

**JUSTIFICATION AND APPROVAL FOR OTHER THAN FULL AND OPEN
COMPETITION**

Updated IAW Revolutionary FAR Overhaul 6 and DOI-AAAP-F006

In accordance with Revolutionary FAR Overhaul 6.103 or FAR 13.501(a), the proposed contractual action is pursuant to the statutory authority identified in paragraph 4. This template is required for actions over the Simplified Acquisition Threshold (unless the procurement is acquired as a limited source IAW FAR 8.405-6 or is an Exception to Fair Opportunity IAW FAR 16.505(b)(2)).

1. Agency and Contracting Activity (FAR 6.104-1(a)(1)).

U.S. Department of the Interior, Bureau of Reclamation, Upper Colorado Basin Region.

2. Nature/Description of Action (FAR 6.104-1(a)(2)).

This is a Firm-Fixed Price (FFP) requirement. The requirement is to provide the necessary services to modify the Cutter Water Treatment Plant (CLWTP) Federal Information Security Management Act (FISMA) to meet current security and compliance standards.

3. Description of Supplies/Services (FAR 6.104-1(a)(3)).

The first objective for the Cutter Lateral – Water Treatment Plant (CLWTP) Federal Information Security Management Act (FISMA) Compliance is to bring the Water Treatment Plant (WTP) to current security standards. These security standards authorize the operation of an information system or component within a specific environment, based on an acceptable level of risk.

The second objective for the CLWTP is to update the communication link with Navajo Tribal Utility Authority's (NTUA's) Escrito Mesa Data Concentrator, which was replaced after the completion of the Cutter Lateral Water Treatment Plant project.

The third objective for the CLWTP is to include an option for the programming and integration of the new DZ Booster Pump Station, requiring the Contractor to furnish materials, equipment, supplies, services, personnel, permits, and other resources necessary to perform the work. Due to the expected completion of the DZ Booster Pump Station, it is in the Government's best interest to include this work as an option.

Estimated Total Cost: [REDACTED]

Delivery Date: Date of Award to 14 February 2028

FOB: Destination

4. Statutory Authority Permitting Other than Full and Open Competition (FAR 6.104-1(a)(4)).

*WBR 1406.303-1 Template 1
eFile - B02
(01/2026)*

	Authority	FAR Coverage	Application
☒	41 U.S.C. 1901	FAR 12.201-1	Only one responsible source using Simplified Acquisition Procedures (above SAT but at or below \$9M)
☐	41 U.S.C. 1903	FAR 13.501	Special emergency procurement authority
☐	41 U.S.C. 3304(a)(1)	FAR 6.103-1	Only one responsible source and no other supplies or services will satisfy agency requirements
☐	41 U.S.C. 3304(a)(1)	FAR 6.103-1(d)	Application for brand-name descriptions
☐	41 U.S.C. 3304(a)(2)	FAR 6.103-2	Unusual and compelling urgency
☐	41 U.S.C. 3304(a)(3)	FAR 6.103-3	Industrial mobilization; engineering, developmental or research capability; or expert services
☐	41 U.S.C. 3304(a)(4)	FAR 6.103-4	International Agreement
☐	41 U.S.C. 3304(a)(5)	FAR 6.103-5	Authorized or required by statute
☐	41 U.S.C. 3304(a)(6)	FAR 6.103-6	National Security
☐	41 U.S.C. 3304(a)(7)	FAR 6.103-7	Public Interest

5. **Demonstration of Contractor's Unique Qualifications (FAR 6.104-1(a)(5)).**

The Navajo-Gallup Water Supply Project (NGWSP) is comprised of two laterals, the Cutter Lateral and the San Juan Lateral. The Cutter Water Treatment Plant (CLWTP) is a segment of the Cutter Lateral. Jacobs Engineering was contracted by the Bureau of Reclamation (Reclamation) for the design and construction of the CLWTP including Federal Information Security Management Act (FISMA) Compliance and the Supervisory Control and Data Acquisition (SCADA) systems. Per the FISMA, Reclamation is required to modify the CLWTP to meet current security standards. The CLWTP uses an interface Programmable Logic Controller (PLC) PLC-302 that Jacobs Engineering installed as their interface for the external connections to the CLWTP.

In June 2022, the Operations, Maintenance and Repair (OM&R) responsibility for the Cutter Lateral system, including the CLWTP, was transferred to the Navajo Nation and the Navajo Tribal Utility Authority (NTUA). NTUA is an enterprise of the Navajo Nation duly authorized by the Navajo Nation Council, pursuant to Navajo Nation Code Title 21 §§ 1 – 27, with jurisdiction over all utility operation, to construct and operate water supply distribution systems for water users within the Navajo Nation and shall perform OM&R of the Transferred Works of the Project. Subsequently, NTUA contracted with Jacobs Engineering for OM&R of the CLWTP. Jacobs Engineering was also contracted by Reclamation for the design and construction of the San Juan Lateral Water Treatment Plant (SJLWTP).

Reclamation requires highly specialized engineering services on this requirement to implement the NG ICS across the transmission pipeline infrastructure maintaining consistency between both water treatment plants and laterals. The contract scope includes modifying the software logic of the PLC-302 interface, executing complex data mapping from the Escrito Mesa Data Concentrator, and upgrading SCADA networks to meet current federal security standards. Jacobs Engineering is uniquely qualified to perform this work due to their unmatched historical system knowledge, active Design/Build role, and integrated operational presence across the NGWSP asset boundary. No other firm can leverage the combined technical insights gained from holding concurrent roles with both Reclamation and NTUA.

The Government would experience substantial duplication of costs not expected to be recovered through competition due to the complexity of this requirement, historical work and knowledge for the integration of these changes if any other contractor was to complete this work. Also, the Government cannot accept any delays in fulfilling this requirement which could delay or derail the final completion of the NGWSP as a whole.

Based upon receiving zero responses through the publicly available sources sought and details provided above, it has been determined that the Government's current needs under this specific requirement cannot be satisfied by any other contractors without significant duplication of costs (Navajo Nation Permits, General Business Registration, Navajo Preference in Employment, etc.) and delays (Navajo Nation Coordination, Navajo Nation Approval, etc.) which would detrimentally impact the NGWSP competition deadline.

6. Description of efforts made to maximize competition (FAR 6.104-1(a)(6)).

An intent to sole source notice was posted on SAM.gov on 06 July 2026 and closed on 21 July 2026 with a statement that all responsible sources may submit a bid or proposal which shall be considered by the agency. The Government received zero (0) responses. As a result, there are no other actions that the Government can take to increase competition for this requirement.

7. Determination of Fair and Reasonable Cost (FAR 6.104-1(a)(7)).

The anticipated cost will be considered fair and reasonable. The Government will determine fair and reasonableness by either the results of the restricted competition and/or comparison of proposed costs/prices with costs/prices for similar supplies or services.

8. Description of Market Research Conducted (FAR 6.104-1(a)(8)).

The Government conducted market research to verify potential offerors that could support this requirement. As stated in paragraph 6, an intent to sole source notice was posted on 6 July 2026 which received zero (0) responses. Further market research was conducted under

NAICS code 238210, which identified zero (0) Multiple Award Schedule (MAS) for this NAICS under GSA contracts. As such, mandatory sources are not a viable option for this type of requirement. Additionally, the Government conducted additional market research to verify how many contractors in the state of New Mexico could provide services under the NAICS 238210 through the SBA's Dynamic Small Business database and uncovered three hundred and seventy seven (377) small businesses. Due to Jacobs Engineering's O&M responsibilities in support of the CLWTP, these businesses are not viable avenues of supporting this requirement.

9. Any Other Supporting Facts (FAR 6.104-1(a)(9)).

N/A

10. Listing of Interested Sources (FAR 6.104-1(a)(10)).

There were zero (0) sources that provided interest in this requirement through the posting of the intent to Sole Source notice.

11. Actions Taken to Remove Barriers to Competition (FAR 6.104-1(a)(11)).

Due to the facts identified in the above sections, removal of barriers to competition are not in the Governments best interest for the specific services needed under this requirement. The Government will continue to compete future requirements supporting the NGWSP wherever possible.

SIGNATURES

PREPARED BY:

Name: Andrew Taylor

**X ANDREW
TAYLOR**

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Date: 7/22/2026

CONTRACTING OFFICER (CO) (FAR 6.104-2(a) or FAR 13.501(a)(2)(i)): (All Values)

Name: Andrew Taylor

**X ANDREW
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CHIEF of the CONTRACTING OFFICE (CCO) (DOI-AAAP-0024): (> \$350K)

**X JAMES
DURRANT**

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