

Clay Kilmer, LLC  
Environmental Geoscience  
Water Resources



Transmitted electronically  
Uploaded to NMOCD Website

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

October 1, 2024

**RE: Notice of Completion of Cell IIB and IIC, Lea Land, LLC Surface Waste Management Facility,  
Permit No. NM-1-0035**

Dear Mr. Kennedy:

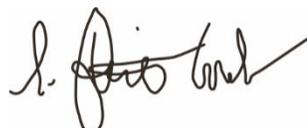
We represent the Lea Land, LLC Surface Waste Management Facility, and are responsible for OCD compliance and submittals. Clay Kilmer, LLC will upload this document to the OCD Portal in addition to sending you this document.

The attached Gantt Chart provides a final update to the "Project Milestone Schedule" routinely submitted to OCD in compliance with Permit Conditions regarding the construction of new Units IIB/IIC. In summary, the two new cells have been completed, and a layer of select soil waste will be placed over the protective soil layer (PSL) in order to preserve it and the underlying geosynthetic liners from the elements. Lea Land will commence landfilling as the PSL is installed, likely in early October. The Permit Conditions place no responsibility on OCD to respond to these Project Milestone Schedule Updates, other to acknowledge receipt. Thank you for your assistance in this matter.

Sincerely,



Clay Kilmer, P.G.  
Certified Groundwater Scientist  
Clay Kilmer, LLC  
[claykilmer@gmail.com](mailto:claykilmer@gmail.com)



I. Keith Gordon, P.E.  
Principal  
IKG, LLC  
[wbcsw@aol.com](mailto:wbcsw@aol.com)

Attachment A – Lea Land Surface Waste Facility Units IIB & IIC Major Milestone Schedule

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

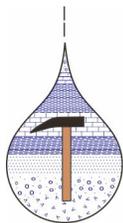


**ATTACHMENT A**  
**Lea Land Surface Waste Management Facility Units IIB & IIC Construction**  
**Major Milestone Schedule**  
**Updated September 26, 2024**

Area of Work	February	March	April	May	June	July	August	September	October
1. Planning & Design	█								
2. Mass Excavation			█						
3. Construction Quality Assurance (CQA)			█						
4. Subgrade Preparation					█				
5. Geosynthetics Installation						█			
6. Protective Soil Layer									█
7. Project Completion							█		
8. Engineering Certification <sup>2</sup>							█		

Notes:

1. Dates and timelines are approximate and highly dependent on weather.
2. Engineering Certification will include submittal of as-built drawings sealed by a New Mexico Licensed Professional Engineer.



Clay Kilmer, LLC  
Environmental Geoscience  
Water Resources

August 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 July 2024 Facility Inspection Report  
and July 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 July 31<sup>st</sup>, 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 July 31, 2024 Facility Inspection Report  
Lea Land LLC July 31, 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: 07.31.24

Print Name: GERALDINE OATWORKS

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	N/A	
Blowing trash	✓	
Fences and Gates	✓	
Leak detection sumps - Landfill - Liquid present?	✓	
Leak detection sumps - Evaporation Ponds - Liquid present?	✓	(Monthly analysis required if yes)
Leak detection sumps - Jet Out Pit - Liquid present?	N/A	(Monthly analysis required if yes)
Leak detection sumps - Stab. & Solid. - Liquid present?	N/A	(Monthly analysis required if yes)
Landfill Leachate Sump	N/A	(Monthly analysis required if yes)
Vadose Zone Monitoring	✓	
Pond Sludge Depth	✓	
*Comments & Repairs:		

H<sub>2</sub>S

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

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

Receipt & Approval

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

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

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

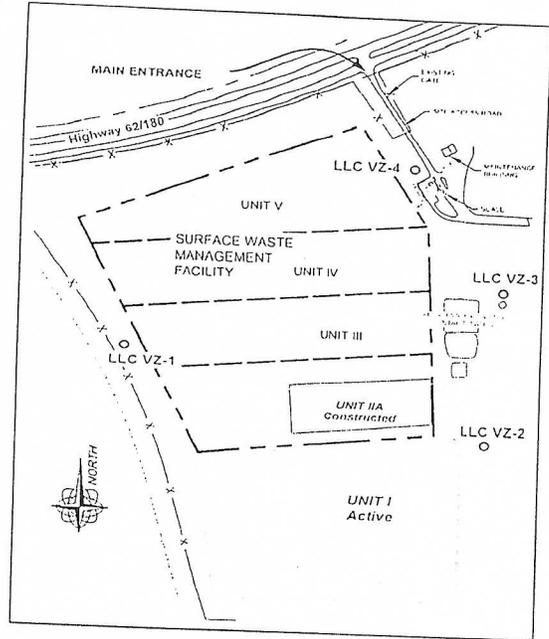
Vadose Zone Well Monitoring Log

Date: 07-31-24

Monitored by: G. ONTIVEROS

Weather Information  
Date and Amount of Last Precipitation: 0 inches  
Current Temp: 84° °F  
Current Wind Speed: 12 mph  
Current Wind Direction: SSE  
Current Barometric Pressure: 29.81 in. Hg  
Barometric Pressure Trend: ↑

Gas Detection Equipment  
Monitoring Equipment Used: GAS ALERT MAX  
Date and Time Last Calibrated: 7-31-24



Vadose Zone Well Vapor Data

Vadose Zone Well Designation	Date	Time	Screen Interval Depth Below Top Casing (feet)	CH <sub>4</sub> Concentration (% LEL)	H <sub>2</sub> S (ppm)	O <sub>2</sub> (%)	CO (%)
LLC VZ-1	7-31-24	08:21	27.75 - 37.75	0	0	20.7	0
LLC VZ-2	7-31-24	08:37	68.38 - 78.38	0	0	20.7	0
LLC VZ-3	7-31-24	08:50	50.57 - 60.57	0	0	20.7	0
LLC VZ-4	7-31-24	09:05	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	7-31-24	08:21	2	37.75	—	
LLC VZ-2	7-31-24	08:37	2	78.38	—	
LLC VZ-3	7-31-24	08:50	2	60.57	—	N/A
LLC VZ-4	7-31-24	09:05	2	50.58	—	
<i>supplemental data</i>						

**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 389663

**CONDITIONS**

Operator: LEA LAND, LLC 1300 W Main St Oklahoma City, OK 73106	OGRID: 195376
	Action Number: 389663
	Action Type: [C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)

**CONDITIONS**

Created By	Condition	Condition Date
joseph.kennedy	None	10/8/2024