
March 19, 2026

Geoffrey Harper
K&S Law
2601 Olive St., Suite 2300
Dallas, Texas 75201

Reference: Historical RRC Records Summary Letter
Silo Mills
7800 Silo Mills Parkway
Joshua, Texas, 76058
Job Number: A26183.00091.000

Dear Mr. Harper:

UES is pleased to provide this letter summarizing the closure documentation and data associated with the former Joshua Landfarm No. 1 Facility, Joshua, Texas - Permit No. LF-0295.

BACKGROUND

UES was retained by King & Spalding, LLP to investigate the closure documentation of the historic landfarm facility that was permitted to incorporate drill cuttings into the native soil. The Railroad Commission of Texas (RRC) issued the permit to operate the landfarm on August 25, 2011. The landfarm consisted of 12 landfarm cells ranging in size from 20 acres to 65 acres. The entire permitted facility was listed as 656 acres in size with 485 acres dedicated to the landfarm cells.

Prior to mobilizing to the RRC Central Records library, a Freedom of Information Act (FOIA) request was made to receive all documents associated with the sampling and closure of the Joshua Landfarm Facility No. 1 (Joshua Landfarm). Due to the 4- to 6-week turnaround time frame of this request, UES personnel mobilized on March 12, 2026, to retrieve and scan all documents available.

In total, UES personnel retrieved seventy-three (73) files associated with sampling, quarterly reporting, RRC correspondence, inspections and closure reports.

CLOSURE HISTORY

The regulatory closure of the Joshua Landfarm was conducted over the period from 2013 to 2018. The closure requests were performed on a cell by cell basis with some cells requiring additional remediation prior to final closure approval.

Joshua Landfarm received an official response from the RRC on June 20, 2017, granting the permit cancellation. The table below summarizes the closure sample dates, report dates, and RRC approval dates for each of the 12 permitted landfarm cells.

Cell ID	Sample Date	Closure Report Date	RRC Approval Date
1	4/16/2014	5/30/2014	12/8/2016
2	12/29/2016	2/10/2017	5/8/2017
3	4/16/2014	5/30/2014	9/25/2015
4	7/7/2014	8/4/2014	9/25/2015
5	6/15/2014	7/15/2014	9/25/2015
6	6/15/2014	7/20/2014	12/8/2016
7	12/29/2016	2/10/2017	5/8/2017
8	6/6/2014	7/14/2014	12/8/2016
9	2/18/2014	6/12/2014	12/8/2016
10	7/6/2014	7/30/2014	12/8/2016
11	1/20/2015	1/31/2015	9/25/2015
12	5/29/2013	9/10/2013	9/25/2015

ADDITIONAL INFORMATION

On September 23, 2014, Joshua Landfarm LLC received guidance from RRC to conduct an arsenic background study. Following the guidance of the RRC, Envirotex completed the background study on September 29, 2014, submitting the findings to the RRC via a correspondence letter on October 14, 2014. The RRC agreed with the determination to increase the landfarm permit threshold for arsenic from 10 mg/kg to 28 mg/kg. Additionally, the RRC agreed the background concentration for arsenic at this site is 18 mg/kg. This was established in the revised permit letter dated November 14, 2014. Therefore, all arsenic concentrations in soil reported in the closure documentation were determined to be within background levels.

On May 8, 2017, the RRC conducted the Site Inspection prior to closure of the Landfarm. The inspection report contained additional correspondence with RRC Technical Coordinator, at the time, Christopher Moore stated that a 100-ft boring was conducted on the property in 2009 and

groundwater was not encountered. Based on this information, the risk to impact of the groundwater from the landfarm appears low.

CONCLUSIONS

UES confirmed that the Joshua Landfarm operated within the RRC's permitted requirements of operation. In addition, there were no violations of the permit during the facility's historical operation. UES has confirmed that the Joshua Landfarm was granted closure of all 12 landfarm cells by the RRC. Furthermore, the risk of impact to groundwater is low since groundwater was not detected within 100 feet of the ground surface.

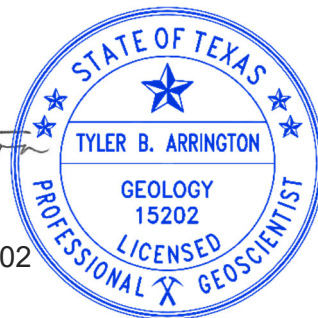
If you have any questions or comments regarding the information contained within this letter, please do not hesitate to call me at (281) 580-8892.

Respectfully,

UES



Tyler Arrington, PG, CAPM
Senior Project Manager
Professional Geoscientist 15202



3/19/2026

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Texas Registered Engineering Firm No. F-2430