



Neal Brown
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February 5, 2026

**Subject: §257.102(f)(2)(i) 2-YEAR CLOSURE TIMEFRAME EXTENSION
COMBINED WASTE TREATMENT POND
Four Corners Power Plant – Fruitland, New Mexico**

Pursuant to 40 Code of Federal Regulations (CFR) Section (§) 257.102(f)(2)(i) of the Coal Combustion Residuals (CCR) Rule, Arizona Public Service (APS) submits this 2-year extension demonstration to the facility operating record to extend the timeframe to complete closure of the Combined Waste Treatment Pond (CWTP) from November 23, 2025 to November 23, 2027. In accordance with §257.102(c) and §257.102(f)(1)(ii), CCR surface impoundments closed by removal must remove and decontaminate the CCR unit, including associated impacted groundwater, within 5 years of commencing closure activities unless it is demonstrated that additional time is required due to factors beyond the facility's control.

Initiation of closure for the CWTP occurred on November 23, 2020. Despite the timely identification of the CWTP for closure and initiation of closure activities, removal of the ash present in the CWTP required underwater dredging which added complexity to calculating initial volumes of ash, determining deposition extent, unknowns concerning dredge efficiencies, physical constraints and ash removal verification. As such, APS is exercising a two-year extension to complete certifications of ash removal and compliance with Groundwater Protection Standards.

If you have any questions regarding this extension, please contact Natalie Chrisman Lazarr at 602.316.1324 or via email at natalie.chrisman@aps.com

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neal B", is placed over a light blue rectangular background.

Neal Brown
Manager, Environmental Support