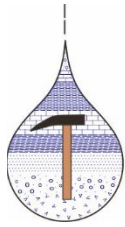


From: [Keith Gordon, PE](#)
To: [Jones, Brad, EMNRD](#)
Subject: [EXTERNAL] 2023 Annual Report
Date: Thursday, April 4, 2024 10:37:02 AM
Attachments: [LLC_2023 Annual Report Transmittal.pdf](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

I. Keith Gordon, PE
IKG, LLC
505.301.2026





Clay Kilmer, LLC
Environmental Geoscience
Water Resources



Transmitted electronically
Hard copy upon request

Ms. Rosa Romero, Chief
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St Francis Dr.
Santa Fe, New Mexico 87505

August 28, 2023

RE: Lea Land, LLC Surface Waste Management Facility,
Permit No. NM-1-0035,
Permit Condition 2.D, "**Annual Report**"

Dear Ms. Romero,

We would like to express our appreciation for the input and collaboration with the OCD staff and consultants in the permitting and review of submittals associated with the Lea Land, LLC Surface Waste Management Facility. Permit Condition No. 1 (General Provisions) Part C specifies that: *Owner/Operator Commitments. The operator must ensure all operations are consistent with the terms and conditions of this permit and in conformance with all pertinent rules and regulations under the Oil & Gas Act.* Lea Land, LLC is obligated to comply with both the "*approved conditions*" and with "*all pertinent rules and regulations under the Oil and Gas Act*". Lea Land has continuously operated in compliance with the Oil and Gas Act since 2002, and with the Permit and Permit Conditions issued on June 22, 2020.

Permit Condition No. 1 (Financial Assurance) Part H requires that: *The operator must provide financial assurance in a form acceptable to OCD for the waste management facility's estimated closure and post-closure cost. On an annual basis, or prior to development of each phase of the facility, or should unforeseen conditions arise, the operator will update the closure/post-closure estimate and, thus, the amount of financial assurance.* Summary financial assurance information for the facility that includes prior encumbered amounts, as well as incremental encumbered amounts for 2022 facility modifications are included in **Attachment A**.

Permit Condition No. 2 (General Facility Operations) Part D specifies that: *The operator must submit a comprehensive Annual Report to the OCD by September 1st of each year detailing the operator's activities during the preceding year (where a year is defined as July 1st through June 30th).* The Permit Condition goes on to list the information that OCD is seeking for each annual period, i.e., through June 30th of each year (the "reporting period"). The Annual Report must include the following information for the preceding year specific to the Lea Land Surface Waste Management Facility:

- *All inspection forms, including those for leak detection systems.*
The monthly "Site Inspection Check Sheets" for the 07/01/22 - 06/30/23 "reporting period" are included as **Attachment B**.

Ms. Rosa Romero
NMOCD – Environmental Bureau

2

August 28, 2023

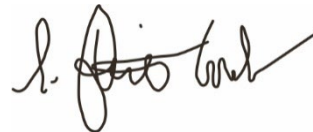
- *All analytical results*
N/A
- *Hydrogen sulfide monitoring results*
N/A
- *Process piping integrity test results*
There has been no piping installed in association with the (future) proposed liquid management process systems.
- As-built documentation of leachate collection system piping for the new landfill Unit IIA (construction completed) was provided to OCD in the "Engineering Certification Report", submitted 12/13/2021.
- As-built documentation of vadose monitoring wells was provided to OCD 12/21/2021. Notice of Intent of well installation was provided to OCD on 8/5/2021 in accordance with Permit NM1-35 permit approval condition 6.M.
- *Training records*
Lea Land, LLC is providing its monthly training logs, for the reporting period. (**Attachment C**)
- *Complaint logs and resolutions*
N/A - There were no complaints during the reporting period.
- *A summary of the nature, amount, and any related remediation of any reportable releases.*
N/A - There have been no releases during the reporting period.

Please contact us with your questions and comments.

Sincerely,



Clay Kilmer, P.G.
Certified Groundwater Scientist
Clay Kilmer, LLC
claykilmer@gmail.com



I. Keith Gordon, P.E.
Principal
IKG, LLC
wbcsw@aol.com

List of Attachments

- A – Financial Assurance Summary
- B – Monthly Inspection Check Sheets
- C – Monthly Safety Training Logs

cc: Ms. Stephanie Grantham, Lea Land, LLC., lealand.sgrantham@gmail.com
Joe Ontiveros, Site Manager, Lea Land, LLC., 575crazyhorse@live.com

ATTACHMENT A
FINANCIAL ASSURANCE

**LEA LAND LLC 2023 ANNUAL REPORT FINANCIAL
ASSURANCE SUMMARY**

Summary of Closure Construction, Landfill Maintenance and Environmental Monitoring Costs -

Task		Subtotals Units I - IIA 39.2 acres
1.0	Landfill Closure Construction	\$ 764,824
2.0	Landfill Maintenance	\$ 547,800
3.0	Environmental Monitoring	\$ 165,000
4.0	Pond Area Closure (future facility)	\$ -
5.0	Process Area Closure (future facility)	\$ -
6.0	Post-Closure Maintenance	\$ 71,940
Grand Total Financial Assurance - UNITS I and IIA		\$1,549,564

ATTACHMENT B
LEA LAND LLC FACILITY INSPECTION REPORTS

Lea Land LLC Surface Waste Management Facility
 Application for Permit Modification
 Volume II: Facility Management Plans
 Section 1: Operations, Inspection, and Maintenance Plan
 June 2019

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 06-06-2022Print Name: José Oliveros

Others: _____

Signature: [Signature]

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	NA	
Sumps	NA	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	NA	
Pit and Pond condition	✓	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	NA	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	NA	
Pond Sludge Depth	NA	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

1
2
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NA

*In the event that a reading of 10 ppm is registered at the Facility, **IMPLEMENT THE CONTINGENCY PLAN!**

Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.

If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
 New Mexico State Police 575-392-5580
 Eddy County Sheriff 575-887-1888
 Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
 NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC Surface Waste Management Facility
Application for Permit Modification
Volume II: Facility Management Plans
Section 1: Operations, Inspection, and Maintenance Plan
June 2019

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 07-11-2022Print Name: Joe Quintaveros

Others: _____

Signature: Joe Quintaveros

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	NA	
Sumps	NA	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	NA	
Pit and Pond condition	✓	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	NA	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	NA	
Pond Sludge Depth	NA	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

2
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NA

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Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
LEA LAND LLC FACILITY INSPECTION REPORTS

Lea Land LLC Surface Waste Management Facility
 Application for Permit Modification
 Volume II: Facility Management Plans
 Section 1: Operations, Inspection, and Maintenance Plan
 June 2019

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 08-08-22Print Name: Joe Ontiveros

Others: _____

Signature: Joe Ontiveros

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	NA	
Sumps	NA	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	NA	
Pit and Pond condition	✓	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	NA	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	NA	
Pond Sludge Depth	NA	

*Comments & Repairs: _____

H₂S

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Evaporation Pond (readings in ppm):

POND	
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NA

*In the event that a reading of 10 ppm is registered at the Facility. **IMPLEMENT THE CONTINGENCY PLAN!**

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 New Mexico State Police 575-392-5580
 Eddy County Sheriff 575-887-1888
 Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
 NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
LEA LAND LLC FACILITY INSPECTION REPORTS
Lea Land LLC

**Surface Waste Management Facility
OCD Permit No. NM1-35**

Inspection Form

Date: 09-30-2022Print Name: JOE ONTIVEROS

Others: _____

Signature: JOE ONTIVEROS

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

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NA

*In the event that a reading of 10 ppm is registered at the Facility, **IMPLEMENT THE CONTINGENCY PLAN!**Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC
Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 10-10-2022Print Name: JOE CORTIVEROS

Others: _____

Signature: JOE CORTIVEROS

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NP	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs: _____		

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

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 Eddy County Sheriff 575-887-1888
 Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
 NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC
Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 11-08-2022Print Name: Joe Quintanilla

Others: _____

Signature: [Signature]

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	✓	
Pit and Pond marker numbers	N/A	
Treatment Plant inspection	N/A	
Solid waste disposal area inspection	N/A	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	N/A	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

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New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC
Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 11-31-2022Print Name: Joe Quintana

Others: _____

Signature: Joe Quintana

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	✓	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	NA	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs: _____		

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

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NA

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Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC
Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 12-31-2022Print Name: JOE ONTIVEROS

Others: _____

Signature: JOE ONTIVEROS

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

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NA

*In the event that a reading of 10 ppm is registered at the Facility, IMPLEMENT THE CONTINGENCY PLAN!

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Lea Land Office 575-887-4048

NMOCD Hobbs 575-393-6161

New Mexico State Police 575-392-5580

NMOCD Santa Fe 505-476-3440

Eddy County Sheriff 575-887-1888

Lea County Sheriff 575-397-3611

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC
Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 01-31-2023Print Name: JOE CORTI VERLOS

Others: _____

Signature: JOE CORTI VERLOS

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	✓	
Pit and Pond marker numbers	N/A	
Treatment Plant inspection	N/A	
Solid waste disposal area inspection	N/A	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	N/A	(Monthly analysis required if yes)
Landfill Leachate Sump	N/A	(Monthly analysis required if yes)
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs:		

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

1
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N/A

*In the event that a reading of 10 ppm is registered at the Facility, **IMPLEMENT THE CONTINGENCY PLAN!**
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 Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
 NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

LEA LAND LLC FACILITY INSPECTION REPORTS

Lea Land LLC

Surface Waste Management Facility

OCD Permit No. NM1-35

Inspection Form

Date: 02-28-2023Print Name: Joe C. Iker

Others: _____

Signature: Joe C. Iker

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
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Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs: _____		

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

1
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N/A

*In the event that a reading of 10 ppm is registered at the Facility, IMPLEMENT THE CONTINGENCY PLAN!

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Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC
Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 03-31-2023Print Name: JOE OLIVEROS

Others: _____

Signature: JOE OLIVEROS

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	

NA

*In the event that a reading of 10 ppm is registered at the Facility, **IMPLEMENT THE CONTINGENCY PLAN!**
Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.

If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Lea Land LLC Surface Waste Management Facility
Application for Permit Modification
Volume II: Facility Management Plans
Section 1: Operations, Inspection, and Maintenance Plan
June 2019

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 04-30-2023Print Name: Joe Antiveros

Others: _____

Signature: Joe Antiveros

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	NA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

1
2
3
4
5
6
7
8
9
10
11
12

NA

*In the event that a reading of 10 ppm is registered at the Facility, **IMPLEMENT THE CONTINGENCY PLAN!**Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
LEA LAND LLC FACILITY INSPECTION REPORTS
Lea Land LLC

Surface Waste Management Facility
OCD Permit No. NM1-35

Inspection Form

Date: 5/15/23Print Name: GERMINE GONZALEZ

Others: _____

Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	✓	
Pit and Pond marker numbers	N/A	
Treatment Plant inspection	N/A	
Solid waste disposal area inspection	N/A	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	N/A	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs: _____		

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

1
2
3
4
5
6
7
8
9
10
11
12

N/A

*In the event that a reading of 10 ppm is registered at the Facility, IMPLEMENT THE CONTINGENCY PLAN!
Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.

If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

LEA LAND LLC FACILITY INSPECTION REPORTS

Lea Land LLC

Surface Waste Management Facility

OCD Permit No. NM1-35

Inspection Form

Date: 5/30/23

Others: _____

Print Name: GERONIMO D. TIVEROS

Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	✓	
Pit and Pond marker numbers	N/A	
Treatment Plant inspection	N/A	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	N/A	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND

2
3
4
5
6
7
8
9
10
11
12

N/A

*In the event that a reading of 10 ppm is registered at the Facility, IMPLEMENT THE CONTINGENCY PLAN!
Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.

If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

Surface Waste Management Facility
OCD Permit No. NM1-35Date: 6/30/23
Others: _____

Inspection Form

Print Name: TERENCE D. JONES

Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	✓	
Berms and outside pond levees	✓	
Tank Labels	✓	
Sumps	✓	
Pond levels three-foot free board	✓	
Free oil on Pits-Ponds	✓	
Pit and Pond condition	✓	
Pit and Pond marker numbers	✓	
Treatment Plant inspection	✓	
Solid waste disposal area inspection	✓	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	✓	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs: _____		

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	1	2	3	4	5	6	7	8	9	10	11	12

N/A

*In the event that a reading of 10 ppm is registered at the Facility, IMPLEMENT THE CONTINGENCY PLAN!
Personnel will evacuate the area and operator will monitor H₂S levels downwind of the Pond.
If H₂S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office 575-887-4048
New Mexico State Police 575-392-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

NMOCD Hobbs 575-393-6161
NMOCD Santa Fe 505-476-3440

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT C

Lea Land LLC Surface Waste Management Facility
 Application for Permit Modification
 Volume II: Facility Management Plans
 Section 1: Operations, Inspection, and Maintenance Plan
 FEBRUARY 2022

ATTACHMENT II.1.A - Safety Communications Program

Safety Meeting Attendance Sheet

Date: 06-13-2022Time: 10:00 AMTopic: Material Acceptance and Handling; Form C-133 and C-138 HandlingPresenter: JOE ONTIVEROSDepartment: MANAGER

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureManuela SanchezSAULOS ONTIVEROSMark McKinnexJOE ONTIVEROSJose J. SanchezIsaias AguirreSohy GarciaEzequiel AguirreDiana CamilloAbsentManuela SanchezJOE ONTIVEROSJose J. SanchezIsaias AguirreSohy GarciaEzequiel AguirreDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 7-15-22Time: 8:45 AMTopic: Migratory Bird preventionPresenter: I. AguirreDepartment: Supervisor**Instructions:**

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaías AguirreIsaías AguirreEzequiel AguirreJoe ContrerasJohn GarciaSantos ContrerasIsaías AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: AUGUST 23 - 2022 Time: 10:00 AM

Topic: SAFETY MEETING

Presenter: JOE CHIVERRAS Department: MANAGER

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed Name
GALLOS CHIVERRAS
Mark McKinney
Isaias Aguirre
Ezequiel Aguirre
John Gopie
Manuela Sanchez
Brianda Carrillo

Signature
[Signature]
Isaias Aguirre
Ezequiel Aguirre
Manuela Sanchez
Brianda Carrillo

Absent

Date Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: SEPTEMBER 08-2022 Time: 8:00 AM

Topic: SAFETY MEETING

Presenter: JOE OLIVEROS Department: MANAGER

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed Name

Signature

Brianca Camillo

SANTOS OLIVEROS

Manuela Sanchez

JOE OLIVEROS

mark McKinney

Ezequiel Aguirre

Jose J. Sanchez

Isaias Aguirre

Brianca Camillo

Manuela Sanchez

JOE OLIVEROS

mark McKinney

Ezequiel Aguirre

Isaias Aguirre

Absent

Date Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 10-10-2022Time: 8:30 AMTopic: Cold Weather StressPresenter: I. AguirreDepartment: Supervisor**Instructions:**

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreIsaias AgJoe ContrerasJoe ContrerasAlly A John GarciaAlly AMark McInnesMarkEzequiel AguirreEzequiel AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 11-05-2022Time: 9:00 AMTopic: Cell Phone usagePresenter: I. AguirreDepartment: Supervisor**Instructions:**

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreJoe OntiverosEzequiel AguirreJohn GarciaMark McKinneyIsaias AguirreJoe OntiverosEzequiel AguirreJohn GarciaMark McKinneyAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 12-15-2022Time: 10:00 AMTopic: Employee BenefitsPresenter: I. AguirreDepartment: supervisor**Instructions:**

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreIsaias AguirreJ. E. CortezJ. E. Cortez~~Isaias Aguirre~~Ezequiel AguirreMaria McKinney~~Isaias Aguirre~~Seba GarciaSeba GarciaAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 1-08-2023 Time: 7:45 AM

Topic: Incompatible Waste

Presenter: I. Aguirre Department: Supervisor

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreIsaias AguirreJohn GarciaJohn GarciaEzequiel AguirreEzequiel AguirreMaria McKinneyAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 2-10-23 Time: 8:05 AM

Topic: Material acceptance and handling

Presenter: I. Aguirre Department: supervisor

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreIsaias AguirreAnthony DuranAnthony DuranJOE CHIVEROJOE CHIVEROJOHN GARCIAJOHN GARCIAEzequiel AguirreEzequiel AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 3-15-23 Time: 10:10 AM

Topic: Non-exempt liquids recognition

Presenter: I. Aguirre Department: Supervisor

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreAnthony DuranJOE CARRILLOJohn GarciaEzequiel AguirreUrbano CruzAnthony DuranJOE CARRILLOJohn GarciaEzequiel AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 4-23-23 Time: 7:45 AM

Topic: Hazard communication

Presenter: I Aguirre Department: supervisor

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreAnthony DuranJoe AntiverosJohn GarciaEzequiel AguirreIsaias AguirreAnthony DuranJoe AntiverosJohn GarciaEzequiel AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 5-15-23 Time: 8:15 AM

Topic: Emergency evacuation drill

Presenter: I. Aguirre Department: supervisor

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreAnthony DuranGERONIMO ANTIVEROSJohn GarciaEzequiel AguirreIsaias AguirreAnthony DuranJOE GARCIAJohn GarciaEzequiel AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 6-12-23Time: 9:15 AMTopic: Incompatible wastePresenter: I. AguirreDepartment: supervisor**Instructions:**

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaac AguirreAnthony DuranJoe CarvajalGERONIMO ANTONIOJohn GarciaEzequiel AguirreIsaac AguirreAnthony DuranJoe CarvajalGERONIMO ANTONIOJohn GarciaEzequiel AguirreAbsentDate Covered

ATTACHMENT C
Lea Land LLC Surface Waste Management Facility
Safety Communications Program
Safety Meeting Attendance Sheet

Date: 7-6-23 Time: 8:16 AM

Topic: Site contingency plan

Presenter: I. Aguirre Department: Supervisor

Instructions:

1. This form must be completed at each safety meeting.
2. Make additional copies as required.
3. Keep copy of completed attendance sheets in binder.

Printed NameSignatureIsaias AguirreAnthony DuranJOE CANTIVEROSGERONIMO CANTIVEROSJohn GarciaEzequiel AguirreIsaias AguirreAnthony DuranJOE CANTIVEROSGERONIMO CANTIVEROSJohn GarciaEzequiel AguirreAbsentDate Covered

From: [Keith Gordon, PE](#)
To: [Jones, Brad, EMNRD](#)
Subject: [EXTERNAL] Lea Land, LLC [Permit No. NM-1-0035] Surface Waste Management Facility Financial Assurance (FA)
Date: Tuesday, April 23, 2024 1:26:00 PM
Attachments: [ATTACHMENT II.4.D Closure Post-closure Cost Estimates.pdf](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good Afternoon Brad,

Thank you for your call last week, and we appreciate your review of Lea Land's OCD submittals. Attached is "Table II.4.D" which was transmitted with the 2023 Annual Report on August 29, 2023. Per your request, we have expanded the existing level of detail by adding new columns reflecting individual tasks for each of the active areas (i.e., Unit I and Unit IIA). We will continue to notify you, with updated FA documentation, prior to activating any new Units. We will also continue to update the Project Schedule (previously provided) for Units IIB and IIC as cell construction progresses.

Lea Land Management, site personnel, and technical support staff are very proud of our compliance track record since OCD granted us the 2020 Major Modification Permit. Thank you for your assistance with our projects.

Regards,

Keith

I. Keith Gordon, PE
IKG, LLC
505.301.2026



Updated 04/09/2024

EXHIBIT 1 - LEA LAND, LLC- C/PC COST MATRIX

ATTACHMENT II.4.D - Closure/Post-Closure Cost Estimates

Performance-Based Alternative Final Cover Demonstration

(From June 2019 Approved Application for Permit Modification)

ATTACHMENT II.4.D.3-Unit I Landfill Closure Construction Cost Estimate (Unit I - 30.8 ± acres)

TASK 1.0	Unit I Quantity	Unit IIA Quantity	Total Quantities	Unit	Unit Cost	Total Cost
1.1 Final Cover Installation						
1.1.1 Install and compact 12" Intermediate Cover Layer	49,691	13,552.10	63,243.10	CY	\$2.50	\$158,107.75
1.1.2 Install and compact 6" Barrier Layer	24,845	6,775.91	31,620.91	CY	\$2.50	\$79,052.28
1.1.3 Install 24" Erosion/Vegetation Layer	99,381	27,103.91	126,484.91	CY	\$2.00	\$252,969.82
1.1.4 Vegetative Layer Seeding (Class A)	30.8	8.4	39.2	AC	\$1500.00	\$58,800.00
Task Subtotal						\$548,929.85
1.2 Final Cover CQA						
1.2.1 Inspection and Testing	1	1	2	LS	\$100,000	\$127,272.73
1.2.2 Certification	1	1	2	LS	\$15,000	\$19,090.91
Task Subtotal						\$146,363.64
TASK TOTALS						\$695,293.49
Independent Project Manager and Contract Administration Cost (10% of Task Totals)						\$69,529.35
TOTAL COST						\$764,822.84

From: [Jones, Brad, EMNRD](#)
To: lealand.sgrantham@gmail.com; 575crazyhorse@live.com
Cc: [Keith Gordon, PE](#); claykilmer@gmail.com
Bcc: [Barr, Leigh, EMNRD](#)
Subject: NM1-35 Lea Land LLC - 2023 Annual Report and Supporting Documents Review
Date: Tuesday, May 21, 2024 10:00:00 AM
Attachments: [2024 0521 NM1-35 Lea Land LLC 2023 Annual Report and Supporting Documents Review signed.pdf](#)
[Exhibit A Original June 2019 Cost Estimate Summaries and Task 1.pdf](#)
[Exhibit B 2023 Annual Report Financial Assurance Summary.pdf](#)
[Exhibit C 2024 Updated Task 1 costs \(includes Unit IIA\).pdf](#)

Ms. Grantham,

Please see the attached. It is OCD's review of the 2023 Annual Report and Supporting Documents. If you have any questions, please do not hesitate to contact me.

Sincerely,

Brad A. Jones

Brad A. Jones Environmental Scientist Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
1220 S. Saint Francis Drive | Santa Fe, New Mexico 87505
(505) 469-7486 | brad.a.jones@emnrd.nm.gov
www.emnrd.nm.gov

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Melanie A. Kenderdine
Cabinet Secretary

Dylan M. Fuge
Deputy Secretary

Dylan M. Fuge, Division Director (Acting)
Oil Conservation Division



BY ELECTRONIC MAIL ONLY

May 21, 2024

Ms. Stephanie Grantham
Lea Land, LLC
1300 W Main Street
Oklahoma City, OK 73106
lealand.sgrantham@gmail.com

**RE: 2023 Annual Report and Supporting Documents Review
Lea Land, LLC (OGRID 195376), Permit No. NM1-35**

Dear Ms. Grantham:

On April 23, 2024, the Oil Conservation Division (OCD) received the 2023 Annual Report and supporting documentation for Lea Land, LLC (Lea Land), Permit No. NM1-35. OCD's review determined the following issue:

- The closure and post-closure cost estimates, Exhibits B and C, are calculated using the unit costs from the original June 2019 financial assurance demonstration, Exhibit A, and have not been adjusted for inflation since June 2019; and

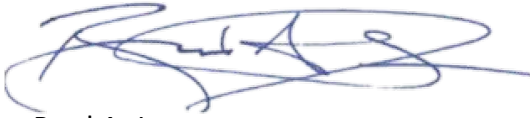
If Lea Land disagrees with OCD's determination of the estimated closure and post closure costs, then Lea Land may request a hearing as provided in 19.15.36.10 NMAC. If Lea Land so requests, and no other person files a request for a hearing regarding the proposed decision, the hearing shall be limited to the determination of estimated closure and post closure costs.

Lea Land must update and resubmit revised closure and post-closure cost estimates, utilizing third-party cost estimates, to address the issue identified above. Lea Land must submit the above information, for OCD's review and approval, through OCD's Permitting Portal at (<https://wwwapps.emnrd.state.nm.us/ocd/ocdpermitting/>) as a "[C-137] Non-Fee SWMF Submittal" within 15 calendar days of email receipt of this letter (i.e., 6/5/2024).

If Lea Land has questions regarding this review, the OCD encourages Lea Land to schedule a meeting with the OCD to discuss OCD's findings in further detail. For questions and/or to schedule a meeting, please contact me at (505) 469-7486 or brad.a.jones@emnrd.nm.gov.

Lea Land, LLC
Permit NM1-35
May 21, 2024
Page 2 of 2

Respectfully,

A handwritten signature in blue ink, appearing to read "Brad A. Jones", with a stylized flourish at the end.

Brad A. Jones
Environmental Specialist - Advanced

Attachments: Exhibit A: Original June 2019 Cost Estimate Summaries and Task 1
 Exhibit B: 2023 Annual Report Financial Assurance Summary
 Exhibit C: 2024 Updated Task 1 costs (includes Unit IIA)

cc: Joe Ontiveros, Lea Land, LLC., 575crazyhorse@live.com
 I. Keith Gordon, IKG, LLC, wbcsw@aol.com
 Clay Kilmer, Clay Kilmer, LLC, claykilmer@gmail.com

Exhibit A

Lea Land LLC Surface Waste Management Facility
 Application for Permit Modification
 Volume II: Facility Management Plans
 Section 4: Closure/Post-Closure Plan
 June 2019

ATTACHMENT II.4.D - Closure/Post-Closure Cost Estimates

ATTACHMENT II.4.D.1 - Phase I Closure/Post-Closure Cost Estimate Summary

TASK	COST ESTIMATE
1.0 LANDFILL CLOSURE CONSTRUCTION (See Att. II.4.E.3)	\$600,933
2.0 LANDFILL MAINTENANCE (See Att. II.4.E.5)	\$547,800
3.0 ENVIRONMENTAL MONITORING (See Att. II.4.E.6)	\$165,000
4.0 POND AREA CLOSURE (Not included in Phase I)	\$0
5.0 PROCESS AREA CLOSURE (Not included in Phase I)	\$0
6.0 POST-CLOSURE MAINTENANCE (See Att. II.4.E.9)	\$71,940
TOTAL COST ESTIMATE	\$1,385,673

ATTACHMENT II.4.D.2 - Facility Closure/Post-Closure Cost Estimate Summary

TASK	COST ESTIMATE
1.0 LANDFILL CLOSURE CONSTRUCTION (See Att. II.4.E.4)	\$2,035,367
2.0 LANDFILL MAINTENANCE (See Att. II.4.E.5)	\$547,800
3.0 ENVIRONMENTAL MONITORING (See Att. II.4.E.6)	\$165,000
4.0 POND CLOSURE (See Att. II.4.E.7)	\$934,338
5.0 PROCESS AREA CLOSURE (See Att. II.4.E.8)	\$584,034
6.0 POST-CLOSURE MAINTENANCE (See Att. II.4.E.9)	\$71,940
TOTAL COST ESTIMATE	\$4,338,478

Lea Land LLC Surface Waste Management Facility
Application for Permit Modification
Volume II: Facility Management Plans
Section 4: Closure/Post-Closure Plan
June 2019

ATTACHMENT II.4.D - Closure/Post-Closure Cost Estimates
Performance-Based Alternative Final Cover Demonstration

ATTACHMENT II.4.D.3-Unit I Landfill Closure Construction Closure Cost Estimate (Unit I - 30.8 ± acres)

TASK 1.0	Unit Quantity	Unit	Unit Cost	Total Cost
1.1 Final Cover Installation				
1.1.1 Install and compact 12" Intermediate Cover Layer	49,691	CY	\$2.50	\$124,227
1.1.2 Install and compact 6" Barrier Layer	24,845	CY	\$2.50	\$62,113
1.1.3 Install 24" Erosion/Vegetation Layer	99,381	CY	\$2.00	\$198,763
1.1.4 Vegetative Layer Seeding (Class A)	30.8	AC	\$1,500.00	\$46,200
Task Subtotal				\$431,303
1.2 Final Cover CQA				
1.2.1 Inspection and Testing	1	LS	\$100,000	\$100,000
1.2.2 Certification	1	LS	\$15,000	\$15,000
Task Subtotal				\$115,000
TASK TOTALS				\$546,303
Independent Project Manager and Contract Administration Cost (10% of Task Totals)				\$54,630
TOTAL COST				\$600,933

Notes:

- Unit I closure costs are based on contracting with a qualified third party to complete and certify closure. The activities included in this cost estimate are based on current dollars, previous experience with landfills located in arid climates, and current subcontractor costs for similar earthwork/geosynthetic in southeastern New Mexico.
- Final cover installation costs assume that:
 - The greatest area requiring final cover is 30.8 acres ± (Unit I).
 - All soils necessary for closure are available on-site.
- CY = Cubic Yard
AC = Acre
LS = Lump Sum
- Due to the perimeter location there is no final cover "crown" and related geosynthetic layers in Unit I.

Exhibit B

ATTACHMENT A
FINANCIAL ASSURANCELEA LAND LLC 2023 ANNUAL REPORT FINANCIAL
ASSURANCE SUMMARY

Summary of Closure Construction, Landfill Maintenance and Environmental Monitoring Costs -

Task		Subtotals Units I - IIA 39.2 acres
1.0	Landfill Closure Construction	\$ 764,824
2.0	Landfill Maintenance	\$ 547,800
3.0	Environmental Monitoring	\$ 165,000
4.0	Pond Area Closure (future facility)	\$ -
5.0	Process Area Closure (future facility)	\$ -
6.0	Post-Closure Maintenance	\$ 71,940
Grand Total Financial Assurance - UNITS I and IIA		\$1,549,564

Updated 04/09/2024

EXHIBIT 1 - LEA LAND, LLC- C/PC COST MATRIX

ATTACHMENT II.4.D - Closure/Post-Closure Cost Estimates
Performance-Based Alternative Final Cover Demonstration
 (From June 2019 Approved Application for Permit Modification)

ATTACHMENT II.4.D.3-Unit I Landfill Closure Construction Cost Estimate (Unit I - 30.8 ± acres)

TASK 1.0	Unit I Quantity	Unit IIA Quantity	Total Quantities	Unit	Unit Cost	Total Cost
1.1 Final Cover Installation						
1.1.1 Install and compact 12" Intermediate Cover Layer	49,691	13,552.10	63,243.10	CY	\$2.50	\$158,107.75
1.1.2 Install and compact 6" Barrier Layer	24,845	6,775.91	31,620.91	CY	\$2.50	\$79,052.28
1.1.3 Install 24" Erosion/Vegetation Layer	99,381	27,103.91	126,484.91	CY	\$2.00	\$252,969.82
1.1.4 Vegetative Layer Seeding (Class A)	30.8	8.4	39.2	AC	\$1500.00	\$58,800.00
Task Subtotal						\$548,929.85
1.2 Final Cover CQA						
1.2.1 Inspection and Testing	1	1	2	LS	\$100,000	\$127,272.73
1.2.2 Certification	1	1	2	LS	\$15,000	\$19,090.91
Task Subtotal						\$146,363.64
TASK TOTALS						\$695,293.49
Independent Project Manager and Contract Administration Cost (10% of Task Totals)						\$69,529.35
TOTAL COST						\$764,822.84

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Phone:(575) 393-6161 Fax:(575) 393-0720
District II
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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 346242

CONDITIONS

Operator: LEA LAND, LLC 1300 W Main St Oklahoma City, OK 73106	OGRID:
	195376
	Action Number:
	346242
Action Type:	
[C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)	

CONDITIONS

Created By	Condition	Condition Date
bjones	On May 21, 2024, OCD emailed Stephnie Grantham and Joe Ontiveros (Lea Land) and their consultants (Keith Gordan and Clay Kilmer) a review letter requesting the financial assurance to be updated for inflation. OCD's letter is attached as OCD's Response.	5/21/2024