

NM1-19

Gandy Marley

Landfarm/Landfill

Closure/Post-Closure Plan
with updated FA

Dated September 10, 2026

Approved September 23, 2026



September 10, 2026

Mr. Joseph Kennedy
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Response to Comments, Review of Closure and Post-Closure Plan for
Gandy-Marley Landfarm/Landfill Permit NM1-19

Dear Mr. Kennedy:

On behalf of Gandy-Marley, Inc. (Gandy-Marley), this letter provides Daniel B. Stephens & Associates, Inc.'s (DBS&A's) responses to your comments dated June 10, 2026 regarding the subject submittal. Comments are reproduced in *italics*, with responses immediately following in regular text.

1. *Title Page. Closure/Post-Closure Plan; Gandy-Marley Landfarm, NM1-19: Please correct this to say Gandy-Marley Landfarm/Landfill, NM1-19. Make the same correction with the Site Name on the Introduction page.*

The site name has been changed to Gandy-Marley Landfarm/Landfill on the title page, report header, and introduction page.

2. *Section 2. Closure Plan. Appendix B contains design drawings for the landfill. MWH completed the landfill design, dated September 2005. Sheet 6 of the MWH design is the closure plan for landfill, including its final grade: GMI must submit a full set of design drawings for the landfill with new drawings for the double lined leak detection system and revisions to the other facility drawings to incorporate changes that the double liner and leak detection systems will affect. For instance, the previously permitted drawings have reference symbols on cross-sections or map views that refer to details of the older, single liner drawings. All design drawings must be stamped by a professional Engineer (PE).*

A full set of design drawings is provided as Appendix B. It includes engineering of the existing and active southern portion of the landfill and double lining of the north portion of the landfill that has yet to be constructed. The drawings are stamped by a professional engineer licensed in New Mexico.

3. *Section 2. Closure Plan. Gandy-Marley is seeking an exception from the closure standards for landfarm vadose zone characterization. The standards are specified in 19.15.36.15.E NMAC and include either practical quantitation limits or background concentrations for various chemical constituents to set cleanup levels. Gandy-Marley requests that the closure standards for impacted soils numerated in Table I of 19.15.29 NMAC (Table I) be used instead, along with the inorganic constituents listed in Subsections A and B of 20.6.2.3103 NMAC (Section 3103), which will be compared to NMED soil screening levels (SSLs) (NMED, 2022): For an exception to vadose zone*

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monitoring specified in 19.15.36.15E(2), GMI must specify that, in lieu of comparing to background sampling data or practical quantitation limits (PQL), they are requesting to compare sampling data to:

o Table I of 19.15.29 NMAC for constituents required by 19.36.15.E(2) NMAC and 19.15.36.15.E(5) NMAC

o The most stringent residential, industrial/occupation, or construction soil screening limits presented in Table A-1: New Mexico Environment Department (NMED) Soil Screening Levels (SSLs) (NMED Risk Assessment Guidance for Site Investigations and Remediation, Volume I Soil Screening Guidance for Human Health Risk Assessments, November 2022) for the sampling data required by 19.15.36.15(E)(3) NMAC, 19.15.36.15(E)(5) NMAC, and 19.15.36.15(F)(5) NMAC.

Note: 19.15.36.15.E(3) NMAC and 19.15.36.15.F(5) NMAC requires analysis of constituents listed in Subsections A and B of 20.6.2.3103 NMAC, determined by EPA SW-846 methods 6010B or 6020. These must be numerated in a table that includes the above limits for NMED SSLs. If a release is detected that triggers 19.15.36.15.E(5) NMAC release sampling, ALL constituents listed in Subsections A and B of 20.6.2.3103 NMAC must be analyzed.

Language in Section 2 has been updated to specify SSLs for comparison and which Section 3103 constituents to include for analysis.

4. *Section 2.1. Oil Treatment Facility Closure [19.15.36.18(C)(1) NMAC]. Oil handling and treatment facilities that will require removal include three concrete bays, two AST batteries, and an individual AST. The concrete bays are referred to as the Artesia pits, mud pits, and washout bays (Figure 1). The Artesia pits are used for waste offloading and separating of liquids from solids: Add the cement tank bottoms stabilization trough, permitted in 1996 that is located between the ancillary tank and the AST battery, NE of the washout bays.*

The stabilization trough facility has been added to Section 2.1 and Figure 2.

5. *Section 2.1. Oil Treatment Facility Closure [19.15.36.18(C)(1) NMAC]. After the tank batteries, ancillary tank, concrete bays, offloading area, truck pullout area, and former pond are removed the soil beneath them will be field screened and sampled to determine whether impacted soils exceed closure standards and need to be removed (Section 4). Soil samples will be collected and sampled for the following constituents: Again, Add the cement tank bottoms stabilization trough. Also cite 19.15.36.18.C(1) NMAC for this soil sampling.*

The stabilization trough facility has been added to Section 2.1, and its sampling grid has been added to Figure 2. Language has also been added to explicitly call out 19.15.36.18(C)(1) NMAC as the reference for the soil sampling.

6. *Section 2.2. Landfill Closure [19.15.36.18(C)(2) NMAC]. Appendix B contains original design drawings for the landfill. They were submitted as Attachment 7 of C-137 in Gandy-Marley's October*

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4, 2005 permit application (NMEMNRD, 2006). Sheet 6 is the ultimate cover plan, with cross sections: As described above, GMI must submit a full set of design drawings for the landfill.

A full set of design drawings is provided as Appendix B.

7. *Section 2.2. Landfill Closure [19.15.36.18(C)(2) NMAC]. The cover will be contoured to promote drainage and prevent ponding of stormwater with final grades of the top surface ranging from 5 to 20 percent, meeting the requirements of 19.15.36.18(C)(2)(a) NMAC. Side slopes will not exceed a twenty percent grade (4 feet horizontal to 1 foot vertical) to prevent erosion: This does not meet the requirement of Paragraph (8) of Subsection C of 19.15.36.14 NMAC: "The operator shall properly close landfill cells, covering the cell with a top cover pursuant to Paragraph (8) of Subsection C of 19.15.36.14 NMAC, with soil contoured to promote drainage of precipitation; side slopes shall not exceed a twenty-five percent grade (four feet horizontal to one foot vertical), such that the final cover of the landfill's top portion has a gradient of two percent to five percent, and the slopes are sufficient to prevent the ponding of water and erosion of the cover material."*

The range of the top surface final grade has been corrected to read 2 to 5 percent instead of 5 to 20 percent, and the final grading side slopes are depicted to be a maximum of 4:1 or at 25 percent slope.

8. *Section 2.2. Landfill Closure [19.15.36.18(C)(2) NMAC]. The final cover will consist of two layers (top to bottom) per 19.15.36.14(C)(8) NMAC: (1) a soil erosion layer constructed of at least 36 inches of evapotranspiration soil cover and (2) 12 inches of a low-permeability clay layer place on compacted oil field waste (Appendix B). The oil field waste will be compacted to 80 percent of standard Proctor density: State the hydraulic conductivity of the layers to be placed.*

The evapotranspiration (ET) soil cover is expected to have a hydraulic conductivity of 10^{-4} to 10^{-6} centimeters per second (cm/s), while the hydraulic conductivity of the low-permeability clay layer is expected to be 10^{-7} cm/s or less. The expected hydraulic conductivity values have been added to Section 2.2.

9. *Section 2.2. Landfill Closure [19.15.36.18(C)(2) NMAC]. The closure grading plan provided in Appendix A includes landfarm cells 15 through 23 because it may take several more decades before the landfill is expanded into these cells. Sheet 5 of Appendix B (Waste Filling Plan & Cross Section, Phase 2) shows a cover and final grading plan for Phase 1, which is the active landfill located in the southwestern portion of the site: It is the OCD's understanding that there is only a small portion ("100"ft) of the southern landfill cells left to utilize. How is it possible that one foot of treatment zone soil from 70 acres of landfarm cells (112,933 cu. yds) can fit into that small amount of remaining landfill? Won't a new cell need to be constructed to take that much soil? Also, how could it be decades before expanding to the northern cells, with that little space left in the southern cells?*

The 100-foot measurement only applies to the portion of the southern landfill that has not yet been constructed and lined. As shown in Figure 1, only the area labeled as "Covered Landfill" no longer can accept new waste. The length of the remaining southern landfill area is approximately 1,000 feet. Using CAD, we estimate 575,000 cubic yards of remaining airspace in the southern portion of the landfill.

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10. *Section 2.3. Landfarm Closure [19.15.36.18(C)(4) NMAC]. These landfarm cells will be completely excavated to allow for placement and construction of the landfill liner: Restate this as allowing for placement and construction of double liner and leak detection system.*

The Section 2.3 sentence has been rewritten to include mention of the double liner and leak detection system.

11. *Section 2.3. Landfarm Closure [19.15.36.18(C)(4) NMAC]. The results show that treatment zone soils exceed the performance standard for chloride, numerated in Subsection F of 19.15.36.15 NMAC; therefore, treatment zone soils will be removed and placed in the landfill: GM must state that treatment zone soil that does not meet all of the closure performance standards of 19.15.36.15.F NMAC, must be disposed of in the landfill cell as waste and not used as cover.*

Language has been added to Section 2.3 to state that treatment zone soil will be added to the landfill as waste and not used as cover.

12. *Section 2.3. Landfarm Closure [19.15.36.18(C)(4) NMAC]. The vadose zone will be sampled in accordance with 19.15.36.15.E(3) NMAC. Vadose zone samples will be compared to the Table I closure criteria, as well as NMED SSLs for inorganic constituents listed in Subsection A and B of Section 3103: Refer to OCD comments for exception request above in Section 2. Closure Plan.*

This section has been revised to address the exception request comments.

13. *Section 2.4. Pond Closure [19.15.36.18(D) NMAC]. The areas will be then regraded to match surrounding topography and to promote runoff, and will be revegetated (Appendix A): State that pond areas will be revegetated pursuant to 19.15.36.18.A(6) NMAC.*

A reference to 19.15.36.18(A)(6) NMAC has been added.

14. *Section 3.1. Landfill Post-Closure [19.15.36.18(C)(3) NMAC]. The post-closure care period for the landfill will be 30 years. During this period, Gandy-Marley will maintain cover integrity, continue operation of the leachate collection and removal system, and monitor groundwater conditions at the on-site well. The cover will be inspected after periods of heavy rain for signs of erosion (e.g., rill along slopes) requiring repair: Add leak detection monitoring.*

Language addressing leak detection monitoring has been added.

15. *Section 4. Sampling and Analysis Plan. Oil treatment facility closure monitoring: Cite 19.15.36.18.C(1)(b).*

Citation has been added.

16. *Section 4. Sampling and Analysis Plan. Removed evaporation pond closure monitoring: Cite 19.15.36.18.D(4).*

Citation has been added.

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17. *Section 4. Sampling and Analysis Plan. Gandy-Marley is seeking an exception from the closure standards for landfarm vadose zone monitoring beneath all cells. Rather than comparing vadose zone monitoring results to practical quantitation limits or background concentrations, Gandy-Marley requests that the constituents and associated standards numerated in Table I be used instead, along with the organic constituents listed in Subsections A and B of Section 3103, which will be compared to NMED SSLs. Gandy-Marley is preparing to sample the vadose zone beneath all landfarm cells to support closure efforts: Refer to OCD comments for exception request above in Section 2. Closure Plan.*

This section has been updated to address the exception request comments.

18. *Section 4. Sampling and Analysis Plan. Soil samples will be collected from depths between 3 and 4 feet beneath the original ground surface and will be analyzed for the following constituents: Add: GM will collect and analyze a minimum of four randomly selected samples from each cell semi-annually for constituents of 19.15.36.15.E(2) NMAC and every five years for constituents of 19.15.36.15.E(3) NMAC until closure of cells is approved.*

Pre-closure monitoring language has been added.

19. *Section 6. Financial Assurance Cost Estimate. Task 2.1 Oil Treatment Facility Closure-Soil Characterization: There should be 12 samples, not 6. Also state that these are five-point composite samples.*

Line item 7 now titled "5-point composite soil sampling, laboratory analyses." Unit quantity for line item 7 is now 14 to account for every soil sampling area.

20. *Section 6. Financial Assurance Cost Estimate. Task 3.2 Landfarm and Former Pond Areas Inspections and Maintenance (3 years): The subtotal for 3.2 is incorrect. The amount of \$2160 for Recordkeeping and reporting was not added in. Correcting this will change total for this task as well as the Task Summary.*

Recordkeeping and reporting value has now been incorporated into Task 3.2 totals as well as the Task Summary table.

21. *If GM wishes to ask for alternative/exception request(s), the CPCP must be submitted as part of a minor modification application which requires a \$150 fee paid at the time of submittal. Note, all alternative/exception requests must demonstrate equivalent protection of fresh water, public health, and the environment.*

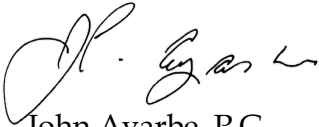
As stated above, Gandy-Marley is seeking an exception from the standards for landfarm vadose zone monitoring specified in 19.15.36.15.E NMAC, requesting to use the standards of 19.36.29 NMAC Table I, along with the aforementioned SSLs for constituents of Subsections A and B of 20.6.2.3103 NMAC. Gandy-Marley is submitting a separate minor modification application with the same date as this letter requesting all regulatory exceptions discussed in this letter, to include site facilities to be added to permit NM1-19.

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Please let me know if you have any further questions.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "J. Ayarbe", with a stylized flourish at the end.

John Ayarbe, P.G.
Principal Hydrogeologist

JA/rpf

cc: L. Gandy, GMI
J. Bearzi, BRZ Consulting

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Prepared for
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1. Introduction

On behalf of Gandy-Marley, Inc. (Gandy-Marley), Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this closure/post-closure plan (CPC plan) describing proposed closeout, reclamation, and monitoring activities at the Gandy-Marley Landfarm/Landfill, located approximately 40 miles east of Roswell, New Mexico, just south of the Waldrop Rest Area. These activities will be implemented at the cessation of operations and are intended to satisfy the requirements of 19.15.36.18 NMAC. The New Mexico Oil Conservation Division (OCD) requested this plan in a September 10, 2025 e-mail from Leigh Barr to Larry Gandy (OCD, 2025). The plan is also used to establish a financial assurance cost estimate.

A dirt road that runs east/west splits the site into two portions (Figure 1). OCD regulates operations in the northern portion in accordance with permit NM1-19. The New Mexico Environment Department (NMED) regulates operations in the southern portion in accordance with discharge permit 1041 (DP-1041). Operations in the northern portion of the site are used for the disposal and processing of oil field waste exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations. Facilities used in support of these operations include an inactive landfarm, an engineered landfill, lined evaporation ponds, and several other ancillary structures (e.g., aboveground storage tanks [ASTs] and concrete bays). Gandy-Marley stopped using the landfarm in 2006 after construction of the landfill, which is now used for the disposal of oil field waste (i.e., primarily oil-impacted earth). This plan is specific to the OCD-regulated facilities and does not cover DP-1041 operations.

Basic information regarding the site is as follows:

- Operator: Gandy-Marley
- Consultant information: John Ayarbe (DBS&A), (505) 822-9400, jayarbe@geo-logic.com
- Site name: Gandy-Marley Landfarm/Landfill
- OCD permit number: NM1-19
- Public Land Survey System (PLSS) location: Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM
- County: Chavez County
- Latitude and longitude: 33.387041°N, 103.835330°W



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Closure will proceed in accordance with this CPC plan and any agreed-to modifications OCD imposes. During implementation of closure activities, Gandy-Marley will maintain the facility in a manner that protects fresh water, public health, and the environment, per 19.15.36.18(A)(5) NMAC.

No exceptions from 19.15.36.18 NMAC are proposed in this CPC plan. Exception requests are allowed per 19.15.36.19 NMAC and must demonstrate that proposed alternatives provide equivalent protection of fresh water, public health, and the environment.

2. Closure Plan

Proposed closure activities at the Gandy-Marley Landfarm/Landfill are based on the requirements of 19.15.36.18(C) through (D) NMAC. The activities cover various site operations and features, including oil handling and treatment facilities, the engineered landfill, the inactive landfarm, and evaporation ponds. A closure grading plan for the site is provided in Appendix A. Appendix B contains design drawings for the landfill. MWH completed the original landfill design, dated September 2005. DBS&A has updated the design to include double lining and leak detection in the northern portion of the landfill that has yet to be constructed. The appendix includes a final grading plan for the landfill at closure.

Closure standards specific to each facility area are outlined in the following sections. Gandy-Marley is seeking an exception from the standards for landfarm vadose zone characterization. The standards are specified in 19.15.36.15.E NMAC and include either practical quantitation limits or background concentrations for various chemical constituents to set cleanup levels. Gandy-Marley requests that the closure criteria for impacted soils numerated in Table I of 19.15.29 NMAC (Table I) be used instead, along with the constituents listed in Subsections A and B of 20.6.2.3103 NMAC (Section 3103). Results for Section 3103 constituents will be compared to the most stringent residential, industrial/occupation, or construction soil screening levels (SSLs) in Table A-1 of NMED's *Risk Assessment Guidance for Site Investigations and Remediation, Volume I: Soil Screening Guidance for Human Health Risk Assessments* (NMED, 2022).

Depth to groundwater at the landfarm is greater than 100 feet below ground surface (feet bgs). A landfarm employee measured depth to water (DTW) at the on-site monitor well located immediately south of landfill cell 17 on November 6, 2025. DTW was 115 feet, and the total well depth was 200 feet. Table I closure criteria for sites with DTW greater than 100 feet bgs are as follows:



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- Chloride concentration less than 20,000 milligrams per kilogram (mg/kg)
- Benzene concentration less than 10 mg/kg
- Total benzene, toluene, ethylbenzene, and total xylenes (BTEX) concentration less than 50 mg/kg
- Sum of total petroleum hydrocarbons (TPH) gasoline-range organics (GRO) and diesel-range organics (DRO) less than 1,000 mg/kg
- TPH concentration less than 2,500 mg/kg

After closure is complete, Gandy-Marley will backfill with clean fill as needed, and revegetate the site. Revegetation, except for the landfill (see Section 2.2), will consist of the establishment of a vegetative cover equal to 70 percent of the native perennial vegetative cover (or scientifically documented ecological description consisting of at least three native plant species, including at least one grass, but not including noxious weeds) and maintenance of that cover through two successive growing seasons, per 19.15.36.18(A)(6) NMAC.

2.1 Oil Treatment Facility Closure [19.15.36.18(C)(1) NMAC]

Oil handling and treatment facilities that will require removal include three concrete bays, two AST batteries, an individual AST, and the cement tank bottoms stabilization trough. The concrete bays are referred to as the Artesia pits, mud pits, and washout bays (Figure 1). The Artesia pits are used for the treatment of soy bean waste from a gas refinery, and the two other bays are used for waste offloading and separating of liquids from solids. These facilities will be closed, as follows:

- There are seven ASTs located on-site. Five ASTs are located north of the washout bays (Figure 2): four in a lined enclosure and one west of the enclosure. Two tanks are located in a lined enclosure east of the Artesia pits (Figure 3). Tanks and ancillary equipment (e.g., pipe) will be cleaned with liquid waste placed in the evaporation ponds and any solid waste placed in the landfill. The tanks and ancillary equipment will be reused, recycled, and removed from the site, or simply crushed and placed in the landfill within 90 days of closure. Closure of the tank batteries will also include removal of the high-density polyethylene (HDPE) liner and placing it in the landfill.
- The three concrete bays will be demolished and broken concrete placed in the landfill along with any other debris (e.g., residual waste solids). Before the bays are demolished, liquids will be evacuated and discharged to the evaporation ponds, and waste solids will be placed



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in the landfill. The HDPE liners beneath the concrete bays will be removed and placed in the landfill.

- A truck pullout area is located immediately east of the washout bay (Figure 2). Oil-impacted soils will be removed from this area and placed in the landfill.
- A cement tank bottoms stabilization trough is located directly between the ancillary tank and the AST battery (Figure 2). The cement trough will be demolished and broken concrete placed in the landfill along with any other debris.
- A historical 0.3-acre offloading area is apparent in aerial imagery taken in 2009. It is 250 feet north of the current evaporation ponds (Figure 4). Gandy-Marley is currently planning to characterize this area for closure. Closure will be performed in accordance with this CPC plan; any liner material left in place will be removed and placed in the landfill. It is not included in the financial assurance cost estimate because characterization activities are expected to be conducted soon.
- A former 0.5-acre offloading area for drill cuttings is located immediately north of the evaporation ponds (Figure 1). Drill cuttings and oil-impacted soils have been removed from this area and placed in the landfill. This area is no longer in use and Gandy-Marley is planning to characterize the area for closure (Figure 5). Closure will be performed in accordance with this CPC plan. It is not included in the financial assurance cost estimate because characterization activities are expected to be conducted soon.
- The two frac tanks used for emergency overflow from the mud pits are located immediately west of the concrete bays (Figure 4).

After the tank batteries, ancillary tank, concrete bays, offloading area, truck pullout area, tank bottoms stabilization trough, and former pond are removed the soil beneath them will be field screened and sampled to determine whether impacted soils exceed closure standards and need to be removed (Section 4). Soil samples will be collected and sampled for the following constituents as required by 19.15.36.18(C)(1) NMAC:

- Total petroleum hydrocarbons
- BTEX constituents
- Major cations and anions (alkalinity, calcium, chloride, magnesium, potassium, sodium, and sulfate)
- RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver)



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Figures 2 through 4 show sampling locations and grids for each facility. If removed, impacted soil will be placed in the landfill. After the areas have been characterized and any impacted soil removed, they will be backfilled with clean fill obtained from a local borrow area located approximately 1 mile east of the site. The areas will then be regraded to match surrounding topography and to promote runoff, and will be revegetated (Appendix A).

2.2 Landfill Closure [19.15.36.18(C)(2) NMAC]

At full buildout, the landfill will occupy most of site (approximately 63.5 acres), including the area west of the evaporation ponds and several odd numbered landfarm cells to the north (cells 15 through 23). The landfill is an engineered structure, consisting of a recompacted subgrade, compacted clay liner, 40-mil HDPE liner, geocomposite drainage layer, and protective operational layer (listed from bottom to top). Currently, the landfill only occupies the southwest portion of the site and is expanding from west to east (Figure 1). Construction of the landfill is concurrent with excavation and waste filling. Leachate is collected from the geocomposite drainage layer, drained to an 8-inch perforated HDPE centerline floor drain, and conveyed to a sump located at the west end of the landfill. Leachate collected from the sump is periodically pumped out and discharged to the evaporation ponds. Appendix B contains design drawings for the landfill. They include a final grading plan, with cross sections. The cover will be contoured to promote drainage and prevent ponding of stormwater with final grades of the top surface ranging from 2 to 5 percent, meeting the requirements of 19.15.36.18(C)(2)(a) NMAC. Side slopes will be at a 25 percent grade (4 feet horizontal to 1 foot vertical) to prevent erosion. Additional cover specifications are as follows:

- The final cover will consist of two layers (top to bottom): (1) a soil erosion layer constructed of at least 36 inches of evapotranspiration (ET) soil cover and (2) 12 inches of a low-permeability clay layer placed on compacted oil field waste (Appendix B). The oil field waste will be compacted to 80 percent of standard Proctor density.
- The ET soil cover is expected to have a hydraulic conductivity of 10^{-4} to 10^{-6} centimeters per second (cm/s), while the hydraulic conductivity of the low-permeability clay layer is expected to be 10^{-7} cm/s or less.
- The final cover will be seeded to establish vegetation. Vegetation will consist of native grasses with the goal of covering at least 70 percent of the landfill cover. At least two grasses will be represented. Efforts will be made to prevent seeding and growth of noxious weeds. Deep rooted shrubs or trees will not be planted.



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Section 3.1 describes proposed post-closure maintenance and monitoring.

DBS&A modified the design for the landfill to include double lining and leak detection for the northern portion of the landfill (Gandy-Marley, 2026). Almost all (95 percent) of the southern portion of the landfill has been lined, according to the current design in the existing permit (i.e., single 40-mil HDPE liner). Gandy-Marley will line the remaining area of the southern portion of the landfill using a single 40-mil HDPE liner because the remaining distance is so short (approximately 100 feet).

The landfill is currently expanding from west to east in the southern portion of the site. Intermediate cover has already been placed on the western portion of the landfill, approximately 10 acres. The intermediate cover has been placed on emplaced oil field waste and sloped to promote runoff while minimizing erosion.

The closure grading plan provided in Appendix A includes landfarm cells 15 through 23 because it may take several more decades before the landfill is expanded into these cells to the north. A cover and final grading plan for the active southern portion of the landfill is provided in Appendix B.

2.3 Landfarm Closure [19.15.36.18(C)(4) NMAC]

Gandy-Marley stopped using the landfarm in 2006. All waste is now placed in the engineered landfill. The landfill is being constructed concurrent with its excavation and waste filling. The landfill is expected to cover several landfarm cells to the north of its current footprint (i.e., cells 15 [portion], 17, 19, 21, and 23). These landfarm cells will be completely excavated to allow for placement and construction of the landfill, including the new double liner and leak detection system. Gandy-Marley will sample, close, and seek OCD approval before converting landfarm cells to landfill cells and is currently planning to characterize all landfill cells for closure in accordance with this CPC plan.

Soils samples were collected from several landfarm cells on October 20, 2025, and submitted to Cardinal Laboratories in Hobbs, New Mexico for analysis of chloride, BTEX constituents, and TPH. Samples were collected from both the treatment zone (6 to 12 inches bgs) and vadose zone (3 to 5 feet bgs) to satisfy the semiannual monitoring requirements of Subsections D and E(2) of 19.15.36.15 NMAC. Sample locations and results are presented in Tables 1 and 2; the maps are provided in Appendix C. The results show that treatment zone soils exceed the performance standard for chloride, numerated in Subsection F of 19.15.36.15 NMAC; therefore, treatment



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zone soils will be removed and placed in the landfill as waste. Treatment zone soils will not be used as landfill cover. Vadose zone samples meet the requested exception closure criteria in Table I of 19.15.29 NMAC.

Gandy-Marley is preparing to sample the vadose zone beneath all landfarm cells and ultimately close the facility with treatment zone soils placed in the existing landfill. The vadose zone will be sampled in accordance with 19.15.36.15.E(2) NMAC, 19, 19.15.36.15.E(3) NMAC, and if a release is discovered, 19.15.36.15.E(5) NMAC. Vadose zone samples will be compared to the Table I closure criteria, as well as the most stringent residential, industrial/occupation, or construction NMED SSLs for the constituents listed in Subsections A and B of Section 3103. If a release to the vadose zone is discovered, Gandy-Marley will sample for and analyze all constituents of Section 3103 in accordance with 19.15.36.15.E(5) NMAC. Although Gandy-Marley is preparing to remove treatment zone soils and place them in the landfill, these costs are still included in the financial assurance cost estimate. Gandy-Marley will seek to reduce financial assurance after they complete landfarm closure.

After treatment zone soils are removed, landfarm cells will be regraded and revegetated. The landfarm area will be regraded to match surrounding topography and to promote runoff (Appendix A). The berms surrounding each cell will be incorporated into final grading.

Until the landfarm has undergone closure, Gandy-Marley will submit annual reports of vadose zone and treatment zone sampling to OCD's Environmental Bureau in Santa Fe, New Mexico.

2.4 Pond Closure [19.15.36.18(D) NMAC]

The two lined evaporation ponds will be closed, as follows:

- Liquids in the ponds will be evaporated or solidified to the extent practical. If necessary, residual liquids will be removed and disposed of at a permitted off-site waste management facility.
- The HDPE liners will be removed and placed in the landfill.
- Ancillary equipment (e.g., pipe) will also be placed in the landfill. The equipment will be drained and cleaned to prevent spills as it is hauled to the landfill.

After the HDPE liners and ancillary equipment are removed, the soils beneath the ponds will be field screened and sampled to determine whether impacted soils exceed closure standards and



Closure/Post-Closure Plan Gandy-Marley Landfarm/Landfill, NM1-19

need to be removed (Section 4). Soil samples will be collected and sampled for the following constituents:

- Total petroleum hydrocarbons
- BTEX constituents
- Metals and other inorganics listed in Subsections A and B of 20.6.2.3103 NMAC (antimony, arsenic, barium, beryllium, cadmium, chromium, cyanide, fluoride, lead, total mercury, nitrate, nitrite, selenium, silver, thallium, uranium, combined radium-226 and radium-228, chloride, copper, iron, manganese, sulfate, zinc, and pH)

Figures 5 and 6 show sampling locations and grids for the two ponds. After the areas have been characterized and any impacted soil removed, they will be backfilled with clean fill obtained from the local borrow area located east of the site. The areas will be then regraded to match surrounding topography and to promote runoff, and will be revegetated pursuant to 19.15.36.18(A)(6) NMAC (Appendix A).

3. Post-Closure Monitoring and Maintenance

The site will continue to be monitored post-closure to help ensure cover and revegetation success.

3.1 Landfill Post-Closure [19.15.36.18(C)(3) NMAC]

The post-closure care period for the landfill will be 30 years. During this period, Gandy-Marley will maintain cover integrity, continue operation of the leachate collection and removal system, and monitor groundwater conditions at the on-site well. The cover will be inspected after periods of heavy rain for signs of erosion (e.g., rill along slopes) requiring repair. Fill material from the borrow area east of the landfill will be used for repairs and to maintain the cover. Gandy-Marley will also continue to monitor for leaks using the leak detection system. Future cells of the northern portion of the landfill will be constructed as required in 19.15.36.14.C NMAC. These cells will include double lining and a leak detection system. During the post-closure care period, Gandy-Marley will perform leak detection monitoring annually. Collected leachate will be temporarily stored on site and then hauled to a permitted off-site waste disposal facility. The on-site well will be monitored annually, including depth to water, field parameter (pH, specific conductance, and temperature) measurements, and water quality



Closure/Post-Closure Plan Gandy-Marley Landfarm/Landfill, NM1-19

sampling. Water quality samples will be submitted to an analytical laboratory for analysis of chloride, BTEX constituents, and TPH. Monitoring reports documenting cover maintenance, leachate collection, and groundwater conditions will be submitted to OCD within 45 days after the end of each calendar year (by February 15). Exceedances of groundwater standards will be addressed pursuant to 19.15.29 NMAC (release regulations).

3.2 Landfarm and Former Pond Areas Post-Closure [19.15.36.18(E) NMAC]

The post-closure care period for areas other than the landfill will be 3 years, assuming that the site achieves clean closure. These areas will include the covered and regraded evaporation ponds, landfarm, and oil treatment facilities (e.g., tank batteries, ancillary tank, and concrete bays). During the post-closure period, Gandy-Marley will regularly inspect and maintain the required revegetation. Annual monitoring reports documenting cover maintenance and success of revegetation will be submitted to OCD within 45 days after the end of each calendar year (by February 15).

4. Sampling and Analysis Plan

After the tank batteries, ancillary tank, concrete bays, offloading area, and evaporation ponds are removed (Sections 2.1 and 2.4), the soil beneath them will be field screened and sampled using procedures consistent with U.S. Environmental Protection Agency (EPA) publication SW-846.

Field screening for soil chloride and hydrocarbons will be performed to determine the need for soil removal beneath removed facilities and infrastructure. The screening will be conducted using a photoionization detector (PID), soil paste specific conductance measurements, and chloride test strips. Soil paste specific conductance will be used as a screening method to determine the magnitude of soil salinity. If soil paste specific conductance values are low (i.e., <500 microsiemens per centimeter [$\mu\text{S}/\text{cm}$] using a 1:5 soil to water ratio), chloride test strips will be used as a secondary screening method to more accurately quantify soil chloride levels. Where field screening results from a grid cell indicate that chloride concentration is below 1,000 mg/kg and hydrocarbons concentrations are less than 20 parts per million (ppm), excavation will cease. Excavated soils with chloride concentrations exceeding the 1,000 mg/kg



Closure/Post-Closure Plan Gandy-Marley Landfarm/Landfill, NM1-19

standard will be placed into existing landfill cells. The contaminated soil will only be treated as waste material and not used for landfill cover.

Soil samples will be collected from excavated areas for laboratory analysis. These samples will be analyzed for the following constituents based on collection location:

- Oil treatment facility closure monitoring [19.15.36.18(C)(1)(b) NMAC]
 - ◊ Chloride using standard method 4500-Cl-B
 - ◊ BTEX constituents using EPA method 8021B
 - ◊ TPH including GRO, DRO, and motor oil range organics (MRO) using EPA method 8015 modified
 - ◊ Major cations and anions
 - ▶ Alkalinity using standard method 2320B
 - ▶ Sulfate using EPA method 300.0
 - ▶ Calcium, magnesium, potassium, and sodium using EPA method 6020A Revision 1 (solids)
 - ◊ RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver) using EPA method 6020A Revision 1 (solids)
- Removed evaporation pond closure monitoring [19.15.36.18(D)(4) NMAC]
 - ◊ Chloride using standard method 4500-Cl-B
 - ◊ BTEX constituents using EPA method 8021B
 - ◊ TPH including GRO, DRO, and MRO using EPA method 8015 modified
 - ◊ Metals and other inorganics listed in Subsections A and B of 20.6.2.3103 NMAC
 - ▶ Antimony, arsenic, barium, beryllium, cadmium, chromium, lead, total mercury, selenium, silver, thallium, uranium, copper, iron, manganese, and zinc using EPA method 6020A Revision 1 (solids)
 - ▶ Cyanide using EPA method 9012A
 - ▶ Fluoride, nitrate, nitrite, and sulfate using EPA method 300.0
 - ▶ Combined radium-226/-228 using EPA method 9315 and 9320, respectively
 - ▶ pH using standard method 4500-H+B



Closure/Post-Closure Plan Gandy-Marley Landfarm/Landfill, NM1-19

Gandy-Marley is seeking an exception from the standards for landfarm vadose zone monitoring beneath all cells. Rather than comparing vadose zone monitoring results to practical quantitation limits or background concentrations, Gandy-Marley requests that the constituents and associated standards numerated in Table I be used instead, along with the constituents listed in Subsections A and B of Section 3103. Results will be compared to the most stringent residential, industrial/occupation, or construction NMED SSLs. Gandy-Marley is preparing to sample the vadose zone beneath all landfarm cells to support closure efforts. Soil samples will be collected from depths between 3 and 4 feet beneath the original ground surface and will be analyzed for the following constituents:

- Chloride using standard method 4500-Cl-B
- BTEX constituents using EPA method 8021B
- TPH including GRO, DRO, and MRO using EPA method 8015 modified
- Metals and other constituents listed in Subsections A and B of 20.6.2.3103 NMAC

◇

Figures 2 through 6 show sampling locations and grids for each of the areas to be characterized before backfilling and grading. Samples from each grid cell for field screening and laboratory sampling will be collected using a point-point composite sampling approach. Each composite sample will consist of soil collected from the base at the cell center and at the middle of each wall. Equal portions of soil by mass (e.g., 500 grams each) from the five locations will be combined and thoroughly homogenized to create a composite sample. Field screening will be performed on a portion of the composite sample. If field screening indicates that the soil meets cleanup criteria, a second portion will be submitted to the analytical laboratory for confirmation testing. Sampling results will be submitted to the OCD Environmental Bureau in Santa Fe, New Mexico.

Where confirmation samples meet standards, the areas will be backfilled and graded.

Gandy-Marley will collect at least four randomly selected samples from each landfarm cell semiannually for analysis of TPH, BTEX, and chloride per 19.15.36.15(E)(2) NMAC and every five years until landfarm cell closure is approved, per 19.15.36.15(E)(3) NMAC, for analysis of the constituents listed in Subsections A and B of Section 3103.



Closure/Post-Closure Plan Gandy-Marley Landfarm/Landfill, NM1-19

5. Schedule

Gandy-Marley will notify the OCD Environmental Bureau at least 60 days before the cessation of operations at the facility and provide a proposed schedule for closure, per 19.15.36.18(A) NMAC. OCD will notify Gandy-Marley within 60 days after the date of cessation of operations if modifications to this CPC plan are necessary; otherwise, Gandy-Marley may proceed with closure in accordance with this CPC plan once it is approved by OCD.

6. Financial Assurance Cost Estimate

A financial assurance cost estimate for site closure and post-closure monitoring and maintenance per 19.15.36.8.C.(9) NMAC is provided in Appendix D. It is a comprehensive estimate that includes a breakdown of all costs to implement the closure and post-closure activities described in Sections 2 and 3. It includes cost assumptions, material items and volumes, groundwater sampling, landfill leachate collection and disposal, cover inspections and maintenance, and annual reporting. The cost estimate also includes New Mexico gross receipts tax.

Upon OCD approval of the cost estimate, Gandy-Marley will secure financial assurance pursuant to 19.15.36.11.E NMAC and submit the appropriate documentation to OCD.

References

- Daniel B. Stephens & Associates, Inc. (DBS&A). 2019. *Work plan for characterization and remediation of State DU #001 Site*. Prepared for Buckeye Disposal, Inc. September 10, 2019.
- Gandy-Marley, Inc. (Gandy-Marley). 2026. *Minor permit modifications, Gandy-Marley, Inc. Permit NM1-19*. May 8, 2026.
- New Mexico Energy, Minerals, and Natural Resource Department (NMEMNRD). 2006. Letter from Roger C. Anderson to Bill Marley, Gandy-Marley, Inc. regarding New Mexico Oil Conservation Division Permit No. NM-01-0019 for the commercial surface waste management facility located in Sections 4, 5, 8, and 9 of Township 11 South, Range 31 East, NMPM, Chaves County, New Mexico. January 17, 2006.

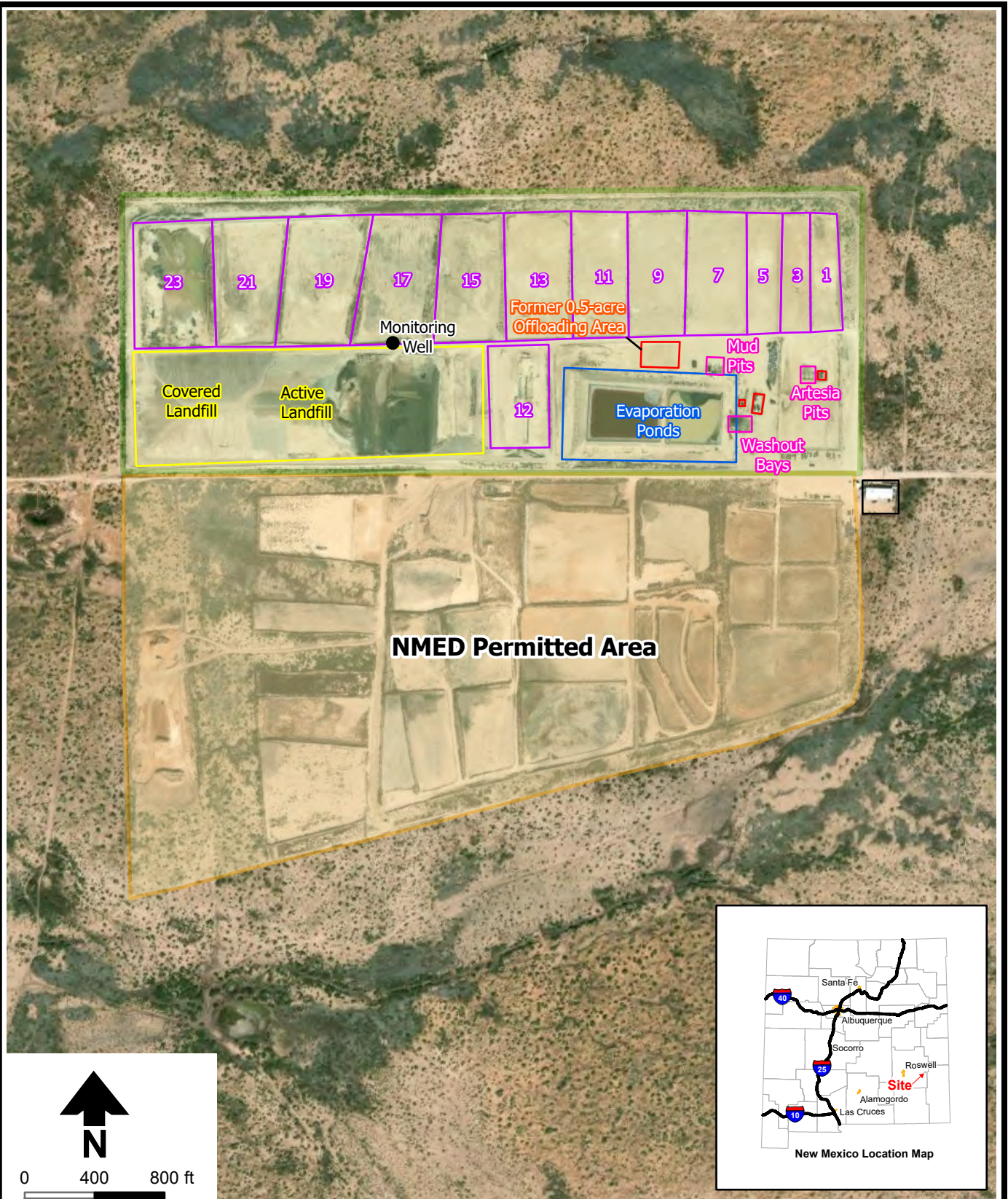


Closure/Post-Closure Plan
Gandy-Marley Landfarm/Landfill, NM1-19

New Mexico Environment Department (NMED). 2022. *NMED risk assessment guidance for site investigations and remediation, Volume I: Soil screening guidance for human health risk assessments*. November 2022

Figures

S:\PROJECTS\DB25.1357 GANDY-MARLEY LANDFARM\GIS\APR\X\GANDY-MARLEY LANDFARM\GANDY-MARLEY LANDFARM.APRX • FIG01 SITE LOCATION



Aerial Imagery: ESRI (February 26, 2026)

Explanation

- | | | |
|-----------------------|--------------------------|------------------------------------|
| ● Monitoring well | □ Ancillary facility | □ Landfill |
| □ OCD permitted area | □ Concrete bays | □ Office and waste collection area |
| □ NMED permitted area | □ Inactive landfarm cell | □ Pond |



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GANDY-MARLEY LANDFARM/LANDFILL Site Layout

Figure 1

LANDFARM/GSIPR/SOIL SAMPLING GRID - WASHOUT BAYS AND STORAGE TANKS



Aerial Imagery: ESRI (February 26, 2026)

- | | |
|--|--|
| ● AST sample location |  AST sample grid |
| ● Washout bay sample location |  Washout bay sample grid |
| ● Truck pullout area sample location |  Truck pullout area sample grid |
| ● Cement tank bottoms stabilization trough sample location |  Cement tank bottoms stabilization trough sample grid |



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GANDY-MARLEY LANDFARM/LANDFILL

Soil Sampling Grids and Locations

Washout Bay and ASTs

Figure 2

S:\PROJECTS\DB25.1357 GANDY-MARLEY LANDFARM\GIS\APR\X\GANDY-MARLEY LANDFARM\GANDY-MARLEY LANDFARM\APR\X\FIG03 SOIL SAMPLING GRID-ARTESIA PITS



Aerial Imagery: ESRI (February 26, 2026)

Explanation

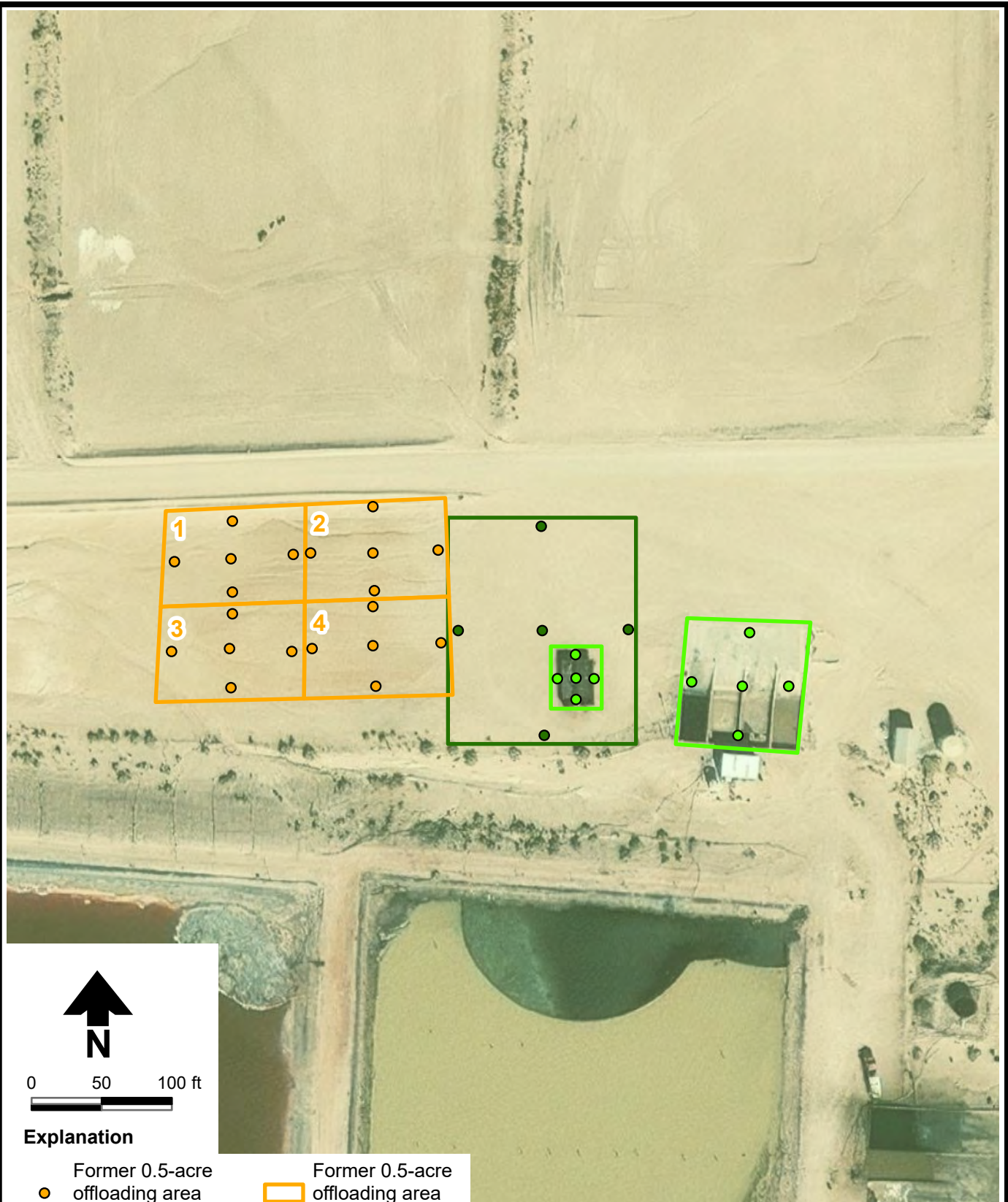
- | | |
|---|---|
|  Artesia pit sample location |  Artesia pit sample grid |
|  AST sample location |  AST sample grid |



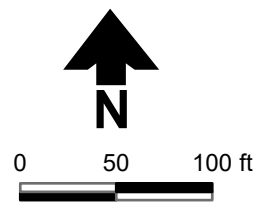
**GANDY-MARLEY LANDFARM/LANDFILL
Soil Sampling Grids and Locations
Artesia Pits**

Figure 3

S:\PROJECTS\DB25.1357 GANDY-MARLEY LANDFARM\GIS\APR\X\GANDY-MARLEY LANDFARM\GANDY-MARLEY LANDFARM-APRX • FIG04 SOIL SAMPLING GRID - MUD PITS



Aerial Imagery: ESRI (February 26, 2026)

**Explanation**

- | | |
|---|---|
| ● Former 0.5-acre offloading area sample location | ■ Former 0.5-acre offloading area sample grid |
| ● Mud pits/frack tank sample location | ■ Mud pits/frack tank sample grid |
| ● Historical 0.3-acre offloading area sample location | ■ Historical 0.3-acre offloading area sample grid |



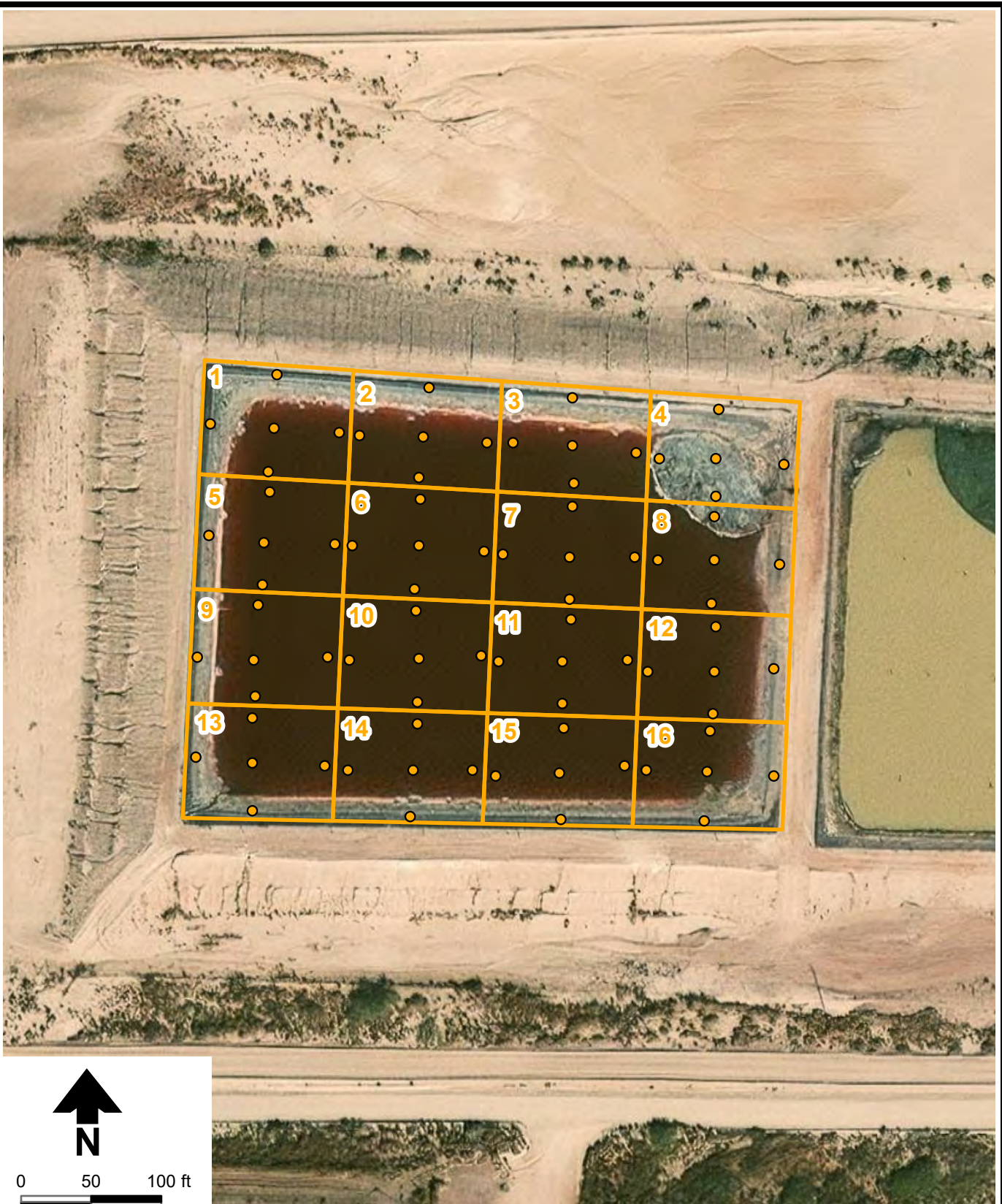
7/14/2026

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GANDY-MARLEY LANDFARM/LANDFILL
Soil Sampling Grids and Locations
Mud Pits and Former 0.5-acre Offloading Area

Figure 4

S:\PROJECTS\DB25.1357 GANDY-MARLEY LANDFARM\GIS\APR\X\GANDY-MARLEY LANDFARM\GANDY-MARLEY LANDFARM\APR\X\FIG05 SOIL SAMPLING GRID - WEST POND



Aerial Imagery: ESRI (February 26, 2026)

Explanation

- West evaporation pond sample location
- West evaporation pond sample grid



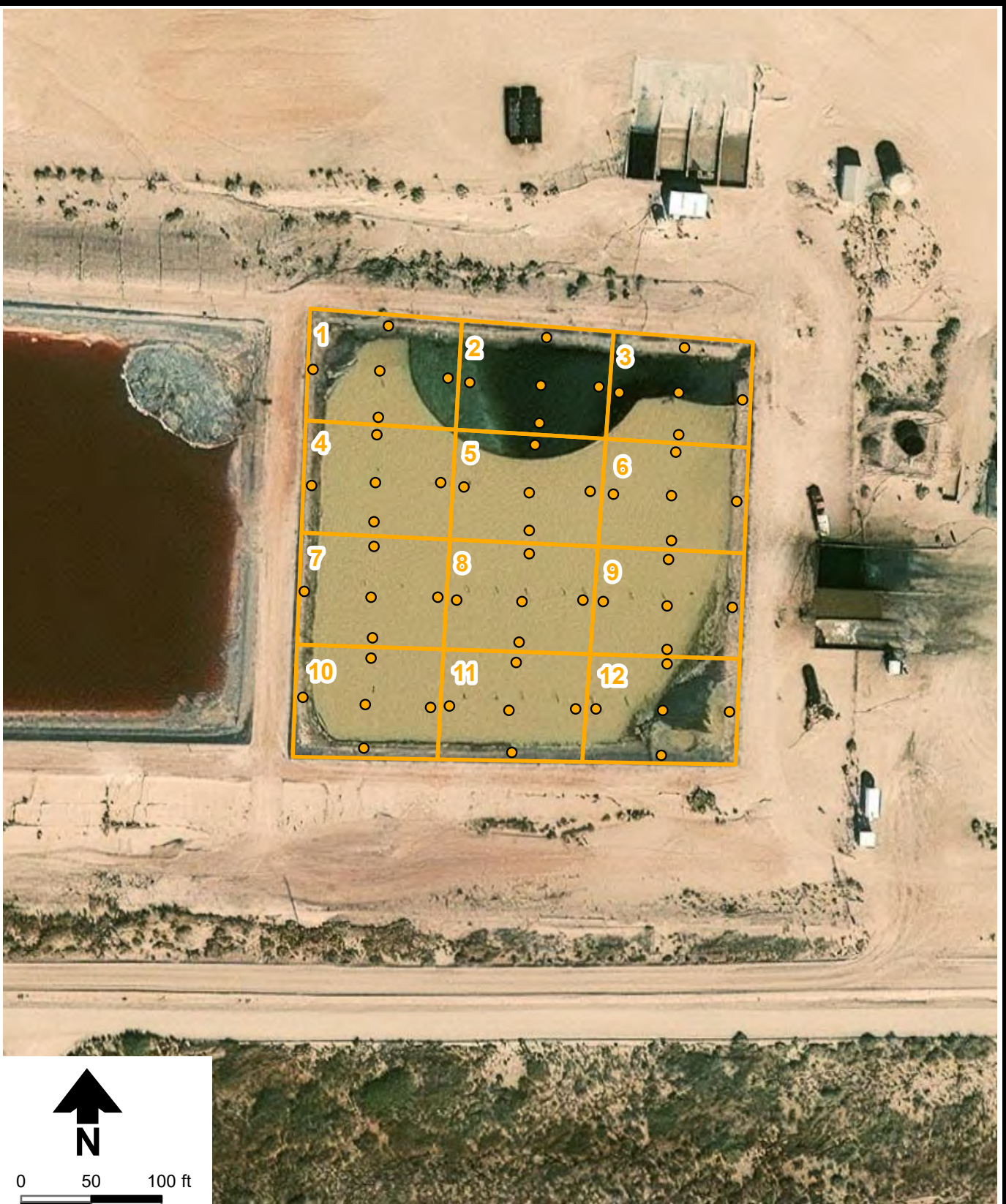
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GANDY-MARLEY LANDFARM/LANDFILL
Soil Sampling Grid and Locations
West Evaporation Pond

Figure 5

S:\PROJECTS\DB25.1357 GANDY-MARLEY LANDFARM\GIS\APR\X\GANDY-MARLEY LANDFARM\GANDY-MARLEY LANDFARM\APR\X\FIG06 SOIL SAMPLING GRID - EAST POND



Aerial Imagery: ESRI (February 26, 2026)

Explanation

- East evaporation pond sample location
- East evaporation pond sample grid



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GANDY-MARLEY LANDFARM/LANDFILL Soil Sampling Grid and Locations East Evaporation Pond

Figure 6

Tables



Closure/Post-Closure Plan
Gandy-Marley Landfarm/Landfill, NM1-19

Table 1. Treatment Zone Composite Soil Sample Results, October 2025

Landfarm Cell	Treatment Zone Composite Soil Sample Results (mg/kg)				
	Chloride	Benzene	Total BTEX	Sum of GRO and DRO	TPH
<i>Standard^a</i>	<i>1,000</i>	<i>0.2</i>	<i>50</i>	<i>500</i>	<i>2,500</i>
1	3,220	ND	ND	ND	ND
2	5,710	ND	ND	250	250
3	4,550	ND	ND	ND	ND
5	5,360	ND	ND	52	52
7	5,890	ND	ND	34	34
9	5,450	ND	ND	410	410
11	5,810	ND	ND	723	723
12	3,820	ND	ND	ND	54
13	6,370	ND	ND	333	333
15	5,170	ND	ND	271	271
17	6,000	ND	ND	26	26
19	5,560	ND	ND	11	11
21	947	ND	ND	ND	28
23	6,870	ND	ND	93	93

Bold indicates that value exceeds the standard.

^a 19.15.36.15 NMAC Subsection F performance standard

mg/kg = Milligrams per kilogram

BTEX = Benzene, toluene, ethylbenzene, and total xylenes

GRO = Gasoline-range organics

DRO = Diesel-range organics

TPH = Total petroleum hydrocarbons

ND = Not detected

July 17, 2026

DB25.1357 | T01_Treatment Zone Rslts.docx



Closure/Post-Closure Plan
Gandy-Marley Landfarm/Landfill, NM1-19

Table 2. Vadose Zone Soil Sample Results, October 2025

Landfarm Cell	Vadose Zone Soil Sample Results (mg/kg)				
	Chloride	Benzene	Total BTEX	Sum of GRO and DRO	TPH
<i>Standard</i> ^a	<i>20,000</i>	<i>10.0</i>	<i>50</i>	<i>1,000</i>	<i>2,500</i>
7	493	ND	ND	199	199
12	4,320	ND	ND	ND	ND
15	4,140	ND	ND	ND	ND
21	1,140	ND	ND	ND	ND

Bold indicates that value exceeds the standard.

^a 19.15.29 NMAC Table I closure standard

mg/kg = Milligrams per kilogram

BTEX = Benzene, toluene, ethylbenzene, and total xylenes

GRO = Gasoline-range organics

DRO = Diesel-range organics

TPH = Total petroleum hydrocarbons

ND = Not detected

July 17, 2026

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Appendix A

Site Final Grading Plan

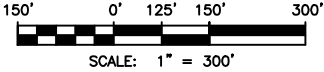


LEGEND

- PROPOSED 10 FT CONTOUR
- PROPOSED 2 FT CONTOUR
- EXISTING 10 FT CONTOUR
- EXISTING 2 FT CONTOUR
- 4510 ELEVATION LABEL
- LIMITS OF GRADING

KEY NOTES:

- 1 LIMITS OF GRADING
- 2 ULTIMATE COVER PLAN FOR COMPLETE BUILDOUT SHOWN ON SHEET 6, APPENDIX B (ULTIMATE COVER PLAN & CROSS SECTION), CONTOURS SHOWN FOR INTERIM GRADING.
- 3 PHASE 1 EXTENT, INTERMEDIATE COVER AND GRADING PLAN SHOWN ON SHEET 5, APPENDIX B (FILLING PLAN & CROSS SECTIONS, PHASE 2)
- 4 ACTIVE LANDFILL AREA



ISSUED FOR REVIEW

REV. NO.	DATE	DESCRIPTION	APPROVED BY

DATE OF ISSUE: 11/14/2025
DESIGNED BY: KH
DRAWN BY: RG
CHECKED BY: MO
APPROVED BY: JH



GANDY -MARLEY INC.

GANDY-MARLEY LANDFARM

GRADING PLAN

SHEET : 1 OF 1
DWG NO. : C-1

JOB NO.
DB25.1357

Appendix B

Landfill Design Drawings



SITE MAP
NTS

GANDY-MARLEY, INC. LANDFILL LINING AND LEAK DETECTION SYSTEM

CHAVES COUNTY, NEW MEXICO

REVISION

1	G-0	COVER SHEET & INDEX
2	G-1	EXISTING CONDITIONS

1
1

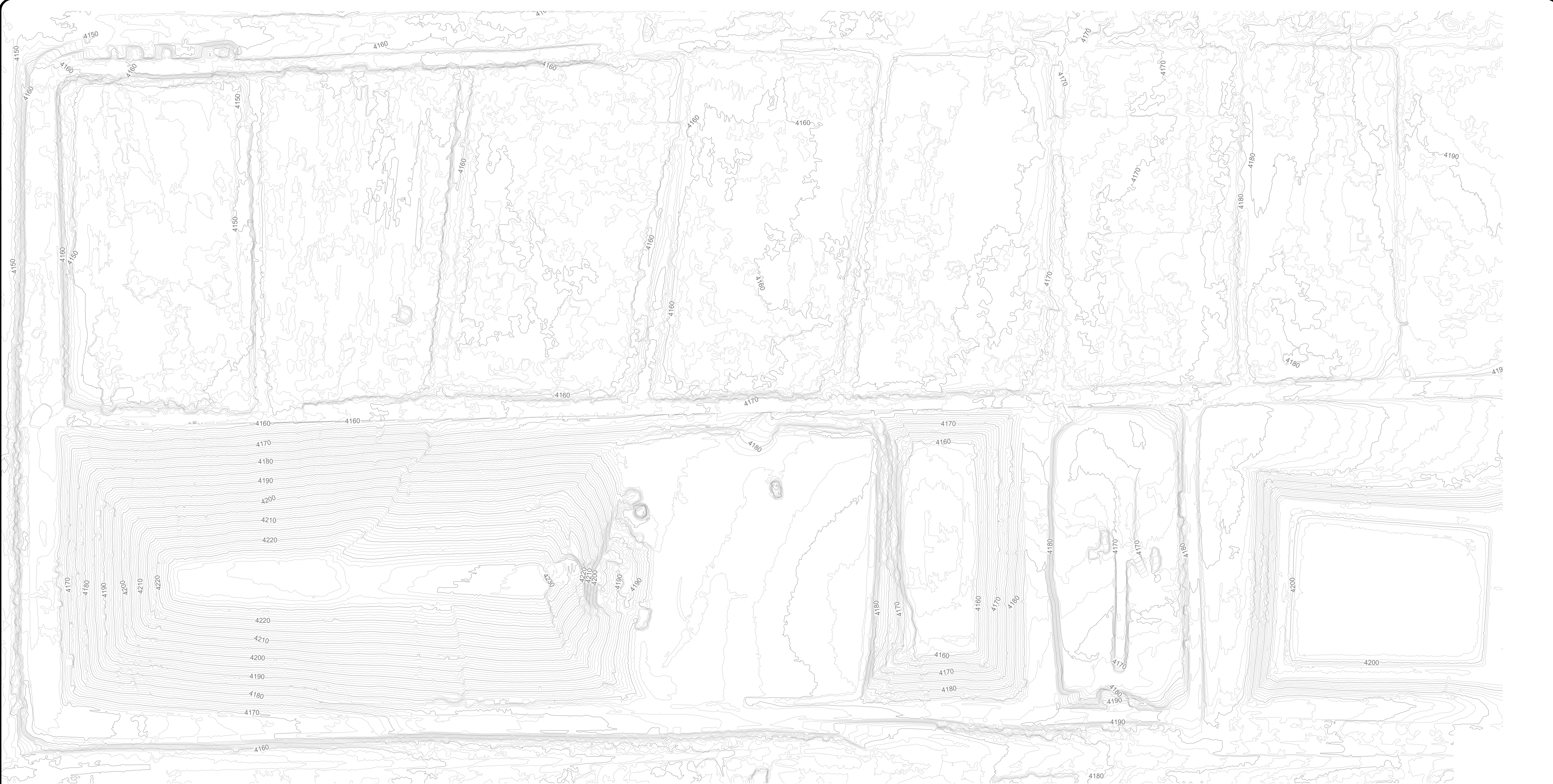
3	C-1	NORTHERN LANDFILL SUBGRADE
4	C-10	LINER DETAILS
5	C-11	TOE OF SLOPE DETAILS
6	C-12	TYPICAL DETAILS

1
1
1
1

MWH DWG 1	COVER SHEET
MWH DWG 2	EXISTING CONDITIONS
MWH DWG 3	ULTIMATE EXCAVATION PLAN AND SECTIONS
MWH DWG 4	ULTIMATE EXCAVATION PLAN AND SECTIONS
MWH DWG 5	WASTE FILLING PLAN AND X-SECTIONS PHASE 2
MWH DWG 6	WASTE FILLING PLAN AND X-SECTIONS PHASE 2
MWH DWG 7	ULTIMATE COVER PLAN AND X-SECTIONS
MWH DWG 8	ULTIMATE COVER PLAN AND X-SECTIONS
MWH DWG 9	TYPICAL DETAILS

REV. NO.	DATE	DESCRIPTION	APPROVED BY	DATE OF ISSUE: 09/02/2026	 	 800-933-3105 www.dbstephens.com	GANDY-MARLEY, INC. CHAVES COUNTY, NEW MEXICO	MINOR PERMIT MODIFICATION DOUBLE LINING OF NEW LANDFILL CELLS	SHEET 1 OF 6 DWG NO. G-0
1	09/02/26	RESPONSE TO NMED COMMENTS	NCN	DESIGNED BY: REM/NCN					
				DRAWN BY: REM					
				CHECKED BY: JA					
				APPROVED BY: NCN					

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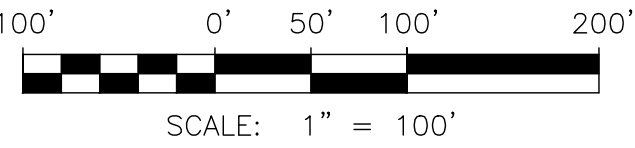


LEGEND

- 4160 EXISTING 10' CONTOUR⁽¹⁾
- 4160 EXISTING 2' CONTOUR⁽¹⁾

NOTES:

- EXISTING TOPOGRAPHY BASED ON AERIAL SURVEYS COMPLETED ON APRIL 14, 2026 AND JUNE 25, 2026 BY ATKINS ENGINEERING ASSOCIATES.



REV. NO.	DATE	DESCRIPTION	APPROVED BY
1	09/02/26	RESPONSE TO NMED COMMENTS	NCN

DATE OF ISSUE:	09/02/2026
DESIGNED BY:	REM/NCN
DRAWN BY:	REM
CHECKED BY:	JA
APPROVED BY:	NCN





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GANDY-MARLEY, INC.
CHAVES COUNTY, NEW MEXICO

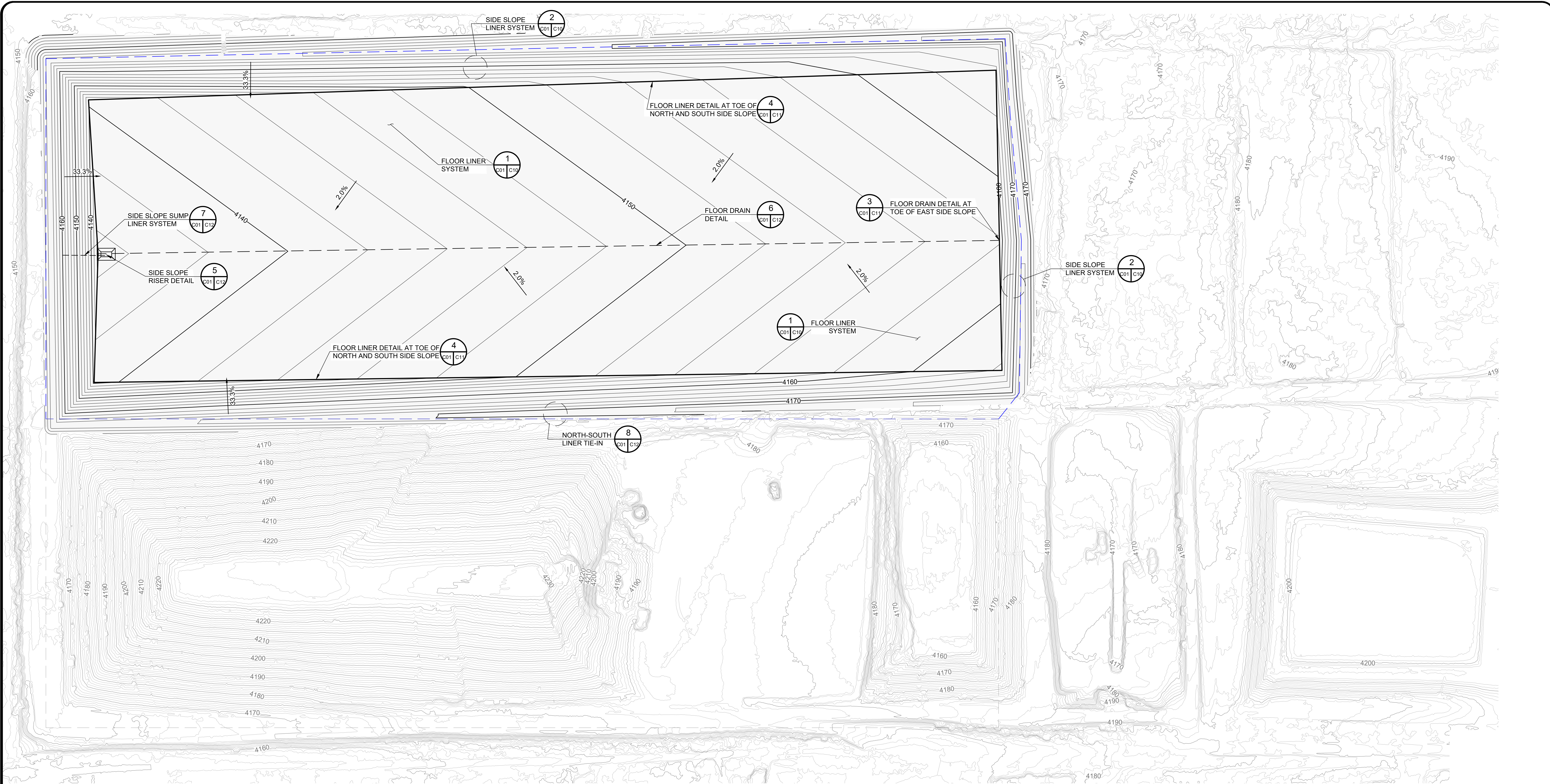
MINOR PERMIT MODIFICATION
DOUBLE LINING OF NEW
LANDFILL CELLS

EXISTING TOPOGRAPHY

SHEET 2 OF 6
DWG NO. G-1

JOB NO.
DB25.1357

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LEGEND

- EXISTING 10' CONTOUR⁽¹⁾
- EXISTING 2' CONTOUR⁽¹⁾
- PROPOSED 10' CONTOUR
- PROPOSED 2' CONTOUR
- SUBGRADE FLOOR
- FLOOR DRAIN

NOTES:

- EXISTING TOPOGRAPHY BASED ON AERIAL SURVEYS COMPLETED ON APRIL 14, 2026 AND JUNE 25, 2026 BY ATKINS ENGINEERING ASSOCIATES.

REV. NO.	DATE	DESCRIPTION	APPROVED BY
1	09/02/26	RESPONSE TO NMED COMMENTS	NCN

DATE OF ISSUE:	09/02/2026
DESIGNED BY:	REM/NCN
DRAWN BY:	REM
CHECKED BY:	JA
APPROVED BY:	NCN



GANDY-MARLEY, INC.
CHAVES COUNTY, NEW MEXICO

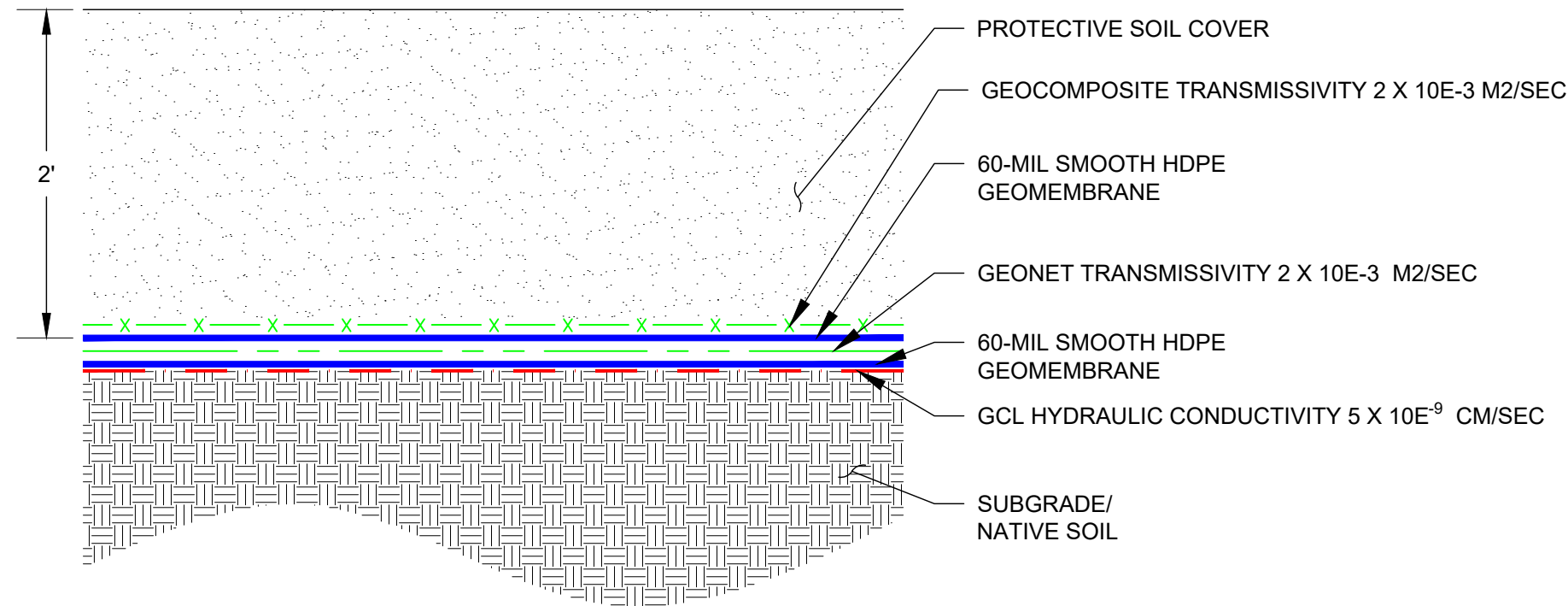
MINOR PERMIT MODIFICATION
DOUBLE LINING OF NEW
LANDFILL CELLS

NORTH LANDFILL SUBGRADE

SHEET 3 OF 6
DWG NO. C-1

JOB NO.
DB25.1357

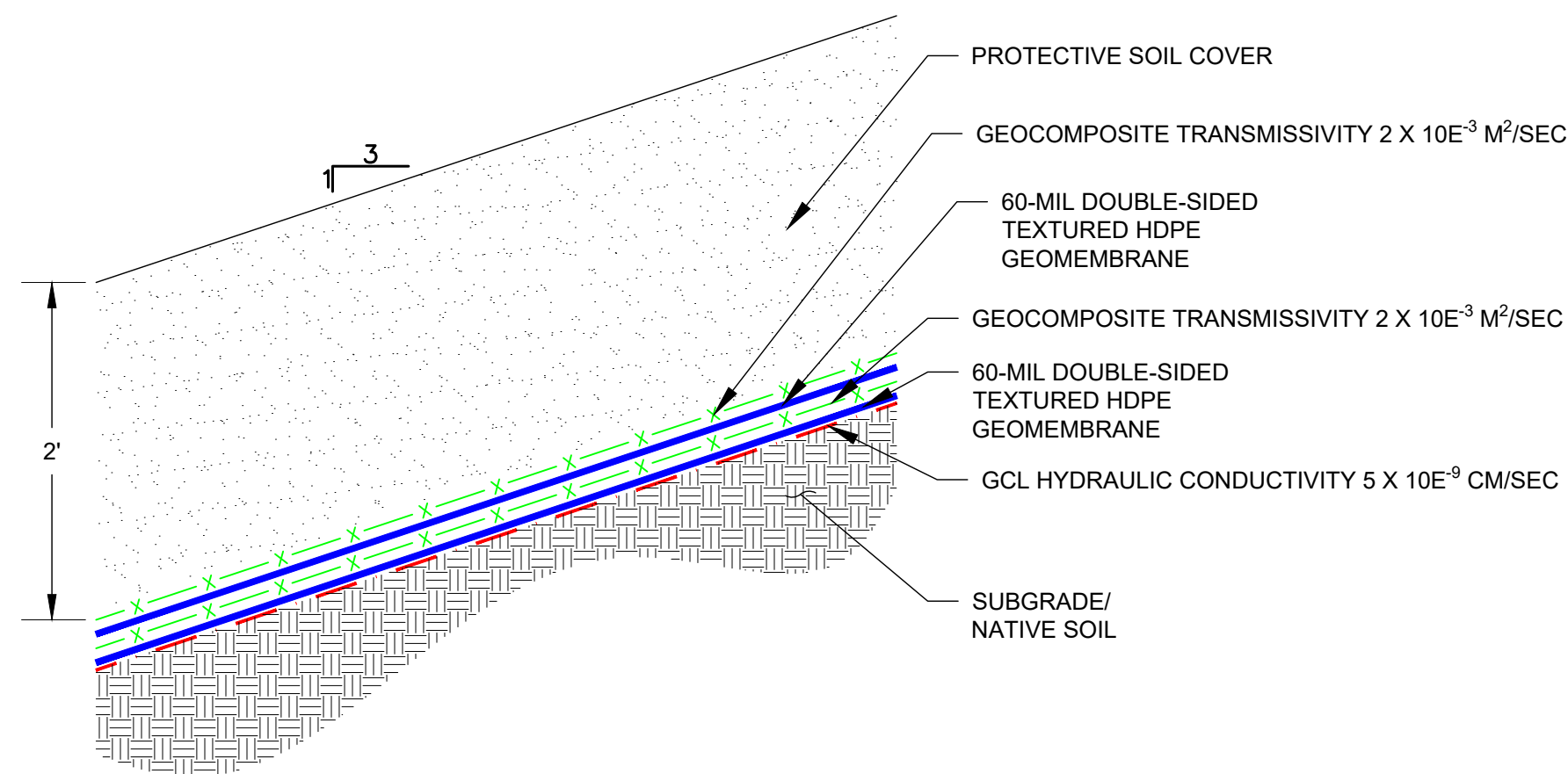
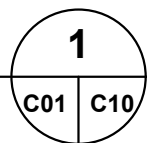
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FLOOR LINER SYSTEM

DETAIL

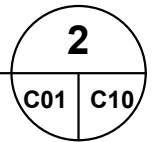
NTS



SIDE SLOPE LINER SYSTEM

DETAIL

NTS



REV. NO.	DATE	DESCRIPTION	APPROVED BY
1	09/02/26	RESPONSE TO NMED COMMENTS	NCN

DATE OF ISSUE: 09/02/2026
DESIGNED BY: REM/NCN
DRAWN BY: REM
CHECKED BY: JA
APPROVED BY: NCN





DBS&A
a Geo-Logic Company
800-933-3105
www.dbstephens.com

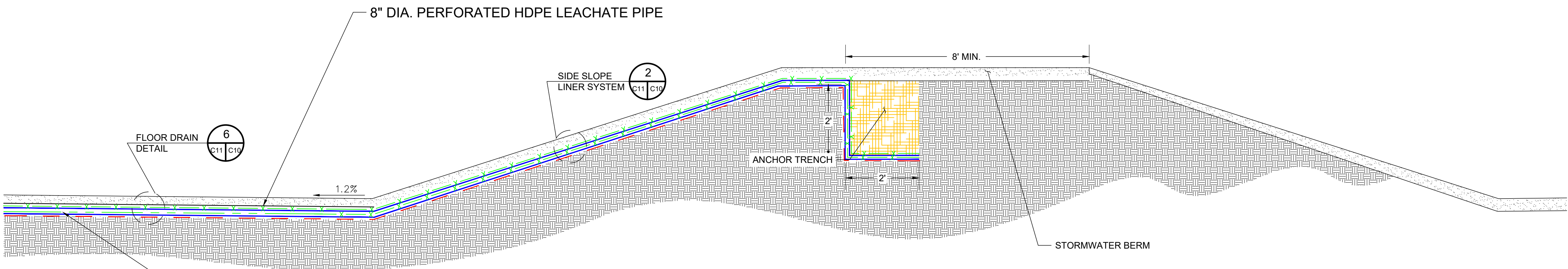
GANDY-MARLEY, INC.
CHAVES COUNTY, NEW MEXICO

MINOR PERMIT MODIFICATION
DOUBLE LINING OF NEW
LANDFILL CELLS

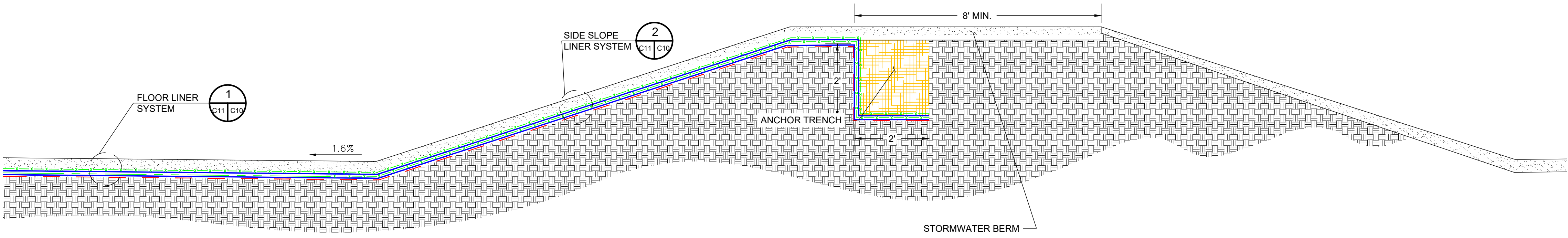
LINER DETAILS

SHEET 4 OF 6
DWG NO. C-10

JOB NO.
DB25.1357



FLOOR DRAIN DETAIL AT
TOE OF EAST SIDE SLOPE
DETAIL
N.T.S. (3)



FLOOR LINER DETAIL AT TOE OF
NORTH SIDE SLOPE
DETAIL
N.T.S. (4)

Z:\1\NM\TX\PROJECTS\025\1357_GANDY-MARLEY_LANDFARM\CAD\WORKING\LINER DETAILS.DWG September 2, 2026 - 2:14 PM BY: GLA-USER
Z:\1\NM\TX\PROJECTS\025\1357_GANDY-MARLEY_LANDFARM\CAD\WORKING\LINER DETAILS.DWG September 2, 2026 - 2:14 PM BY: GLA-USER

REV. NO.	DATE	DESCRIPTION	APPROVED BY
1	09/02/26	RESPONSE TO NMED COMMENTS	NCN

DATE OF ISSUE: 09/02/2026
DESIGNED BY: REM/NCN
DRAWN BY: REM
CHECKED BY: JA
APPROVED BY: NCN



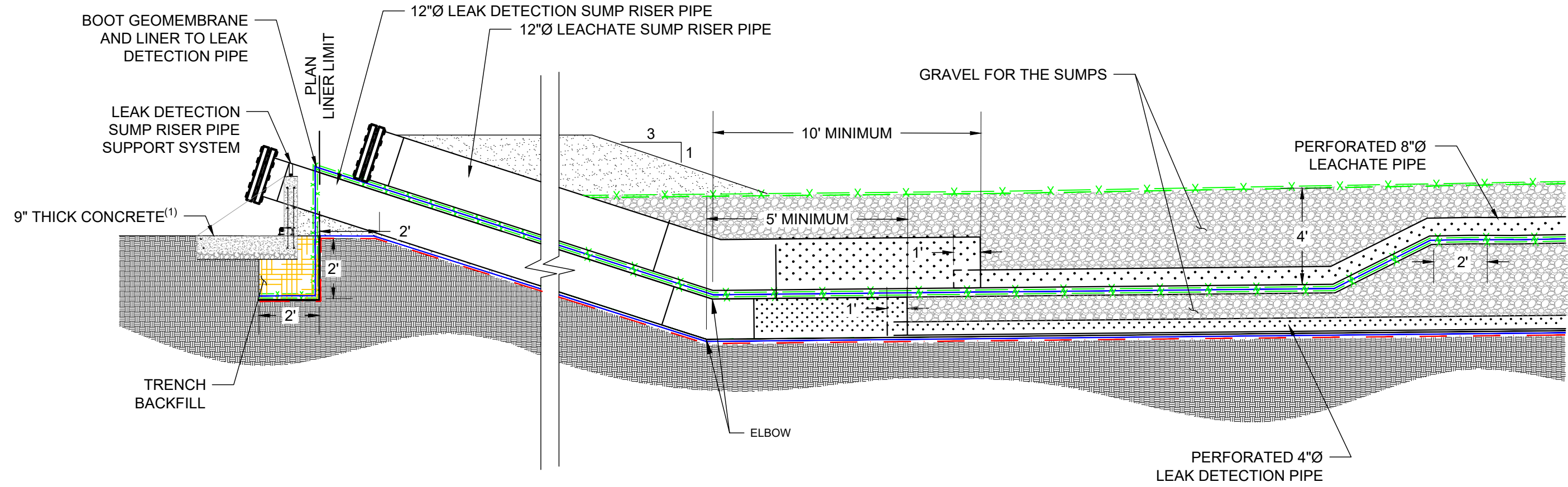
GANDY-MARLEY, INC.
CHAVES COUNTY, NEW MEXICO

MINOR PERMIT MODIFICATION
DOUBLE LINING OF NEW
LANDFILL CELLS

TOE OF SLOPE DETAILS

SHEET 5 OF 6
DWG NO. C-11

JOB NO.
DB25.1357



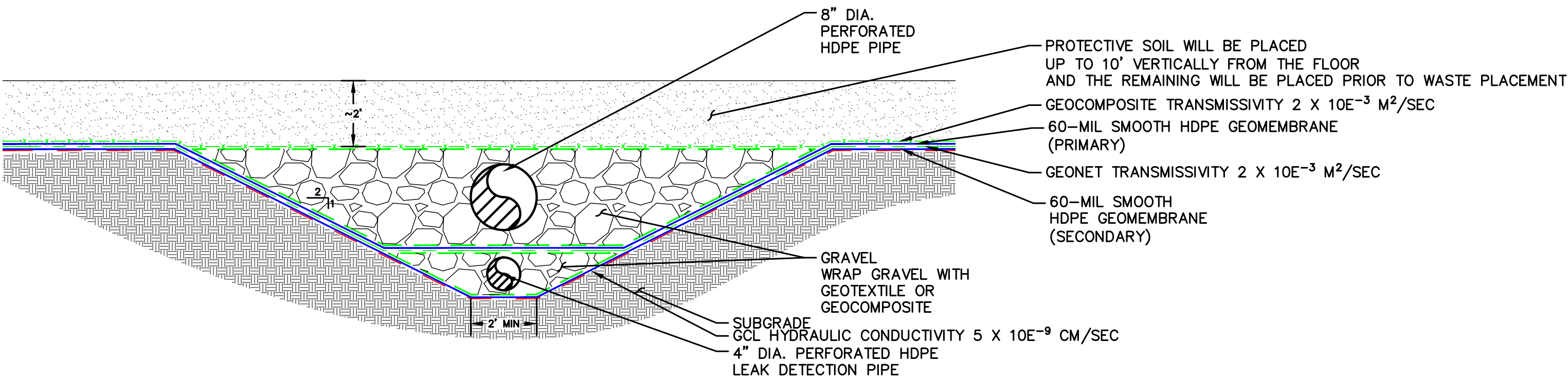
SIDE SLOPE RISER DETAIL

DETAIL

5

N.T.S

C01 C12



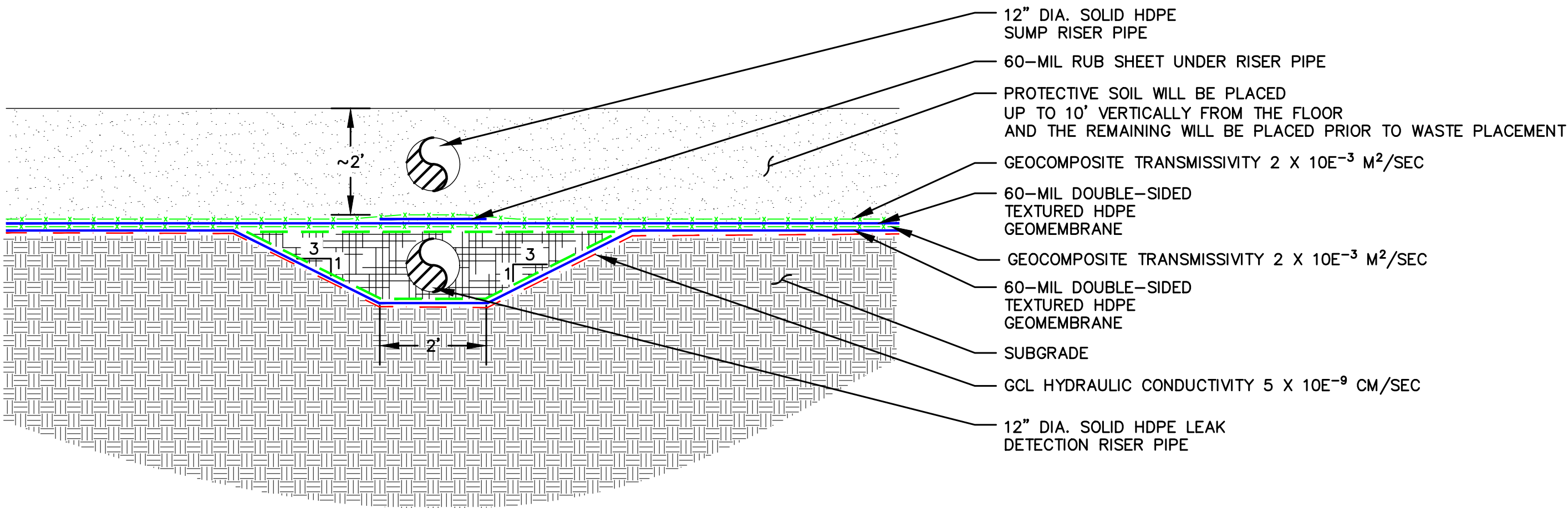
FLOOR DRAIN DETAIL

DETAIL

6

N.T.S

C01 C12



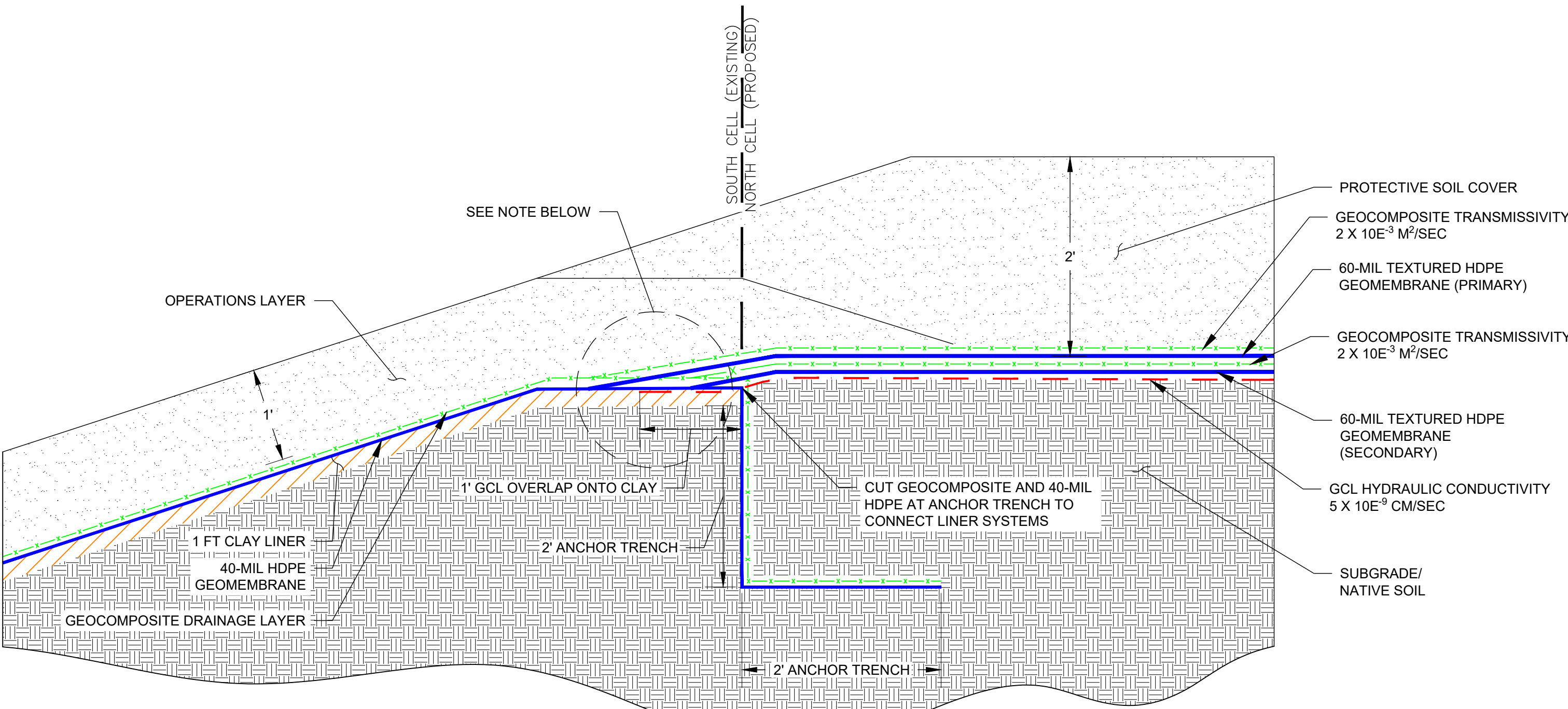
SIDE SLOPE SUMP LINER SYSTEM

DETAIL

7

N.T.S

C01 C12



NORTH TO SOUTH LINER TIE-IN DETAIL

DETAIL

8

N.T.S

C01 C12

- NOTES FOR DETAIL 8:
1. EXPOSE SOUTH LINER AT TOP SLOPE ANCHOR TRENCH.
 2. CUT GEOCOMPOSITE AND 40-MIL MIL HDPE TO EXPOSE UNDERLYING CLAY LINER.
 3. OVERLAP NEW GCL FROM THE NORTH CELL AT LEAST 1 FOOT OVER CLAY LINER AND UNDER 40-MIL HDPE OF SOUTH CELL.
 4. PLACE AND WELD SECONDARY 60-MIL HDPE FROM NORTH CELL TO 40-MIL HDPE OF SOUTH CELL.
 5. PLACE GEOCOMPOSITE OVER SECONDARY 60-MIL HDPE FROM NORTH CELL.
 6. PLACE PRIMARY 60-MIL HDPE OVER GEOCOMPOSITE, THEN WELD TO 40-MIL HDPE OF THE SOUTH CELL.
 7. PLACE GEOCOMPOSITE OVER PRIMARY 60-MIL HDPE TIE-IN WITH SOUTH CELL.

REV. NO.	DATE	DESCRIPTION	APPROVED BY
1	09/02/26	RESPONSE TO NMED COMMENTS	NCN

DATE OF ISSUE:	09/02/2026
DESIGNED BY:	REM/NCN
DRAWN BY:	REM
CHECKED BY:	JA
APPROVED BY:	NCN



GANDY-MARLEY, INC.
CHAVES COUNTY, NEW MEXICO

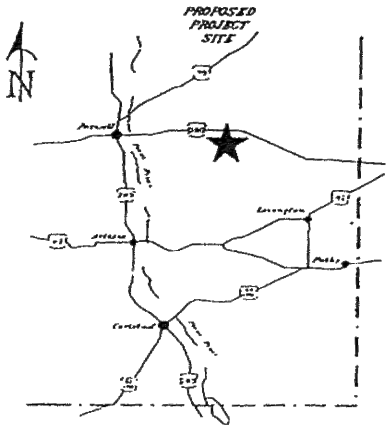
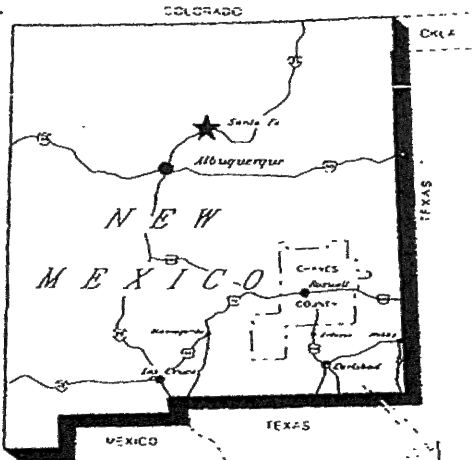
MINOR PERMIT MODIFICATION
DOUBLE LINING OF NEW
LANDFILL CELLS
TYPICAL DETAILS

SHEET 6 OF 6
DWG NO. C-12
JOB NO.
DB25.1357

GANDY MARLEY, INC. COMMERCIAL SURFACE WASTE MANAGEMENT FACILITY
CHAVES COUNTY, NEW MEXICO

SEPTEMBER 2005
DRAFT - REV A

NOT FOR CONSTRUCTION -
FOR PERMITTING PURPOSES ONLY



LIST OF DRAWINGS

DRAWING NO.	DRAWING TITLE
1	COVER SHEET
2	EXISTING CONDITIONS
3	ULTIMATE EXCAVATION PLAN AND CROSS-SECTIONS (2 SHEETS)
4	WASTE FILLING PLAN AND CROSS-SECTIONS - PHASE 1 (2 SHEETS)
5	WASTE FILLING PLAN AND CROSS-SECTIONS- PHASE 2 (2 SHEETS)
6	ULTIMATE CLOSURE PLAN AND CROSS-SECTIONS (2 SHEETS)
7	TYPICAL DETAILS

NOTES

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2. This sheet provided for information only and it pertains to the south cell only.
3. New detail callouts included for North Cell. See DBS&A drawing set.

Prepared For:



Gandy Marley, Inc.
P.O. Box 827
1109 East Broadway
Tatum, New Mexico 88267

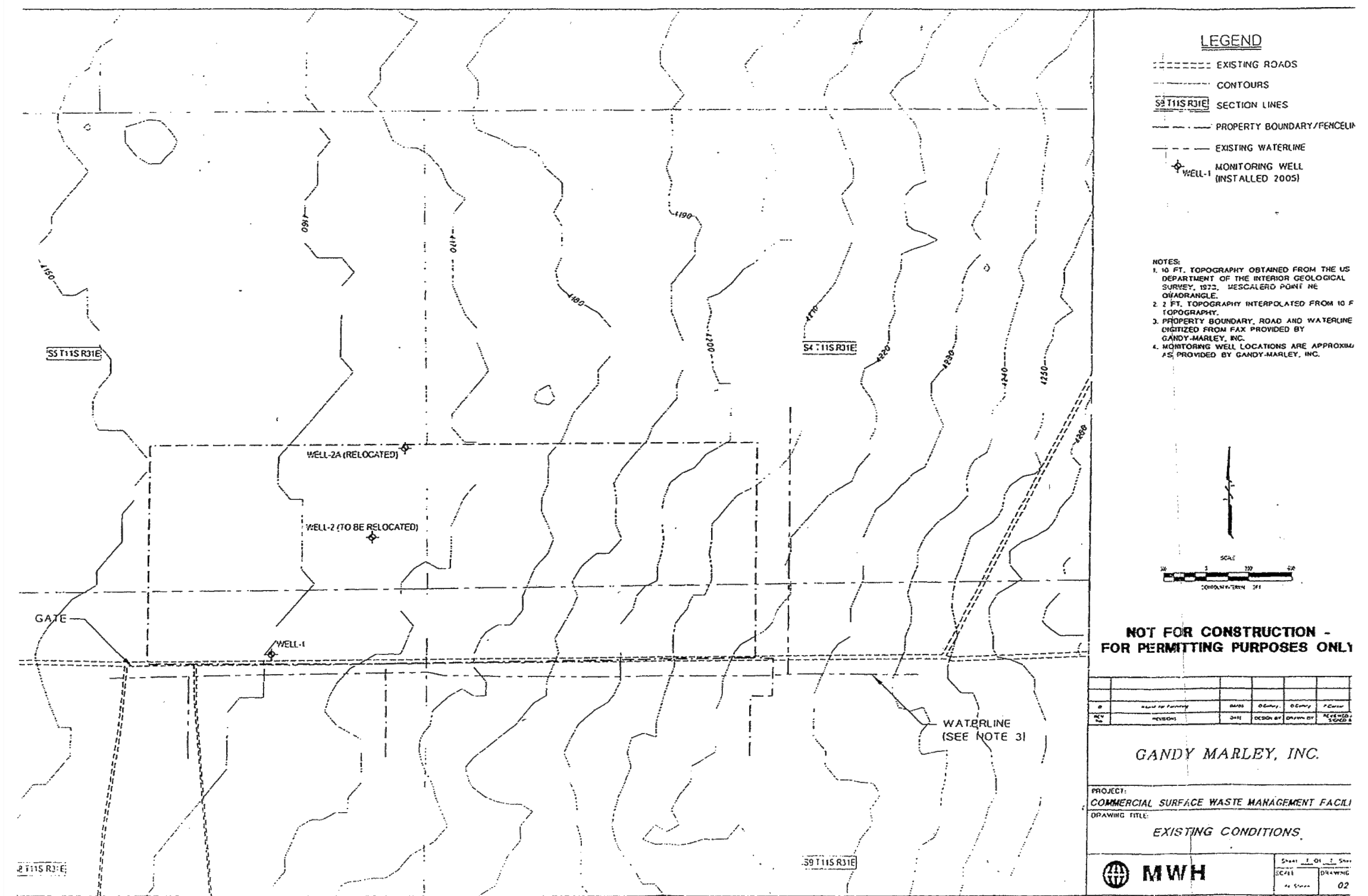
Prepared By:



MWH

1475 Pine Grove Road
P.O. Box 774018
Steamboat Springs, Colorado 80477

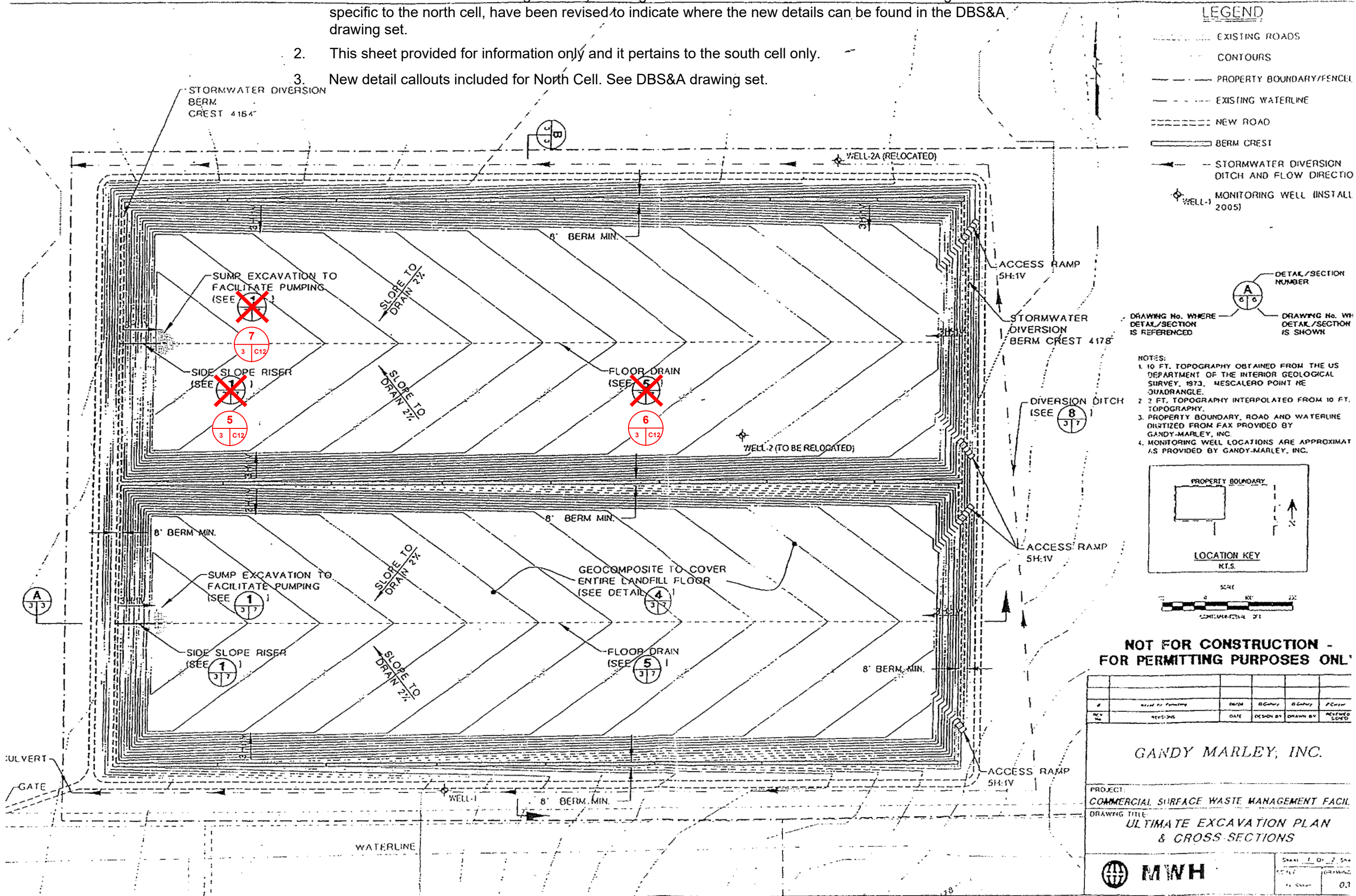
MWH DRWG. #1
Sheet 1 of 1

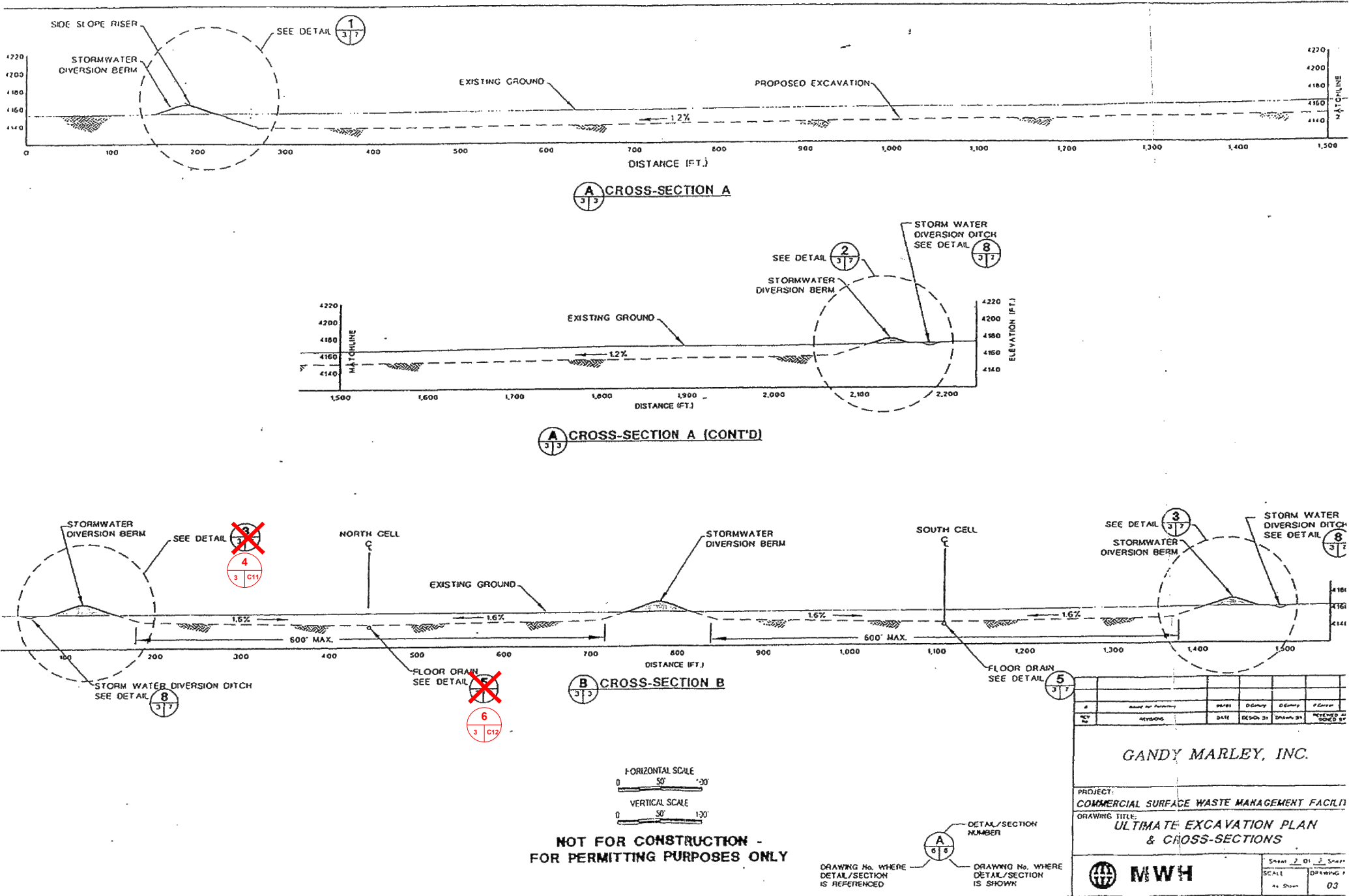


- NOTES**
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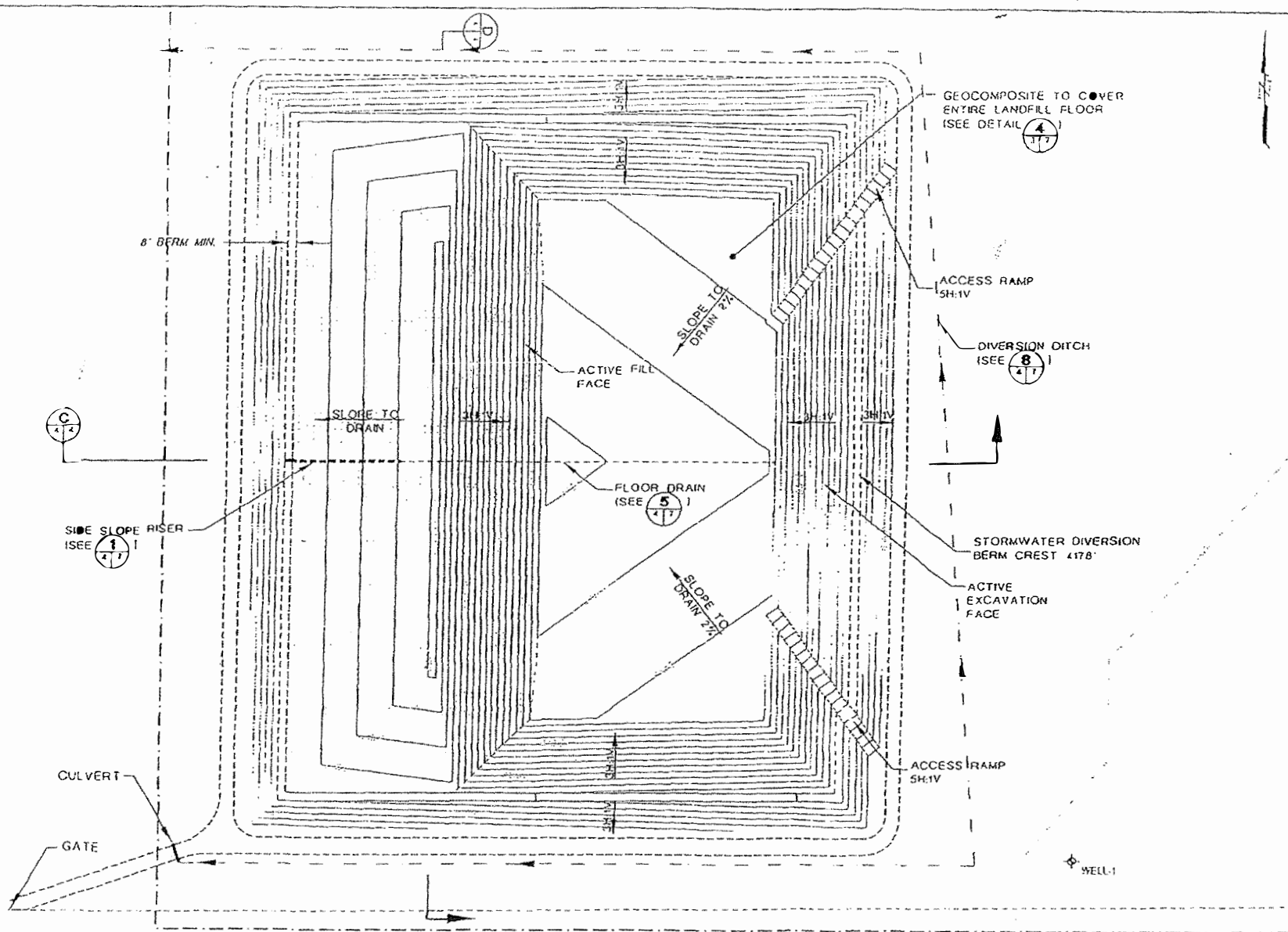
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MWH DRWG. # 3
SHEET 2 OF 2

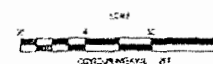
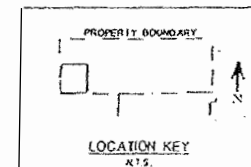


LEGEND

- EXISTING ROADS
- CONTOURS
- PROPERTY BOUNDARY/FENCE
- NEW ROAD
- BERM CREST
- COVER
- STORMWATER DIVERSION DITCH AND FLOW DIRECTION
- MONITORING WELL (INSTALLED 2005)
- DETAIL/SECTION NUMBER
- DRAWING NO. WHERE DETAIL/SECTION IS REFERENCED
- DRAWING NO. WHERE DETAIL/SECTION IS SHOWN

NOTES:

1. 10 FT. TOPOGRAPHY OBTAINED FROM THE U.S. DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY, 1973, MESCALERO POINT NE QUADRANGLE.
2. 2 FT. TOPOGRAPHY INTERPOLATED FROM 10 FT. TOPOGRAPHY.
3. PROPERTY BOUNDARY, ROAD AND WATERLINE DIGITIZED FROM FAX PROVIDED BY GANDY-MARLEY, INC.
4. MONITORING WELL LOCATIONS ARE APPROXIMATE AS PROVIDED BY GANDY-MARLEY, INC.
5. COVER SHALL BE CONSTRUCTED TO FORM A SLOPE OF 3:20X AFTER CONSOLIDATION 6% GRADE SHOWN.



**NOT FOR CONSTRUCTION -
FOR PERMITTING PURPOSES ONLY**

#	Revised for Permitting	Revised	Revised	Revised	Revised
REV	DATE	REVISION	BY	CHKD BY	APPROVED AND SIGNED BY

GANDY MARLEY, INC.

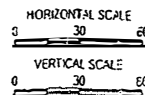
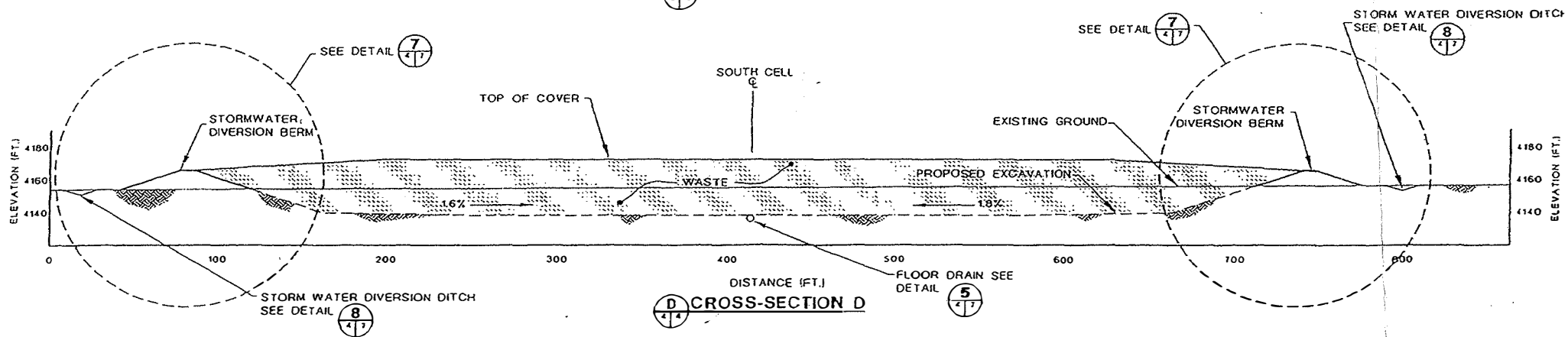
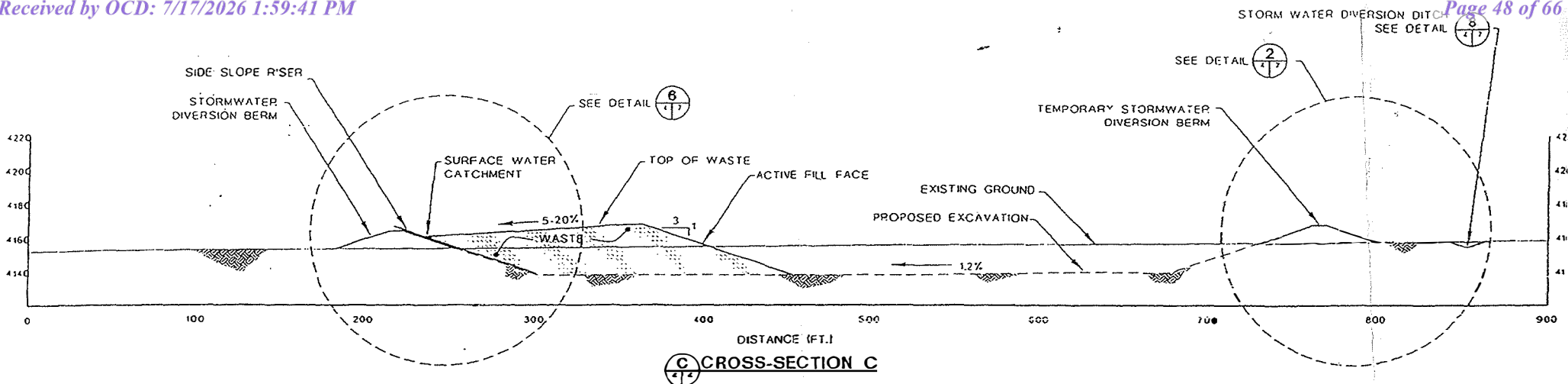
PROJECT:
COMMERCIAL SURFACE WASTE MANAGEMENT FACILITY
DRAWING TITLE:
WASTE FILLING PLAN & CROSS-SECTIONS
PHASE 1



MWH DRWG. #4

Sheet 1 of 2

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4. Use this sheet for the South Cell liner system and for the final cover detail for the entire cap (North + South).



**NOT FOR CONSTRUCTION -
FOR PERMITTING PURPOSES ONLY**

NOTE:
COVER SHALL BE CONSTRUCTED TO FORM A SLOPE
OF 5.20% AFTER CONSOLIDATION 5% GRADE
SHOWN.

DETAIL/SECTION
NUMBER
A
016

DRAWING No. WHERE
DETAIL/SECTION
IS REFERENCED

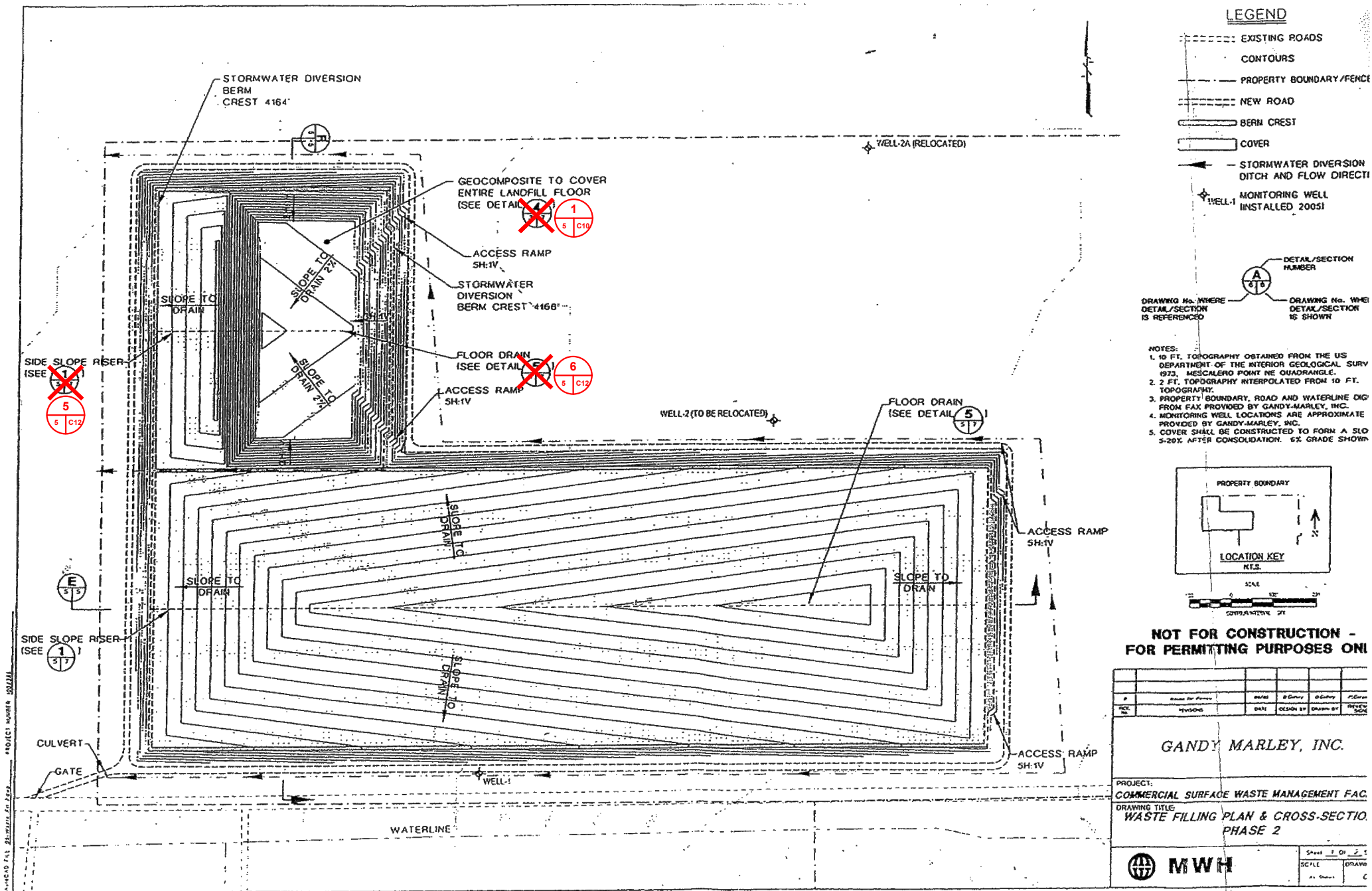
DRAWING No. WHERE
DETAIL/SECTION
IS SHOWN

PROJECT:	COMMERCIAL SURFACE WASTE MANAGEMENT FAC			
DRAWING TITLE:	WASTE FILLING PLAN & CROSS-SECTION PHASE 1			
GANDY MARLEY, INC.		MWH		DATE: 07/17/2026
PROJECT: 2.01.2		SCALE: 1" = 30'		DATE: 07/17/2026

- These MWH drawings are included herein as reference to show the north and south cells and details. DBS&A includes them to show a complete set and none of the south cell drawings and details are changed and they remain as presented in the permit. The drawings and details for the north cell have been updated and are included in the DBS&A drawing set. Any drawings and details included with these MWH drawings that are specific to the north cell, have been revised to indicate where the new details can be found in the DBS&A drawing set.
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MWH DRWG. #4

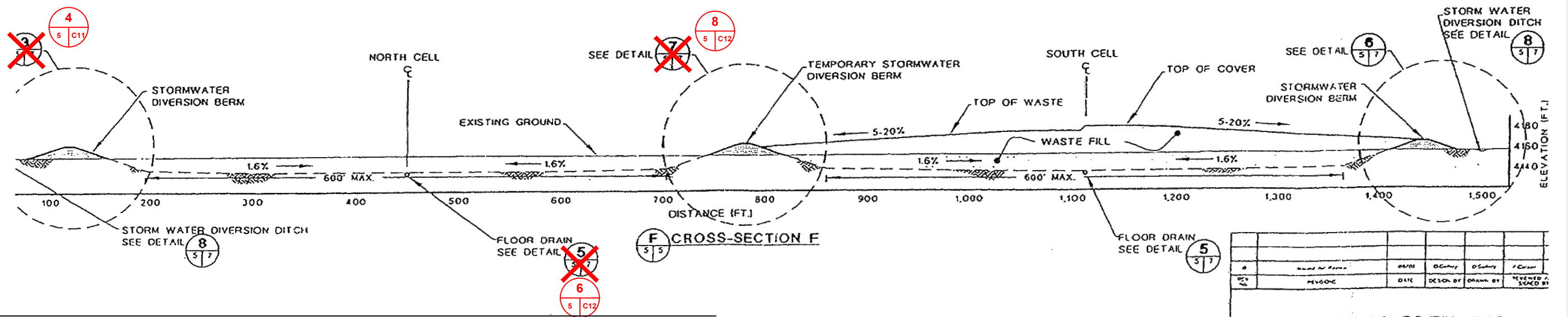
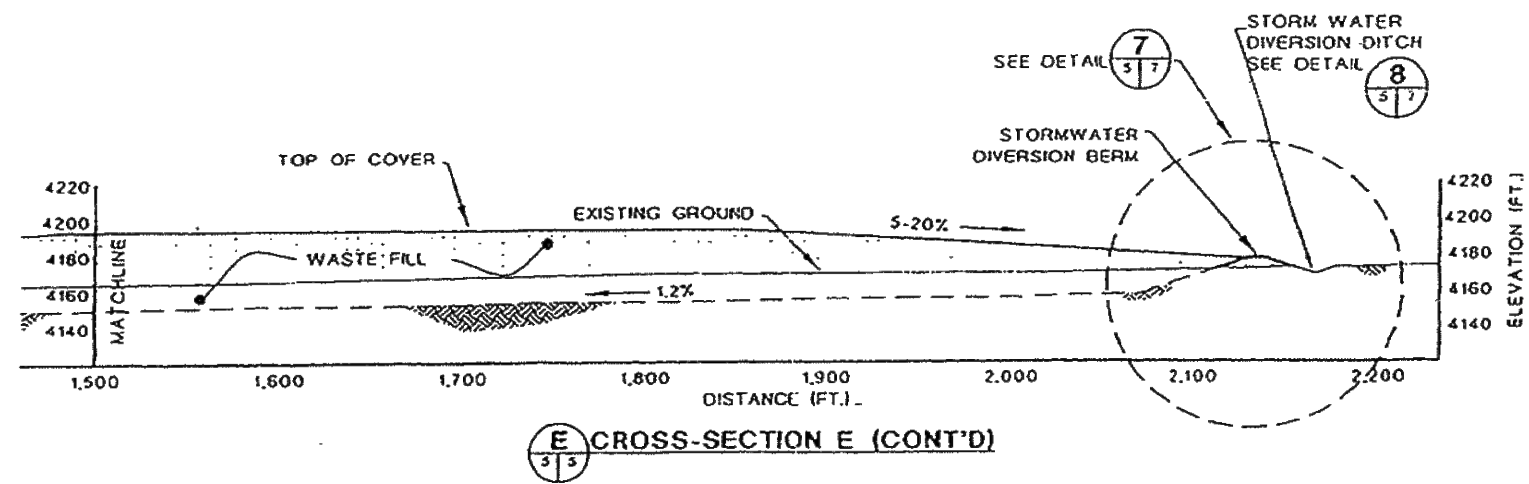
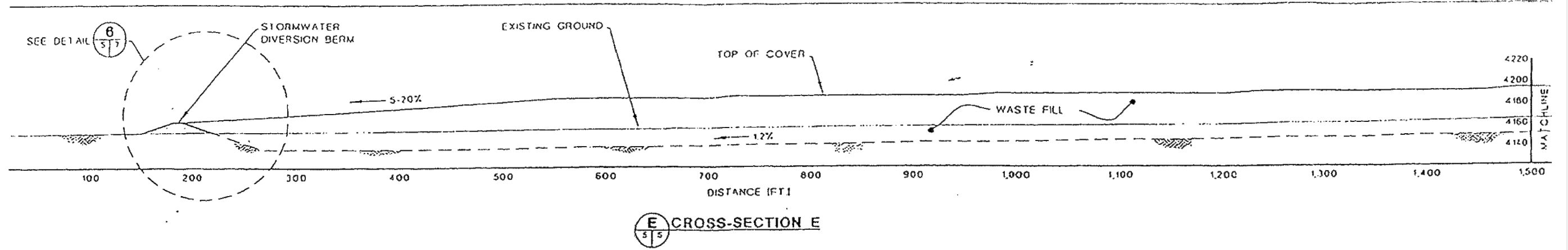
Sheet 2 of 2



NOTES

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MWH DRWG. #5
Sheet 1 of 2

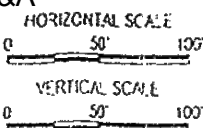


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NOT FOR CONSTRUCTION -
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NOTE:
COVER SHALL BE CONSTRUCTED TO FORM A SLOPE
OF 5-20% AFTER CONSOLIDATION 6% GRADE
SHOWN.

DRAWING No. WHERE
DETAIL/SECTION
IS REFERENCED

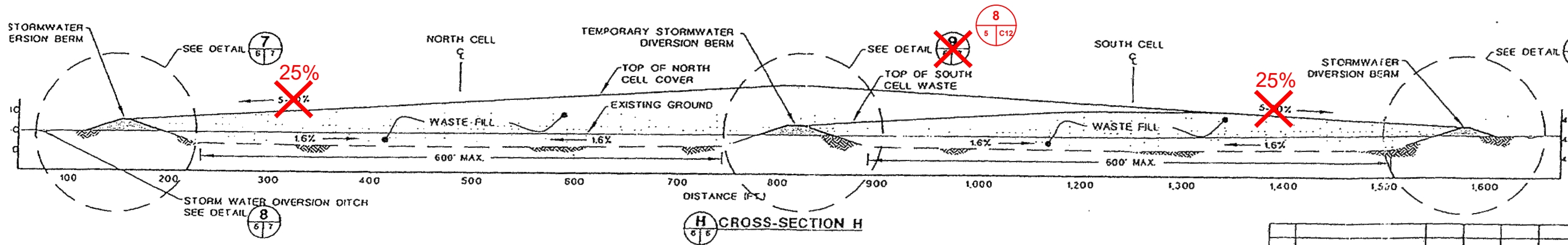
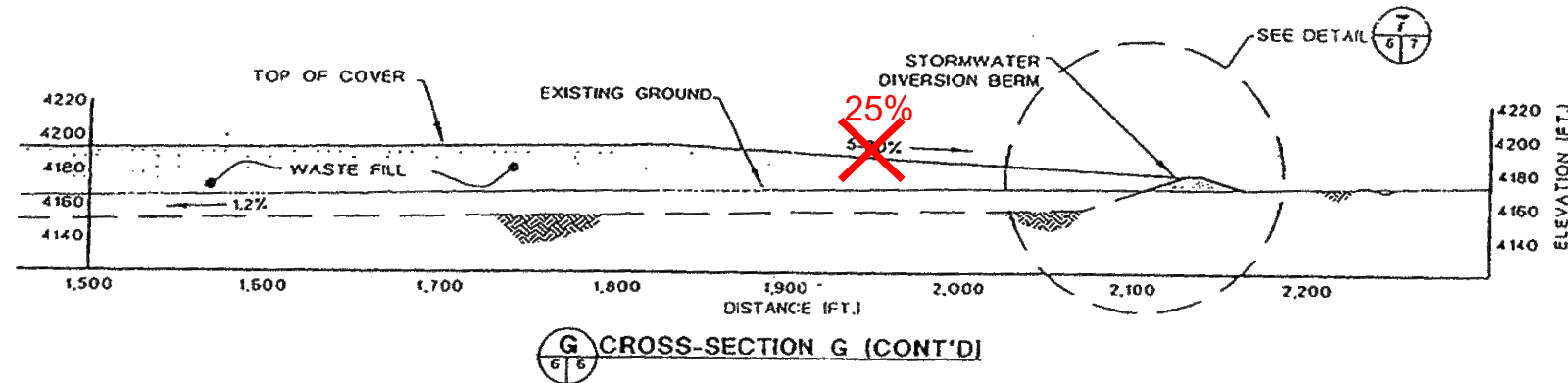
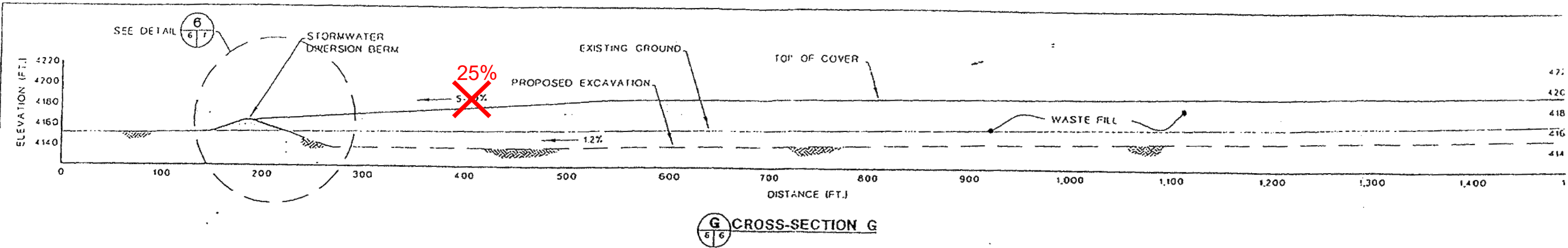
DETAIL/SECTION
NUMBER

DRAWING No. WHERE
DETAIL/SECTION
IS SHOWN

GANDY MARLEY, INC.				
PROJECT: COMMERCIAL SURFACE WASTE MANAGEMENT FACILITY				
DRAWING TITLE: WASTE FILLING PLAN & CROSS-SECTIONS PHASE 2				
MWH		Sheet 2 of 2 SCALE as shown 05		



- MWH DRWG. #6, Sheet 1 of 2



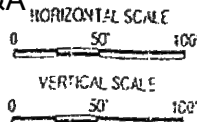
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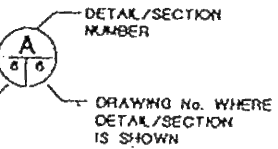
This sheet provided for information only and it pertains to the south cell only.

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NOTE:
COVER SHALL BE CONSTRUCTED TO FORM A SLOPE OF 5-20% AFTER CONSOLIDATION 6% GRADE SHOWN



DESIGNED BY	CHECKED BY	DATE	DESIGN BY	DRAWN BY	REVIEWED BY

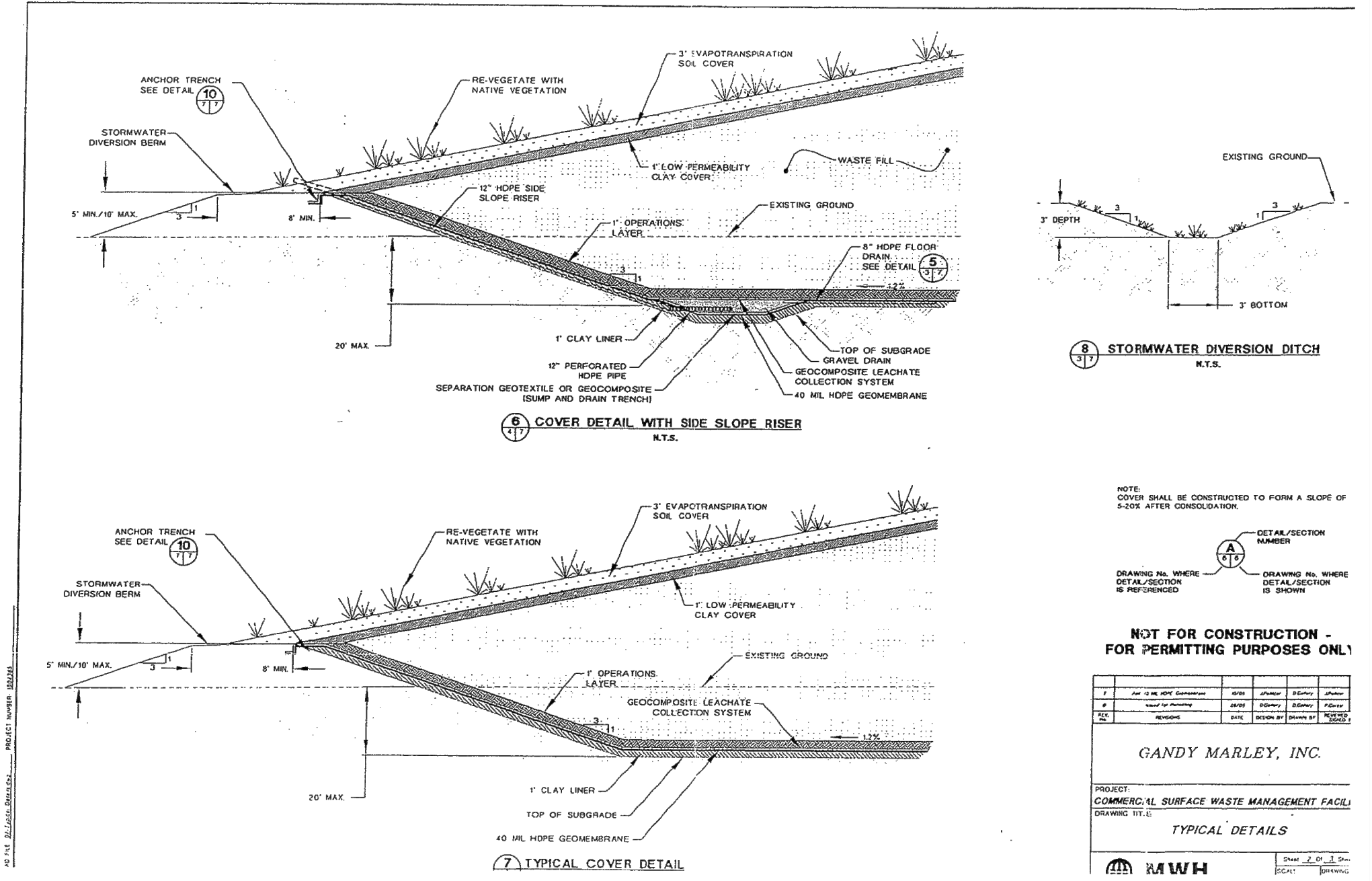
GANDY MARLEY, INC.

PROJECT: **COMMERCIAL SURFACE WASTE MANAGEMENT FACILITY**

DRAWING TITLE: **ULTIMATE COVER PLAN CROSS-SECTIONS**

MWH

Sheet 2 of 2
SCALE: 1" = 50'-0"
DRAWING NO. 06

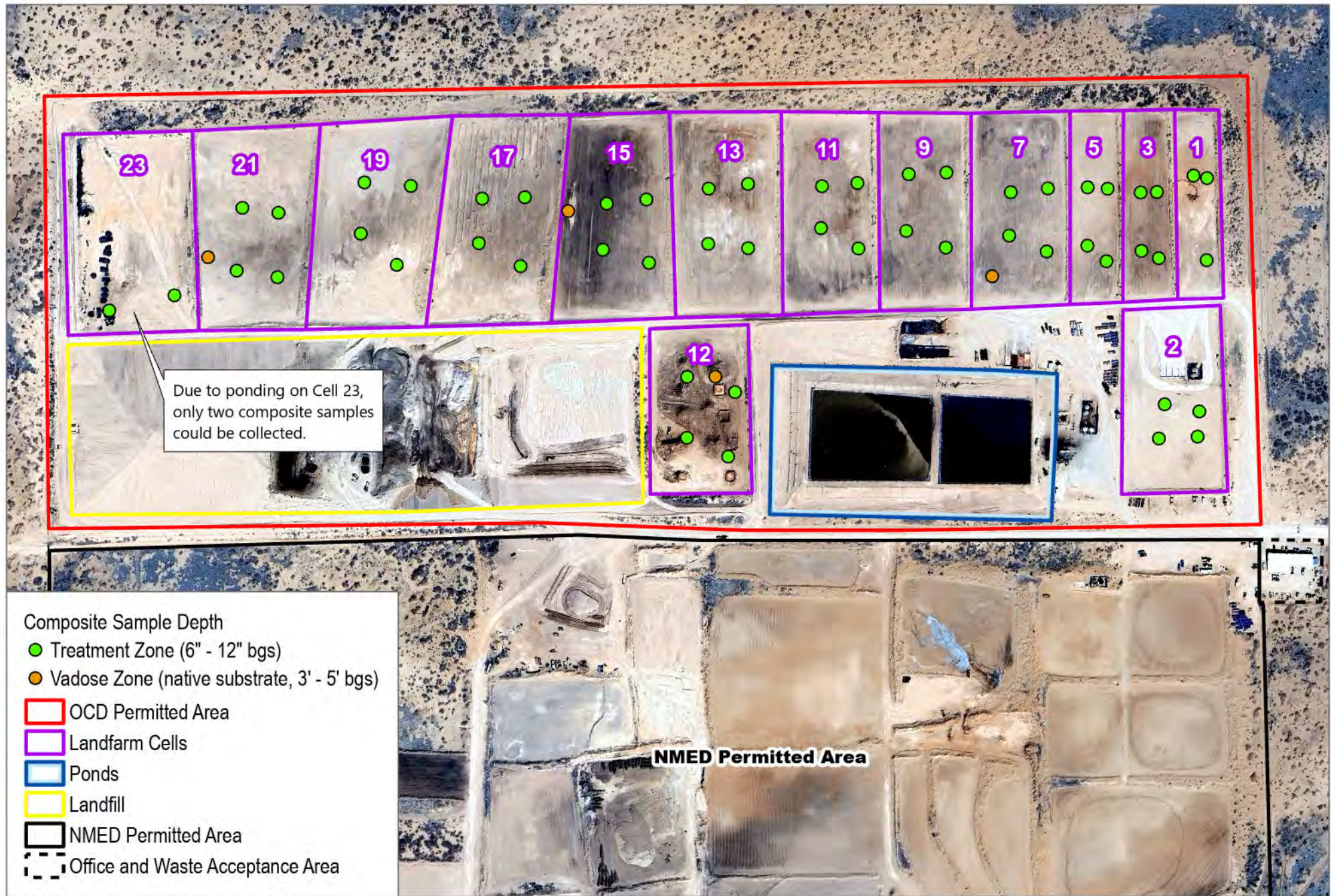


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Appendix C

Landfarm Cell Sampling Results



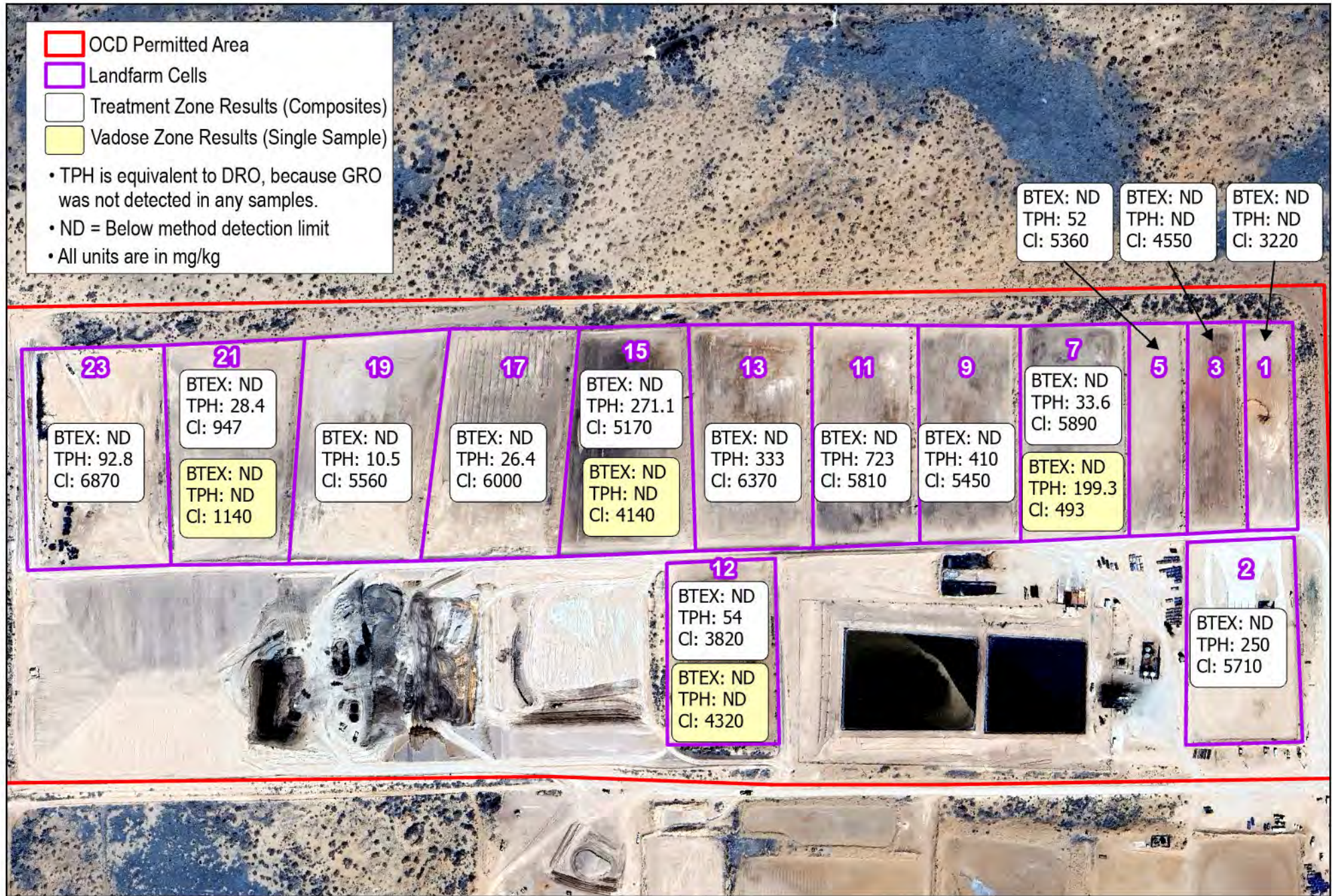
SOURCE: Google Earth Imagery (Dated 3/20/2023)



0 500 1,000 Feet

FIGURE 4
Composite Sample Locations (October 20, 2025)

Gandy-Marley, Inc. Surface Disposal Facility



SOURCE: Google Earth Imagery (Dated 3/20/2023)



FIGURE 5
 Composite Sample Results (October 20, 2025)

Gandy-Marley, Inc. Surface Disposal Facility

Appendix D

Financial Assurance Cost Estimate



Gandy-Marley Inc.

Closure Cost Estimate Task Summary

Task	Cost Estimate
Task 2.1: Oil Treatment Facility Closure	\$549,394
Task 2.2: Landfill Cell Closure	\$944,559
Task 2.3: Landfarm Closure	\$1,796,059
Task 2.4: Evaporation Pond Closure Construction	\$855,377
Task 3.0: Post-Closure Monitoring and Maintenance	\$860,596
Total Cost (including fees and tax)	\$5,005,985



Gandy-Marley Inc.

Task 2.1: Oil Treatment Facility Closure

Task	Unit Quantity	Unit	Unit Cost	Total Cost
Removal, Disposal of Tanks (7) and Ancillary Equipment				
Liquid removal, on-site disposal (1,000 gal/tank)	167	BBL	\$25.00	\$4,167
Remove tanks (7), liners, equipment; place in on-site landfill ¹	1	LS	\$50,000.00	\$50,000
Concrete Bunker (3) Demolition and Disposal				
Waste removal, on-site disposal (assumed quantity, rate)	1000	CY	\$2.50	\$2,500
Remove concrete slab, place in landfill (3) ¹	1	LS	\$80,000.00	\$80,000
Remove liner, place in landfill (3) ¹	1	LS	\$7,500.00	\$7,500
Truck Pullout Area Soil Removal				
Waste removal, on-site disposal (assumed quantity, rate)	1465	CY	\$2.50	\$3,662
Soil Characterization				
5-point composite soil sampling, laboratory analyses ²	14	EA	\$465.00	\$6,510
Field labor	1	Event	\$10,282.17	\$10,283
Backfill, Regrading, and Revegetation				
Backfill, Regrading ^{1,3}	30	AC	\$8,205.13	\$246,154
Seeding (BLM blend as recommended) ^{1,3}	30	AC	\$1,500.00	\$45,000
Subtotal				\$455,776
Independent Project Manager & Contract Administration Cost (12% of Task Totals)				\$54,694
New Mexico GRT (7.625%)				\$38,924
Total Cost				\$549,394

Notes:

1. Ag Services Construction, Inc., 1905 Old Dexter Highway, Roswell, NM. April 2, 2025 quote.
2. Eurofins Albuquerque, NM, 4901 Hawkins NE, Albuquerque, NM. May 7, 2026 estimate.
3. Includes 0.5-acre offloading area used to handle drill cuttings
4. Costs are roundup to the nearest dollar.
5. AC = Acre
LS = Lump Sum
EA = Each
BBL = Barrel (US)



Gandy-Marley Inc.

Task 2.2: Landfill Cell Closure

Task	Unit Quantity	Unit	Unit Cost	Total Cost
Grading				
Grade uncapped portion of landfill in preparation of vegetative cover cap ¹	1	LS	\$110,000.00	\$110,000
Final Cover Installation²				
Install and Compact 36" Evapotranspiration Cover Layer ³	143,555	CY	\$3.09	\$443,585
Install and compact 12" Low Permeability Layer ³	31,848	CY	\$4.11	\$130,896
Landfill Area Seeding (BLM blend as recommended) ^{1,4}	1	LS	\$40,000.00	\$40,000
Final Cover Construction Quality Assurance (CQA)				
Inspection and Testing	1	LS	\$51,411.84	\$51,412
Certification	1	LS	\$7,712.13	\$7,713
Subtotal				\$783,606
Independent Project Manager & Contract Administration Cost (12% of Task Totals)				\$94,033
New Mexico GRT (7.625%)				\$66,920
Total Cost				\$944,559

Notes:

1. Ag Services Construction, Inc., 1905 Old Dexter Highway, Roswell, NM. April 2, 2025 quote.
2. 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.
3. Final cover installation costs assume that:
9.92 acres is already covered with a low permeability layer. 19.74 acres would still need the low permeability layer. Total landfill area needing ET cover is 29.66 acres. All soils necessary for closure construction are available on-site.
4. Cost are roundup to the nearest dollar.
5. CY = Cubic yard
AC = Acre
LS = Lump sum



Gandy-Marley Inc.

Task 2.3: Landfarm Closure

Task	Unit Quantity	Unit	Unit Cost	Total Cost
Regrade and Revegetation				
Excavate 1' of dirt from landfarm and place in on-site landfill ¹	1	LS	\$337,500.00	\$337,500
Backfill, Regrading ²	339,000	CY	\$3.09	\$1,047,510
Scarify and Seeding (BLM blend as recommended) ¹	1	LS	\$105,000.00	\$105,000
Subtotal				\$1,490,010
Independent Project Manager & Contract Administration Cost (12% of Task Totals)				\$178,802
New Mexico GRT (7.625%)				\$127,247
Total Cost				\$1,796,059

Notes:

1. Ag Services Construction, Inc., 1905 Old Dexter Highway, Roswell, NM. April 2, 2025 quote.
2. Inactive landfarm is 70 acres, approximately 3 foot of borrow need for backfilling.
3. Cost are roundup to the nearest dollar.
4. CY = Cubic yard
LS = Lump Sum



Gandy-Marley Inc.

Task 2.4: Evaporation Pond Closure Construction

Task	Unit Quantity	Unit	Unit Cost	Total Cost
Evaporation Pond Removal				
Demolition of evaporation ponds (2), remove solids/sludge from ponds and place in on-site landfill. ¹	1	LS	\$390,000.00	\$390,000
Removal of primary liner, geo net, secondary liner, & leak detection system, dispose of in on-site landfill ¹	1	LS	\$175,000.00	\$175,000
Soil Characterization				
5-point composite soil sampling, laboratory analyses ²	28	EA	\$985.00	\$27,580
Field labor	1	Event	\$10,282.17	\$10,283
Backfill, Regrading, and Revegetation				
Backfill, Regrading ¹	11	AC	\$8,205.13	\$90,257
Seeding (BLM blend as recommended) ¹	11	AC	\$1,500.00	\$16,500
Subtotal				\$709,620
Independent Project Manager & Contract Administration Cost (12% of Task Totals)				\$85,155
New Mexico GRT (7.625%)				\$60,602
Total Cost				\$855,377

Notes:

1. Ag Services Construction, Inc., 1905 Old Dexter Highway, Roswell, NM. April 2, 2025 quote.
2. Eurofins Albuquerque, NM, 4901 Hawkins NE, Albuquerque, NM. May 7, 2026 estimate.
3. Cost are roundup to the nearest dollar.
4. AC = Acre
 LS = Lump Sum
 EA = Each



Gandy-Marley Inc.

Task 3.0: Post-Closure Monitoring and Maintenance

Task	Unit Quantity	Unit	Unit Cost	Total Cost
Task 3.1: Annual Landfill Monitoring and Maintenance (30 Years)				
Cover inspection	30	event	\$1,542.43	\$46,273
Cover maintenance (1 acre/yr assumed)	30	event	\$2,056.23	\$61,687
Revegetation (1 acre/yr assumed)	30	event	\$1,542.43	\$46,273
Leachate system inspection/repairs	30	event	\$1,028.62	\$30,859
Leachate disposal (2 events/yr)	60	event	\$1,028.62	\$61,718
Leak detection monitoring and operation	30	event	\$1,028.62	\$30,859
Stormwater drainage system inspection/repairs	30	event	\$1,028.62	\$30,859
Fencing inspection/Repairs	30	event	\$617.37	\$18,522
Groundwater sampling, laboratory analyses ²	30	event	\$825.00	\$24,750
Groundwater monitoring, field labor	30	event	\$10,282.17	\$308,466
Recordkeeping and reporting	30	event	\$719.93	\$21,598
Task 3.1 subtotal				\$681,864
Task 3.2: Landfarm and Former Pond Areas Inspections and Maintenance (3 years)				
Semiannual cover inspections	6	event	\$1,542.43	\$9,255
Semiannual cover maintenance	6	event	\$2,056.23	\$12,338
Annual revegetation (1 acre/yr assumed)	3	event	\$1,542.43	\$4,628
Semiannual fencing inspection/Repairs	6	event	\$617.37	\$3,705
Recordkeeping and reporting	3	event	\$719.93	\$2,160
Task 3.2 subtotal				\$32,086
Subtotal				\$713,950
Independent Project Manager & Contract Administration Cost (12% of Task Totals)				\$85,674
New Mexico GRT (7.625%)				\$60,972
Total Cost				\$860,596

Notes:

1. Post-closure environmental monitoring costs are based on contracting with a qualified third party to conduct post-closure monitoring for the landfill. The activities included in this cost estimate are based on current dollars, previous experience with landfills located in arid climates, and current subcontractor costs.
2. Laboratory Analysis cost \$825 per Sample (Hall Environmental), 1 on-site monitor well
3. Cost are roundup to the nearest dollar.
4. LS = Lump Sum
AC = Acre

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Erin Taylor
Acting Cabinet Secretary

Ben Shelton
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division



BY ELECTRONIC MAIL ONLY

September 23, 2026

Larry Gandy
Gandy Marley, Inc.
P.O. Box 1658
Roswell, New Mexico 88202
lgandy@gandycorporation.com

RE: Gandy-Marley Landfarm/Landfill, Permit NM1-19 Closure/Post-Closure Plan and Financial Assurance

Dear Mr. Gandy:

The New Mexico Oil Conservation Division (OCD) has completed a review of the Closure/Post-Closure Plan (CPCP), with updated Financial Assurance (FA), for Gandy-Marley Landfarm/Landfill (GM), Permit NM1-19, dated September 10, 2026. OCD hereby approves the CPCP and FA with the following condition:

- Prior to construction, GM must update their FA to cover the costs for the addition of any new landfill cells.

OCD received a letter from GM dated August 14, 2026, stating that GM would secure the required FA of \$5,005,985 with \$2,502,993 initially and annual installments of \$625,748 for four years thereafter. OCD does not approve of this proposal, as discussed with Mr. Larry Gandy by telephone on September 14, 2026. GM must submit to OCD full replacement FA of \$5,005,985 within 45 days of receipt of this letter.

Please be advised that approval of this CPCP does not relieve GM of liability should operations result in pollution of surface water, ground water, or environment. Nor does approval relieve GM of its responsibility to comply with any other applicable government authority's rules and regulations.

1220 South St. Francis Drive • Santa Fe, New Mexico 87505
Phone (505) 476-3441 • www.emnrd.nm.gov/ocd/

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 549-5583 or via email at joseph.kennedy@emnrd.nm.gov.

Respectfully,

A handwritten signature in black ink, appearing to read "Joe Kennedy", with a stylized flourish at the end.

Joe Kennedy • Senior Environmental Scientist

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

CONDITIONS

Action 605844

CONDITIONS

Operator: GANDY MARLEY INC PO Box 1658 Roswell, NM 88202	OGRID: 195280
	Action Number: 605844
	Action Type: [C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)

CONDITIONS

Created By	Condition	Condition Date
joseph.kennedy	Please see letter emailed to Mr. Larry Gandy on 9/23/2026	9/23/2026