimize access to excavated areas during non-working hours. Heavy equipment will be

secured and stored at the site during non-working hours; equipment will be located to further deter access to the excavated area.

3.3.5 Excavation of Contaminated Soil

The estimated dimensions and area of excavation are shown on Figure 2. The total proposed excavation area is approximately 291,870 square feet. Excavation activities will be performed according to the RAP and OSHA Excavation Safety Regulations (29 CFR 1926.650 to 652).

The extent of excavation proposed by DBS&A is based on analyses of soil collected from Geoprobe borings installed by DBS&A (DBS&A, 2026).

Excavation activities will be performed using an excavator to a depth of approximately 16 feet, which is the approximate depth to water. Accompanying each load of contaminated soil will be a waste manifest filled out by on-site personnel. One copy of the manifest will be given to the disposal facility and one copy will be retained for inclusion in the final summary report to be submitted to the NMED. The excavation walls will be as near to vertical as the soils and safety will allow. Site personnel will only enter the excavation when it is determined to be absolutely necessary for the successful completion of the project.

Excavated soils will be temporarily staged on-site and then transferred to 18-cubic yard end dump trucks, in a manner to minimize dust, for transfer to a licensed disposal facility.

The RA activities will be conducted in a manner to minimize the creation and dispersion of dust related to soil excavation, loading, handling, backfilling, and transportation. Dust control measures will be achieved through misting in the work areas to suppress the dust. Using a misting approach for dust suppression will minimize dust and will not create runoff of water outside of the excavation area. EnviroWorks will supply water if it is not available on-site.

3.3.5.1 Soil Screening

As soils are being excavated, DBS&A will perform field screening using a flame-ionization detector (FID) and the heated headspace method. Results of field screening will be used to guide the extent of excavation. As soils are excavated, they will be segregated based on the field screening results into two piles that will be staged on-site. Soils containing organic vapor concentrations greater than 100 parts per million by volume (ppmv) will be designated contaminated and staged on visqueen for loading and transport to the disposal facility. Soils containing organic vapor concentrations less than 100 ppmv will be designated clean and placed in a clean soil pile for use as backfill. Excavation will continue until field screening results

indicate that the organic vapor concentrations in remaining soils are less than 100 ppmv and there is no obvious visual or olfactory evidence of contamination remaining, or until site constraints prevent further excavation. Results of field screening will assist in guiding the extent of excavation and confirm the presence of hydrocarbon-impacted soils.

3.3.5.2 Confirmation Sampling

Confirmation sampling will be conducted prior to backfilling to determine if additional removal of soils is required. Upon reaching the final excavation depth in the excavation above the water table (16 feet bgs), a string line will be stretched across the excavation on the ground surface. A tape measure or ruler will be used to measure the depth from the bottom of the excavation to the string line. Five measurements across the excavation will be recorded to document the final excavation depth. Five soil samples will be collected from the bottom of the excavation and analyzed for volatile organic compounds (VOCs) using EPA method 8260B. The soil samples will be collected using a disposable trowel pursuant to the SOPs (Appendix B). All samples will remain on ice until they are delivered to the analytical laboratory. Chain of custody documentation will accompany the samples at all times. Samples will be submitted to Eurofins Environment Testing (Eurofins) in Albuquerque, New Mexico for analysis.

Table 1 specifies the required sample volume, container type, preservation technique and holding time for each analysis that is to be conducted on the soil samples.

Table 1. Required Sample Volume, Containers, Preservatives, and Holding Times for Soil Samples

Parameter	Method	Volume and Container	Preservatives	Holding Time ^a
VOCs	EPA 8260B	One 125-mL/4-oz wide-mouth glass jar	Unpreserved, store at <6°C	Extract in 14 days

^a Holding time is measured from the time of sample collection to the time of sample extraction and analysis.

VOCs = Volatile organic compounds

EPA = U.S. Environmental Protection Agency

mL = Milliliter(s)

oz = Ounce(s)

3.3.5.3 Waste Characterization

A composite waste characterization sample will be collected approximately every 1,000 cubic yards during excavation. The samples will be labeled and preserved at 4°C on ice in an insulated cooler for delivery to Eurofins. The waste characterization samples will be analyzed for VOCs

using EPA method 8260B (short list), for GRO and DRO using EPA method 8015B, and for toxicity characteristic leaching procedure (TCLP) metals only using EPA method 6010.

3.3.5.4 Staging of Excavated Soils

Contaminated soils will be excavated and loaded for transport to a licensed disposal facility. Efforts will be made to minimize stockpiling of contaminated soils on-site. If contaminated soils are stockpiled, they will be completely enclosed with visqueen and secured to prevent erosion from wind and/or precipitation and to preclude unauthorized access. These soils will be staged on-site in the vicinity of the excavation where truck access is feasible.

3.3.6 Hauling and Disposal

Contaminated soils will be loaded into end-dump trucks with polyethylene lined beds and transported to the Special Waste Disposal Facility in Mountainair, New Mexico, operated by Keers Industries, Inc. Each load will be covered and hauled in accordance with applicable state and federal transportation guidelines. Accompanying each load of contaminated soil will be a waste manifest filled out by the on-site DBS&A field staff. One copy of the manifest will be given to the disposal facility and one copy will be retained by DBS&A for inclusion into the summary RA report to be submitted to the NMED.

The haul route for trucks transporting contaminated soil to the disposal facility is as follows:

- Departing trucks will leave the site onto West Tucumcari Boulevard and proceed west on I-40 to Santa Rosa, New Mexico. Proceed west on US Route 66 and south on US 54 to Vaughn, New Mexico. Proceed west on US 60 to Mountainair, New Mexico. Proceed south on NM 55 to the disposal facility.
- Inbound trucks will follow the reverse of the above route, with modification for pickup of clean fill material. The disposal route is shown on Figure 7. The one-way total mileage from the site to the disposal facility is approximately 173 miles.

The trucks will be no larger than the HS20 AASTHO rating (36 tons). All bridges on this route are functionally rated for these trucks.

3.3.7 Backfill

Site restoration will include backfill and compaction. In the excavation pits, a layer of gravel will be placed in the bottom of the excavation to approximately 1 foot above the static water table so that saturated soils can be appropriately compacted. Prior to compaction, ORC amendment

will be added to the gravel layer and will be mixed at the bottom of the excavation pit with the excavator bucket. Based on recommendations from Regenesys, DBS&A intends to amend the gravel backfill with approximately 4,480 pounds of ORC-Advanced™. Following confirmation sampling, the area will be backfilled with clean select fill material. The excavation will be backfilled using hand labor and decontaminated heavy equipment.

Clean soils staged during the excavation and engineered fill imported to the site will be used as backfill. Engineered fill is expected to be predominantly sandy soil, but may vary based on availability of materials at the time excavation activities commence. A minimum of one Proctor test will be required for each of the engineered fill and clean soil reused as backfill. Grain size analysis will also be performed to assess suitability of proposed compaction equipment. Fill materials will be placed for backfill in 12- to 18-inch lifts by a front-end loader or similar equipment. The fill will be wetted prior to placement and will be compacted using a roller soil compactor, such as a sheepfoot roller, vibratory roller compactor, or other similar compaction equipment. The compaction equipment used for the work will be dependent on the engineered fill used during the RA, and will be described in more detail in the RA report. Dependent on material conditions and moisture content at the time of compaction, DBS&A anticipates using a minimum of three passes with the compaction equipment to achieve the specified relative compaction. The actual number of passes could be highly variable; however, engineering controls are in place to ensure relative compaction will be achieved for anticipated property uses.

Density testing will be performed on the backfilled soils to ensure proper compaction according to the specifications. Each lift will be tested for density and moisture content by DBS&A personnel with a Troxler nuclear moisture density gauge. During the RA, DBS&A will require the contractor to perform additional compaction effort for density tests that do not meet specifications.

After density testing across the site has been accepted by the DBS&A professional engineer as conforming to the specified relative compaction, the contractor will finish each excavated area with 6 inches of base course. The base course will be compacted using a vibratory roller compactor, plate compactor, or similar compaction equipment. The compacted base course surface will match the pre-construction grade, and will minimize the potential for producing ponded stormwater during a typical precipitation event. Following emplacement of the base course, a final grade survey will be conducted.

3.3.8 Summary RA Report

A summary RA report will be submitted to the NMED Project Manager after completion of on-site activities. The report will document the soil excavation and include all supporting field screening results, laboratory analytical results from the confirmation and waste characterization samples, details of soil disposal including copies of the waste manifests, a figure showing the areal extent of the soil excavation, and photographic documentation of field activities.

4. Implementation Schedule

After approval of the RAP, the 30-day public notices will be submitted. DBS&A anticipates that the field program can be initiated immediately after completion of the 30-day public notices and that a draft report can be completed within 10 working days after completion of field activities and receipt of all laboratory results associated with the RA. After receipt of NMED's one consolidated set of comments to the draft report, the final report will be submitted within 10 working days, in accordance with the NMED Environmental Assessment Remediation Consulting Services contract.

DBS&A anticipates that the field activities will take approximately 12 weeks to complete from mobilization to final grading and restoration of the site.

References

Chronic, H. 1987. *Roadside geology of New Mexico*. Mountain Press Publishing Company.

Daniel B. Stephens & Associates, Inc. (DBS&A). 2026. Letter from John R. Bunch to George Schuman, New Mexico Environment Department, Remediation Oversight Section, regarding Phase II site investigation, Tucumcari Truck Terminal Site, 3700 W. Tucumcari Blvd., Tucumcari, New Mexico, Project Activity Code: 51573170, Contract No. 24-667-2030-27722. January 13, 2026.

New Mexico Environment Department (NMED). 2026. Letter from George Schuman to John R. Bunch, Daniel B. Stephens & Associates, regarding Notice to proceed - proposal for remedial action activities at Tucumcari Truck Terminal Site in Tucumcari, NM, Work order no: DBSA08-ROS-26, NMED Department code: ZJ5203 (FY 26 NCS), Subaccount code: ZGWQB, Contract #24-667-2030-27722. February 3, 2026.

Figures



Aerial image: Google Earth, 11/17/2024



0 2000 4000 ft



DBS&A

a Geo-Logic Company
DB24.1236

1/12/2026

**TUCUMCARI TRUCK TERMINAL
Area Map**

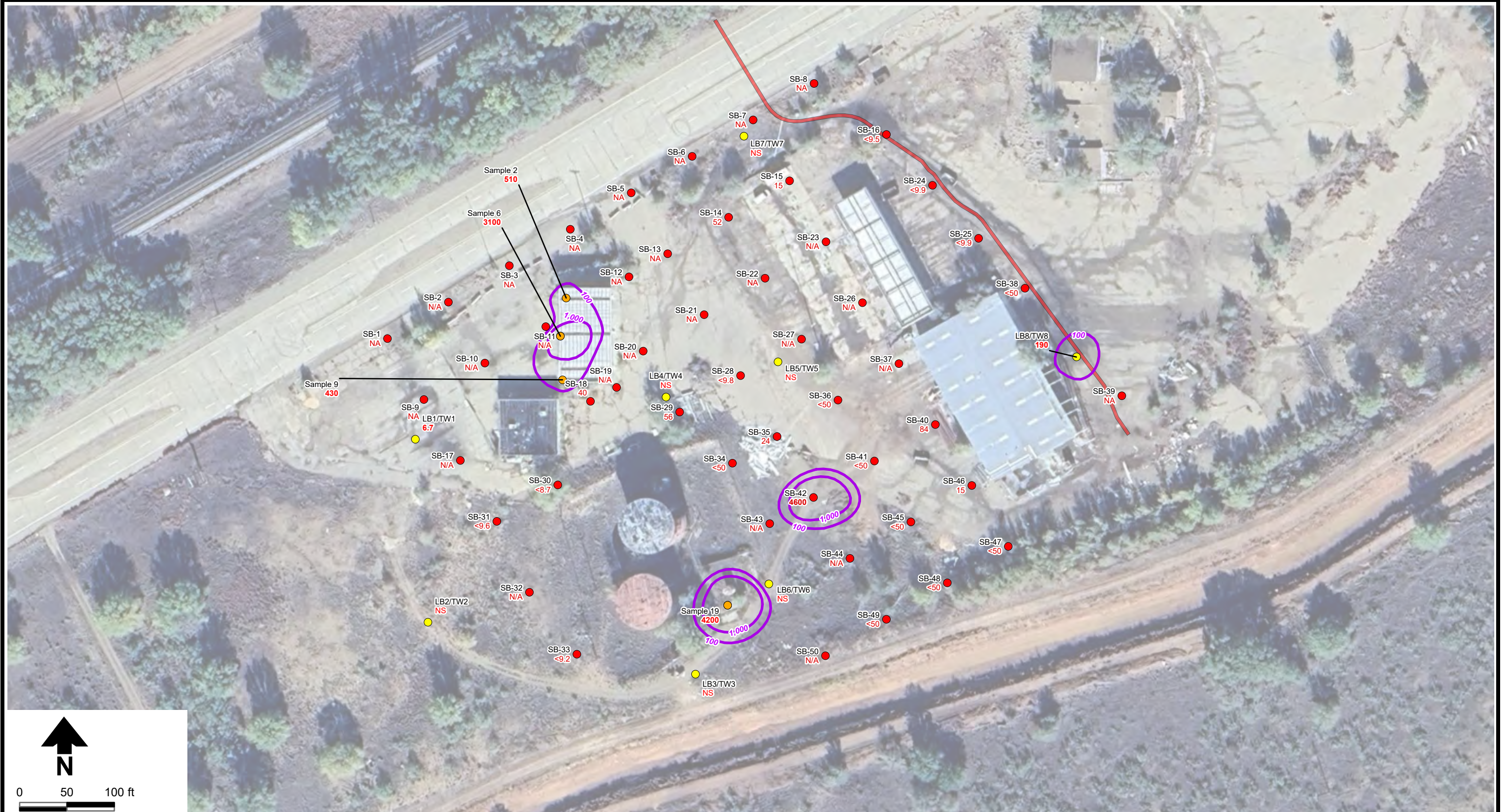


Aerial image: Google Earth, 11/17/2024

Explanation

— Waste oil spill

□ Approximate area of
soil above NMED SSC
for DRO/GRO in
cubic yards
Total: ~ 17,815 yd³



Aerial image: Google Earth, 11/17/2024

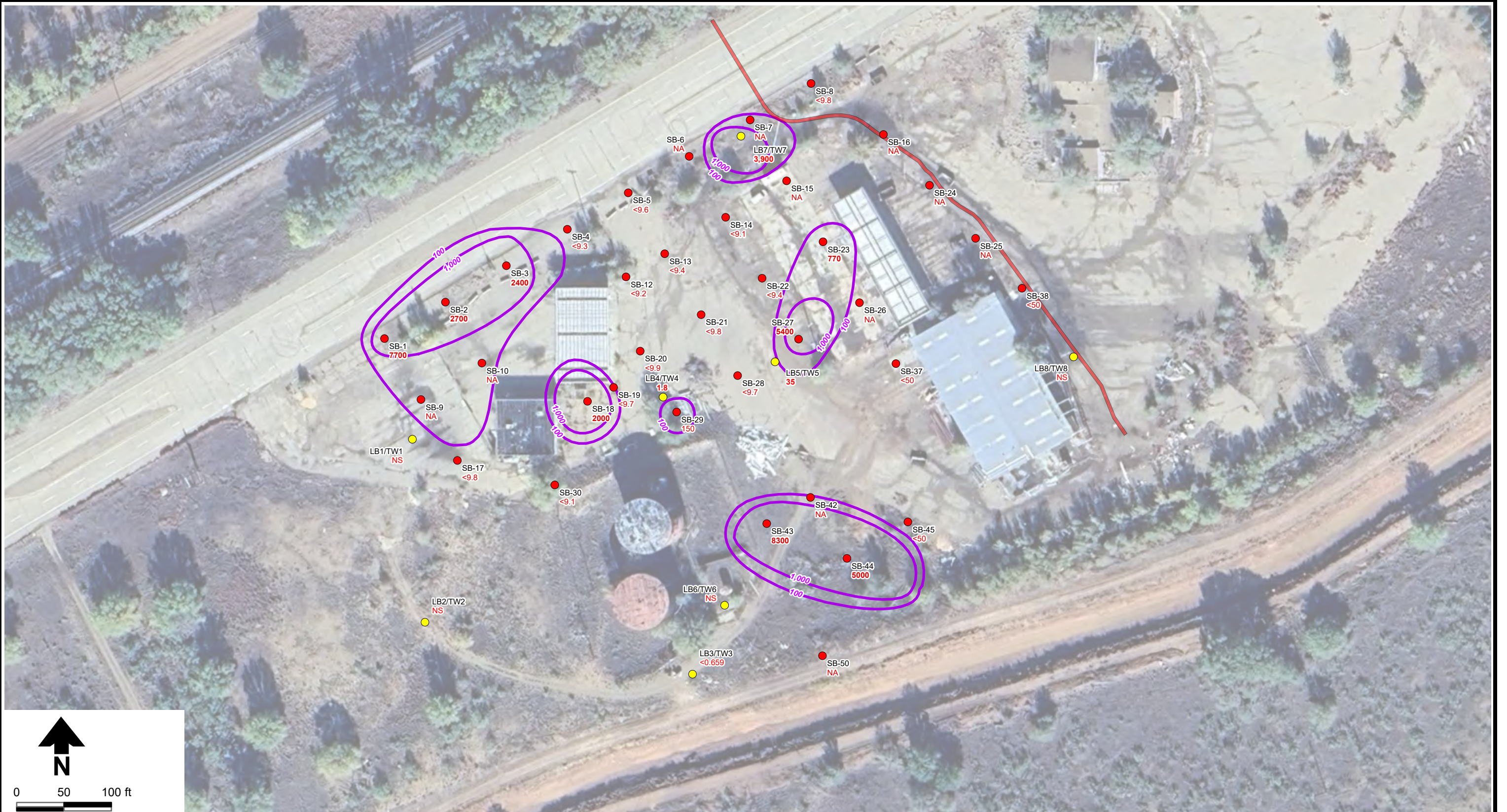
Explanation

- | | | |
|-----------------------------|--------------------------------|------------------------------------|
| ● August 2024 soil boring | — Waste oil spill | <9.2 DRO Concentration (µg/kg) |
| ● February 2025 soil sample | DRO soil isoconcentration line | < non-detect above reporting limit |
| ● October 2025 soil | NA = not analyzed | |
| — DRO isoconcentration line | NS = not sampled | |

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Figure 4

S:\PROJECTS\B24.1236_TUCUMCARI_TRUCK_STOP_UPDATE_PHASE_1\ESR\ARCGIS_PRO\TUCUMCARI_TRUCK_TERMINAL\TUCUMCARI_TRUCK_TERMINAL.APRX • FIG 5 CONTAMINANTS 12-FOOT INTERVAL



Aerial image: Google Earth, 11/17/2024

Explanation

- August 2024 soil boring
- October 2025 soil
- DRO isoconcentration line
- Waste oil spill
- DRO soil isoconcentration line
- < non-detect above reporting limit
- NA = not analyzed
- NS = not sampled

<9.1 DRO Concentration (µg/kg)



1/12/2026

DB25.0000

TUCUMCARI TRUCK TERMINAL
DRO Contamination 8-12 feet bgs

Figure 5

S:\PROJECTS\DB24.1236_TUCUMCARI_TRUCK_STOP_UPDATE_PHASE_1\ESA\GIS\ARCGIS_PRO\TUCUMCARI_TRUCK_TERMINAL\TUCUMCARI_TRUCK_TERMINAL.APRX • FIG 6 CONTAMINANTS 16-FOOT INTERVAL



Aerial image: Google Earth, 11/17/2024

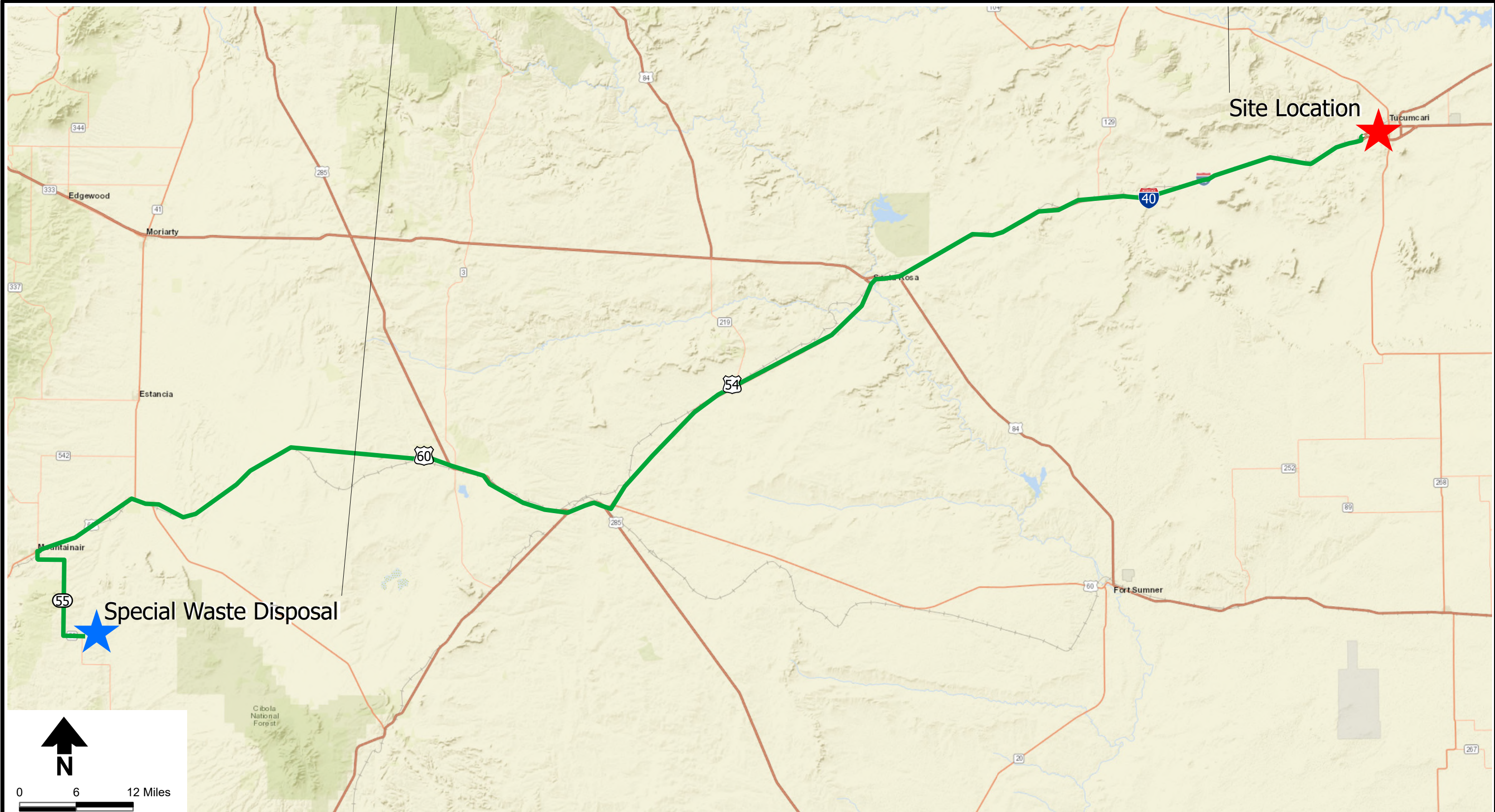
Explanation

- August 2024 soil boring
- October 2025 soil
- DRO isoconcentration line

Waste oil spill
DRO soil isoconcentration line
< non-detect above reporting limit
NA = not analyzed
NS = not sampled

<9.2 DRO Concentration (µg/kg)

S:\PROJECTS\DB24.1236_TUCUMCARI_TRUCK_STOP\GIS\ARCGIS_PRO\TUCUMCARI_TRUCK_TERMINAL\TUCUMCARI_TRUCK_TERMINAL_APRX_F07 DISPOSAL ROUTE MAP



Source: ArcGIS Map Service

Appendix C

Site Access Agreement



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

CONSENT FOR ACCESS TO PROPERTY

NAME OF PROPERTY OWNER:

Mike ADELL

LOCATION OF PROPERTY:

3700 Tucumcari Blvd, Tucumcari NM 88401

This is my consent and authorization to the New Mexico Environment Department officers, employees, contractors, and authorized representatives (all collectively NMED) for entry to the above-described property for the following purposes:

1. To install, maintain, repair, or properly plug and abandon monitoring wells.
2. To excavate and temporarily store soil contaminated with petroleum substances for proper transport and disposal off-site.
3. To collect surface and subsurface soil samples to assess completeness of contaminated soil removal.
4. To replace contaminated soil and compact with clean overburden and clean fill.
5. To periodically collect groundwater samples from replacement and compliance monitoring wells
6. To install a remediation system for potential known remaining contaminants at the site

It has been explained to me that NMED will bring equipment and vehicles onto the property. Upon completion of activities listed above, NMED will promptly remove all equipment from the property. This consent is given with the understanding that NMED will act in a reasonable manner consistent with its investigation or remediation requirements.

This access shall continue indefinitely until NMED completes investigation and remediation activities at the Tucumcari Truck Terminal site. The Owner shall give the NMED at least thirty days prior notice if, during the pendency of this consent, the Owner would like to revoke access to the above-described property. The Owner's notice may be given orally to the current NMED project manager Anthony McGlown at (505) 660-9662 or via e-mail at Anthony.McGlown@env.nm.gov. NMED will provide a 48-hour notice prior to accessing the property.

I understand that these actions by NMED are undertaken pursuant to its responsibilities under the New Mexico Department of Environment Act, NMSA 1978, Section 9-7A-1 *et seq*; the New Mexico Environmental Improvement Act, NMSA 1978, Sections 74-1-1 *et seq.*, and the New Mexico Water Quality Act, NMSA 1978, Sections 74-6-1 *et seq.*

Neither party shall be responsible for liability incurred as a result of the other party's negligence, acts or omissions in connection with this Consent for Access to Property. Any liability incurred by NMED in connection with this Consent is subject to the immunities and limitations of the New Mexico Tort Claims Act, NMSA 1978, §§ 41-1-1 *et seq.*

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Ground Water Quality Bureau | 1190 Saint Francis Drive, PO Box 5469, Santa Fe, New Mexico 87502-5469

Telephone (505) 827-2900 | www.env.nm.gov/gwqb/

My consent is given by me voluntarily after having had a chance to ask questions and having had all my questions answered to my satisfaction and with knowledge of my right to refuse to give consent voluntarily.

PRINTED NAME OF PROPERTY OWNER:

MIKE ADELL

CONTACT TELEPHONE NUMBER:

.817 771 3327

CONTACT EMAIL:

Mike@HANA-USA.com

PROPERTY OWNER SIGNATURE:

Mike Adell

DATE:

2-14-2026

Specification Sheet



**OXYGEN
RELEASE
COMPOUND**

ORC Advanced® Technical Description

ORC Advanced® is an engineered, oxygen release compound designed specifically for enhanced, *in situ* aerobic bioremediation of petroleum hydrocarbons in groundwater and saturated soils. Upon contact with groundwater, this calcium oxyhydroxide-based material becomes hydrated producing a controlled release of molecular oxygen (17% by weight) for periods of up to 12 months on a single application.

ORC Advanced decreases time to site closure and accelerates degradation rates up to 100 times faster than natural degradation rates. A single ORC Advanced application can support aerobic biodegradation for up to 12 months with minimal site disturbance, no permanent or emplaced above ground equipment, piping, tanks, power sources, etc are needed. There is no operation or maintenance required. ORC Advanced provides lower costs, greater efficiency and reliability compared to engineered mechanical systems, oxygen emitters and bubblers.



Example of ORC Advanced

ORC Advanced provides remediation practitioners with a significantly faster and highly effective means of treating petroleum contaminated sites. Petroleum hydrocarbon contamination is often associated with retail petroleum service stations resulting from leaking underground storage tanks, piping and dispensers. As a result, ORC Advanced technology and applications have been tailored around the remediation needs of the retail petroleum industry and include: tank pit excavations, amending and mixing with backfill, direct-injection, bore-hole backfill, ORC Advanced Pellets for waterless and dustless application, combined ISCO and bioremediation applications, etc.

For a list of treatable contaminants with the use of ORC Advanced, view the [Range of Treatable Contaminants Guide](#)

Chemical Composition

- Calcium hydroxide oxide
- Calcium hydroxide
- Monopotassium phosphate
- Dipotassium phosphate

Properties

- Physical state: Solid
- Form: Powder
- Odor: Odorless
- Color: White to pale yellow
- pH: 12.5 (3% suspension/water)



**OXYGEN
RELEASE
COMPOUND**

ORC Advanced® Technical Description

Storage and Handling Guidelines

Storage

- Store in a cool, dry place out of direct sunlight
- Store in original tightly closed container
- Store in a well-ventilated place
- Do not store near combustible materials
- Store away from incompatible materials
- Provide appropriate exhaust ventilation in places where dust is formed

Handling

- Minimize dust generation and accumulation
- Keep away from heat
- Routine housekeeping should be instituted to ensure that dust does not accumulate on surfaces
- Observe good industrial hygiene practices
- Take precaution to avoid mixing with combustibles
- Keep away from clothing and other combustible materials
- Avoid contact with water and moisture
- Avoid contact with eyes, skin, and clothing
- Avoid prolonged exposure
- Wear appropriate personal protective equipment

Applications

- Slurry mixture direct-push injection through hollow rods or direct-placement into boreholes
- *In situ* or *ex situ* slurry mixture into contaminated backfill or contaminated soils in general
- Slurry mixture injections in conjunction with chemical oxidants like RegenOx or PersulfOx
- Filter sock applications in groundwater for highly localized treatment
- *Ex situ* biopiles

Health and Safety

Wash thoroughly after handling. Wear protective gloves, eye protection, and face protection. Please review the [ORC Advanced Safety Data Sheet](#) for additional storage, usage, and handling requirements.



www.regenesis.com
1011 Calle Sombra, San Clemente CA 92673
949.366.8000

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