

- Production of documentation that the Defendants made due diligent and good faith efforts to timely obtain permission from owners of offsite wells in these Zones;
 - Production of all sampling results for PFAS conducted at Cannon and Holloman and any sampling that might have occurred offsite;
 - Analysis and quantification of perfluorobutanoate (“PFAB”) in the ongoing testing of soil and water on and near the Bases;
 - Resampling of all on-base water wells for all PFAS constituents; and
 - Sampling/surveys of wildlife, including migratory birds.
- Completion of the following interim measures to protect the public health at Cannon and Holloman:
 - Providing voluntary blood tests for residents who wish to quantify their exposures to known and suspected PFAS used at the Bases; and
 - Providing alternative drinking water sources to all individuals that have affected water supplies, to the extent those impacts can be determined without full delineation of the contaminant plume.

WHEREFORE, for the reasons more fully set forth in Plaintiffs’ Brief in Support of Plaintiffs’ Motion for Preliminary Injunction, as well as the certifications of Cholla Khoury, Dave Cobrain, and Mark Laska, Ph.D., in support, Plaintiffs respectfully ask this Court to enter an order granting the requested preliminary injunction.

Dated: July 24, 2019

Respectfully submitted:

**HECTOR H. BALDERAS
NEW MEXICO ATTORNEY GENERAL**

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CERTIFICATE OF SERVICE

I CERTIFY that, on July 24, 2019, I filed the foregoing using CM/ECF which cause the parties of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ P. Cholla Khoury