December 6, 2022

CCR Program Documentation
FC_EAPMeeting_021_20221206

Subject: EAP – Documentation of Annual Exercise – Four Corners

This document serves as Notification of an annual face-to-face meeting or exercise between representatives of APS and local emergency response agencies as required by 40 CFR 257.73(a)(3)(i)(E). The exercise was coordinated with and by the local emergency response agency with jurisdiction, and as described in the Emergency Action Plan.
<table>
<thead>
<tr>
<th>Email Address</th>
<th>EVENT/MEETING NAME</th>
<th>LAST NAME</th>
<th>FIRST NAME</th>
<th>ORGANIZATION</th>
<th>PHONE NUMBER</th>
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</thead>
<tbody>
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<td>Mark</td>
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</tbody>
</table>
San Juan County Office of Emergency Management
“SJC Dams 2022” Table Top Dams EAP (APS) Morgan Lake Dam After Action Report and Improvement Plan (AAR/IP)

December 6, 2022

Morgan Lake Dam

SCENARIO
- Plant maintenance from APS/FCPP was making their rounds (PM work order) at the Dam and discovered a “cut wiring in the fencing” and notice a suspicious like package, i.e. shipping box indicating items related to plant equipment. Upon further investigation, a pickup stuck in the mud along the shore of Dam near the principle spillway of the dam.

EAP Definition
- Identifies Potential Emergency Conditions of your DAM
  - Accident at a Dam or failure to a Dam
  - Human interaction
  - Seepage Discharge
  - Impending flood condition
  - Dam not in danger

Procedures to:
- Mitigate problems/issues/concerns at Dam
- Early Notification
- Provide information to downstream entities
- All players
Administrative Handling Instructions

1. The title of this document is the **APS Morgan Lake Dam 2022 Functional Exercise, After Action Report and Improvement Plan (AAR/IP)**.

2. Information gathered in this AAR/IP is designated as For Official Use Only (FOUO) and should be handled as sensitive information that is not to be disclosed. This document should be safeguarded, handled, transmitted, and stored in accordance with appropriate security directives. Reproduction of this document, in whole or in part, without prior approval from San Juan County office of Emergency Management or APS Four Corners is prohibited.

3. For more information about the exercise, please consult the following points of contact (POCs):

   **San Juan County OEM**  
   209 South Oliver Drive  
   Aztec, NM 87410

   **APS Four Corners**  
   6675 County Road  
   Fruitland NM

   Mike Mestas  
   Emergency Manager  
   505-334-1180  
   Mmestas@sjcounty.net

   Cletis Mark  
   Engineer/Planning  
   Cletis.Mark@aps.com
Strengths

The strengths identified during this exercise are as follows:

• Excellent dialogue with other Dam Owners in San Juan County on EAP.
• Explanation of the EAP
• Good to go through the EAP process.
• Thanks to Cletis Mark (APS) once again for his presentation.
• Agency and Dam Owner collaboration! Good information was shared.
• Relevant questions related to the EAP.
• The exercise was valuable. Allowed us all to understand requirements.
• County Dams Owners have bought into the concept of having TTX/Functional exercises annually! (Thank you)
• City of Farmington agreed to Host next year’s exercise (2022). ?????
• Explanation of High Hazard Dams and the need to attend these TTX annually.
• Homeland Security PSA is willing to come to your Dam and do a vulnerability assessment. Contact Mike for more information.
• Explanation of reverse 911, IPAWS…………..
Areas for Improvement

During the Table Top exercise some opportunities for improvement in the Safety plans were identified. Action Items, including some recommendations, are as follows:

“FEMA P-64 Guidance
http://www.fema.gov/media-library-data/5b20db599c212f77fd5e85d256f471a3/EAP+Federal+Guidelines__FEMA+P-64.pdf

- When you call Dispatch (911) Speak plain Text (No Codes) (No Levels)
- Become more familiar with potential hazards associated with Dams.
- More (Dam) owner participation/representation needed.
- More (Responder) Participation
- Complete a full walk-through of the EAP Process.
- Update your EAP annually.
- Test your call tree.
- Have all Dam owners send their EAP’s to 911 Dispatch? (If you have not already done so).
  Call Crystal Arellano @ 334-6622 to be sure or carellano@sjcounty911.net

Overall, the Table Top was successful. When agencies get together and discuss problems and shortfalls; the outcome is always a positive experience. Morgan Lake (APS) Dam (Four Corners Plant) is proactive and has implemented plans, procedures, and safety into their plan.
Exercise Planning Team

Mike Mestas, Emergency Manager San Juan County

Cletis Mark, APS – Morgan Lake Dam, (Four Corners Power Plant)

Participating Organizations

Response Agencies:
San Juan County Office of Emergency Management San Juan County 911 SJCCA
San Juan County Fire/Rescue
American Red Cross
City of Farmington Safety

Dam Owners:
**EPROD: Blanco Dam (Enterprise)**
**City of Farmington: Farmington Lake Dam & Retention Dams Four Corners Power Plant/APS; Morgan Lake Dam**

Players: 12
Evaluators: 1
Facilitator: 1
Observers: 0
Total: 14
CAPABILITY 1: Capability 1: Onsite Incident Management

Capability Summary: Onsite incident management is the capability to effectively direct and control incident management activities by using the Incident Command System (ICS) consistent with the National Incident Management System (NIMS). As a capability outcome, the incident is managed safely, effectively and efficiently through the integration of facilities, resources (personnel, equipment, supplies, and communications) and procedures using a common organizational structure that is ICS.

A capability for evaluation of the Functional was: Emergency Action Planning (EAP) Activity 1: EAP

Activity Description: Review Emergency Action Planning Documents for Dams.

Summary of Strengths

Activity: Discuss Full On-Site Incident Command & Emergency Action Plans

Activity Description: Discussion on staff and facilities necessary to conduct EAP Planning. Emergency Planning Observation:

Analysis: Emergency Procedures were known by the majority of personnel in the room. Most players knew their positions and responsibilities during an emergency.

Analysis: Excellent exchange of information. All members contributed to the scenario.

Areas for Improvement

Activity 2: Participation/Review from Dam Owners. Activity Description: P-64

Guidance

Analysis: P-64 Guidance for participation and requirements
CONCLUSION

Agencies and Four Corners Plant (APS) Morgan Lake Dam exhibited the level of cooperation that is needed for a sustainable response. Table Top Exercises continue to be valuable as a method for improving incident response management. Combined with regular EAP updates & exercises that focus on the response and evacuation will pay dividends during a real-world emergency.

Comments made during the TTX:

**Dams Table Top 12.6.22**

- Good morning remarks and a Safety Moment from San Juan College.
- (Presentation) Mike Mestas, Emergency Manager; Why are we here.
- Review EAP Actions for Dams in San Juan County
- EAP Definition and Procedures (Discussion).
- Discussion on what goes into an EAP and procedures and who to report to. In addition to the State Engineers Office and Emergency Management.
- Begin the Scenario (Cletis).
- Truck stuck on mud, Fence cut near the dam (Morgan Lake). Suspicious Package.
- (Mike) years ago we had Homeland Security complete a vulnerability assessment of the Morgan Lake Dam. They made suggestions because this is a critical infrastructure location. Fencing and not allowing anyone to drive across the dam was a recommendation.
- (Cletis) Yes and completed those recommendations.
- We have security checks.
- (Scenario), discussion on notifications and who....
- Control room at APS would start the EAP process.
- The EAP at APS is color coded, other Dams in the exercise have numbers for different progressions. (Dispatch) Speak plain language when you call us. We don’t want you to speak in codes to us, so we understand the severity of the situation.

- Discussion on what format is required. Depends on the format and the codes or
number does not matter. (Situational).

- (Scenario) Media starts to arrive: (OEM) Use our office to help. PIO Group, Information on Social Media can help. Stop false information before it gets out of hand.
- Provide truthful information; (Under investigation) Always a good move.
- (Scenario) Suspicious package...Bomb? Unknown, will need to investigate.
- Important to let 911 dispatch know all pertinent information, so they can get the correct response. You do not want a delay.
- (APS) This would increase our CODE color to Red. (Notification).
- (Dispatch) Gave a brief on reverse 911 (Land lines) Sign up for Everbridge and we would use IPAWS (Like Amber Alert). [www.Sjcounty911.net](http://www.Sjcounty911.net) is where you go to sign up for Everbridge, click on the Icon.
- (APS) We would call the chapter houses. (OEM) Good as a backup, but understand that we would be doing that as well with a widespread message. Always good to have back up notification.
- Water is needed to cool the power plant, would that really help in this situation. (Discussion).
- (APS) We would certainly error on the side of citizen safety if we had too. Lives over property.
- Discussion on what would really be feasible.
- Why important to work in Unified Command to bring all this information to the table.
- (Fire) Brief on Unified Command. Brings players to the table. So all stakeholders have a voice. Nothing is missed.
- Don’t send a Jr. Employee, need a decision maker.
- (OEM) Need a contingency plan as well; 3 deep chain of command; Just in case the person is not there or on vacation? Or has retired...
- (Scenario) Was a bomb device, yes on bomb team response.
- Discussion on jurisdiction. (Reservation) Yes FBI is the law Enforcement authority for this area. Yes, SJC Sheriffs and Navajo Police would be involved.
- Question review (Dams Owners)

- Questions review (911 center)
Questions review (Response)

Closing Comments:

➢ **Mari Beth** – EPROD not required to come but does because it helps since they have to review their dam annually. Tabletop is good because it gives her more knowledge about dams which helps since they have one.

➢ **Crystal 911** – willing to help with EAP

➢ **Lisa Public Works** – Enjoy coming to them, very informational and willing to help anyone with EAP

➢ **Mark Red Cross** – glad to come good information didn’t think about Dam breaks, also talked about Shelter Trailers, work with local restaurants for food

➢ **Andrew City of Farmington** – appreciate info on internal tabletops, being proactive

➢ **Clark City of Farmington** - Appreciate the discussions, feels EAP scenario should be about aged infrastructure over terrorist scenario for dam breach, good info

➢ **James Riverview** – appreciate being in on the discussion – usually find communication important – knowledge is important, being proactive, learned a lot and who to contact

➢ **Devin APS** – appreciate being invited and actions that can take back to company – good discussion

➢ **Ray APS** - Very informative – better understanding with EAP – make more theoretically situational – have own internal discussion – internal drills

➢ **Cletus APS** – put scenario together for creating discussion with group – any structure holding back water is critical - trigger thoughts

➢ **Ryan LEPC** – DAM EAP updating them often – LEPC – meet and get to know each other before the emergency hits – how everyone can work together
➢ **David SJC Fire** – glad to hear the power plant is staying open at least until 2031
– Gordon Graham High risk low frequency – time to think it through, no time to think it through
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### IMPROVEMENT PLAN

This IP has been developed as a result of the SJC Dams 2022 TTX conducted on 12/6/2022. These recommendations draw on comments and review from the exercise. The IP should include the key recommendations and corrective actions identified. The IP has been formatted to align with the Corrective Action.

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<th>Capability</th>
<th>Observation Title</th>
<th>Recommendation</th>
<th>Corrective Action Description</th>
<th>Primary Responsible Agency</th>
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<tbody>
<tr>
<td>Agency Attendance</td>
<td>No 1. Attendance</td>
<td>Recommendation</td>
<td>Need Fire and Police to attend. Need Dam owners to attend. Help from State Engineers office, to highly suggest they attend.</td>
<td>Dam owners and SJC OEM</td>
<td>SJC OEM</td>
<td>Dec 2023</td>
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<td>Guidance</td>
<td>No 2 Requirements</td>
<td>Recommendation: FEMA P 64</td>
<td>P-64 guidance (Review)</td>
<td>State Engineers Office</td>
<td>State Engineer Office</td>
<td>2023</td>
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<td>Exercise</td>
<td>Call Tree</td>
<td>Call tree exercise per State Engineer office</td>
<td>N/A update your EAP numbers</td>
<td>Dam Owner</td>
<td>Prior to Inspection</td>
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