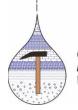
From:Keith Gordon, PETo:Jones, Brad, EMNRDSubject:[EXTERNAL] 2023 Annual ReportDate:Thursday, April 4, 2024 10:37:02 AMAttachments:LLC 2023 Annual Report Transmittal.pdf

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

August 28, 2023

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

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 - 06/30/2023 "reporting period" are included as **Attachment B**. Ms. Rosa Romero NMOCD – Environmental Bureau

2

- 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 Tilma

Clay Kilmer, P.G. Certified Groundwater Scientist Clay Kilmer, LLC <u>claykilmer@gmail.com</u>

List of Attachments

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

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

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

## 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

### Received by OCD: 5/21/2024 10:21:29 AM 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: 06-06-2022	Print Name: UTS WTIVEROS
Others:	Signature:

Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign		
Berms and outside pond levees		
Tank Labels	MA	
Sumps	NA	
Pond levels three-foot free board	· ·	
Free oil on Pits-Ponds	MA	
Pit and Pond condition	4	
Pit and Pond marker numbers	LAA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	NA	
Blowing trash		
Fences and Gates		
Leak detection sumps - Landfill - Liquid present?	MA	(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:		

### H<sub>2</sub>S

#### READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm): POND



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  $H_2S$  levels downwind of the Pond. If  $H_2S$  levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office New Mexico State Police Eddy County Sheriff Lea County Sheriff

575-887-4048
575-392-5580
575-887-1888
575-397-3611

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

Receipt & Approval

Name: 

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 I	I.1.C - Insp	ection Form (Typical)
Date:	07-11-2022	Print Name-	Sor Cartiveres
Others		Signature:	- Chiller

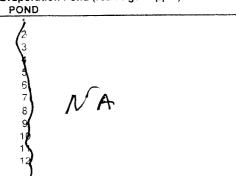
Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign		
Berms and outside pond levees		· · · · · · · · · · · · · · · · · · ·
Tank Labels	M M	
Sumps	NK	
Pond levels three-foot free board		
Free oil on Pits-Ponds	NA	
Pit and Pond condition	V	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection		
Blowing trash	V	
Fences and Gates	1	
Leak detection sumps - Landfill - Liquid present?	MA	(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	K	
Vadose Zone Monitoring	NA	
Pond Sludge Depth	NA	1
*Comments & Repairs:		

H<sub>2</sub>S

### READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



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

Receipt & Approval

..... Name:

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### Received by OCD: 5/21/2024 10:21:29 AM 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 I	I.1.C - Inspe	ction Form (T	ypical)
Date:	08-08-22	Print Name:	500	ONTIVEROS
Others:		Signature:	JUE	alier

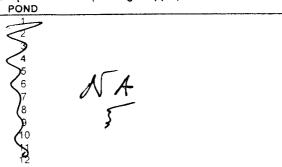
Inspection will be in accordance with NMOCD operational conditions.

Item	Satisfactory	Action Required
Entrance Sign	4	
Berms and outside pond levees	V	
Tank Labels	NA	
Sumps	NH	
Pond levels three-foot free board		
Free oil on Pits-Ponds	MA	
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	V	
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:		

#### H<sub>2</sub>S

### READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



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575-393-6161
505-476-3440

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Receipt & Approval

Name:

by OCD: 5/21/2	2024 10:21:29 AM LEA LAND LLC F	ATTACHMENT B FACILITY INSPECTION REPORTS Lea Land LLC	
		Waste Management Facility D Permit No. NM1-35	
Date:	09-30-2022	Inspection Form	

Signature:

Inspection will be in accordance with NMOCD operational conditions.

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Item	Satisfactory	Action Required
Entrance Sign	V.	
Berms and outside pond levees	V	
Tank Labels	V	
Sumps	V	
Pond levels three-foot free board	V	
Free oil on Pits-Ponds	·1⁄	
Pit and Pond condition	NA	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	V	
Blowing trash	l V	
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?	MA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid Liquid present?	MA	(Monthly analysis required if yes)
Landfill Leachate Sump		
Vadose Zone Monitoring	/	
Pond Sludge Depth	V	
*Comments & Repairs:		

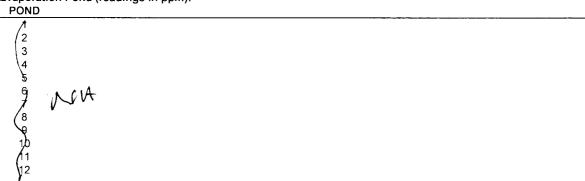
 $H_2S$ 

### READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

Received

Others:



\*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 H<sub>2</sub>S levels downwind of the Pond.

If H<sub>2</sub>S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office New Mexico State Police Eddy County Sheriff Lea County Sheriff

575-887-4048 575-392-5580 575-887-1888 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

ATTACHMENT B

LEA LAND LLC FACILITY INSPECTION REPORTS

		Inspection Form
Date:	10-10-2022	Print Name: DE Print FROS
Others:		Signature: Jog Cit- City
	Increation will be in	

Inspection will be in accordance with NMOCD operational conditions.

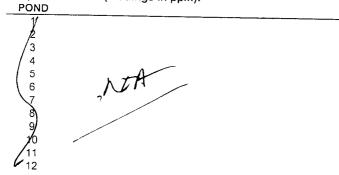
Item	Satisfactory	Action Required
Entrance Sign		
Berms and outside pond levees		
Tank Labels		
Sumps	+	
Pond levels three-foot free board		
Free oil on Pits-Ponds		
Pit and Pond condition	4.1	
Pit and Pond marker numbers	NA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection		
Blowing trash		
Fences and Gates		
Leak detection sumps - Landfill - Liquid present?		(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	1.1	(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	HA.	(Monthly analysis required if yes)
Vadose Zone Monitoring		
Pond Sludge Depth		
*Comments & Repairs:		1

H₂S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

Received by OCD: 5/21/2024 10:21:29 AM



\*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  $H_2S$  levels downwind of the Pond. If  $H_2S$  levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

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575-887-4048
575-392-5580
575-887-1888
575-397-3611

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

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Receipt & Approval

Name:

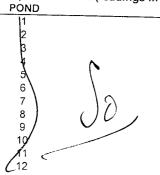
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Date: /	INSPEction will be in	Inspection F Print Name: Signature: accordance with NI	Form		
Item Entrance Sig Berms and c Tank Labels Sumps	gn butside pond levees		Satisfactory	Action Required	

		~ ~	
Berms and outside pond levees	-+		
Tank Labels			
Sumps			
Pond levels three-foot free board			
Free oil on Pits-Ponds		Ľ	
Pit and Pond condition		~	
Pit and Pond marker numbers	-MA		
Treatment Plant inspection	-NA		
Solid waste disposal area inspection	-MA_		
Blowing trash		~	
ences and Gates		K	
eak detection sumps - Landfill - Liquid present?			
eak detection sumps - Evaporation Ponds - Liquid present?		$\overline{\mathcal{V}}$	(Monthly analysis required if yes)
eak detection sumps - Jet Out Pit - Liquid present?	A/H A/H		(Monthly analysis required if yes)
eak detection sumps - Stab. & Solid Liquid present?			(Monthly analysis required if yes)
andfill Leachate Sump	-NIT-		(Monthly analysis required if yes)
/adose Zone Monitoring		$\checkmark$	
Pond Sludge Depth			
Comments & Repairs:		V	

### H₂S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



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575-887-4048	
575-392-5580	
575-887-1888	
575-397-3611	

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

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Receipt & Approval	
Name:	
Date:	

Received by OCD:	LEA LAND LLC F	ATTACHMENT B ACILITY INSPECTION REPORTS Lea Land LLC Waste Management Facility CD Permit No. NM1-35
	Date: <u>11-31-2022</u> Dthers:	Inspection Form

Inspection will be in accordance with NMOCD operational conditions.

Page 11 of 43

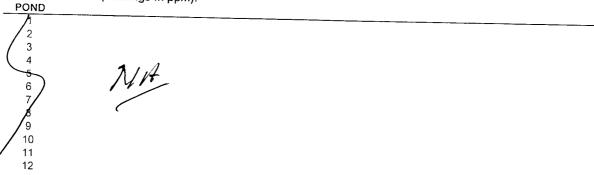
ltem	Satisfactory	Action Required
Entrance Sign	outisidetory	
Berms and outside pond levees		
Tank Labels		
Sumps		
Pond levels three-foot free board		
Free oil on Pits-Ponds		
Pit and Pond condition	K	T
Pit and Pond marker numbers	HA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	AA	
Blowing trash		
Fences and Gates		1
Leak detection sumps - Landfill - Liquid present?		1
Leak detection sumps - Evaporation Ponds - Liquid present?		(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	HA	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid Liquid present?	HA	(Monthly analysis required if yes)
Landfill Leachate Sump	NA	(Monthly analysis required if yes)
Vadose Zone Monitoring		
Pond Sludge Depth	K	
*Comments & Repairs:	K	1

### H₂S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

**F** 



\*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 H<sub>2</sub>S levels downwind of the Pond. If H<sub>2</sub>S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office New Mexico State Police Eddy County Sheriff Lea County Sheriff

575-887-4048 575-392-5580 575-887-1888 575-397-3611

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

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Receipt & Approval

Name:

### Received by OCD: 5/21/2024 10:21:29 AM ATTACHMENT B LEA LAND LLC FACILITY INSPECTION REPORTS

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

Date:         12-31-2022         Print Name:	Ъ	- ONTIVEROS
Others: Signature:	char	$( \rightarrow f \cdot ( \overrightarrow{a}))$
		S.M.
Inspection will be in accordance with NMOCD operational conditions.		
Item	Satisfactory	Action Required
Entrance Sign		The section required
Berms and outside pond levees		
Tank Labels		
Sumps	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	<u> </u>
Pond levels three-foot free board	1	
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	V	
	V	
Leak detection sumps - Landfill - Liquid present?	- V	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	MA	(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? Landfill Leachate Sump	MA	(Monthly analysis required if yes)
Vadose Zone Monitoring		
Pond Sludge Depth	· · · · · ·	
*Comments & Repairs:	V	

#### H₂S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm): POND

7 1 2 4 5 6 7 8 0 0 1 2 NA

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575-887-4048	
575-392-5580	
575-887-1888	
575-397-3611	

and the be given to the	lonowing.
NMOCD Hobbs	575-393-6161
NMOCD Santa Fe	505-476-3440

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**Receipt & Approval** 

Name:

### Received by OCD: 5/21/2024 10:21:29 AM ATTACHMENT B LEA LAND LLC FACILITY INSPECTION REPORTS

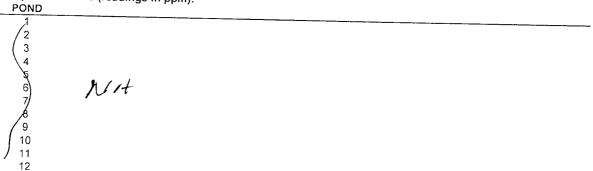
# Lea Land LLC Surface Waste Management Facility OCD Permit No. NM1-35

Date:       01-31-2023       Print Name         Others:       Signature:         Inspection will be in accordance with	* Joe C	at:VEROS
Item		
Entrance Sign	Satisfactory	Action Required
Berms and outside pond levees	V	
Tank Labels		
Sumps	<i>V</i>	
Pond levels three-foot free board		
Free oil on Pits-Ponds	V	
Pit and Pond condition		
Pit and Pond marker numbers	ALA	
Treatment Plant inspection	NA	
Solid waste disposal area inspection	HA	
Blowing trash	V	
Fences and Gates	K	
Leak detection sumps - Landfill - Liquid present?	K	
Leak detection sumps - Evaporation Ponds - Liquid present?	<i>`</i>	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	tit	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid Liquid present?	MA	(Monthly analysis required if yes)
Landfill Leachate Sump	-NA	(Monthly analysis required if yes)
Vadose Zone Monitoring	K	1
Pond Sludge Depth		
*Comments & Repairs:		

### H₂S

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575-887-4048
575-392-5580
575-887-1888
575-397-3611

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

Receipt & Approval

Name: \_\_\_\_

## Received by OCD: 5/21/2024 10:21:29 AM ATTACHMENT B LEA LAND LLC FACILITY INSPECTION REPORTS Lea Land LLC Surface Waste Management Facility

# OCD Permit No. NM1-35

	Inspection Form
Date: 02-28-2023	Print Name: DE CHEROS
Others:	Signature: Joc CH End

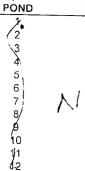
Inspection will be in accordance with NMOCD operational conditions.

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ltem	Satisfactory	Anting Design
Entrance Sign	Jacislacioly	Action Required
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	NH.	-
Solid waste disposal area inspection	NA	
Blowing trash	V	
Fences and Gates		
Leak detection sumps - Landfill - Liquid present?		
Leak detection sumps - Evaporation Ponds - Liquid present?	V	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	dip	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid Liquid present?	NA	(Monthly analysis required if yes)
Landfill Leachate Sump	MA	(Monthly analysis required if yes)
Vadose Zone Monitoring	V	
Pond Sludge Depth	<i>\</i>	-
*Comments & Repairs:	L V	1
	-	

### H₂S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



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575-392-5580
575-887-1888
575-397-3611

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

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Receipt & Approval

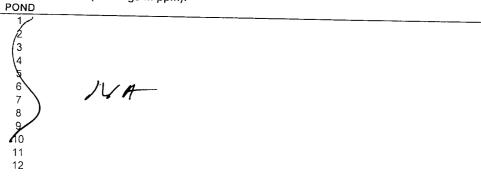
Name: \_\_\_\_

Surfac	<u>ATTACHME</u> <u>C FACILITY INS</u> Lea Lan e Waste Mar OCD Permit I	<u>SPECTION</u> Id LLC nagemen	t Facility
Date: <u>03-31 - 2023</u> Others:	Inspection Print Name: Signature:	Form	E ONLIVEROS E ONL- ER
Inspection will be in Item Entrance Sign	n accordance with N	IMOCD opera	
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 Solid waste disposal area inspection		NA	
Blowing trash Fences and Gates Leak detection sumps - Landfill - Liquid prese	nt?		
Leak detection sumps - Evaporation Ponds - I Leak detection sumps - Jet Out Pit - Liquid pro	Liquid present?	NA	(Monthly analysis required if yes) (Monthly analysis required if yes) (Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid Liquid Landfill Leachate Sump Vadose Zone Monitoring	present?	NA.	(Monthly analysis required if yes)
Pond Sludge Depth *Comments & Repairs:			7

H<sub>2</sub>S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



\*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 H<sub>2</sub>S levels downwind of the Pond. If  $H_2S$  levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

Lea Land Office New Mexico State Police 575-392-5580 Eddy County Sheriff Lea County Sheriff

575-887-4048 575-887-1888 575-397-3611

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

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Page 15 of 43

**Receipt & Approval** 

Name:

#### ATTACHMENT B Received by OCD: 5/21/2024 10:21:29 AM LEA LAND LLC FACILITY INSPECTION REPORTS

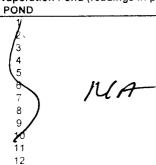
Lea Land LLC Surface Waste Management Facility **Application for Permit Modification** Volume II: Facility Management Plans Section 1: Operations, Inspection, and Maintenance Plan June 2019

ATTACHMENT II.1.C - Inspection Form (Typical)					
Date: 04-30-2023 Print Name:	DE	CNTIVEROS			
Others: Signature:	200	- Chi Eri			
Inspection will be in accordance with NMOCD operational conditions.					
ltem	Satisfactory	Action Required			
Entrance Sign	<u> </u>	Ţ			
Berms and outside pond levees					
Tank Labels	×				
Sumps					
Pond levels three-foot free board	~ ~				
Free oil on Pits-Ponds	<u> </u>				
Pit and Pond condition	MA				
Pit and Pond marker numbers	14				
Treatment Plant inspection	NA				
Solid waste disposal area inspection					
Blowing trash					
Fences and Gates		1			
Leak detection sumps - Landfill - Liquid present?		(Monthly analysis required if yes)			
Leak detection sumps - Evaporation Ponds - Liquid present?	MA	(Monthly analysis required if yes)			
Leak detection sumps - Jet Out Pit - Liquid present?	MA	(Monthly analysis required if yes)			
Leak detection sumps - Stab. & Solid Liquid present?	NA	(Monthly analysis required if yes)			
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Vadose Zone Monitoring		1			
Pond Sludge Depth	<i>K</i>	f			
*Comments & Repairs:					

H<sub>2</sub>S

#### READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



\*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 H<sub>2</sub>S levels downwind of the Pond. If H<sub>2</sub>S levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

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575-887-4048
575-392-5580
575-887-1888
575-397-3611

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

#### **Receipt & Approval**

Name:

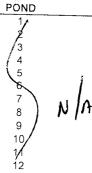
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_	LEA LAND LLC FACILITY INS Lea Lar Surface Waste Ma OCD Permit	nagement	t Facility	
	Inspection	Form		
r	Date: <u>5/15/23</u> Print Name:	$\sim$		
	Print Name:	(TCRW	Time CANTINGER 3	
С	Others: Signature:		Illa	
		$\langle -\langle -\rangle$		
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	ntrance Sign	Satisfactor	y Action Required	
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	ank Labels			
	umps	<u>v</u>		
P	ond levels three-foot free board			
Fr	ree oil on Pits-Ponds			
	t and Pond condition	NIA		
Pi	t and Pond marker numbers			
Tr	eatment Plant inspection	NIA		
Sc	olid waste disposal area inspection	NIG_		
BI	owing trash			
	ences and Gates	+		
Le	ak detection sumps - Landfill - Liquid present?			
Le	ak detection sumps - Evaporation Ponds - Liquid present?	NIA	(Monthly analysis required if yes)	
Le	ak detection sumps - Jet Out Pit - Liquid present?	NIA	(Monthly analysis required if yes)	
Le	ak detection sumps - Stab. & Solid Liquid present?	~ (n	(Monthly analysis required if yes)	
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Po	and Sludge Depth			
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H<sub>2</sub>S

# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



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Lea Land Office New Mexico State Police 575-392-5580 Eddy County Sheriff Lea County Sheriff

575-887-4048 575-887-1888 575-397-3611

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

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Receipt & Approval

Name:

	ea Land LLC
Surface was	ste Management Facility
OCD F	Permit No. NM1-35
Ins	spection Form
e cla las	
Date: 5/30/23 Pr	Int Name: (ACCUN INTINGIUS
Othere	the second secon
Sig	gnature:
Inspection will be in accord	ance with NMOCD operational conditions.
Item	
Entrance Sign	Satisfactory Action Required
Berms and outside pond levees	V
Tank Labels	V,
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	NIA
Blowing trash	
Fences and Gates	
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Leak detection sumps - Jet Out Pit - Liquid present?	
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Vadose Zone Monitoring Pond Sludge Depth	

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# READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):



\*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  $H_2S$  levels downwind of the Pond. If  $H_2S$  levels reach 20 ppm, the Facility will be closed and notification will be given to the following:

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

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

Receipt & Approval

Name: \_\_\_\_\_

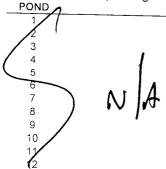
Date: \_\_\_\_\_

	Surface Waste Ma OCD Permit	<u>SPECTION</u> nd LLC nagemer No. NM1	nt Facility -35
Date: <b>(230/23</b> ) Others:	Inspection Print Name Signature:	Acer 	Time Doriores
Item	pection will be in accordance with	NMOCD oper	
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### H<sub>2</sub>S

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Lea Land Office New Mexico State Police Eddy County Sheriff Lea County Sheriff

575-887-4048 575-392-5580 575-887-1888 575-397-3611

NMOCD Hobbs	5
NMOCD Santa Fe	5

575-393-6161 505-476-3440 Page 19 of 43

Receipt & Approval

Name:

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: 06-13-2022

Time: 10:00 Am

Topic: Material Acceptance and Handling; Form C-133 and C-138 Handling

DOE CATIVERUS Presenter:

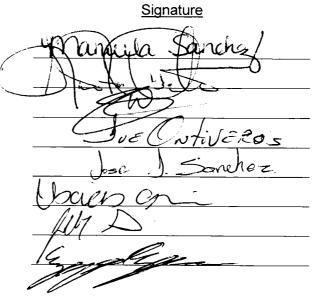
Department: <u>MANAGER</u>

### 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

Manuela Sanchez SANTOS CLITIVEROS Mark MCKinner Saias GUIN sirre requiel ianda Absent



Date Covered

ATTACHMENT C Lea Land LLC Surface Waste Management Facility Safety Communications Program Safety Meeting Attendance Sheet		
Date: 7-15-22 Time: 8:45 AM Topic: Migratory Bird Prevention		
Presenter: <u>T. Aguivre</u>	Department: <u>Supervisor</u>	
<ul> <li>Instructions:</li> <li>1. This form must be completed at each sa</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance she</li> </ul>		
Printed Name	Signature	
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### ATTACHMENT C

Lea Land LLC Surface Waste Management Facility

Safety Communications Program

**Safety Meeting Attendance Sheet** 

Date: August 23-2022 Time: 10:00 Ame Topic: Swift for MIEE Ting Department: ManingER FROS Presenter: 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 Bignature ALTOS "ALTONEROS Marn Mckinney saias t guime zarialto John Ger Manuela Somhez amillo arnillo rianda rianda **Date Covered** Absent

ATTACHMENT C Lea Land LLC Surface Waste Management Facility

> Safety Communications Program Safety Meeting Attendance Sheet

Date: DENTE DEN OB-ZOZZ Time: S'ODA MEETing Topic:

Presenter:

Department: MANAGYEN

## 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 Canilla Brianda Circuit O SALITOS DALITUBERS Manuela Sanchez Vola Gliz Mark Mckinney Ezequiel Aquirre Jose J. Sanches Salas tovirw Absent **Date Covered** 

Safety Meeting Attendance Sheet	
Date: <u>10-10- 2022</u>	Time: <u>8:30 AM</u>
Topic: <u>Cold Weather stress</u>	>
Presenter: <u>T. Aguirre</u>	Department: <u>Supervisor</u>
<ul> <li>Instructions:</li> <li>1. This form must be completed at each s</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance sh</li> </ul>	
Printed Name	Signature
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Mark Mckimex Ezequiel Aguirre	É and an
1 9	2. 3.

ATTACHMENT C Lea Land LLC Surface Waste Management Facility Safety Communications Program Safety Meeting Attendance Sheet	
Topic: <u>Cell Phone Usage</u>	
Presenter: I. Agwirre	Department: <u>Supervisor</u>
<ul> <li>Instructions:</li> <li>1. This form must be completed at each s</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance shows</li> </ul>	
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Ezequid Aquirre	and len
John Grein	My St
Mannakinnay	- A
Absent	Date Covered

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Safety Communications Program Safety Meeting Attendance Sheet	
Date: 12-15-2022	
opic: Employee Benefits	
Presenter: <u>T. Aguirre</u>	_ Department: <u>Supervisor</u>
nstructions: 1. This form must be completed at eac 2. Make additional copies as required. 3. Keep copy of completed attendance	
Printed Name	Signature
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ATTACHMENT C Lea Land LLC Surface Waste Management Facility	
	nunications Program
Safety Meetin	ng Attendance Sheet
Date: 1-08-2023	Time: 7:45 AM
ropic: Incompatible Waste	
Presenter: T. Agwirre	Department: <u>Supervisor</u>
nstructions: 1. This form must be completed at each 2. Make additional copies as required. 3. Keep copy of completed attendance s	
Printed Name	Signature
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John Gain	Maio and Ela MA MA Date Covered

ATTACHMENT C Lea Land LLC Surface Waste Management Facility Safety Communications Program Safety Meeting Attendance Sheet	
Topic: Material acceptance	e and kandling
Presenter: T. Aguirre	Department: <u>Spervisor</u>
<ul> <li>Instructions:</li> <li>1. This form must be completed at each</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance s</li> </ul>	-
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Ezequiel Agivire	- A.S.
Absent	
<u></u>	Date Covered

	ACHMENT C ce Waste Management Facility
	munications Program
Safety Meeting Attendance Sheet	
Date: 3-15-23	Time: 10:10 AM
Topic: Non - exempt liquids recognition	
Presenter: <u>TAguirre</u>	Department: Supervisor
<ol> <li>Instructions:         <ol> <li>This form must be completed at each</li> <li>Make additional copies as required.</li> <li>Keep copy of completed attendance</li> </ol> </li> </ol>	
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in the second second	- Anna Car
JECLAR VEROS	_ <u>Jor Can</u>
Ezequiel Aquirre	
Ezequiel Aguirre	- Englige
Absent	Date Covered

	HMENT C Vaste Management Facility
	nications Program
Safety Meeting Attendance Sheet	
Date: <u>4-23-23</u>	Time: 7:45 AM
Topic: Hazard communication	Δ
Presenter: <u>LAGUIVE</u>	Department: <u>Superusor</u>
<ul> <li>Instructions:</li> <li>1. This form must be completed at each sa</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance she</li> </ul>	
Printed Name	Signature
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Anthony Duroin	A de la 1
Due ONTivenus	Joe Chi EP
Schill Garrie	ill 57
Ezequiel Agenire	E guira
Absent	Date Covered

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ATTACHMENT C Lea Land LLC Surface Waste Management Facility		
	nications Program	
Safety Meeting Attendance Sheet		
Date: 5-15-23	Time: 8:15 AM	
Topic: Emergency evacuation drill		
Presenter: <u>T. Aguivre</u>	Department: <u>SUPERVISER</u>	
<ul> <li>Instructions:</li> <li>1. This form must be completed at each sa</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance she</li> </ul>		
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Anthony Durgen	Chatting land	
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John Green	Maria	
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Absent	Date Covered	
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ATTACHMENT C Lea Land LLC Surface Waste Management Facility Safety Communications Program Safety Meeting Attendance Sheet	
Date: 6-12-23	Time: 9:15 AM
Topic: Incompatible waste	
Presenter: I. Aguirre	Department: <u>SUPERVISO</u>
<ol> <li>Instructions:</li> <li>1. This form must be completed at each sa</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance shows</li> </ol>	
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John Garcia	- 4M
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Absent	Date Covered

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	HMENT C Vaste Management Facility
	nications Program
	Attendance Sheet
Date: 7-6-23	Time: <u>8:16 AM</u>
Topic: Site contingency f	Dian
Presenter: I. Aguime	Department: <u>Supervisor</u>
<ul> <li>Instructions:</li> <li>1. This form must be completed at each sa</li> <li>2. Make additional copies as required.</li> <li>3. Keep copy of completed attendance she</li> </ul>	
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John Gaica	
Ecquiel Againe	4 / A
	Han yum
	-
Absent	Date Covered

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From:	Keith Gordon, PE
То:	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

## 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	Unit IIA	Total	Unit	Unit	Total Cost
	Quantity	Quantity	Quantities		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
То:	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 | <u>brad.a.jones@emnrd.nm.gov</u> <u>www.emnrd.nm.gov</u>

# 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 (<u>https://wwwapps.emnrd.state.nm.us/ocd/ocdpermitting/</u>) 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 <u>brad.a.jones@emnrd.nm.gov</u>.

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

Respectfully,

Brad A. Jones Environmental Specialist - Advanced

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

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



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	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/Vegitation Layer	99,381	CY	\$2.00	\$198,763
1.1.4 Vegetative Layer Seeding (Class A)	30.8	AC	\$1,500.00	\$46,200
	<b>·</b>		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)				
			TOTAL COST	\$600,933

Notes:

1. 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.

2. 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.

3. CY = Cubic Yard

AC = Acre

LS = Lump Sum

4. Due to the perimeter location there is no final cover "crown" and related geosynthetic layers in Unit I.

## 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 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	Unit IIA	Total	Unit	Unit	Total Cost
	Quantity	Quantity	Quantities		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
				Tas	sk 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	

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

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

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CONDITIONS

Action 346242

CONDITIONS

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