

Clay Kilmer, LLC
Environmental Geoscience
Water Resources



Transmitted electronically
Hard copy upon request

September 3, 2024

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 2024 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" and "Vadose Zone Monitoring Reports" for the 08/7/23 - 07/31/2024 "reporting period" are included as **Attachment B**.

Ms. Rosa Romero
NMOCD – Environmental Bureau

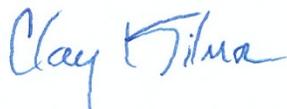
2

September 3, 2024

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

Please contact us with your questions and comments.

Sincerely,



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



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

List of Attachments

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

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

ATTACHMENT A



I. Keith Gordon, P.E.

24 Tejon Cañon Rd
Placitas NM 87043
505.301.2026 *Mobile*
505.369.1446 *Fax*

To: Brad A. Jones
Environmental Scientist Specialist – Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

Submitted Electronically
Hard copy upon request.

Re: 2023 Annual Report and Supporting Documents Review
Permit No. NM1-135

June 5, 2024

Dear Mr. Jones,

This submittal is provided in response to your transmittal of May 21, 2024, regarding Financial Assurance for Closure/Post-closure of the Lea Land, LLC Landfill. Your request is consistent with our previous discussions, as is the documentation provided herein. We have taken the opportunity to revisit the previous calculations, and although the units have not changed, the projections for post-closure care/monitoring and maintenance have been over-funded (i.e., liquids processing area post-closure maintenance). To facilitate the calculation of C/PC costs, we are utilizing the recommended approach of applying the standard Consumer Price Index (CPI) retroactively to the approved unit costs from the approved 2019 Permit. More specifically, we have added the cumulative CPI rate, compounded annually, for each active Unit (i.e., Unit I, and Unit IIA). We have also added construction cost projections for closure of the two new Units currently under construction (i.e., Unit IIB and Unit IIC) using the adjusted CPI indices.

These two new Units comprise 8.7± acres, and the Division has been provided Construction Notification, plans, and specifications for Units IIB and IIC. Although Lea Land has more than adequate capacity remaining in Unit I and IIA, we will need to apply the 2 to 3 foot “fluff layer” of select soil solids to preserve the liner system and protective soil layer (PSL). Therefore, we have updated the “Major Milestone Schedule” to reflect the accelerated schedule (attached) and will proceed with the first lift of waste solids immediately following confirmation of the PSL thickness (i.e., 24” min.).

Attachment 1.0 summarizes the application of the standard Consumer Price Index for each consecutive year following activation of each Unit. Attachment 1.0 also shows the addition of \$203,240.99 for closure construction of future Units IIB and IIC (8.7± acres). In addition to adding the new Units (IIB and IIC), and the CPI increase, we have defrayed the \$71,940 cost estimate for Post-Closure Maintenance of the Liquids Processing Facility (Section 6.0, Exhibit B). There has been no construction of these planned Units, and no new vadose zone wells or leachate sumps have been installed that would increase environmental monitoring costs.

ATTACHMENT A



I. Keith Gordon, P.E.

24 Tejon Cañon Rd
Placitas NM 87043
505.301.2026 *Mobile*
505.369.1446 *Fax*

Table 2.0 summarizes the individual unit costs for the line items identified on Attachment II.4.D, from the 2019 Permit. The standard CPI Inflation Adjustments for 2020 through 2023 have been calculated and added cumulatively to reach the current unit cost (see attachments). We have reduced the Financial Assurance amount from the entire 100-acre± footprint to the 47.9-acre±, comprising the actual active area (i.e., Units I, IIA, plus the new cells IIB, and IIC), this change is documented in Attachment 1.0, under Task 2.0. Lea Land, LLC is fully funded for \$1,549,564, as demonstrated in the September 2023 Annual Report.

Lea Land plans to apply the 2024 CPI increase when available (typically February 2025) and furnish updated FA to you at that time. It is our understanding that the Division is applying the same scrutiny on FA for the other Part 36 surface waste management facilities. Thank you for your direct communication in discussing the FA issue; and we will submit electronically as instructed in your letter – as well as an electronic copy to you. This represents our formal response to your 05/21/2023 request. There have been some difficulties in accessing the OCD portal that you provided, we are still working on that.

Regards,

I. Keith Gordon, PE
IKG, LLC

List of Attachments:

Attachment 1.0 FA Update Including Inflation Adjustments to all Units
Table 2.0 Unit Costs plus CPI
Updated Major Milestone Schedule

Cc: Stephanie Grantham, Lea Land, LLC
Clay Kilmer, PG, Clay Kilmer, LLC

ATTACHMENT A

06/05/2024

Attachment 1.0
FA Update Including CPI Adjustments

Unit I
Landfill Closure Construction Cost Estimates
Including CPI Increases (2020 through 2023)

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	\$124,227.50
1.1.2 Install and compact 6" Barrier Layer	24,845	CY	\$2.50	\$62,112.50
1.1.3 Install 24" Erosion/Vegetation Layer	99,381	CY	\$2.00	\$198,762.00
1.1.4 Vegetative Layer Seeding (Class A)	30.8	AC	\$1500.00	\$46,200.00
Task Subtotal				\$431,302.00
1.2 Final Cover CQA¹				
1.2.1 Inspection and Testing	30.8	AC	\$3,246.75	\$100,000.00
1.2.2 Certification	30.8	AC	\$487.01	\$15,000.00
Task Subtotal				\$115,000.00
TASK TOTALS				\$546,302.00
Independent Project Manager and Contract Administration Cost (10% of Task Totals)				\$54,630.20
TOTAL COST				\$600,932.20
Year	CPI Percentage Rate	Cost Added to Total Cost for Unit Closure²		
2020	1.6%	\$9,614.92		\$610,547.12
2021	7.0%	\$42,738.30		\$653,285.42
2022	6.5%	\$42,463.55		\$695,748.97
2023	3.4%	\$23,655.46		\$719,404.43
Unit I Task 1.0 Total with CPI Inflation Adjustments				\$719,404.43

Notes:

¹Original Document (II.4.D.3 Landfill Closure Construction Closure Cost Estimate) gave Lump Sum amounts for Inspection and Testing and Certification. This cost has been converted to demonstrate a per acre cost.

²Inflation Adjustments are compounded.

Unit IIA
Landfill Closure Construction Cost Estimates
Including CPI Increases (2023)

Task 1.0	Unit Quantity	Unit	Unit Cost 2022	Total Cost
1.1 Final Cover Installation				
1.1.1 Install and compact 12" Intermediate Cover Layer	13,552	CY	\$2.90	\$39,300.80
1.1.2 Install and compact 6" Barrier Layer	6,776	CY	\$2.90	\$19,650.40
1.1.3 Install 24" Erosion/Vegetation Layer	27,104	CY	\$2.31	\$62,610.24
1.1.4 Vegetative Layer Seeding (Class A)	8.4	AC	\$1,736.67	\$14,588.03
Task Subtotal				\$136,149.47
1.2 Final Cover CQA				
1.2.1 Inspection and Testing	8.4	AC	\$3,759.02	\$31,575.77
1.2.2 Certification	8.4	AC	\$563.85	\$4,736.34
Task Subtotal				\$36,312.11
TASK TOTALS				\$172,461.58
Independent Project Manager and Contract Administration Cost (10% of Task Totals)				\$17,246.16
TOTAL COST				\$189,707.74
Year	CPI Percentage Rate	Cost Added to Total Cost for Unit Closure¹		
2023	3.4%	\$6,450.06		\$196,157.80
Unit IIA Total with CPI Inflation Adjustments				\$196,157.80

Notes:

¹Inflation Adjustments are compounded.

ATTACHMENT A

06/05/2024

**Units IIB & IIC
Landfill Closure Construction Cost Estimates**

Task 1.0	Unit Quantity	Unit	Unit Cost 2023	Total Cost
1.1 Final Cover Installation				
1.1.1 Install and compact 12" Intermediate Cover Layer	14,036	CY	\$3.00	\$42,108.00
1.1.2 Install and compact 6" Barrier Layer	7,018	CY	\$3.00	\$21,054.00
1.1.3 Install 24" Erosion/Vegetation Layer	28,072	CY	\$2.39	\$67,092.08
1.1.4 Vegetative Layer Seeding (Class A)	8.7	AC	\$1,795.72	\$15,622.76
Task Subtotal				\$145,876.84
1.2 Final Cover CQA				
1.2.1 Inspection and Testing	8.7	AC	\$3,886.83	\$33,815.42
1.2.2 Certification	8.7	AC	\$583.02	\$5,072.28
Task Subtotal				\$38,887.70
TASK TOTALS				\$184,764.54
Independent Project Manager and Contract Administration Cost (10% of Task Totals)				\$18,476.45
TOTAL COST				\$203,240.99

Notes:

There is not a CPI Increase for Units IIB & IIC. They are scheduled to open July 2023.

**Landfill Maintenance and Environmental Monitoring
100-Acre OCD Landfill Footprint vs. 47.9 Acre Active Area
CPI Inflation Adjustments (2020 through 2023)**

Task 2.0	2019 Lump Sum Cost ¹ (100-acre footprint)	Lump Sum for Active 47.9-Acre Footprint Post-closure Care	Total Cost
2.1 Landfill Maintenance	\$547,800.00	\$262,396.20 (\$5,478/acre)	\$262,396.20
2.2 Environmental Monitoring	\$165,000.00	\$79,035.00 (\$1,650/acre)	\$79,035.00
Task Subtotal			\$341,431.20
TASK TOTALS			\$341,431.20
Year	CPI Percentage Rate	Cost Added to Total Cost for Maintenance & Monitoring ²	
2020	1.6%	\$5,462.90	\$346,894.10
2021	7.0%	\$24,282.59	\$371,176.69
2022	6.5%	\$24,126.48	\$395,303.17
2023	3.4%	\$13,440.31	\$408,743.48
Landfill Maintenance and Environmental Monitoring Total with CPI Inflation Adjustments			\$408,743.48

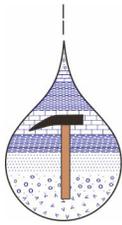
Notes:

¹Lump Sum amounts from the Approved 2019 Permit.

²Inflation Adjustments are compounded.

**Closure/Post-closure Care
2023 Financial Assurance Update**

Task 1.0 – Landfill Closure Construction Cost Estimates	2023 Closure Costs
Unit I	\$719,404.43
Unit IIA	\$196,157.80
Units IIB & IIC	\$203,240.99
Task Subtotal	\$1,118,803.22
Task 2.0 – Landfill Maintenance and Environmental Monitoring	
Landfill Maintenance and Environmental Monitoring	\$408,743.48
Task Subtotal	\$408,743.48
TOTAL COST	\$1,527,546.70



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

May 5, 2023

Delivered: Electronically, Hard copy by mail

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of March 2023 Facility Inspection Report
and Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on April 30 and May 3-4, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC April 30, 2023 Facility Inspection Report
Lea Land LLC May 4-5, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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
 Others: _____

Print Name: JOE ANTIVEROS
 Signature: [Signature]

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

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

NA

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 5-3-23

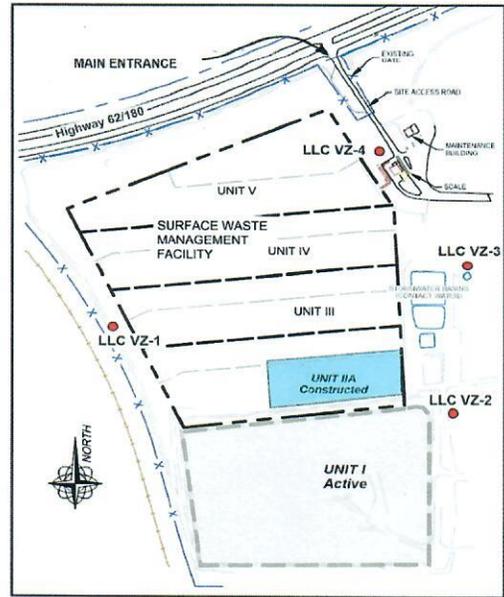
Monitored by: K.IMER

Weather Information

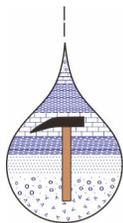
Date and Amount of Last Precipitation: 5-3-23 0.20 inches
 Current Temp: 82 °F
 Current Wind Speed: 5 mph
 Current Wind Direction: SW
 Current Barometric Pressure: 26.27 in. Hg
 Barometric Pressure Trend: Steady

Gas Detection Equipment

Monitoring Equipment Used: Multirae Lite
 Date and Time Last Calibrated: 5-3-23 14:30



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	5-3-23	14:38	27.75 - 37.75	0.0	0.0	20.9	0.0
LLC VZ-2	5-3-23	15:01	68.38 - 78.38	0.0	0.0	20.9	0.0
LLC VZ-3	5-4-23	08:50	50.57 - 60.57	0.0	0.0	20.9	0.0
LLC VZ-4	5-4-23	09:08	40.58 - 50.58	0.0	0.0	20.9	0.0
supplemental data							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1	5-3-23	14:38	2	37.75	Dry @ 37.75		
LLC VZ-2	5-3-23	15:01	2	78.38	Dry @ 78.38		
LLC VZ-3	5-4-23	08:50	2	60.57	Dry @ 60.57		
LLC VZ-4	5-4-23	09:08	2	50.58	Dry @ 50.58		
supplemental data							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

August 7, 2023

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of July 2023 Facility Inspection Report
and July 2023 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on July 30 and July 31, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer". The signature is written in a cursive style.

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC July 30, 2023 Facility Inspection Report
Lea Land LLC July 31, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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: 7-30-2020

Print Name: JOE OUTIVIEROS

Others: _____

Signature: [Signature]

Inspection will be in accordance with NMOCD operational conditions

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

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

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 7.31.23

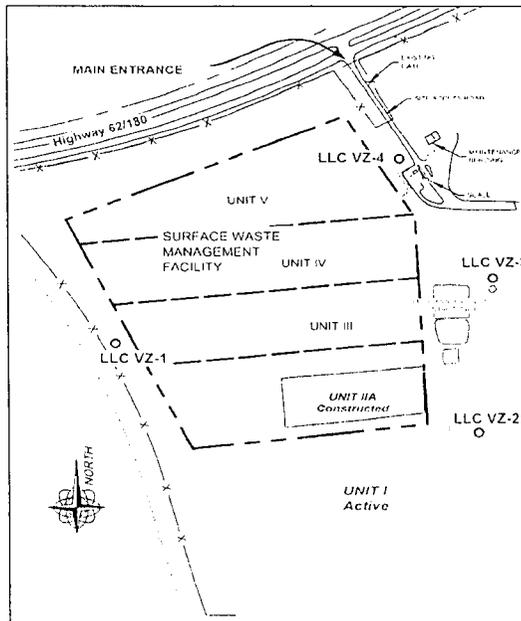
Monitored by: G. Quiñones

Weather Information

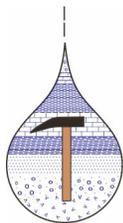
Date and Amount of Last Precipitation: 0 inches
 Current Temp: 88 °F
 Current Wind Speed: 10 mph
 Current Wind Direction: N
 Current Barometric Pressure: 30.00 in. Hg
 Barometric Pressure Trend: ↓

Gas Detection Equipment

Monitoring Equipment Used: GasAlert MAX
 Date and Time Last Calibrated: 7.31.23



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	7/31	8:30	27.75 - 37.75	0	0	20.1	0
LLC VZ-2	7/31	8:49	68.38 - 78.38	0	0	20.1	0
LLC VZ-3	7/31	9:12	50.57 - 60.57	0	0	20.1	0
LLC VZ-4	7/31	9:25	40.58 - 50.58	0	0	20.1	0
<i>supplemental data</i>							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1	7/31	8:30	2	37.75	—		
LLC VZ-2	7/31	8:49	2	78.38	—	N/A	
LLC VZ-3	7/31	9:12	2	60.57	—		
LLC VZ-4	7/31	9:25	2	50.58	—		
<i>supplemental data</i>							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

September 1, 2023

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of August 2023 Facility Inspection Report
and August 2023 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on September 1, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer".

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC September 1, 2023 Facility Inspection Report
Lea Land LLC September 1, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 9.1.23

Print Name: GERONIMO J. WILSON

Others: _____

Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Readings
1	
2	N/A
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	

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

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

- Lea Land Office 575-887-4048 NMOCD Hobbs 575-393-6161
- New Mexico State Police 575-392-5580 NMOCD Santa Fe 505-476-3440
- Eddy County Sheriff 575-887-1888
- Lea County Sheriff 575-397-3611

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 9-1-23

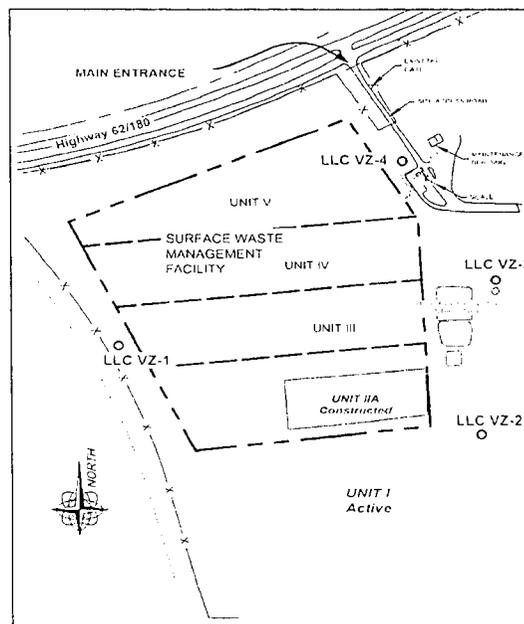
Monitored by G. O'CONNOR

Weather Information

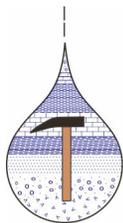
Date and Amount of Last Precipitation: 0 inches
 Current Temp: 84 °F
 Current Wind Speed: 9 mph
 Current Wind Direction: N
 Current Barometric Pressure: 29.96 ↑ in. Hg
 Barometric Pressure Trend: ↑

Gas Detection Equipment

Monitoring Equipment Used: GAS ALERT MAX II
 Date and Time Last Calibrated: 9-1-23



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	9-1-23	9:01	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	9-1-23	9:18	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	9-1-23	9:31	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	9-1-23	9:50	40.58 - 50.58	0	6	20.9	0
supplemental data							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1	9-1-23	9:01	2	37.75	—		
LLC VZ-2	9-1-23	9:18	2	78.38	—		
LLC VZ-3	9-1-23	9:31	2	60.57	—		
LLC VZ-4	9-1-23	9:50	2	50.58	—		
supplemental data							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

October 1, 2023

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of September 2023 Facility Inspection Report
and September 2023 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on September 28, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer". The signature is written in a cursive, flowing style.

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC September 28, 2023 Facility Inspection Report
Lea Land LLC September 28, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 9-28-23
 Others: _____

Print Name: _____
 Signature: *Gerardo Ortiz*

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	2/3	
Pit and Pond marker numbers	2/3	
Treatment Plant inspection	2/3	
Solid waste disposal area inspection	2/3	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Evaporation Ponds - Liquid present?	2/3	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	2/3	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	2/3	(Monthly analysis required if yes)
Landfill Leachate Sump	✓	
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):
 POND

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

N/A

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

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

Lea Land Office	575-887-4048	NMOCD Hobbs	575-393-6161
New Mexico State Police	575-392-5580	NMOCD Santa Fe	505-476-3440
Eddy County Sheriff	575-887-1888		
Lea County Sheriff	575-397-3611		

Receipt & Approval

Name: _____
 Date: _____

ATTACHMENT B
Landfill Gas Monitoring Log

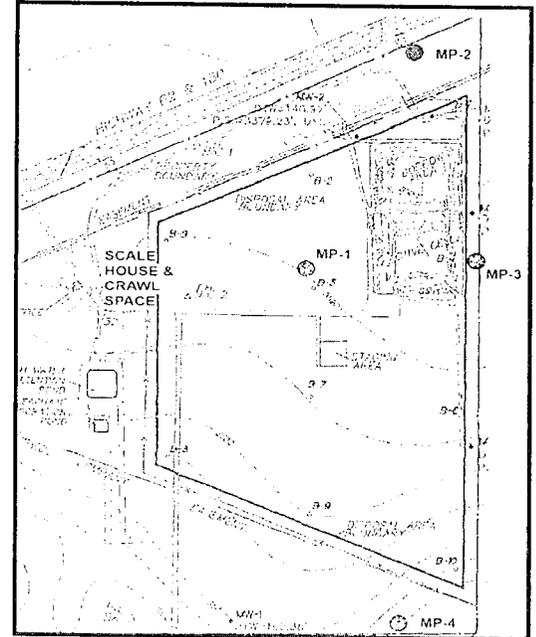
Lea Land MSW Landfill
Lea County, New Mexico

Monitored by G. Ontiveros

Date: 9.28.23

Weather Information

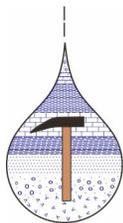
Date and Amount of Last Precipitation: 0 inches
 Current Temp: 70 °F
 Current Wind Speed: 10 mph
 Current Wind Direction: SE
 Current Barometric Pressure: 29.87 in in. Hg



Equipment Information

Monitoring Equipment Used Gas Alert MAX
 Date and Time Last Calibrated: 7.29.23

Perimeter Probes							
Monitoring Probe ID	Probe Depth (feet)	CH ₄ Concentration (% in air)	CO ₂ (%)	O ₂ (%)	Balance Gas (%)	Time of Measurement	Duration of Measurement
Perimeter Landfill Gas Monitoring Probe							
MP-1	2.5	0	0	20.9	79.1	7:31	5 min
MP-2	2.5	0	0	20.9	79.1	7:44	5 min
MP-3	2.5	0	0	20.9	79.1	7:58	5 min
MP-4	2.5	0	0	20.9	79.1	8:10	5 min
Future Permanent Probe							
--							
--							
--							
--							
Landfill Structures							
Structure							
Scalehouse Interior	--	0	0	20.9	79.1	8:30	5 min
Scalehouse Crawl Space	--	0	0	20.9	79.1	8:35	5 min
Supplemental Barhole Probes (as necessary)							
Probe ID							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

November 6, 2023

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of October 2023 Facility Inspection Report
and October 2023 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on October 31, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer".

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC October 31, 2023 Facility Inspection Report
Lea Land LLC October 31, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 10-31-23

Print Name: GERARD J. JENNINGS

Others: _____

Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):
 POND

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

N/A

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 10-31-2023

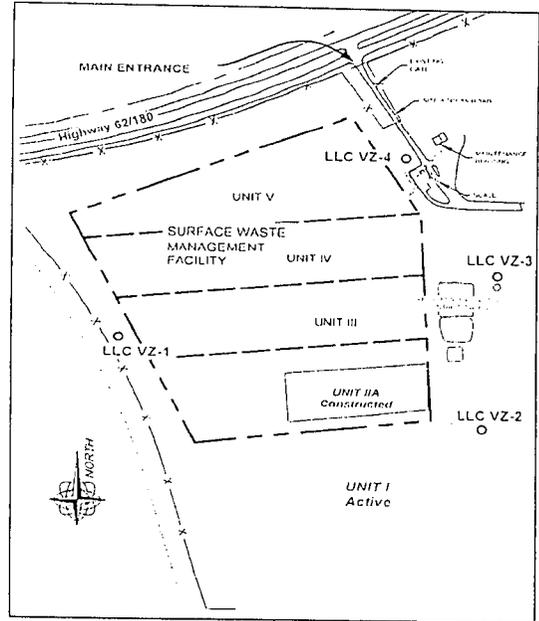
Monitored by: GERONIMO OSTIQUAS

Weather Information

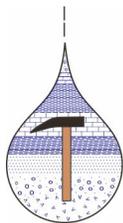
Date and Amount of Last Precipitation: 0 inches
 Current Temp: 47° °F
 Current Wind Speed: 4 mph
 Current Wind Direction: S
 Current Barometric Pressure: 30.47 = in. Hg
 Barometric Pressure Trend: =

Gas Detection Equipment

Monitoring Equipment Used: Gas Alert Max
 Date and Time Last Calibrated: 10-31-23



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	10-31-23	8:00	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	10-31-23	8:23	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	10-31-23	8:39	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	10-31-23	8:52	40.58 - 50.58	0	0	20.9	0
<i>supplemental data</i>							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1	10-31-23	8:00	2	37.75	—		
LLC VZ-2	10-31-23	8:23	2	78.38	—		
LLC VZ-3	10-31-23	8:39	2	60.57	—	N/A	
LLC VZ-4	10-31-23	8:52	2	50.58	—		
<i>supplemental data</i>							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

November 30, 2023

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of November 2023 Facility Inspection Report
and November 2023 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on November 30, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer". The signature is written in a cursive style.

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC November 30, 2023 Facility Inspection Report
Lea Land LLC November 30, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 11.30.23

Print Name: GERONIMO OJIVISREWS

Others: _____

Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading
1	N/A
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	

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

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

- Lea Land Office 575-887-4048 NMOCD Hobbs 575-393-6161
- New Mexico State Police 575-392-5580 NMOCD Santa Fe 505-476-3440
- Eddy County Sheriff 575-887-1888
- Lea County Sheriff 575-397-3611

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 11.30.23

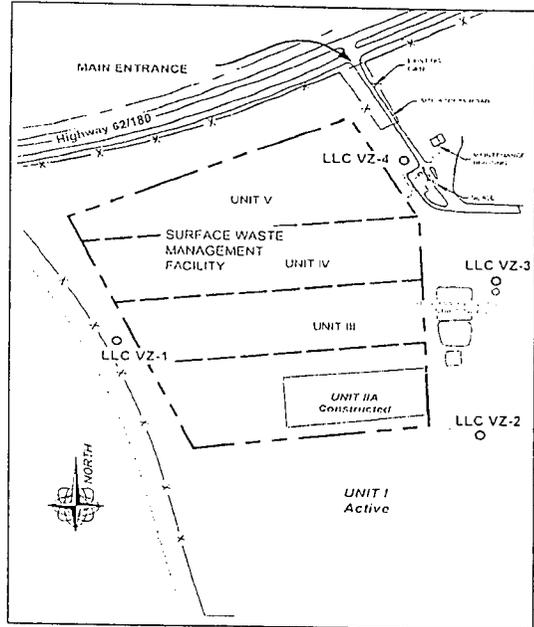
Monitored by: G. Ontiveros

Weather Information

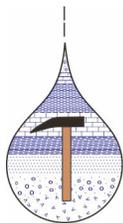
Date and Amount of Last Precipitation: 0 inches
 Current Temp: 49 °F
 Current Wind Speed: 15 mph
 Current Wind Direction: WSW
 Current Barometric Pressure: 29.74 in. Hg
 Barometric Pressure Trend: =

Gas Detection Equipment

Monitoring Equipment Used: GAS ALERT Max
 Date and Time Last Calibrated: 11.30.23



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1		8:03	27.75 - 37.75	0	0	20.9	0
LLC VZ-2		8:18	68.38 - 78.38	0	0	20.9	0
LLC VZ-3		8:31	50.57 - 60.57	0	0	20.9	0
LLC VZ-4		8:47	40.58 - 50.58	0	0	20.9	0
<i>supplemental data</i>							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1		8:03	2	37.75	—		
LLC VZ-2		8:18	2	78.38	—		
LLC VZ-3		8:31	2	60.57	—		
LLC VZ-4		8:47	2	50.58	—		
<i>supplemental data</i>							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

January 2, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of December 2023 Facility Inspection Report
and December 2023 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on December 29, 2023.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer". The signature is written in a cursive style.

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC December 29, 2023 Facility Inspection Report
Lea Land LLC December 29, 2023 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 12-29-23

Print Name: AGRONIMA CONTINGUOS

Others: _____

Signature: 

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading
1	}
2	
3	
4	
5	
6	N/A
7	}
8	
9	
10	
11	
12	

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

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

- Lea Land Office 575-887-4048 NMOCD Hobbs 575-393-6161
- New Mexico State Police 575-392-5580 NMOCD Santa Fe 505-476-3440
- Eddy County Sheriff 575-887-1888
- Lea County Sheriff 575-397-3611

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

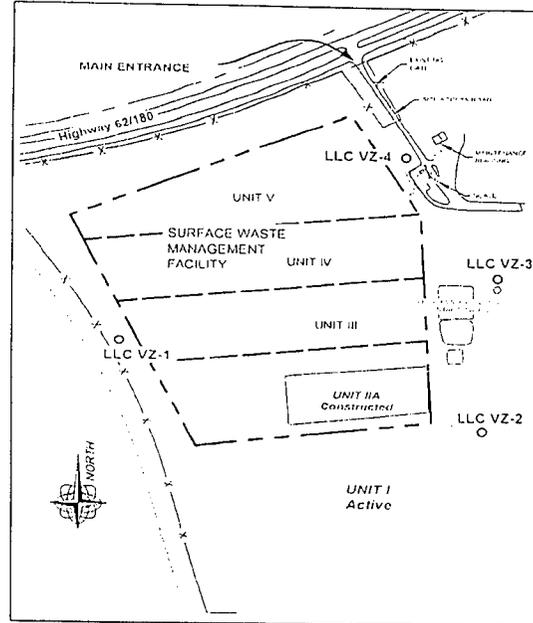
Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 12.29.23

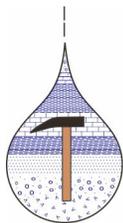
Monitored by: G. OSTIVROS

Weather Information
 Date and Amount of Last Precipitation: 0 inches
 Current Temp: 43° °F
 Current Wind Speed: 6 mph
 Current Wind Direction: W
 Current Barometric Pressure: 30.35 in. Hg
 Barometric Pressure Trend: ↓

Gas Detection Equipment
 Monitoring Equipment Used: Gas Alert MAX
 Date and Time Last Calibrated: 12.29.23



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	12.29.23	7:58	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	12.29.23	8:16	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	12.29.23	8:31	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	12.29.23	8:48	40.58 - 50.58	0	0	20.9	0
supplemental data							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1	12.29.23	7:58	2	37.75	—		
LLC VZ-2	12.29.23	8:16	2	78.38	—		
LLC VZ-3	12.29.23	8:31	2	60.57	—		
LLC VZ-4	12.29.23	8:48	2	50.58	—		
supplemental data							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

February 2, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of January 2024 Facility Inspection Report
and January 2024 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on January 30, 2024.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer".

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC January 30, 2024 Facility Inspection Report
Lea Land LLC January 30, 2024 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 1-30-24
 Others: _____

Print Name: GERONIMO D. JUVENOS
 Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading (ppm)
1	N/A
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 1-30-24

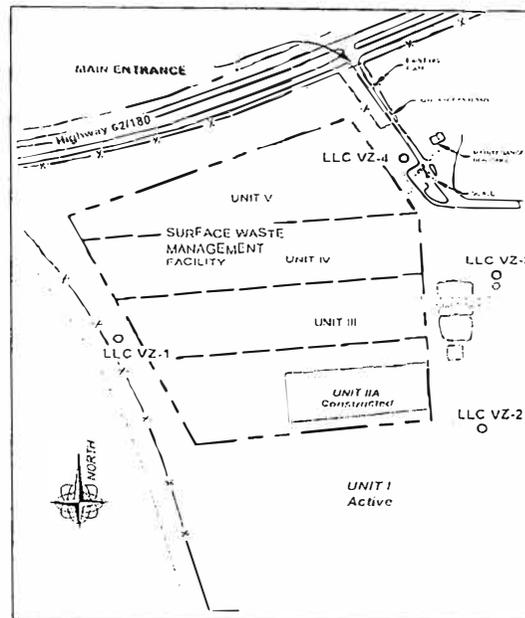
Monitored by: G. Duruecos

Weather Information

Date and Amount of Last Precipitation: 0 inches
 Current Temp: 63 °F
 Current Wind Speed: 2+ mph
 Current Wind Direction: W
 Current Barometric Pressure: 30.15 ↓ in. Hg
 Barometric Pressure Trend: ↓

Gas Detection Equipment

Monitoring Equipment Used: Gas Alert Max
 Date and Time Last Calibrated: 1-30-24



Vadose Zone Well Vapor Data

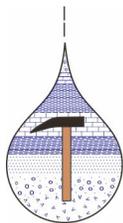
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	1-30-24	10:38	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	1-30-24	11:01	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	1-30-24	11:22	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	1-30-24	11:43	40.58 - 50.58	0	0	20.9	0

Supplemental data

Vadose Zone Well Fluid Measurements

Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments
LLC VZ-1	1-30-24	10:38	2	37.75	—	
LLC VZ-2	1-30-24	11:01	2	78.38	—	
LLC VZ-3	1-30-24	11:22	2	60.57	—	
LLC VZ-4	1-30-24	11:43	2	50.58	—	

Supplemental data



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

March 25, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of February 2024 Facility Inspection Report
and February 2024 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on February 29, 2024.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer". The signature is written in a cursive style.

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC February 29, 2024 Facility Inspection Report
Lea Land LLC February 29, 2024 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 2-29-24
Others: _____

Print Name: GERONIMO DANTUSLOS
Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading
1	
2	
3	
4	
5	
6	
7	N/A
8	
9	
10	
11	
12	

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

2-29-24

Vadose Zone Well Monitoring Log

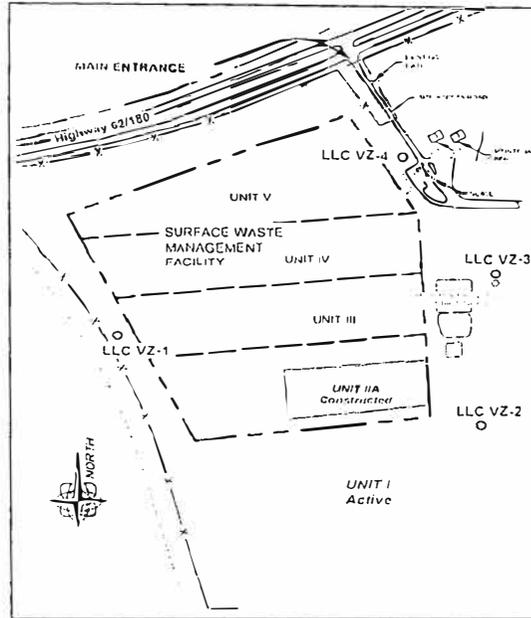
Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 2-29-24

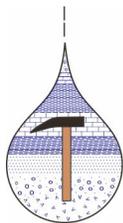
Monitored by: G. Ontiveros

Weather Information
 Date and Amount of Last Precipitation: .05 inches
 Current Temp: 38 °F
 Current Wind Speed: 9 mph
 Current Wind Direction: SSE
 Current Barometric Pressure: 30.25 in. Hg
 Barometric Pressure Trend: =

Gas Detection Equipment
 Monitoring Equipment Used: Gas Alert MAX
 Date and Time Last Calibrated: 2-29-24



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	2-29-24	8:01	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	2-29-24	8:17	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	2-29-24	8:40	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	2-29-24	9:07	40.58 - 50.58	0	0	20.9	0
<i>supplemental data</i>							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments	
LLC VZ-1	2-29-24	8:01	2	37.75	—		
LLC VZ-2	2-29-24	8:17	2	78.38	—		
LLC VZ-3	2-29-24	8:40	2	60.57	—		
LLC VZ-4	2-29-24	9:07	2	50.58	—		
<i>supplemental data</i>							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

March 29, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of March 2024 Facility Inspection Report
and March 2024 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on March 29, 2024.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer". The signature is written in a cursive style.

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC March 29, 2024 Facility Inspection Report
Lea Land LLC March 29, 2024 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 3-27-24
 Others: _____

Print Name: GERARDUS ANTONIOS
 Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading
1	
2	S
3	
4	
5	
6	
7	N/A
8	S
9	
10	
11	
12	

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____
 Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
Surface Waste Management Facility
Lea County, New Mexico

Date: 3-29-24

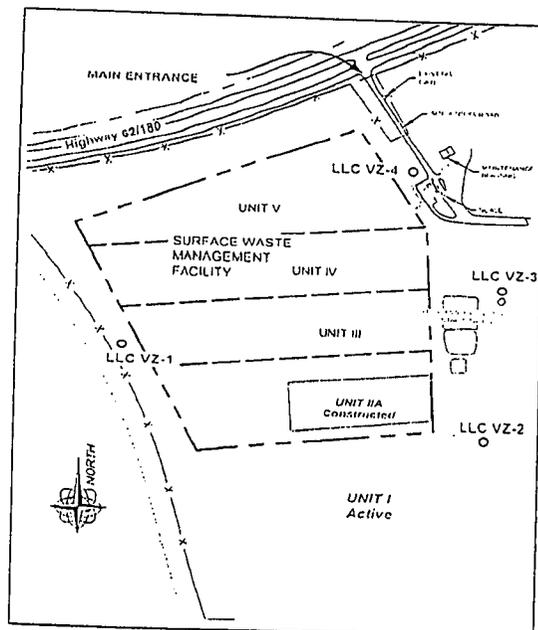
Monitored by: G. Otiagos

Weather Information

Date and Amount of Last Precipitation: 0 inches
 Current Temp: 68° °F
 Current Wind Speed: 7 mph
 Current Wind Direction: SW
 Current Barometric Pressure: 29.81 in. Hg
 Barometric Pressure Trend: ↑

Gas Detection Equipment

Monitoring Equipment Used: Gas Alert Max
 Date and Time Last Calibrated: 3-29-24

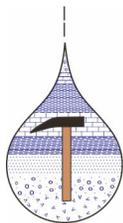


Vadose Zone Well Vapor Data

Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	3-29-24	8:31	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	3-29-24	8:49	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	3-29-24	9:20	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	3-29-24	9:37	40.58 - 50.58	0	0	20.9	0
<i>supplemental data</i>							

Vadose Zone Well Fluid Measurements

Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments
LLC VZ-1	3-29-24	8:31	2	37.75	—	
LLC VZ-2	3-29-24	8:49	2	78.38	—	
LLC VZ-3	3-29-24	9:20	2	60.57	—	
LLC VZ-4	3-29-24	9:37	2	50.58	—	
<i>supplemental data</i>						



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

May 1, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of April 2024 Facility Inspection Report
and April 2024 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on April 29th and April 30th, 2024.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer".

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC April 29, 2024 Facility Inspection Report
Lea Land LLC April 30, 2024 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 4-29-24
 Others: _____

Print Name: Gerardus Cortinas
 Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading (ppm)
1	
2	
3	
4	
5	
6	
7	NA
8	
9	
10	
11	
12	

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 4.30.24

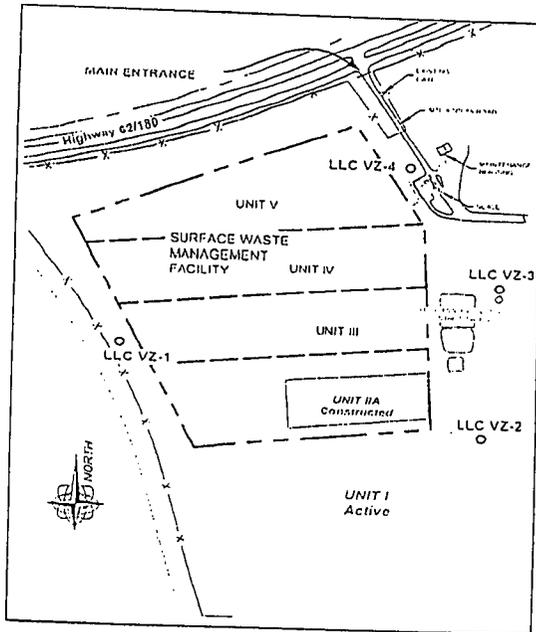
Monitored by: G. O. N. T. J. W. S.

Weather Information

Date and Amount of Last Precipitation: _____ inches
 Current Temp: 88 °F
 Current Wind Speed: 15 mph mph
 Current Wind Direction: SSW
 Current Barometric Pressure: 29.80 in. Hg
 Barometric Pressure Trend: =

Gas Detection Equipment

Monitoring Equipment Used: Gas Alert Max
 Date and Time Last Calibrated: 4.30.24

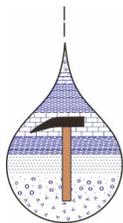


Vadose Zone Well Vapor Data

Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	4.30.24	0800	27.75 - 37.75	0	0	20.7	0
LLC VZ-2	4.30.24	0821	68.38 - 78.38	0	0	20.7	0
LLC VZ-3	4.30.24	0839	50.57 - 60.57	0	0	20.7	0
LLC VZ-4	4.30.24	0901	40.58 - 50.58	0	0	20.7	0
<i>supplemental data</i>							

Vadose Zone Well Fluid Measurements

Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)	Comments
LLC VZ-1	4.30.24	0800	2	37.75	—	
LLC VZ-2	4.30.24	0821	2	78.38	—	
LLC VZ-3	4.30.24	0839	2	60.57	—	
LLC VZ-4	4.30.24	0901	2	50.58	—	
<i>supplemental data</i>						



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

June 5, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of May 2024 Facility Inspection Report
and May 2024 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on May 31st, 2024.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer".

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC May 31, 2024 Facility Inspection Report
Lea Land LLC May31, 2024 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 5-31-24
Others: _____

Print Name: GERARDINE OSTINGS
Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading
1	
2	
3	
4	
5	
6	N/A
7	
8	
9	
10	
11	
12	

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 5/31/2024

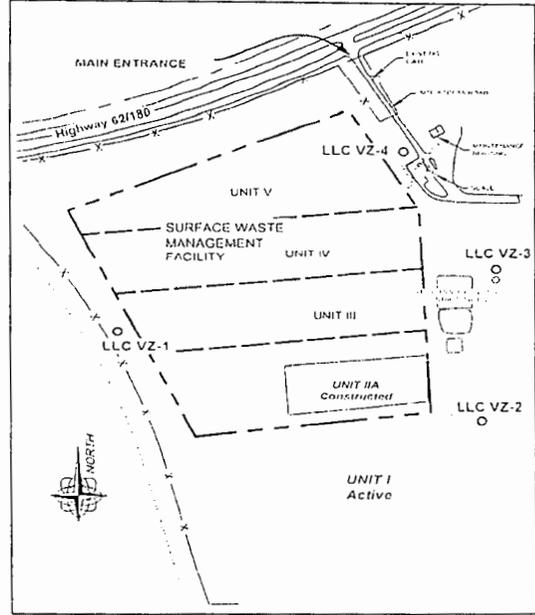
Monitored by: G. Ontiveros

Weather Information

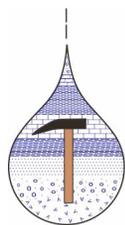
Date and Amount of Last Precipitation: 0 inches
 Current Temp: 81 °F
 Current Wind Speed: 7 mph
 Current Wind Direction: SE
 Current Barometric Pressure: 29.80 in. Hg
 Barometric Pressure Trend: ↓

Gas Detection Equipment

Monitoring Equipment Used: Gas Alert Max
 Date and Time Last Calibrated: 5/31/24



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	5/31	10:02	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	5/31	10:24	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	5/31	10:37	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	5/31	10:50	40.58 - 50.58	0	0	20.9	0
<i>supplemental data</i>							
Vadose Zone Well Fluid Measurements							
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)		Comments
LLC VZ-1	5/31	10:02	2	37.75	0		
LLC VZ-2	5/31	10:24	2	78.38	0		
LLC VZ-3	5/31	10:37	2	60.57	0		
LLC VZ-4	5/31	10:50	2	50.58	0		
<i>supplemental data</i>							



Clay Kilmer, LLC
Environmental Geoscience
Water Resources

June 30, 2024

Electronic Delivery

Mr. Brad Jones
Environmental Permitting Group
New Mexico Oil Conservation Division (OCD)
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM, 87505

**RE : Lea Land LLC, Surface Waste Management Facility
OCD Permit No. NM1-35
Transmittal of June 2024 Facility Inspection Report
and June 2024 Vadose Zone Monitoring Report**

Dear Mr. Jones:

Transmitted herein are copies of the Vadose Zone monitoring report and Facility Inspection Report for monitoring and inspection events conducted at the Lea Land LLC Surface Waste Management Facility in Lea County, New Mexico on June 28th, 2024.

No free liquid, methane, hydrogen sulfide, or carbon monoxide were detected in any of the monitoring wells during the vadose zone monitoring event. No issues were identified relative to inspection parameters for the landfill, leachate and stormwater controls at the surface waste management facility.

Thanks very much for your effort to review this document. Please contact me with your questions and comments.

Sincerely,

A handwritten signature in blue ink that reads "Clay Kilmer".

Clay Kilmer
Sr. Hydrogeologist

Attachment: Lea Land LLC June 28, 2024 Facility Inspection Report
Lea Land LLC June 28, 2024 Vadose Zone Monitoring Report

cc: Stephanie Grantham, President, Lea Land, LLC.
Joe Ontiveros, Site Manager, Lea Land LLC
I Keith Gordon, P.E., IKG, LLC

Clay Kilmer LLC
3312 June Street, Northeast
Albuquerque, NM 87111
(505) 235-4482
claykilmer@gmail.com

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

Inspection Form

Date: 6-28-24
 Others: _____

Print Name: JEROME J. TORRES
 Signature: _____

Inspection will be in accordance with NMOCD operational conditions.

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

*Comments & Repairs: _____

H₂S

READINGS ARE TO BE TAKEN 4 FT DOWNWIND FROM EVAPORATION PONDS

Evaporation Pond (readings in ppm):

POND	Reading
1	✓
2	✓
3	✓
4	✓
5	✓
6	✓
7	N/A
8	✓
9	✓
10	✓
11	✓
12	✓

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

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

- | | | | |
|-------------------------|--------------|----------------|--------------|
| Lea Land Office | 575-887-4048 | NMOCD Hobbs | 575-393-6161 |
| New Mexico State Police | 575-392-5580 | NMOCD Santa Fe | 505-476-3440 |
| Eddy County Sheriff | 575-887-1888 | | |
| Lea County Sheriff | 575-397-3611 | | |

Receipt & Approval

Name: _____

Date: _____

Vadose Zone Well Monitoring Log

Lea Land LLC
 Surface Waste Management Facility
 Lea County, New Mexico

Date: 6-28-24

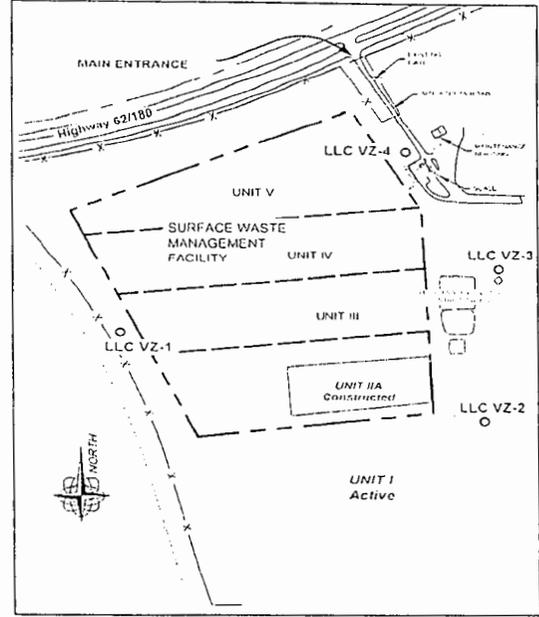
Monitored by: G. D. [Signature]

Weather Information

Date and Amount of Last Precipitation: 0 inches
 Current Temp: 88 °F
 Current Wind Speed: 5 mph
 Current Wind Direction: W
 Current Barometric Pressure: 29.65 in. Hg
 Barometric Pressure Trend: ↓ DOWNWARD

Gas Detection Equipment

Monitoring Equipment Used: GAS ALERT MAX
 Date and Time Last Calibrated: 6-28-24



Vadose Zone Well Vapor Data							
Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH ₄ Concentration (% LEL)	H ₂ S (ppm)	O ₂ (%)	CO (%)
LLC VZ-1	6-28-24	8:30	27.75 - 37.75	0	0	20.9	0
LLC VZ-2	6-28-24	8:47	68.38 - 78.38	0	0	20.9	0
LLC VZ-3	6-28-24	8:57	50.57 - 60.57	0	0	20.9	0
LLC VZ-4	6-28-24	9:17	40.58 - 50.58	0	0	20.9	0
supplemental data							
Vadose Zone Well Fluid Measurements							Comments
Vadose Zone Well Designation	Date	Time	Well Diameter (inch)	Total Well Depth Below Top of Casing (feet)	Fluid Level Below Top of Casing (ft)		
LLC VZ-1	6-28-24	8:30	2	37.75	0		
LLC VZ-2	6-28-24	8:47	2	78.38	0		
LLC VZ-3	6-28-24	8:57	2	60.57	0		
LLC VZ-4	6-28-24	9:17	2	50.58	0		
supplemental data							

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

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

Topic: Site contingency plan

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaias Aguirre
Anthony Duran
JOE ANTIVEROS
TERESIMO ANTIVEROS
John Garcia
Leaquel Aguirre

[Signature]
[Signature]
[Signature]
[Signature]

Absent

Date Covered

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

Date: 8-7-23 Time: 7:45 AM

Topic: Employee safety

Presenter: I. Aguirre Department: supervisor

Instructions:

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

Printed Name

Signature

Isaias Aguirre
GERONIMO DANTINEROS
Ezequiel Aguirre
John Garcia

[Signature]
[Signature]
[Signature]
[Signature]

Absent

Date Covered

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

Date: 9-20-23 Time: 9:10 AM

Topic: Loader

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

<u>Isaias Aguirre</u>	<u>[Signature]</u>
<u>TERONIMO QUINTANAS</u>	<u>[Signature]</u>
<u>Jose Gutierrez</u>	<u>[Signature]</u>
<u>Ezequiel Aguirre</u>	<u>[Signature]</u>
<u>Anthony Duran</u>	<u>[Signature]</u>
<u>SANTOS QUINTANAS</u>	<u>[Signature]</u>
<u>John Garcia</u>	<u>[Signature]</u>

Absent

Date Covered

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

Date: 10-5-23 Time: 9:15

Topic: Cold weather stress

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

<u>Isaiah Aguirre</u>	<u>[Signature]</u>
<u>JOE CANTIVEROS</u>	<u>[Signature]</u>
<u>GERONIMO CANTIVEROS</u>	<u>[Signature]</u>
<u>Anthony Duran</u>	<u>[Signature]</u>
<u>John Garcia</u>	<u>[Signature]</u>
<u>Ezequiel Aguirre</u>	<u>[Signature]</u>

Absent

Date Covered

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

Date: 11-9-23 Time: 8:00 AM

Topic: cell phone usage

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaias Aguirre

[Signature]

GERONIMO ONTIVEROS

[Signature]

Anthony Duran

[Signature]

Ezequiel Aguirre

[Signature]

John Garcia

[Signature]

JOE ONTIVEROS

[Signature]

Absent

Date Covered

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

Date: 12-1-23 Time: 10:10 AM

Topic: Temp. Employee safety

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaias Aguirre

[Signature]

John Gorkis

[Signature]

Anthony Duran

[Signature]

Joe [Signature]

[Signature]

Ezequiel Aguirre

[Signature]

GERONIMO OBTIVOSOS

[Signature]

Absent

Date Covered

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

Date: 1-08-24 Time: 10:10 AM

Topic: Good Housekeeping

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

<u>Isaías Aguirre</u>	<u>[Signature]</u>
<u>GERONIMO OATIBERRAS</u>	<u>[Signature]</u>
<u>Ezequiel Aguirre</u>	<u>[Signature]</u>
<u>Anthony Duran</u>	<u>[Signature]</u>
<u>JOE OATIBERRAS</u>	<u>[Signature]</u>
<u>Paul Garcia</u>	<u>[Signature]</u>

Absent

Date Covered

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

Date: 2-6-24 Time: 9:30 AM

Topic: Material Acceptance and Handling

Presenter: J. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaias Aguirre

Isaias Aguirre

Anthony Duran

Anthony Duran

Jerónimo Antiveros

Jerónimo Antiveros

John Garcia

John Garcia

Ezequiel Aguirre

Ezequiel Aguirre

John Garcia

John Garcia

Absent

Date Covered

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

Date: 3-26-24 Time: 7:30 AM

Topic: H2S Treatment procedures

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaías Aguirre

[Signature]

Anthony Duran

[Signature]

GERONIMO OJIVAROS

[Signature]

Jose Oant Jeros

[Signature]

Ezequiel Aguirre

[Signature]

José Garcia

[Signature]

Absent

Date Covered

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

Date: 4-15-24 Time: 8:45 AM

Topic: Site contingency plan

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

I. Aguirre

[Signature]

Ezequiel Aguirre

[Signature]

Jaime Peraltes

Jaime Peraltes

[Signature]

[Signature]

Gerardo Ontiveros

[Signature]

John Garcia

[Signature]

Anthony Duran

[Signature]

Absent

Date Covered

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

Date: 5-14-24

Time: 7:30 AM

Topic: Heat Stress

Presenter: I. Aguirre

Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaías Aguirre

[Signature]

Ezequiel Aguirre

[Signature]

Jaime Morales

[Signature]

José Antiveros

[Signature]

CERONIMO Antiveros

[Signature]

Sofia Galicia

[Signature]

Anthony Devon

[Signature]

Absent

Date Covered

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

Date: 6-24-24 Time: 9:00 AM

Topic: Site Inspection

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

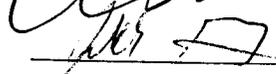
Isaias Aguirre



GERNIMO DUTRILLOS



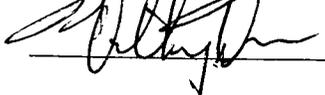
John Garcia



Ezequiel Aguirre



Anthony Duran



Absent

Date Covered

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

Date: 7-18-24 Time: 7:15 AM

Topic: Good House Keeping

Presenter: I. Aguirre Department: Supervisor

Instructions:

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

Printed Name

Signature

Isaias Aguirre

Isaias Aguirre

Ezequiel Aguirre

[Signature]

Joh Garcia

[Signature]

Anthony Duran

[Signature]

JOE OHLIDOROS

[Signature]

GERONIMO OHLIDOROS

[Signature]

Absent

Date Covered

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

CONDITIONS

Action 387519

CONDITIONS

Operator: LEA LAND, LLC 1300 W Main St Oklahoma City, OK 73106	OGRID: 195376
	Action Number: 387519
	Action Type: [C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)

CONDITIONS

Created By	Condition	Condition Date
joseph.kennedy	None	9/26/2024