Jones, Brad A., EMNRD

From: Barr, Leigh P EMNRD

Sent: Tuesday, August 30, 2022 4:27 PM

To: Jones, Brad A., EMNRD; Kruse, Jacob, EMNRD

Subject: FW: [EXTERNAL] ANNUAL REPORT - PERMIT NO NM-1-0035, LEA LAND LLC Surface Facility

Attachments: LEA LAND LLC_2022 Annual Report Transmittal.pdf

I'd like for both of you to review the attached document and then discuss your findings with each other.

Hope you have a wonderful evening.

Leigh

From: Romero, RosaM, EMNRD <RosaM.Romero@state.nm.us>

Sent: Tuesday, August 30, 2022 3:59 PM

To: Barr, Leigh P EMNRD < leighp.barr@state.nm.us>

Subject: FW: [EXTERNAL] ANNUAL REPORT - PERMIT NO NM-1-0035, LEA LAND LLC Surface Facility

From: claykilmer@gmail.com <claykilmer@gmail.com>

Sent: Tuesday, August 30, 2022 3:57 PM

To: Romero, RosaM, EMNRD < RosaM.Romero@state.nm.us >

Cc: lealand.sgrantham < lealand.sgrantham@gmail.com >; Johnathan Grantham < jonathan@lealandllc.com >; Gordon, I

<wbcsw@aol.com>

Subject: [EXTERNAL] ANNUAL REPORT - PERMIT NO NM-1-0035, LEA LAND LLC Surface Facility

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

Dear Ms. Romero:

Transmitted herewith is the 2022 Annual Report for the Lea Land LLC surface waste management facility in Lea County. A hard copy is also being transmitted by mail today. If you have any problems receiving or opening this file, or if there are any questions about the report content, please do not hesitate to contact me. Thanks very much for OCD's effort in this matter.

Sincerely, Clay Kilmer







Transmitted electronically Hard copy to follow

August 30, 2022

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 of 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 January 24, 2020.

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

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.

August 30, 2022

2

The twelve monthly "Site Inspection Check Sheets" for the 07/01/21 - 06/30/2022

"reporting period" are included as Attachment B. The new landfill cell's leak detection system will be activated upon initial placement of waste in PHASE IIA.

- All analytical results N/A
- Hydrogen sulfide monitoring results
- 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
- 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

Clay Tilma

I. Keith Gordon, P.E.

Principal

IKG, LLC

wbcsw@aol.com

List of Attachments

A – Updated Financial Assurance Summary

B – Monthly Inspection Check Sheets

C – Monthly Training Logs

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

ATTACHMENT A FINANCIAL ASSURANCE

LEA LAND LLC 2022 ANNUAL REPORT FINANCIAL ASSURANCE SUMMARY

Summary of Closure Construction, Landfill Maintenance and Environmental Monitoring Costs - Units I & IIA

	Task	Co	30.8 acres Cost L		remental st Unit IIA .4 acres	Subtotal Units I - IIA 39.2 acres	
1.0	Landfill Closure Construction	\$	600,933	\$	163,891	\$	764,824
2.0	Landfill Maintenance	\$	547,800	\$	-	\$	547,800
3.0	Environmental Monitoring	\$	165,000	\$	-	\$	165,000
4.0	Pond Area Closure (future facility)	\$	-	\$	-	\$	-
5.0	Process Area Closure (future facility)	\$	-	\$	-	\$	-
6.0	Post-Closure Maintenance	\$	71,940	\$	-	\$	71,940

Subtotals, Units I and IIA

\$1,385,673

\$163,891 \$1,549,563

Grand Total Financial Assurance - UNITS I and IIA \$ 1,549,563

Lea Land, LLC Unit IIA pro rata Closure Cost Summary

Task	Unit	Acres	Unit Cost (\$/acre)	Total Cost
1.0 Landfill Closure Construction	1	30.8	\$19,511	\$600,933
1.1 Landfill Closure Construction Unit IIA (new)	IIA	8.4	\$19,511	\$163,891
1.2 Total Landfill Closure Construction	I & IIA	39.2	\$19,511	\$764,824

LEA LAND LLC MONTHLY INSPECTION REPORTS JUNE 2021 - JULY 2022

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Date: 08-08-22	Print Nar	ne:	
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Sumps		NH	
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ree oil on Pits-Ponds		MA	
Pit and Pond condition			
Pit and Pond marker numbers		MA	
Treatment Plant inspection		NA	<u> </u>
Solid waste disposal area inspection		NA	<u> </u>
Blowing trash	· · · · · · · · · · · · · · · · · · ·		<u> </u>
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Date: 04-04-22	•	195 L	DIVEROS
Others:	Signature:		
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PM ATTACHMENT B LEA LAND LLC MONTHLY INSPECTION REPORTS JUNE 2021 - JULY 2022

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	CHMENT II.1.C - Ins	` V /	phyaly
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Solid waste disposal area inspection		NA	
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	DATE
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SUMMARY

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

Date: 12 131 25- 2021 Time: 10-	00/1
Topic: SHIFFTY MEETING	
Presenter: Department: Ma	ANGER
Instructions: 1. This form must be completed at each safety meeting.	·
 Make additional copies as required. Keep copy of completed attendance sheets in binder. 	
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Isaias Agvine Ubalen	<u> </u>
Erequiel Aguirre Zuelly	?
John Gorcie Jeft	J -
Manuela Sanchez Manuela	Sanday
Brianda Carrillo Brianda	(arnilo
About	- 0
<u>Absent</u> <u>Date</u>	e Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: 300 E DER 13-202/	Time: & copy
Topic: Saffy MEEting	
· /	
Presenter or Viras	Department: MANAGY EN
Instructions: 1. This form must be completed at each sa 2. Make additional copies as required. 3. Keep copy of completed attendance she	
Printed Name	Signature
Salitos Others	Spranda Camilo
Manuela Sanchez	Manuela Sancha
Vol. 6(5	$\mathcal{M} \otimes$
mark mekinney	
Ezequiel Aguirre	Gyal Cym
Ezequiel Aguerre Jose J. Sanches	
Isaias Aguirne	Daias S
<u>Absent</u>	Date Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: 4/CtobER 04- LOZZ	Time: 7:00 //
Topic: SASTY MEETING	
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Presenter: Duti VERUS	Department: MAWAO, EV2
Instructions: 1. This form must be completed at each so 2. Make additional copies as required. 3. Keep copy of completed attendance sh	
Printed Name	Signature
Manuela Sanchez	Manuela Sancha
Brianda Carrillo BALITOS Waltivenes	Briancher Carrillo
John GIFCS	phy 2
Mary mohimey	A
Ezequiel Aguirre	En Comment
Jose J. Somehoz	
Isaias Aguirm	Saices si
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<u>Absent</u>	Date Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: MOVEMBER 16- 2021 Topic: SAFFY MEETING	Time: 9500 Pm
Topic: SAFFU MEETING	
Presenter: De Cutivos	Department: MANAGEL
Instructions: 1. This form must be completed at each s 2. Make additional copies as required. 3. Keep copy of completed attendance sh	•
Printed Name	<u>Signature</u>
Manuela Sanchez	Manuela Sancha/
Brianda Carrillo	Parianda Karrillo
SALITOS DUTIVEROS	(Martin Land
John Giras	pen Z
Mark Mckinney	
Ezequiel Aquire	and Comment
Jose J. Sandies	St. 3
Isaias Aguirm	Main g
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Absent	Date Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: 12-06-222/ Time: 10:00 Am

Topic: SAFfy MEETing	
	······································
Presenter: Os Ontiveros	Department: Managen
Instructions: 1. This form must be completed at each sa 2. Make additional copies as required. 3. Keep copy of completed attendance she	
Printed Name	<u>Signature</u>
Manuela Sanchez	Manuela Sarche/
Briunda Cavrillo BANTOS CUNTIVEROS	Pricinda Cavillo
John Oucis	904 D
Mark makimey	<u> </u>
Ezequel Aguirre Jose J. Sanchez	Egget agree
Jose J. Sanchez	
Isaias Aguirm	Usaias an
Absent	Date Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: 01-03-2022 Time: 10:02 Arm

Topic: SAFLy MEEting	
, ,	
Presenter Dutivanos	Department: MANAGER
Instructions: 1. This form must be completed at each safe. 2. Make additional copies as required. 3. Keep copy of completed attendance sheet.	
Printed Name Printed Name Carrillo SAUTOS DIATIVIDAS	Signature Avrillo Control
Manuela Sanchez	YManuela Scenchaz
Mark McKinnay	a a
Ezequiel Aguerre	Ezzal Ezza
Iswias Agume	Bais &
Absent	Date Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: 02-07-2022 Time: 8:00 Am

Topic: SAFFTY MEETING	
	·
Presenter UF Out Valos	Department: MANAGER
 Instructions: This form must be completed at each sa Make additional copies as required. Keep copy of completed attendance she 	
Printed Name	<u>Signature</u>
Manuela Sanchez	Manuela Sancha
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Absent	Date Covered

Lea Land LLC Surface Waste Management Facility

Safety Communications Program Safety Meeting Attendance Sheet

Date: MARCH 04-2022	Time: 10:00 Hm
Topic: SAFETY MEETING	
Presenter: Jos Ontivasos	Department: Manager
 Instructions: This form must be completed at each sa Make additional copies as required. Keep copy of completed attendance she 	
Printed Name	<u>Signature</u>
Maruela Sanchez	Marula Sanday
Prianda Carrillo	Priaria Carrillo
5041 6600	pelo 200
Mark McKinney	any
Exequel Aguare	Eggel Com
Isaias Agrim	Bain 8-
Absent	Date Covered

Topic: Lockout-Tagout Procedure

Good Housekeeping
Incompatible Waste

Stormwater Pollution Prevention Plan

ATTACHMENT C

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

ATTACHMENT II.1.A - Safety Communications Program

Safety Meeting Attendance Sheet

Date: April-11-2022 Time: 8:00 Am

Presenter: DE ONTIVEROS	Department: <u>MANAGER</u>
 Instructions: This form must be completed at each set Make additional copies as required. Keep copy of completed attendance she 	
Printed Name	<u>Signature</u>
Mark mckinney	
Isaias Agurre	Vain &
Andhoring Davan My John Golcia	And
SANTOS WILLIEROS	Day Ti
Brianda Carrillo	Brianda Carrillo
Manuela Sanchoz	Manuela Sanchez
<u>Absent</u>	<u>Date Covered</u>

Date: <u>05- 09-</u> 2**0**22

ATTACHMENT C

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

Time: 11:00 Am

ATTACHMENT II.1.A - Safety Communications Program

Safety Meeting Attendance Sheet

Topic: Non-Exempt Liquids Recognition, H2S Treatment Procedures		
Presenter: DE WhiveRus	Department: MANAGER	
Instructions:		
This form must be completed at each safety	meeting	
Make additional copies as required.	meeting.	
3. Keep copy of completed attendance sheets	in binder.	
Printed Name	Signature	
SANTES OUTIVERES	A local	
Manuela Sanchez	Manuela Erriche	
Mark mokinney	0	
DOE ON FILEROS	Jue Curicipal Control	
Jose J. Smufac	Jose J. Saroluz	
Isaias Aguirre	thain &	
John Galcia	Mil D.	
Ezequiel Aguire	"Syllen	
Brianda Cavilla		
<u>Absent</u>	Date Covered	
	-	

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

ATTACHMENT II.1.A - Safety Communications Program

Safety Meeting Attendance Sheet

Date: 06-13-2022	Time: 10:00 Am
Topic: Material Acceptance and Handling: Form C. Presenter: Topic Continues of the Continu	Department: MANAGER
Tresenter.	Department. 111111111111111111111111111111111111
 Instructions: This form must be completed at each safety Make additional copies as required. Keep copy of completed attendance sheets 	•
Printed Name	<u>Signature</u>
Manuela Sanchez	Markyla Sancha/
SAUTOS CLITTYERAS	
Mark mckinney	
DOE Coming	JUE CNTIVEROS
Juse J. Sanchen	Jose J. Sonehez
Isaias Aguine	Gaen Con
John Gara	AM D
Ezequel Aguire	12 July
Dricinda Camillo	
<u>Absent</u>	<u>Date Covered</u>

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD

Friday, September 2, 2022 3:52 PM Sent:

Stephanie Grantham To:

claykilmer@gmail.com; Gordon, I Cc:

Subject: NM1-35 Lea Land LLC Annual Report review

Attachments: 2022 0902 NM1-35 Lea Land LLC Annual Report Review and FA Increase Request signed.pdf

Ms. Grantham,

Please see the attached. It is OCD's review of the Annual Report, dated August 30, 2022, for the surface waste management facility under permit NM1-35. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Brad A. Jones

Brad A. Jones • Environmental Scientist Specialist - Advanced Environmental Bureau EMNRD - Oil Conservation Division 1220 S. Saint Francis Drive | Santa Fe, New Mexico 87505 (505) 469-7486 | <u>brad.a.jones@state.nm.us</u>

www.emnrd.nm.gov

State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Adrienne Sandoval
Director, Oil Conservation Division



Todd E. Leahy, JD, PhD Deputy Secretary

September 2, 2022

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

RE: Annual Report Review
Lea Land LLC – OGRID 195376
Permit NM1-35
Section 32, Township 20 South, Range 32 East NMPM,
Lea County, New Mexico

Ms. Grantham:

The Oil Conservation Division (OCD) has completed its review of Lea Land LLC's (Lea Land) Annual Report, dated August 30, 2022, for the Lea Land surface waste management facility which addresses Conditions 1H and 2D under permit NM1-35. The annual report includes a reassessment of the financial assurance that must be addressed.

OCD performed an internal financial assurance review and has determined that the current financial assurance established with the agency is \$1,385,673.00, which is also the amount recognized in Condition H1 of the June 24, 2020 major modification permit. Please provide the detailed financial assurance calculations, similar to the ones provided in Attachment II.4.D in the Closure and Post-Closure Plan of July 30, 2019 major modification application, to support the financial assurance reassessment. Also, please submit a replacement financial assurance mechanism or rider to the existing financial assurance mechanism to bring the financial assurance total up to the reassessed value of \$1,549,563.00.

The annual report clarifies that the as-built documentation of vadose monitoring wells was provided to OCD on December 21, 2021, after the Notice of Intent of well installation was provided on August 5, 2021. OCD was unable to locate any monthly inspection reports after the December 2021 that indicates Lea Land initiated and performed any monitoring of the four vadose zone monitoring wells after installation. OCD has been informed that Lea Land anticipates the new landfill Unit IIA to be operational prior to the end of 2022. Pursuant to Condition 6B of the June 22, 2020 permit, "the vadose zone monitoring system shall be *installed and operational prior to the commencement of operations in the new landfill units*, evaporation ponds, and of stabilization/ solidification areas." In accordance with Section 3.3, Proposed Monitoring Program, of the Vadose Zone Monitoring Plan in Volume II of the July

Lea Land LLC Permit NM1-35 September 2, 2022 Page 2 of 2

30,2019 Lea Land LLC Surface Waste Management Facility Application for Permit Modification, OCD approved Lea Land to perform the following monitoring: "The proposed vadose zone monitoring program would include monthly inspection of each well for the presence of fluid as with leak detection sumps in accordance with provisions set forth in 19.15.36.13.L.(1)." Pursuant to Condition 1C of Permit NM1-35, "the operator shall abide by the approval conditions contained herein, along with all commitments submitted in its permit application of June 2019, including any attachments and/or amendments, all of which are incorporated into this Permit Modification by reference." Lea Land shall immediately initiate the vadose zone monitoring program as specified in Section 3.3, Proposed Monitoring Program, of the Vadose Zone Monitoring Plan in Volume II of the July 30, 2019 Lea Land LLC Surface Waste Management Facility Application for Permit Modification and document its findings on the monthly inspection report.

The annual report included a monthly inspection report dated August 8, 2022 in Attachment B instead of one for March 2022. Please provide OCD a copy of the March 2022 Monthly Inspection Report to complete the annual report.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 469-7486 or brad.a.jones@state.nm.us.

Respectfully,

Brad A. Jones

Environmental Specialist

Cc: Clay Kilmer, Clay Kilmer, LLC, clayKilmer@gmail.com

Keith Gordon, IKG, LLC, wbcsw@aol.com

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

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 140567

CONDITIONS

Operator:	OGRID:	
LEA LAND, LLC	195376	
1300 W Main St	Action Number:	
Oklahoma City, OK 73106	140567	
	Action Type:	
	[C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)	

CONDITIONS

Created By	Condition	Condition Date
bjones	OCD emailed the review of the Annual Report, for the Lea Land LLC surface waste management facility under NM1-35, to Stephanie Grantham (Lea Land), Clay Kilmer (Clay Kilmer, LLC) and Keith Gordon (IKG, LLC) on September 2, 2022. OCD's review is attached to the end of the report submittal as OCD's Response. If you have any questions regarding this matter, please do not hesitate to contact me.	9/2/2022