

February 9, 2026

Ms. Renee Romero
New Mexico Environmental Department
Petroleum Storage Tank Bureau
1914 West Second Street
Roswell, New Mexico 88201-1712

Re: Letter Report for Oxidizer Annual Maintenance and Conversion to Catalytic Mode
Former Y Station, 721 Commerce Way, Clovis, New Mexico
Facility #53742, Release ID #4746, WPID #4418

Dear Ms. Romero:

Daniel B. Stephens & Associates, Inc. (DBS&A) is pleased to submit this letter report documenting conversion of the thermal oxidizer to catalytic mode and oxidizer and dual-phase extraction (DPE) system annual maintenance at the Former Y Station. Prior to mobilization, subcontractor agreements were obtained for vendor and contractor services to complete conversion and maintenance items.

DBS&A coordinated with the New Mexico Environment Department (NMED) Petroleum Storage Tank Bureau (PSTB) and EnviroWorks, LLC (EnviroWorks) of Edgewood, New Mexico to retrieve the catalyst module from the PSTB storage unit in Santa Fe, New Mexico. EnviroWorks delivered the catalyst on October 21, 2025. On October 22, 2025, EnviroWorks removed the stack using an articulating boom manlift and reach fork and installed the catalyst. The stack and thermocouple were then reinstalled. Adjustments were made to the system programming and control settings under the supervision of Intellishare Environmental (Intellishare) of Menomonie, Wisconsin on November 4, 2025. Photographs of the catalyst installation are provided in Attachment 1.

Intellishare performed a full inspection and annual maintenance of the DPE system and oxidizer on November 4 and 5, 2025. Support was provided by McNiel Electric (McNiel) of Peralta, New Mexico. The full inspection report is provided as Attachment 2. Intellishare identified that the combustion blower motor and fan wheel were operational and did not require immediate replacement. The replacement motor and fan wheel are being stored on-site until future failure of the motor. Air filters were inspected, and the combustion air filter was replaced. A breaker was replaced on the control panel. The inspection identified that the combustion air valve actuator needed to be replaced. Intellishare attempted to receive this part while still on-site, but due to UPS shipping delays associated with the plane crash on November 4, 2025 and electrician availability, the actuator was not replaced and tested until February 2, 2026.

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DBS&A intends to invoice a reduced amount of \$80,459.22, including New Mexico gross receipts tax, for Deliverable ID #4418-1 to reflect the completed scope of work. If you have any questions or require additional information, please contact us at (505) 822-9400.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Grace Herrmann". The signature is fluid and cursive, written over a white background.

Grace Herrmann, P.E.
Project Engineer/Project Manager

GH/rpf
Attachments

cc: Katherine MacNeil, PSTB
Jason Raucci, P.G., DBS&A
Lydia Allison, E.I., DBS&A

Attachment 1

Photographs



FORMER Y STATION STATE LEAD SITE
CLOVIS, NEW MEXICO
Photographs



FORMER Y STATION STATE LEAD SITE
CLOVIS, NEW MEXICO
Photographs

Attachment 2
Inspection Report



PROJECT/SERVICE INSPECTION REPORT

CLIENT: DBS&A
PROJECT: CLOVIS NEW MEXICO

To:	Grace Herrman
cc:	
From:	John Strey
Report Date:	11/7/25
Reporting Period:	11/4-5/25

Accomplishments this Reporting Period

1. Inspect oxidizer & components
2. Set up for catalytic operation
3. Perform safety check

Trip Activity and Findings

Nov 4 & 5, 2025

- Arrive Site
- Review reason why temperatures not displaying on HMI. The temperatures are communicated to the PLC via modbus via the temperature controllers. The temperature controllers do the controlling and the PLC is reading the register. Check the modbus connections at the temperature controllers and HMI that looks ok. Check connections at the PLC modbus terminals and found that connector slightly loose. Tighten wires and use electrical tape to secure connector to block. Correct temperature readings returned to HMI.
- Hook up dp meters to burner to record air and gas dp to check burner set up for catalytic mode. Put combustion air control valve in manual and increased to 100% but the actuator would not move. Checked wiring and signal and found all ok. Check inlet temperature controller and settings ok (8-12 ma is range) Check for power at actuator, 128VAC ok. Used 4-20ma signal generator wired direct to actuator and no response. Actuator is not working. Spend some time trying to find one get it shipped for next day arrival. Actuator did not arrive due to UPS plane crash and KY hub closure as a result. Reroute actuator to McNeil electric. Confirmed actuator arrived on Nov 6 with Ben.
- Combustion Blower amps good at 3.4, 3.6, 3.1, Feed voltage is 490 so slightly high but within tolerance.
- Check combustion air filter. It was dirty and we replaced with new element.
- Checked combustion blower for vibration. There is some vibration but not excessive. When the blower inlet filter housing was removed I checked the blower wheel for any loose vanes and none were present. Check the wheel hub mount and checked bolts for the wheel hub, motor and fan mounting. All are tight. Fan wheel has only minor runout.
- Noticed a slight motor ticking sound as it winds down to a stop. Removed motor fan cover and inspect fan and bolts. That is ok. Open blower discharge butterfly valve and

blower has just slightly less vibration. Suspect blower is operating just left of peak and creating some turbulence due to low flow and low firing rate. Ben commented the blower vibration is less now that the catalyst is installed and so adding some back pressure to the system has helped the blower vibration. I did not feel the blower vibration was excessive at this time and should hold off on replacing wheel and motor until something fails (like the motor) then install motor, fan wheel and check balance. Advised will need some tetracord Teflon gasketing in case fan wheel housing gaskets is not reusable during the motor/fan wheel replacement. ½” wide tetracord will be ok. Comes on a roll.

- Removed inlet thermocouple for inspection. Looks ok but replaced with spare and put current TC into spares.
- Add Lydia to telemetry email.
- Enter in new temperature parameters and alarms into HMI. Catalyst inlet control temperature to 650F, catalyst outlet control temperature to 900F. Catalyst inlet and outlet alarms to 1100F. Ready temperature set to 600F.
- Test all alarm and alarm devices including, low and high temperature alarms. Low and high gas pressure alarms, feed air and catalyst dp alarms, thermocouple failure alarms, flame safety alarms. All fail safe
- Gas train blocking valve leak test revealed 0 bubbles confirming no leakage.
- Note primary regulator spring color is red and 50 engaged.
- Check ratio regulator spring is brown and only slightly engaged
- Reviewed actuator replacement with Ben McNeil.
- Replace UV scanner gasket with new gasket as old one was torn.
- Review firing rate of burner by manually operating the combustion air valve. Burner lights and fires ok.
- Check isolation and dilution actuators in manual and both work ok
- Check firmware on HMI. Firmware is up to date

Action Items

- 1. Replace combustion air valve actuator**
- 2. Check firing rate of burner of actuator is installed. John will provide Ben with remote phone support. Site return may be required but nothing we could do with part not showing up and no ability to track the part to tell when it would arrive.**
- 3. If blower motor is replaced in the future this requires a lift because the motor is at 7' elevation and weight of motor is 150 lbs so not safe to lift manually due to fan location.**