



Neal Brown
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April 10, 2026

**Subject: §257.102(f)(2)(i) 2-YEAR CLOSURE TIMEFRAME EXTENSION
LINED ASH IMPOUNDMENT AND NORTH TOE BUTTRESS
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 Company (APS) submits this initial 2-year extension demonstration to the facility operating record to extend the timeframe to complete closure of the Lined Ash Impoundment (LAI) and North Toe Buttress from April 10, 2026 to April 10, 2028. In accordance with § 257.102(d), § 257.102(f)(1)(ii), and § 257.102(f)(2)(i), CCR surface impoundments closed when leaving CCR in place must meet the requirements of a general performance standard, drain and stabilize the unit, and install a final cover system within 5 years of commencing closure activities unless it is demonstrated that additional time is required due to factors beyond the facility's control. The CCR Rule at § 257.102(f)(2)(ii)(B), anticipates that time extensions may be required and sets a maximum time extension for CCR surface impoundments larger than 40 acres to 10 years via five 2-year extensions.

Initiation of closure for the LAI and North Toe Buttress occurred on April 10, 2021, concurrent with the Lined Decant Water Pond (LDWP) which is designed to receive decant seepage from the LAI to the LDWP. Since that time, APS has been conducting investigations supporting surface stabilization and dewatering drainable pore water, advancing closure design/strategy, initiating construction contracting, and installing/operating a dewatering system at the LAI. The 126.8-acre LAI contains sluiced flue gas desulfurization (FGD) solids that require more time to dewater due to the extensive volume and fine-grained nature of CCR contained in the unit. As such, APS is exercising this initial two-year extension to continue closure activities at the unit.

If you have any questions regarding this extension, please contact Natalie Chrisman Lazarr at 602.316.1324 or via email at natalie.chrismanlazarr@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 that reads "Neal B" followed by a stylized flourish.

Neal Brown
Manager, Environmental Support