

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

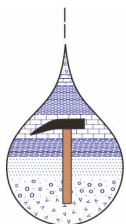
From: claykilmer@gmail.com <claykilmer@gmail.com>
Sent: Tuesday, August 30, 2022 3:57 PM
To: Romero, RosaM, EMNRD <RosaM.Romero@state.nm.us>
Cc: lealand.sgrantham <lealand.sgrantham@gmail.com>; Johnathan Grantham <jonathan@lealandllc.com>; Gordon, I <wbcsw@aol.com>
Subject: [EXTERNAL] ANNUAL REPORT - 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.

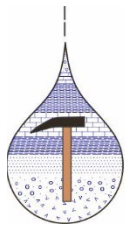
Dear Ms. Romero:

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



Clay Kilmer, LLC
Environmental Geoscience
Water Resources
3312 June St. NE
Albuquerque, NM 87111
(505) 235-4482



Clay Kilmer, LLC
Environmental Geoscience
Water Resources



Transmitted electronically
Hard copy to follow

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

August 30, 2022

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.

Ms. Rosa Romero
NMOCD – Environmental Bureau

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August 30, 2022

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*
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 – Updated Financial Assurance Summary
- B – Monthly Inspection Check Sheets
- C – Monthly Training Logs

cc: Ms. Stephanie Grantham, Lea Land, Inc., lealand.sgrantham@gmail.com
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		Cost Estimate Unit I 30.8 acres	Incremental Cost Unit IIA 8.4 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	I	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

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

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 06-30-2021Print Name: Joe Gutierrez

Others: _____

Signature: Joe Gutierrez

Inspection will be in accordance with NMOCDC 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 - Slab. & 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):

POUND

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
New Mexico State Police 575-382-5580
Eddy County Sheriff 575-887-1888
Lea County Sheriff 575-397-3611

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

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B **LEA LAND LLC MONTHLY INSPECTION REPORTS** **JUNE 2021 - JULY 2022**

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: 08-10-2021Print Name: JOE CANTIVEROS

Others: _____

Signature: Joe Cantiveros

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

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

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

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B

LEA LAND LLC MONTHLY INSPECTION REPORTS

JUNE 2021 - JULY 2022

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: 09-13-2021Print Name: Joe Oliveros

Others: _____

Signature: Joe Oliveros

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

1
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NA
S

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

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

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
LEA LAND LLC MONTHLY INSPECTION REPORTS
JUNE 2021 - JULY 2022

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: 10-04-2021Print Name: JUG ENFIEROS

Others: _____

Signature: JUG ENFIEROS

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	
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NA

*In the event that a reading of 10 ppm is registered at the Facility, **IMPLEMENT THE CONTINGENCY PLAN!**

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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 **LEA LAND LLC MONTHLY INSPECTION REPORTS** **JUNE 2021 - JULY 2022**

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: 11-05-2021(FRI) Print Name: JOE ONTIVEROS
 Others: _____ Signature: JOE ONTIVEROS

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

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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
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Eddy County Sheriff	575-887-1888		
Lea County Sheriff	575-397-3611		

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B **LEA LAND LLC MONTHLY INSPECTION REPORTS** **JUNE 2021 - JULY 2022**

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: 12-06-2021Print Name: JOE NIVERO

Others: _____

Signature: JOE NIVERO

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)
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Vadose Zone Monitoring	NA	
Pond Sludge Depth	NA	
*Comments & Repairs: _____		

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Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
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JUNE 2021 - JULY 2022

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 Volume II: Facility Management Plans
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 June 2019

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 01-03-2022Print Name: JOE N. JERVIS

Others: _____

Signature: JOE N. JERVIS

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)
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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: _____

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Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B **LEA LAND LLC MONTHLY INSPECTION REPORTS** **JUNE 2021 - JULY 2022**

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: 02-07-22 Monday Print Name: Joe Cantiveros
 Others: _____ Signature: Joe Cantiveros

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	
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Fences and Gates	✓	
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Landfill Leachate Sump	✓	
Vadose Zone Monitoring	NA	
Pond Sludge Depth	NA	

*Comments & Repairs: _____

H₂S

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POND

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NA

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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

LEA LAND LLC MONTHLY INSPECTION REPORTS

JUNE 2021 - JULY 2022

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: 08-08-22

Print Name: _____

Others: _____

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

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

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

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
LEA LAND LLC MONTHLY INSPECTION REPORTS
JUNE 2021 - JULY 2022

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: 04-04-22 Monday Print Name: José Olivares
 Others: _____ 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

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: _____

ATTACHMENT B **LEA LAND LLC MONTHLY INSPECTION REPORTS** **JUNE 2021 - JULY 2022**

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: 05-03-22 Tuesday Print Name: J. OLIVEROS
 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

1
2
3
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5
6
7
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9
10
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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: _____

ATTACHMENT B
LEA LAND LLC MONTHLY INSPECTION REPORTS
JUNE 2021 - JULY 2022

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

ATTACHMENT II.1.C - Inspection Form (Typical)

Date: 06-06-2022Print Name: José Oliveros

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

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4
5
6
7
8
9
10
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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
 New Mexico State Police 575-392-5580
 Eddy County Sheriff 575-887-1888
 Lea County Sheriff 575-397-3611

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

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT B
LEA LAND LLC MONTHLY INSPECTION REPORTS
JUNE 2021 - JULY 2022

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: 07-11-2022Print Name: Joe Antiveros

Others: _____

Signature: Joe Antiveros

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
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8
9
10
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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
 New Mexico State Police 575-392-5580
 Eddy County Sheriff 575-887-1888
 Lea County Sheriff 575-397-3611

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

Receipt & Approval

Name: _____

Date: _____

ATTACHMENT C

DATE _____

PURPOSE _____

July 2021

CUE COLUMN

NOTES

(1) As Temperature goes up, Stay Cool
Drink a lot of Fluids, Stay hydrated

(2) Do a walk around your
Equipment before getting in (Pre Trip)

(3) Always Have a Land Spotter
when backing up

See [Signature] (Initials)

SUMMARY

ATTACHMENT C

Lea Land LLC Surface Waste Management Facility

Safety Communications Program

Safety Meeting Attendance Sheet

Date: AUGUST 23 - 2021 Time: 10:00 AMTopic: SAFETY MEETINGPresenter: JOE OLIVEROS Department: MANAGER

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

JALITOS OLIVEROSMarn McKinneyIsaias AguirreEzequiel AguirreJohn GarciaManuela SanchezBrianda Carrillo

Signature

[Signature]Isaias AguirreEzequiel AguirreJohn GarciaManuela SanchezBrianda Carrillo

Absent

Date Covered

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

Date: SEPTEMBER 13-2021 Time: 8:00 AM
 Topic: SAFETY MEETING

Presenter: JOE OLIVEROS Department: MANAGER

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 NameSignatureBrianca CamilloBrianca CamilloSANTOS OLIVEROSManuela SanchezManuela SanchezJOE OLIVEROSJOE OLIVEROSmark metinneymark metinneyEzequiel AguirreEzequiel AguirreJose J. SanchezIsaias AguirreIsaias AguirreAbsentDate Covered

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

Date: October 04-2024 Time: 9:00 AM

Topic: SAFETY MEETING

Presenter: J. Ontiveros Department: MANAGER

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

Manuela Sanchez

Brianda Carrillo

Santos Ontiveros

Jota Garcia

Mark Martinez

Ezequiel Aguirre

Jose J. Sanchez

Isaias Aguirre

Manuela Sanchez

Brianda Carrillo

Santos Ontiveros

Jota Garcia

Mark Martinez

Ezequiel Aguirre

Jose J. Sanchez

Isaias Aguirre

Absent

Date Covered

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

Date: NOVEMBER 16- 2021Time: 9:00 AMTopic: SAFETY MEETINGPresenter: JOB OLIVEROS Department: MANAGER**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 NameSignature

Manuela Sanchez
Brianda Carrillo
SALUDS OLIVEROS
JOHN BICKIS
Mark McKinney
Ezequiel Aguirre
Jose J. Sanchez
Isaias Aguirre

Manuela Sanchez
Brianda Carrillo
JOHN BICKIS
Mark McKinney
Ezequiel Aguirre
Jose J. Sanchez
Isaias Aguirre

AbsentDate Covered

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

Date: 12-06-2021Time: 10:00 AmTopic: SAFETY MEETINGPresenter: JOE OLIVEROSDepartment: MANAGER**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 NameSignature

Manuela Sanchez
Brianda Carrillo
SANTOS OLIVEROS
JOHN OLIVEROS
Mark McKinney
Ezequiel Aguirre
Jose J. Sanchez
Isaias Aguirre

Manuela Sanchez
Brianda Carrillo
SANTOS OLIVEROS
JOHN OLIVEROS
Mark McKinney
Ezequiel Aguirre
Jose J. Sanchez
Isaias Aguirre

AbsentDate Covered

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

Date: 01-03-2022Time: 10:02 AMTopic: SAFETY MEETINGPresenter: J. D. LIVEROSDepartment: MANAGER**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 NameSignatureBrianda CarrilloBrianda CarrilloSANTOS DONTIVEROSSantos D. CarrilloManuela SanchezManuela SanchezAM LJohn Garciamark mckinneyMark McKinneyEzequiel AguirreEzequiel AguirreFscias AguirreFscias AguirreAbsentDate Covered

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

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

Topic: SAFETY MEETING

Presenter: Joe Oliveros Department: MANAGER

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

Manuela Sanchez
Brianda Carrillo
SALUDS Oliveros
JOHN GARCIA
Mark McKinney
Ezequiel Aguirre
Isaias Aguirre

Manuela Sanchez
Brianda Carrillo
SALUDS Oliveros
JOHN GARCIA
Mark McKinney
Ezequiel Aguirre
Isaias Aguirre

Absent

Date Covered

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

Date: MARCH 04-2022Time: 10:00 AMTopic: SAFETY MEETINGPresenter: JOE ONTIVEROSDepartment: MANAGER**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 NameSignature

Manuela Sanchez
Brianda Carrillo
Santos Ontiveros
JOHN GARCIA
Mark McKinney
Ezequiel Aguirre
Isaias Aguirre

Manuela Sanchez
Brianda Carrillo
Santos Ontiveros
JOHN GARCIA
Mark McKinney
Ezequiel Aguirre
Isaias Aguirre

AbsentDate Covered

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 - 2022Time: 8:00 AmTopic: Lockout-Tagout Procedure ✓Stormwater Pollution Prevention Plan ✓Good Housekeeping ✓Incompatible Waste ✓Presenter: Joe OntiverosDepartment: MANAGER

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 NameSignatureMark McKaneyIsaias AguirreEzequiel AguirreAnthony DacanM. L. John GarciaJoe OntiverosSANTOS ONTIVEROSBrianda CarrilloManuela SanchezAbsentDate Covered

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

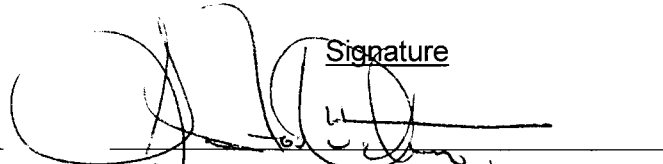
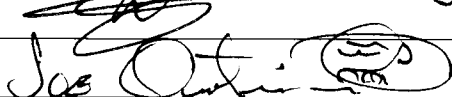
ATTACHMENT II.1.A - Safety Communications Program

Safety Meeting Attendance Sheet

Date: 05-09-2022Time: 11:00 AMTopic: Non-Exempt Liquids Recognition, H2S Treatment ProceduresPresenter: JOE OULIVEROSDepartment: MANAGER

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 NameSignatureSANTOS OULIVEROSManuela SanchezMark McKinneyJOE OULIVEROSJose J. SanchezIsaias AguirreJohn GarciaEzequiel AguirreDrianda CarrilloAbsentManuela SanchezJose J. SanchezIsaias AguirreJohn GarciaDate Covered

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
FEBRUARY 2022

ATTACHMENT II.1.A - Safety Communications Program

Safety Meeting Attendance Sheet

Date: 06-13-2022Time: 10:00 AMTopic: Material Acceptance and Handling; Form C-133 and C-138 HandlingPresenter: JOE ONTIVEROSDepartment: MANAGER

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 NameSignatureManuela SanchezSAULOS ONTIVEROSMark McKinnexJOE ONTIVEROSJose J. SanchezIsaias AguirreSohy GarciaEzequiel AguirreDiana CamilloAbsentManuela SanchezJOE ONTIVEROSJose J. SanchezIsaias AguirreSohy GarciaEzequiel AguirreDate Covered

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Friday, September 2, 2022 3:52 PM
To: Stephanie Grantham
Cc: claykilmer@gmail.com; Gordon, I
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 | brad.a.jones@state.nm.us
www.emnrd.nm.gov

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Secretary

Adrienne Sandoval
Director, Oil Conservation Division



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

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 140567

CONDITIONS

Operator: LEA LAND, LLC 1300 W Main St Oklahoma City, OK 73106	OGRID: 195376
	Action Number: 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