



Outlook

---

**FW: [EXTERNAL] RWO Fed 33 2025 Sampling NAPP2100441738**

---

**From** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>**Date** Fri 10/17/2025 9:43 AM**To** Randall Hicks <r@rthicksconsult.com>**Cc** Bisbey-Kuehn, Elizabeth A. <ebisbeykuehn@nmslo.gov>; Rene Hope <hope\_rene@yahoo.com>; 'Kristin Pope' <kristin@rthicksconsult.com>

1 attachment (3 MB)

2025SamplingPlan\_Final.pdf;

Greetings all,

OCD does not consider the attached to be a sampling plan. In addition, there is a remedial proposal of sorts included in this document. As such, the document is rejected in its entirety. Be advised that App ID 511247, submitted through OCD Online Permitting Portal by Ray Westall Operating has been rejected due to errors made during the submission. A re-submittal is due by November 13, 2025 for review. Also be advised that no fluid or chemicals are to be applied to this release in any form other than natural precipitation events. If fluids and/or chemicals have been applied, OCD requests volumes, types, analyses, dates of application, SDS, and any other pertinent information be submitted to OCD immediately.

It is also noted that the Date of Discovery for this release was listed as being 12/31/2020. Google Earth Imagery Date 12/21/2019 indicates the release occurred prior to the 2019 date. In the event enforcement actions are initiated for this release, the time frame for the release and lack of response will be considered, as well as Ray Westall Operating's cooperation in bringing this incident to a rapid closure going forward. Recycling previously rejected proposals will likely not be conducive to a rapid closure.

**Mike Bratcher**

Incident Supervisor

Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave | Artesia, NM 88210

(575) 626-0857 |

[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)<http://www.emnrd.nm.gov/ocd>

---

**From:** Randall Hicks <r@rthicksconsult.com>**Sent:** Monday, October 6, 2025 4:31 PM**To:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>**Cc:** 'Bisbey-Kuehn, Elizabeth A.' <ebisbeykuehn@nmslo.gov>; 'Rene Hope' <hope\_rene@yahoo.com>; 'Kristin Pope' <kristin@rthicksconsult.com>**Subject:** [EXTERNAL] RWO Fed 33 2025 Sampling NAPP2100441738

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

Mr. Bratcher –

As stated in the transmittal letter, Rule 29 does not require notification of the District Office of this proposed event as it is NOT closure sampling. Therefore, we are not asking RWO to upload this document unless you wish it so or our reading of the Rule is incorrect.

There are a few administrative steps we need to take before collecting the samples, thus the schedule is not yet set.

Please contact me if you have any questions.

Randall Hicks, PG  
505-238-9515 (cell best number)  
505-266-5004 (land line – no voice mail allowed)  
901 Rio Grande Blvd. NW  
Suite F-142  
Albuquerque, NM 87104

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/oed/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

CONDITIONS

Action 523301

CONDITIONS

Operator: RAY WESTALL OPERATING, INC. P.O. Box 4 Loco Hills, NM 88255	OGRID: 119305
	Action Number: 523301
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
nvez	None	11/5/2025