

August 8, 2023

Mr. Tim Noger
New Mexico Environment Department
Petroleum Storage Tank Bureau
2905 Rodeo Park Drive East, Building I
Santa Fe, New Mexico 87505

Re: FRP Implementation – Project Planning Report
Lovington 66 State Lead Site, 424 South Main, Lovington, New Mexico
Facility #1489, Release ID #1182, WPID #4327

Dear Mr. Noger:

Daniel B. Stephens & Associates, Inc. (DBS&A) is pleased to submit this letter report documenting project planning activities associated with implementation of the final remediation plan (FRP) for the subject site located in Lovington, New Mexico. The FRP was submitted to the New Mexico Environment Department (NMED) Petroleum Storage Tank Bureau (PSTB) on October 6, 2020 and accepted on October 20, 2020. DBS&A submitted a work plan for implementation of the FRP on October 27, 2021. Implementation of the FRP was then delayed due to an extended period of access negotiations between PSTB and affected property owners. Upon the apparent resolution of these negotiations in April and May 2023, the PSTB requested a revised work plan for FRP implementation, which was submitted by DBS&A on May 19, 2023 and approved on May 23, 2023 under work plan identification number (WPID #) 4327. Activities were conducted on an accelerated schedule to allow for project completion before expiration of the current State Lead contract.

Project planning activities have been completed in accordance with the scope of work defined in the approved project work plan, and include the following:

- DBS&A developed the project work plan, schedule, and opinion of probable costs.
- DBS&A updated the site-specific health and safety plan (HASP) to cover the planned remediation system installation activities.
- Upon approval of the FRP implementation work plan, DBS&A immediately obtained subcontractor agreements and placed orders for major remediation equipment with the respective vendors. DBS&A arranged for rapid down payment and delivery of custom-fabricated equipment and other long-lead items.
- DBS&A obtained engineer-stamped traffic control plans (TCPs), and obtained required permits from the New Mexico Department of Transportation (NMDOT). An NMDOT utility permit application was submitted to NMDOT District 2 on June 22, 2023 and

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approved the following day. DBS&A continued to coordinate with NMDOT during the project planning phase, including correspondence and conference calls with NMDOT contractors preparing for road work within the intersection of Main Street and Avenue D during the anticipated well drilling and constructions activities for this project.

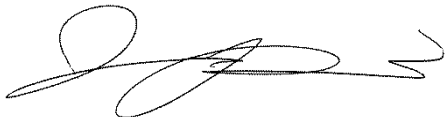
- DBS&A conducted two on-site meetings with representatives of Lea County Electric and New Mexico Gas Company to determine the eventual layout of the electrical and gas service supplies and meters.
- DBS&A filed a well permit application with the New Mexico Office of the State Engineer (OSE). Approval of that permit application was suspended by OSE due to unresolved property access concerns.
- DBS&A coordinated with the City of Lovington to facilitate access to City right-of-way and determine the best times and locations for layout and assembly of the horizontal well casing.

Project planning and preparation activities continued until project cancellation in mid-July 2023 due to delays in the final access negotiations between the PSTB and the owner of the parcel of private land slated to host the remediation system. Continuing subcontractor coordination and logistical support will be required to wind down project activities and take delivery of custom-fabricated remediation equipment and associated appurtenances. Charges related to these activities will be billed under separate tasks. This letter report constitutes the deliverable for Deliverable ID #4327-1. DBS&A intends to invoice the full approved amount for this work.

If you have any questions or require additional information, please contact us at (505) 822-9400.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.



Jason J. Raucci, P.G.
Project Manager



Thomas Golden, P.E.
Senior Engineer

JJR/TG/rpf

cc: Katherine MacNeil, NMED PSTB