

December 23, 2024

## Watkins 32 State #001 – Raybaw Operating, LLC



Remediation Plan Report

Written by Sapec-Eco, LLC for Raybaw  
Operating, LLC

**ATTN:** NMOCD District 1  
1625 N French Dr  
Hobbs, NM 88240

**RE:** Remediation Plan Report  
Watkins 32 State #001  
API No. 30-025-31735 Raybaw Operating, LLC [330220]  
Surface Location: F - 32 - 18S - 32E 1980 FNL 1650 FWL  
Lat/Long: 32.7058411, -103.7917099 NAD83  
NMOCD Incident IDs - nSAP0132411072 & nGRL0936533622

Raybaw Operating, LLC (Raybaw) has contracted Saptec-Eco, LLC (Saptec) to prepare this remediation report for two (2) historic open release areas at the Watkins 32 State #001 (Watkins).

### **Site Characterization**

The Watkins is located in Lea County, NM approximately ten (10) miles south of Maljamar, NM. This release site is in Unit F, Section 32, Township 18S, Range 32E, at GPS coordinates 32.7058411 latitude and -103.7917099 longitude. It can be accessed by a lease road that bears entry from the east. A Location Map can be referenced in Figure 4.

Per the New Mexico Bureau of Geology and Mineral Resources, the geology in this area is Eolian and piedmont deposits. Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits. Appendix B contains a Geologic Unit Map for reference.

The soil in this area, according to the United States Department of Agriculture Natural Resources Conservation Service soil survey, is made up of Kermit soils and Dune land, having 0 to 12 percent slopes. The drainage class for this type of soil is excessively drained. There is a low potential for karst geology to be present around the Watkins (Figure 2) with the nearest medium karst zone being 7.65 miles away. Soil Survey and Geological Data can be found in Appendix B. A Topographic Map can be referenced in Figure 3.

This site is in a known Lesser Prairie Chicken or Sand Dune Lizard habitat. It is in an Isolated Population Area within an LPC Timing Restriction Area zone, according to the LPC Timing Area 2021 Southern Map courtesy of the Bureau of Land Management. Any work to be done on this site between March 1, and June 15, will strictly adhere to the Timing Restrictions regulation. LPC-Dune Lizard Maps can be referenced in Figure 5.

This site is not in a sensitive plant species area but does have a Sheer's Beehive Cactus habitat located less than 4 miles to the southwest. A Tharp's Blue Star habitat is located northwest of this site at a distance of less than 10 miles. A Plant-Wildlife Map can be referenced in Figure 6.

According to the New Mexico Office of the State Engineer, depth to the nearest groundwater in this area is greater than 55 feet below grade surface (bgs). This data was recorded from CP-01938-P0D1, in January of 2023, which is located approximately 81 feet to the northeast of the Watkins wellhead. According to the United States Geological Survey, well water data from USGS 324356103471601 18S.32E.20.14411 records depth to the nearest groundwater at 166 feet bgs, with the last gauge being conducted in 1992. This well is approximately 1.75 miles away from the Watkins. All referenced Water Surveys and Water-Related Maps can be found in Appendix A.

The nearest surface water body is an unnamed Salt Pond located approximately 7.72 miles to the south of this site. The U.S. Fish and Wildlife Service National Wetlands Inventory shows the nearest wetland to be a Freshwater Pond approximately 3.41 miles to the northeast of this area. According to Fema's National Flood Hazard Layer search, the Watkins is situated in Zone D - Area of Undetermined Flood Hazard.

### **Release Information**

**nSAP0132411072:** No previous information could be found during the research phase of this incident. Included in this report will be a proposed sampling-delineation plan for the purpose of investigating where on this location this incident may have occurred. The area within and around the tank battery secondary containment will be excluded from investigation as this area was already closure approved on February 6, 2023, with the report submitted on February 3, 2023. This incident was nAB1636456292 and the submitted report is found in OCD Online: Permitting - Application ID 182484.

**nGRL0936533622:** On November 25, 2009, Bottom site glass on heater broke in half spilling 14 BO in dike, recovered 9 BO. Affected area is 20' X 20'. Called vacuum truck to pickup fluid. Will rake, till and fertilize. All of spill was contained in the dike

### **Proposed Remediation & Sampling Plan**

On behalf of Raybaw, Saptec respectfully proposes the following remediation and sampling plan for the two remaining open historic incidents, nAB1517443063 and nAB1614734572:

1. Collect discrete samples from six (6) sample points from the heater release area for incident nGRL0936533622. Two (2) of these sample points should be from within the release area, and four (4) of the sample points should be from around the edges of the release area. Samples will be collected from each sample point at depth intervals of surface, 1', 2', 3', and 4' bgs.
2. Collect discrete samples from six (6) sample points from various areas on the pad to investigate the incident nSAP0132411072. Two (2) sample points should be collected from the heater/separator area within the berm but outside of the area designated for nGRL0936533622. Four (4) sample points should be collected from around the wellhead and on the pad. Samples will be collected from each sample point at depth intervals of surface, 1', 2', 3', and 4' bgs. A Proposed Sampling-Delineation Map can be referenced in Figure 1.
3. Collect two (2) samples as background samples from areas off the pad to the north and to the west of the pad surface. These samples will be from no less than 1' bgs.
4. A total of 62 samples will be put on ice, jarred, prepared for delivery, then delivered to Envirotech Analytical Laboratories for official analysis of all constituents listed in Table 1 19.15.29.12 NMAC.
5. Once lab results have been received and all data has been assessed, any sample results verifying contamination is present over the regulatory limit of the 51-100-foot depth to ground water section of Table 1 19.15.29.12 NMAC, will be remediated by methods of hand-tool and/or mechanical excavation. Area calculations and volume calculations will be estimated as well.
6. After removing any existing contamination, a 48-Hour notification of confirmation sampling event will be submitted, and confirmation composite samples will be collected from all excavated areas representing no more than 200 square feet each. These samples will be collected from the base and walls of all excavated areas.
7. All samples will be put on ice, jarred, prepared for delivery, then delivered to Envirotech Analytical Laboratories for official analysis of all constituents listed in Table 1 19.15.29.12 NMAC.
8. Once lab results are received, if samples are verified to be under the regulatory limits of the 51-100-foot depth to ground water section of Table 1, a final closure report will be drafted and submitted to the Portal for approval.
9. If after step 4 of this plan, lab results reported for the samples collected verify contamination levels are already under the regulatory limit of the 51-100-foot depth to ground water section of Table 1, then a final closure report will be drafted and submitted to the Portal for approval.

### **Approval Request**

Raybaw Operating, LLC. respectfully requests that this remediation and sampling plan for the two remaining open historic incidents, nAB1517443063 and nAB1614734572, be approved. The tank battery and surrounding area can be excluded from investigation due to previously performed remediation activities and the NMOCD-approved closure report for incident nAB1636456292 (OCD Online: Permitting – Application ID 182484). NMOCD Correspondence regarding these two historic incidents can be found in Appendix C. Raybaw has complied with the applicable remediation plan requirements outlined in 19.15.29.12 NMAC

Should you have any questions or need additional information, please feel free to contact:  
Raybaw Operating, LLC. – Nancy Winn at 281-793-5452 or [nwinn@sbcglobal.net](mailto:nwinn@sbcglobal.net).  
Saptec-Eco, LLC. – Tom Bynum at 580-748-1613 or [tombynum@saptec-eco.com](mailto:tombynum@saptec-eco.com).

### **Attachments**

#### **Figures**

- 1- Proposed Sampling-Delineation Map
- 2- Karst Map
- 3- Topographic Map
- 4- Location Map
- 5- LPC-Dune Lizard Maps
- 6- Plant-Wildlife Map

**Appendices**

Appendix A – Water Surveys & Water-Related Maps

Appendix B – Soil Survey & Geological Data

Appendix C – NMOCD Correspondence

Appendix D – Photographic Documentation

## ***Figures***

1 – Proposed Sampling-Delineation Plan

2 – Karst Map

3 – Topographic Map

4 – Location Map

5 – LPC-Dune Lizard Maps

6 – Plant-Wildlife Map

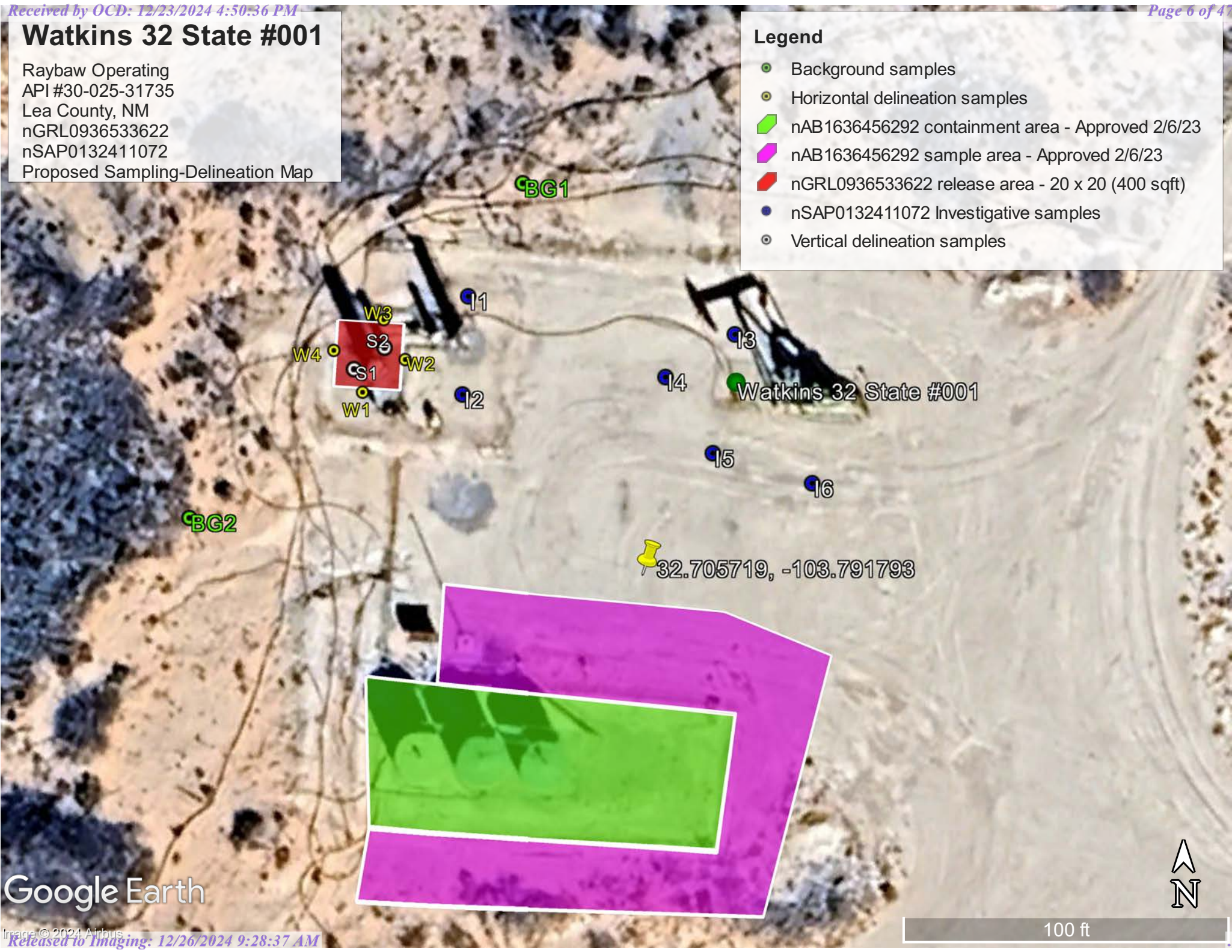


# Watkins 32 State #001

Raybaw Operating  
API #30-025-31735  
Lea County, NM  
nGRL0936533622  
nSAP0132411072  
Proposed Sampling-Delineation Map

Legend

- Background samples
- Horizontal delineation samples
- nAB1636456292 containment area - Approved 2/6/23
- nAB1636456292 sample area - Approved 2/6/23
- nGRL0936533622 release area - 20 x 20 (400 sqft)
- nSAP0132411072 Investigative samples
- Vertical delineation samples






Google Earth



## Watkins 32 State #001

Raybaw Operating  
API #30-025-31735  
Lea County, NM  
nGRL0936533622  
nSAP0132411072  
Karst Map

### Legend

-  High Karst
-  Low Karst
-  Medium Karst

Watkins 32 State #001

Google Earth



4 mi



Raybaw Operating  
API #30-025-31735  
Lea County, NM  
nGRL0936533622  
nSAP0132411072  
Topographic Map

- Watkins 32 State #001



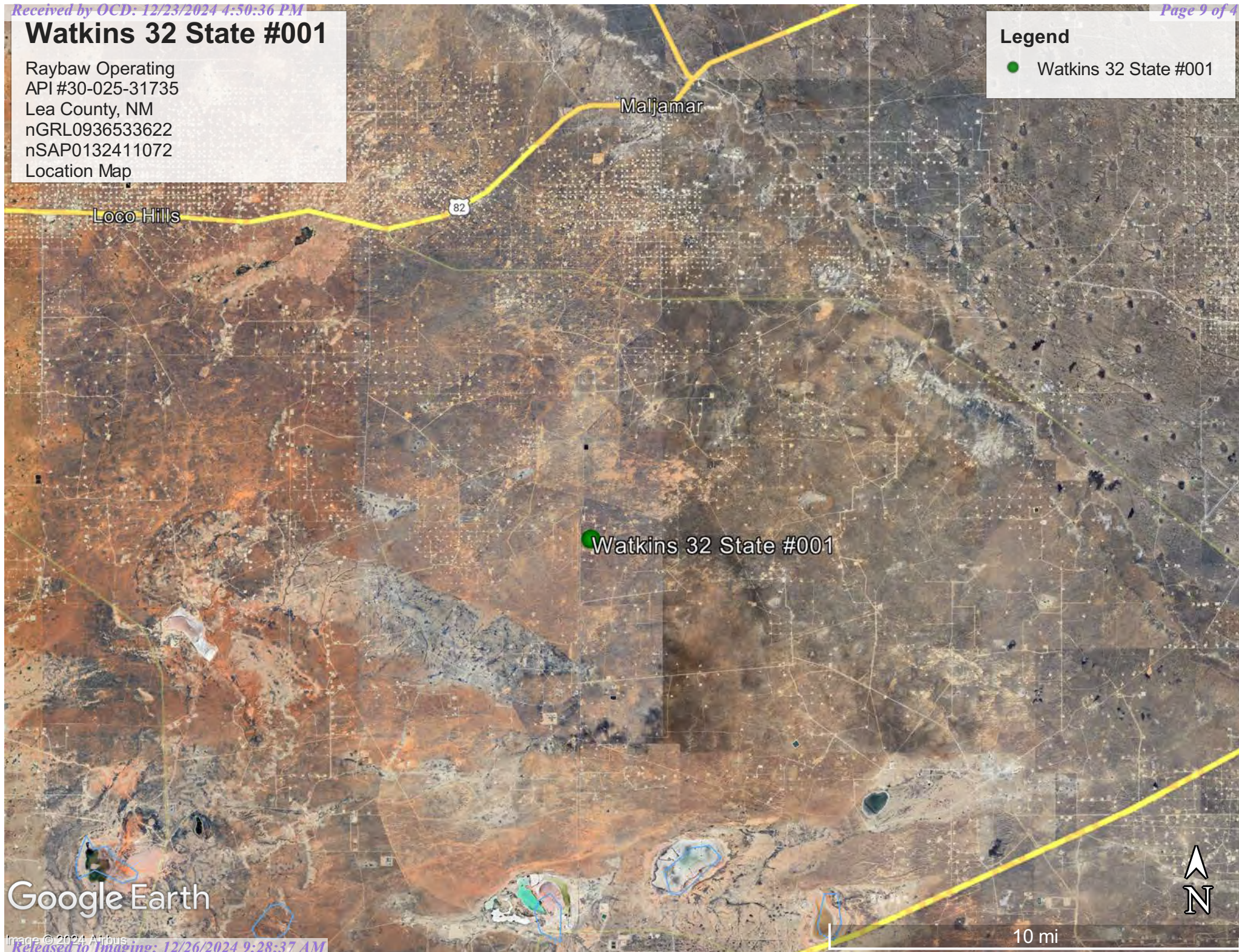


# Watkins 32 State #001

Raybaw Operating  
API #30-025-31735  
Lea County, NM  
nGRL0936533622  
nSAP0132411072  
Location Map

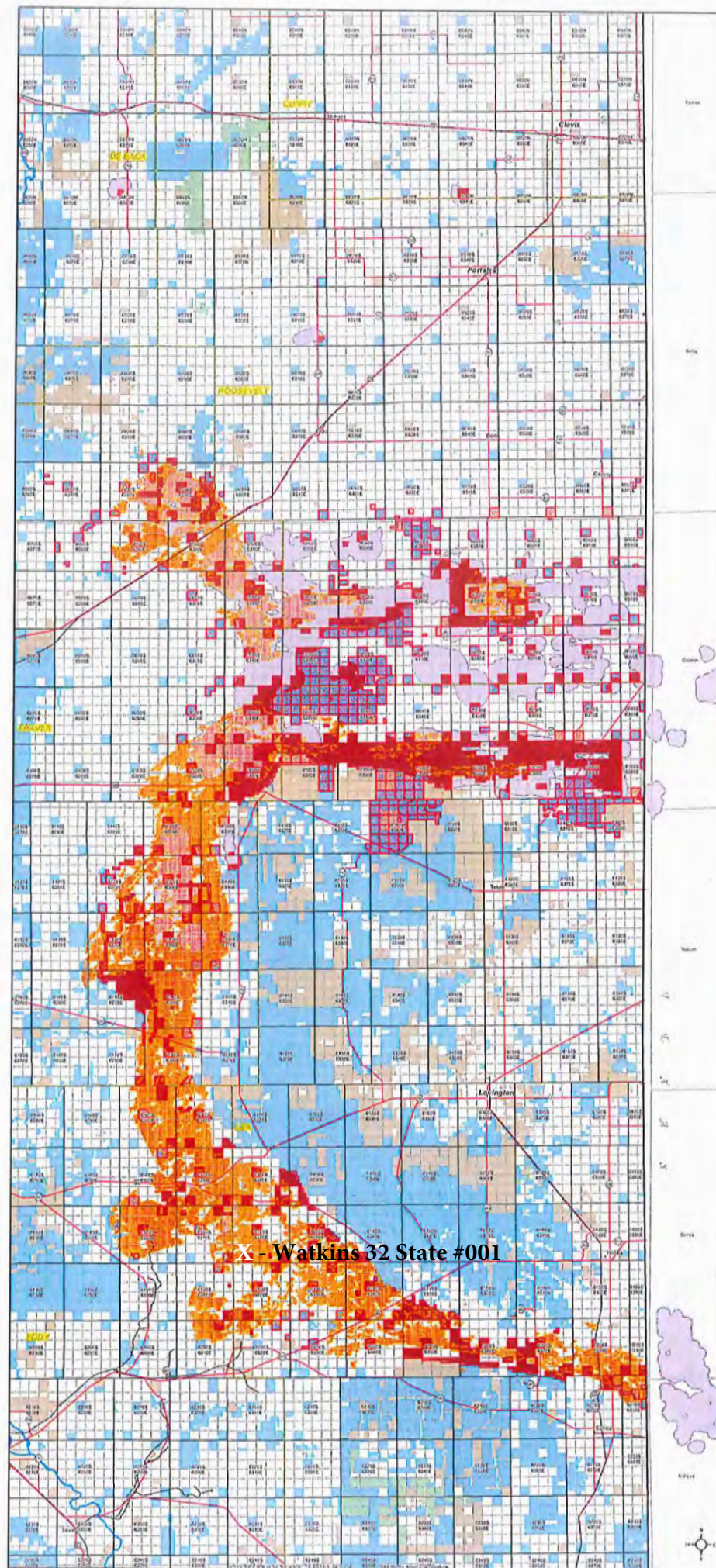
## Legend

● Watkins 32 State #001



Google Earth





**NEW MEXICO**  
**STATE LAND OFFICE**  
*When we Take Care of our Land, Our Land Takes Care of us!*

Ray Powell, M.S., D.V.M.  
Commissioner of Public Lands  
505-827-5760  
www.nmstatelands.org

**March 20, 2014 Revisions  
to Lesser Prairie-Chicken  
and Sand Dune  
Sagebrush Lizard  
CCAA CI-OGOP-025**



**Legend**

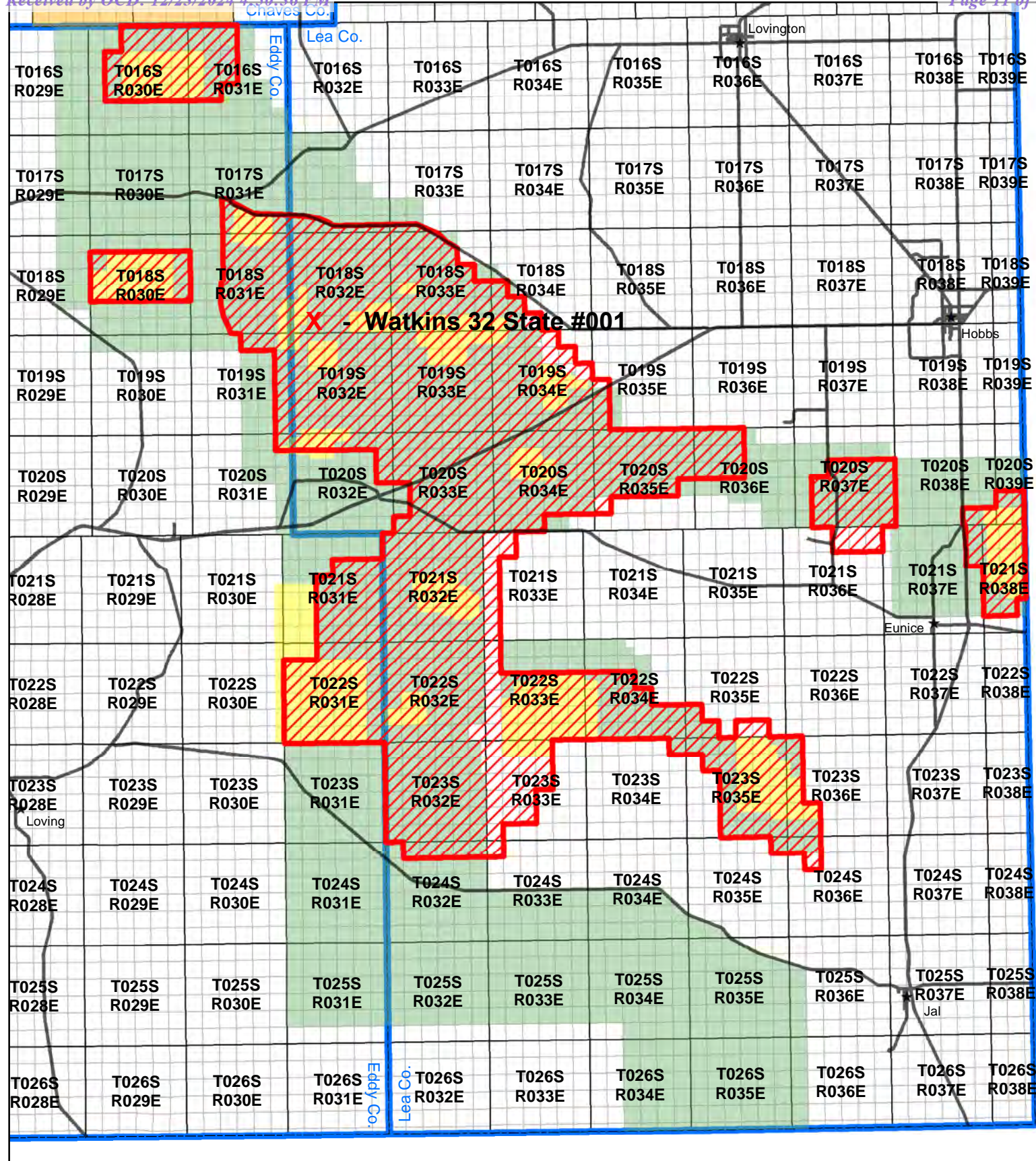
- Additional State Trust Lands Inclusion
- Rivers
- Towns
- County Seats
- Roads**
  - Interstate Highway
  - US Highway
  - State Highway
  - Railroads
- Trust Lands within CCAA, March 2012
- Surface Estate
- Subsurface Estate
- Surface and Subsurface Estate
- Core Habitat, Lesser Prairie Chicken
- Updated Sand Dune Lizard Habitat



The New Mexico State Land Office assumes no responsibility or liability for, or in connection with, the accuracy, reliability or use of the information provided here, in State Land Office data layers or any other data layer.

Downloaded with ArcGIS 10.6, 11 March 2014  
Updated with New Mexico CCAA Amendment 10/2014  
Exported with ArcGIS 10.6, 11 March 2014  
10/12/2014 Geographic Information Center, Landcare Institute  
8/20/2014/10/12/2014





# LPC Timing Area 2021

Southern Map



— NM Major Roads

LPC Timing Restriction Area

NM Counties

## RMPA Zones

Habitat Area

Sparse and Scattered Population Area

Isolated Population Area

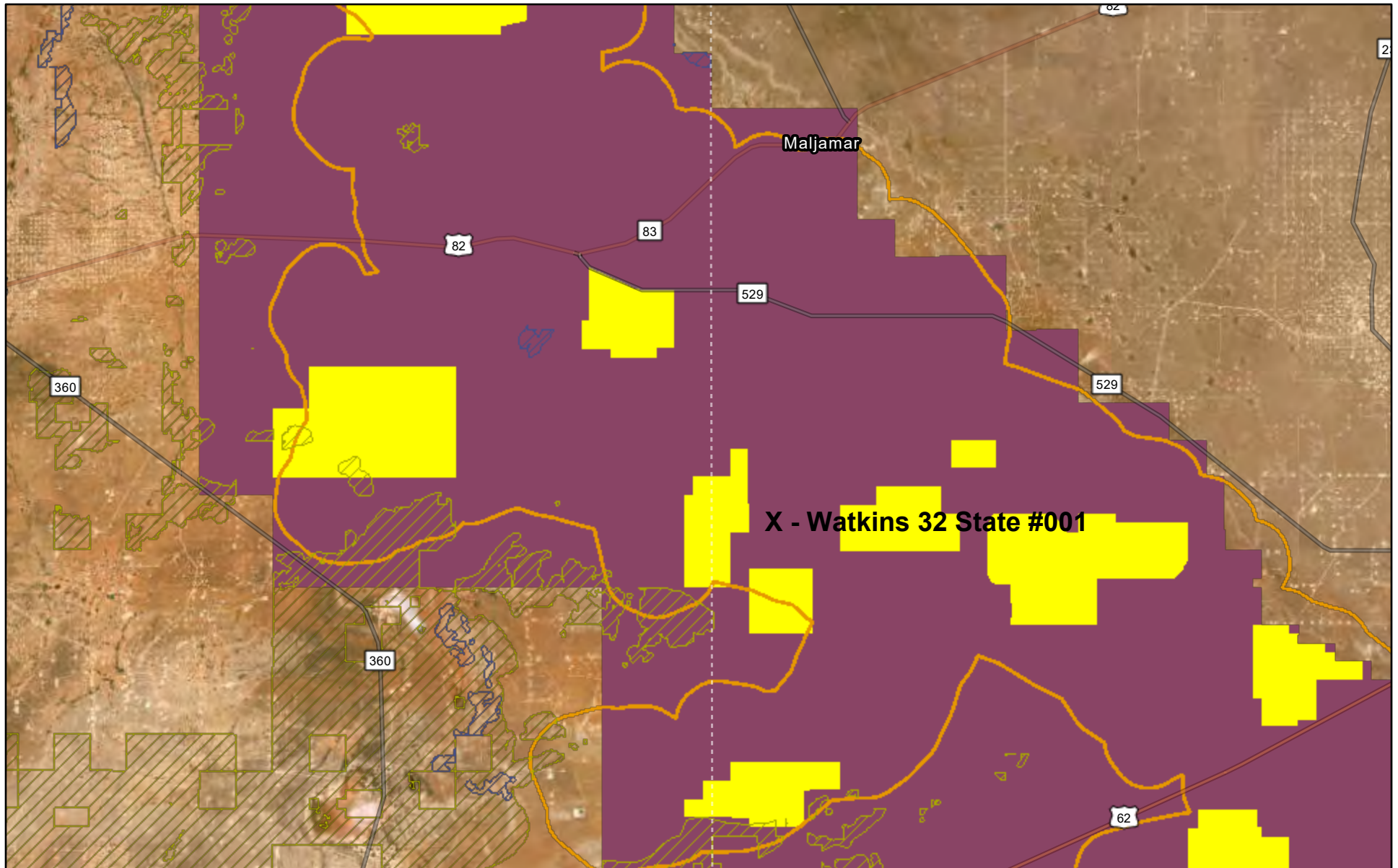
This Timing Restriction Map only applies to Carlsbad FO

No Warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. Original data was compiled from various sources. Data collection may not meet National Map Accuracy Standards. This information may be updated without notification.





# Plant-Wildlife Map



12/20/2024

Potential Habitat (Planning Area Only)

Scheer's beehive cactus

Tharp's blue-star

Dunes Sage Brush Lizard Habitat

Lesser Prairie Chicken Habitat

Habitat Evaluation Area

Isolated Population Area

World Imagery

Low Resolution 15m Imagery

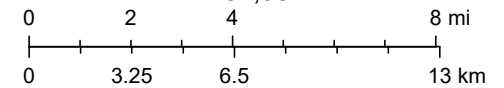
High Resolution 60cm Imagery

High Resolution 30cm Imagery

Citations

75m Resolution Metadata

1:284,382



Earthstar Geographics, Texas Parks & Wildlife, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, USFWS, Bureau of Land

## ***Appendix A***

Water Surveys

Water-Related Maps



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.) (R=POD has been replaced, O=orphaned, C=the file is closed) (quarters are smallest to largest) (meters) (In feet)

POD Number	Code	Sub basin	County	Q64	Q16	Q4	Sec	Tws	Range	X	Y	Map	Distance	Well Depth	Depth Water	Water Column
<a href="#">CP 01938 POD1</a>		CP	LE	NW	SE	NW	32	18S	32E	613276.6	3619332.4		27	51		
<a href="#">CP 02015 POD1</a>		CP	LE	SW	SW	SW	05	19S	32E	612911.8	3616830.4		2514	55		
<a href="#">CP 02015 POD1</a>	C	CP	LE	SW	SW	SW	05	19S	32E	612911.8	3616830.4		2514	55		

Average Depth to Water: 0 feet

Minimum Depth: 0 feet

Maximum Depth: 0 feet

Record Count: 3

Basin/County Search:  
County: LE

UTM Filters (in meters):  
Easting: 613250.88  
Northing: 3619321.92  
Radius: 03000

\* UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.





# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD 1		WELL TAG ID NO.		OSE FILE NO(S). CP 01938		
	WELL OWNER NAME(S) Raybaw Operating, LLC				PHONE (OPTIONAL)		
	WELL OWNER MAILING ADDRESS 2626 Cole Avenue Suite 300				CITY Dallas	STATE TX ZIP 75204	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 42	SECONDS 21.34 N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	47	29.13 W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE Unit Letter "F", Section 32, T18S, R32E							
2. DRILLING & CASING INFORMATION	LICENSE NO. 1755		NAME OF LICENSED DRILLER John Norris		NAME OF WELL DRILLING COMPANY Hungry Horse, LLC		
	DRILLING STARTED 1/18/23	DRILLING ENDED 1/18/23	DEPTH OF COMPLETED WELL (FT) NA	BORE HOLE DEPTH (FT) 51	DEPTH WATER FIRST ENCOUNTERED (FT) NA		
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN *add Centralizer info below <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) NA	DATE STATIC MEASURED NA	
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:						
	DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER – SPECIFY:					CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>	
	DEPTH (feet bgl) FROM TO		BORE HOLE DIAM. (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)
				No Casing			
3. ANNULAR MATERIAL	DEPTH (feet bgl) FROM TO		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL <i>*(if using Centralizers for Artesian wells- indicate the spacing below)</i>	AMOUNT (cubic feet)	METHOD OF PLACEMENT	
	0 10		6	bentonite chips	1.96	tremie	
	10 51		6	native soil	8.05	shovel	


FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. CP-1938	POD NO. 1	TRN NO. 740 275
LOCATION 32. 18S. 32E 141	WELL TAG ID NO. N17	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	10	10	red sand	Y    ✓ N	
	10	20	10	caliche	Y    ✓ N	
	20	40	20	red sand	Y    ✓ N	
	40	47	7	sand rock mix	Y    ✓ N	
	47	51	4	white rock	Y    ✓ N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input checked="" type="checkbox"/> OTHER – SPECIFY: not tested					TOTAL ESTIMATED WELL YIELD (gpm): 0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION: The borehole was drilled according to NMOCD request as no water wells exist within a half-mile radius of a release site. As per NMOCD, drill a 51' borehole, wait 72 hours, then gauge for presence of water. No water was present so borehole was plugged per approved plugging plan. <div style="text-align: right;">QSE DTI FEB 6 2023 08:34</div>	
PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE:		

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:
 _____ SIGNATURE OF DRILLER / PRINT SIGNEE NAME	John Norris _____ DATE

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 09/22/2022)	
FILE NO. CP-1938	POD NO. 1	TRN NO. 740275	
LOCATION 32.155. 32E 141	WELL TAG ID NO. NA	PAGE 2 OF 2	



# OSE POD Location Map



11/5/2024, 10:01:13 AM

GIS WATERS PODs

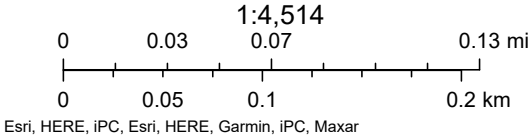
● Plugged

□ OSE District Boundary

Water Right Regulations New Mexico State Trust Lands

□ Closure Area

□ Both Estates







[USGS Home](#)  
[Contact USGS](#)  
[Search USGS](#)

## National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

- Explore the *NEW* [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for the Nation

 Important: [Next Generation Monitoring Location Page](#)

### Search Results -- 1 sites found

site\_no list =

- 324356103471601

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

### USGS 324356103471601 18S.32E.20.14411

Available data for this site

Groundwater: Field measurements

GO

Lea County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°43'56", Longitude 103°47'16" NAD27

Land-surface elevation 3,746 feet above NAVD88

The depth of the well is 270 feet below land surface.

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Chinle Formation (231CHNL) local aquifer.

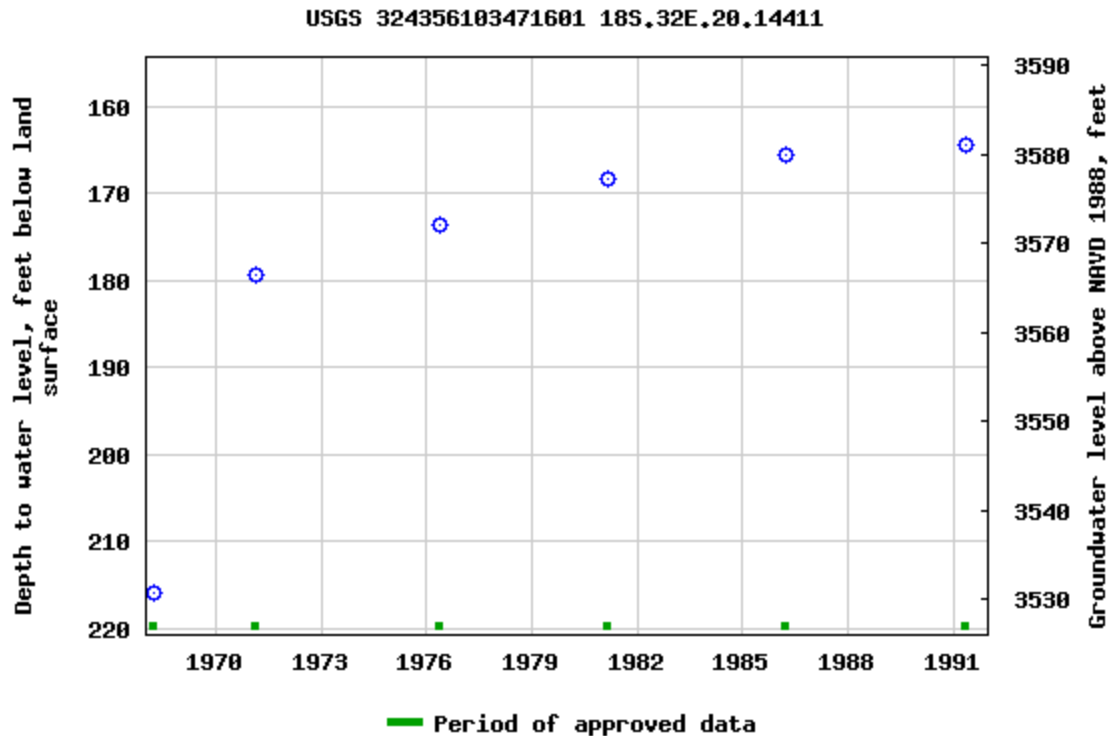
#### Output formats

[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)



Breaks in the plot represent a gap of at least one year between field measurements.  
[Download a presentation-quality graph](#)

- [Questions or Comments](#)
- [Help](#)
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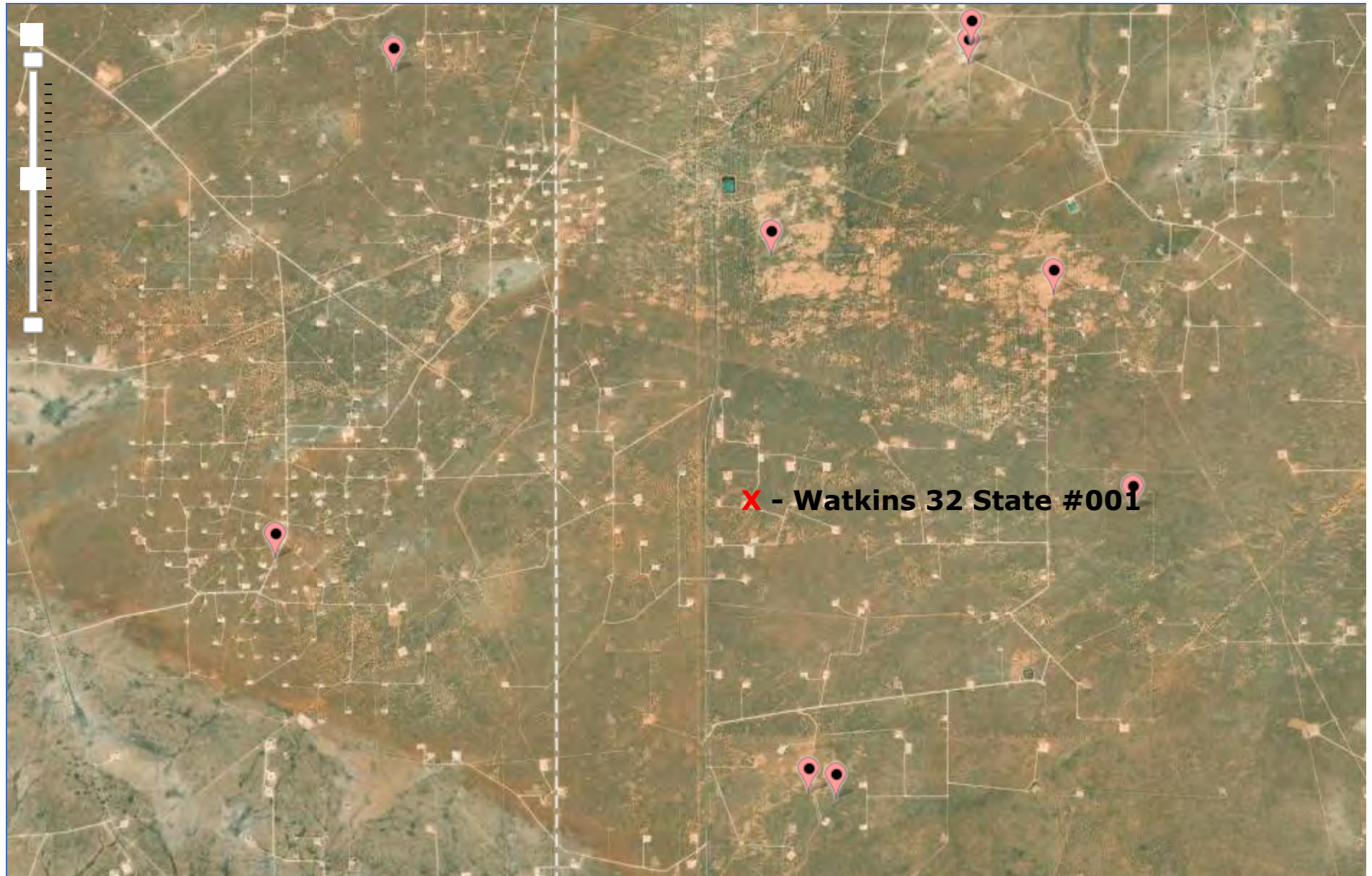
[Accessibility](#)   [FOIA](#)   [Privacy](#)   [Policies and Notices](#)  
[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)  
**Title: Groundwater for USA: Water Levels**  
**URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>**



Page Contact Information: [USGS Water Data Support Team](#)  
Page Last Modified: 2024-11-05 11:04:28 EST  
0.75 0.51 nadww01



## National Water Information System: Mapper







## Watkins 32 State #001

Raybaw Operating  
API #30-025-31735  
Lea County, NM  
nGRL0936533622  
nSAP0132411072  
Surface Water Map

### Legend

-  7.72 Miles
-  Salt Pond

Watkins 32 State #001

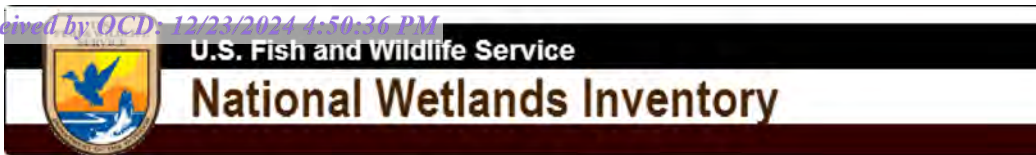
Salt Pond

Google Earth



4 mi





## Wetlands Map



November 5, 2024

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

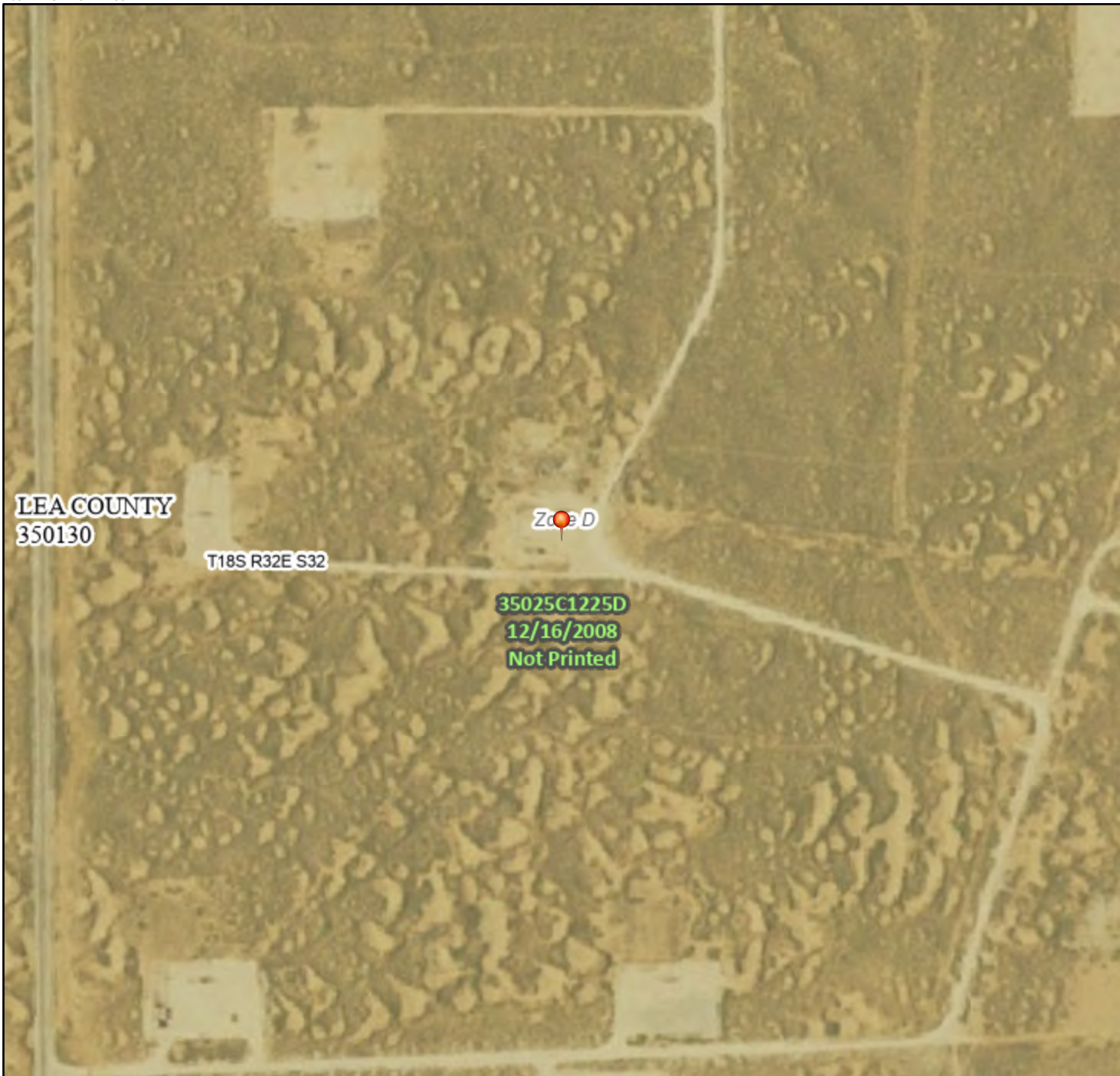
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



# National Flood Hazard Layer FIRMette



103°47'49"W 32°42'35"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

103°47'11"W 32°42'5"N

Released to Imaging: 12/26/2024 9:28:37 AM

Basemap Imagery Source: USGS National Map 2023

## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 11/5/2024 at 4:08 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



## ***Appendix B***

Soil Survey

Soil Map

Geologic Unit Map

Map Unit Description: Kermit soils and Dune land, 0 to 12 percent slopes---Lea County, New Mexico

---

## Lea County, New Mexico

### KM—Kermit soils and Dune land, 0 to 12 percent slopes

#### Map Unit Setting

*National map unit symbol:* dmpx

*Elevation:* 3,000 to 4,400 feet

*Mean annual precipitation:* 10 to 15 inches

*Mean annual air temperature:* 60 to 62 degrees F

*Frost-free period:* 190 to 205 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Kermit and similar soils:* 46 percent

*Dune land:* 44 percent

*Minor components:* 10 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Kermit

##### Setting

*Landform:* Dunes

*Landform position (two-dimensional):* Shoulder, backslope, footslope

*Landform position (three-dimensional):* Side slope

*Down-slope shape:* Concave, convex, linear

*Across-slope shape:* Convex

*Parent material:* Calcareous sandy eolian deposits derived from sedimentary rock

##### Typical profile

*A - 0 to 8 inches:* fine sand

*C - 8 to 60 inches:* fine sand

##### Properties and qualities

*Slope:* 5 to 12 percent

*Depth to restrictive feature:* More than 80 inches

*Drainage class:* Excessively drained

*Runoff class:* Very low

*Capacity of the most limiting layer to transmit water (Ksat):* Very high (20.00 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Calcium carbonate, maximum content:* 3 percent

*Gypsum, maximum content:* 1 percent

*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 2.0

*Available water supply, 0 to 60 inches:* Low (about 3.1 inches)

Map Unit Description: Kermit soils and Dune land, 0 to 12 percent slopes---Lea County, New Mexico

---

**Interpretive groups**

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 7e

*Hydrologic Soil Group:* A

*Ecological site:* R070BC022NM - Sandhills

*Hydric soil rating:* No

**Description of Dune Land****Setting**

*Landform:* Dunes

*Landform position (two-dimensional):* Shoulder, backslope, footslope

*Landform position (three-dimensional):* Side slope

*Down-slope shape:* Concave, convex, linear

*Across-slope shape:* Convex

*Parent material:* Sandy eolian deposits derived from sedimentary rock

**Typical profile**

*A - 0 to 6 inches:* fine sand

*C - 6 to 60 inches:* fine sand

**Interpretive groups**

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 8

*Hydrologic Soil Group:* A

*Hydric soil rating:* No

**Minor Components****Palomas**

*Percent of map unit:* 3 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

**Pyote**

*Percent of map unit:* 3 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

**Wink**

*Percent of map unit:* 2 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

**Maljamar**

*Percent of map unit:* 2 percent

*Ecological site:* R070BD003NM - Loamy Sand



Map Unit Description: Kermit soils and Dune land, 0 to 12 percent slopes---Lea County, New Mexico

---

*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Lea County, New Mexico  
Survey Area Data: Version 21, Sep 3, 2024


Soil Map—Lea County, New Mexico




## Soil Map—Lea County, New Mexico


## MAP LEGEND

## Area of Interest (AOI)

 Area of Interest (AOI)

## Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

## Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

## Water Features



Streams and Canals

## Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

## Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Lea County, New Mexico

Survey Area Data: Version 21, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 7, 2020—May 12, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.





Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
KD	Kermit-Palomas fine sands, 0 to 12 percent slopes	0.8	22.6%
KM	Kermit soils and Dune land, 0 to 12 percent slopes	2.6	77.4%
Totals for Area of Interest		3.4	100.0%

# Watkins 32 State #001

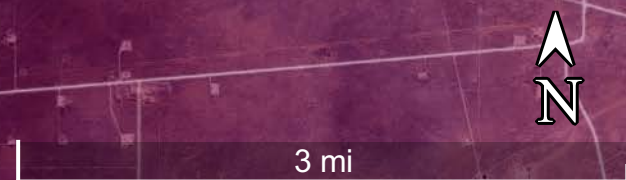
Raybaw Operating  
API #30-025-31735  
Lea County, NM  
nGRL0936533622  
nSAP0132411072  
Geologic Unit Map

## Legend

-  Eolian and piedmont deposits
-  Piedmont alluvial deposits

Watkins 32 State #001

Google Earth





## ***Appendix C***

NMOCD Correspondence



Outlook

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**RE: [EXTERNAL] NSAP0132411072 -- Watkins 32 State #001 @30-025-31735**

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**From** Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>**Date** Wed 11/6/2024 11:39 AM**To** Tom bynum <tombynum@saptec-eco.com>; Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>**Cc** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; 'Nancy Winn' <nwinn@sbcglobal.net>; 'Tom Campbell' <tom@oaknrg.com>; 'Irma Rodriquez' <irma@oaknrg.com>

Good Morning Tom,

The sampling plan will need to be included in a remediation work plan and submitted via the OCD permitting portal. OCD understands that estimates are sometime used during the submittal of a remediation work plan. The information provided can be updated later when submitting subsequent reports.

**Ashley Maxwell** • Environmental Specialist

Environmental Bureau Projects Group

EMNRD - Oil Conservation Division

1000 Rio Brazos Road | Aztec, NM 87110

505.635.5000 | [Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)<http://www.emnrd.state.nm.us/OCD/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

---

**From:** Tom bynum <tombynum@saptec-eco.com>**Sent:** Wednesday, November 6, 2024 10:33 AM**To:** Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>**Cc:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; 'Nancy Winn' <nwinn@sbcglobal.net>; 'Tom Campbell' <tom@oaknrg.com>; 'Irma Rodriquez' <irma@oaknrg.com>**Subject:** Re: [EXTERNAL] NSAP0132411072 -- Watkins 32 State #001 @30-025-31735

Some people who received this message don't often get email from [tombynum@saptec-eco.com](mailto:tombynum@saptec-eco.com). [Learn why this is important](#)  
Good morning,

Attached is the proposed sampling plan we came up with for the Watkins incidents (nSAP0132411072 & nGRL0936533622), would it be acceptable to ask for an approval of this plan via email, then compile all received data in a remediation plan to be submitted to the NMOCD Pay Portal afterwards?

If not, and you would prefer to have this included in a remediation plan now, to be submitted to the Portal, I can surely do that. But without our delineation information the plan won't have calculated areas and volumes figured yet.

We are happy to oblige in either case, thank you for your time today.

Many thanks,



*Tom Bynum*

Sapec-Eco, LLC  
(580) 748-1613



---

**From:** Tom bynum <[tombynum@sapec-eco.com](mailto:tombynum@sapec-eco.com)>

**Sent:** Tuesday, November 5, 2024 12:07 PM

**To:** Maxwell, Ashley, EMNRD <[Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)>; Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>

**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; 'Nancy Winn' <[nwinn@sbcglobal.net](mailto:nwinn@sbcglobal.net)>; 'Tom Campbell' <[tom@oaknrg.com](mailto:tom@oaknrg.com)>; 'Irma Rodriguez' <[irma@oaknrg.com](mailto:irma@oaknrg.com)>

**Subject:** Re: [EXTERNAL] NSAP0132411072 -- Watkins 32 State #001 @30-025-31735

Hey Ashley,

Thank you for responding, we do have NGRL0936533622 on our radar and are currently working on site characterization, delineation, and a remediation plan for that one. I appreciate your time.

Many thanks,

*Tom Bynum*

Sapec-Eco, LLC  
(580) 748-1613



---

**From:** Maxwell, Ashley, EMNRD <[Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)>

**Sent:** Tuesday, November 5, 2024 11:47 AM

**To:** Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>; Tom bynum <[tombynum@sapec-eco.com](mailto:tombynum@sapec-eco.com)>

**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; 'Nancy Winn' <[nwinn@sbcglobal.net](mailto:nwinn@sbcglobal.net)>; 'Tom Campbell' <[tom@oaknrg.com](mailto:tom@oaknrg.com)>; 'Irma Rodriguez' <[irma@oaknrg.com](mailto:irma@oaknrg.com)>

**Subject:** RE: [EXTERNAL] NSAP0132411072 -- Watkins 32 State #001 @30-025-31735

Good Morning Tom,

I have reviewed NSAP0132411072 -- Watkins 32 State #001 @30-025-31735 and all the information available is provided. While researching, it appears that there is another incident that remains unresolved on this location (NGRL0936533622). This release will need to be addressed as well as it is currently out of compliance.

Please submit a work plan for both incidents by January 3, 2025. The work plan for incident NSAP0132411072 will need to include how Raybaw intends to investigate where the release occurred and proposed sampling plan.

**Ashley Maxwell** • Environmental Specialist

Environmental Bureau Projects Group

EMNRD - Oil Conservation Division

1000 Rio Brazos Road | Aztec, NM 87110

505.635.5000 | [Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)

<http://www.emnrd.state.nm.us/OCD/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/oed/oed-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/oed/oed-announcements-and-notifications/> or <https://www.emnrd.nm.gov/oed/oed-forms/>.

---

**From:** Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>  
**Sent:** Tuesday, November 5, 2024 9:52 AM  
**To:** Maxwell, Ashley, EMNRD <[Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)>  
**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Subject:** FW: [EXTERNAL] NSAP0132411072 -- Watkins 32 State #001 @30-025-31735

Hi Ashley,

You are named as the reviewer on this one. Do you mind seeing what you might be able to find?

Kind regards,

Shelly

**Shelly Wells** \* Environmental Specialist-Advanced  
Environmental Bureau  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive|Santa Fe, NM 87505  
(505)469-7520|[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Tom bynum <[tombynum@saptec-eco.com](mailto:tombynum@saptec-eco.com)>  
**Sent:** Tuesday, November 5, 2024 8:12 AM  
**To:** Enviro, OCD, EMNRD <[OCD.Enviro@emnrd.nm.gov](mailto:OCD.Enviro@emnrd.nm.gov)>  
**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Nancy Winn <[nwinn@sbcglobal.net](mailto:nwinn@sbcglobal.net)>;  
[tom@oaknrg.com](mailto:tom@oaknrg.com); [irma@oaknrg.com](mailto:irma@oaknrg.com)  
**Subject:** [EXTERNAL] NSAP0132411072 -- Watkins 32 State #001 @30-025-31735

Some people who received this message don't often get email from [tombynum@saptec-eco.com](mailto:tombynum@saptec-eco.com). [Learn why this is important](#)  
**CAUTION:** This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning,

After much research and reaching out to the previous operator, Raybaw has not come up with any information regarding the above-mentioned incident.

Is there any chance the Division has any other information surrounding this incident?

If so, could the Division share that information with Raybaw and Saptec-Eco so that we can begin assessing for remediation?

If not, how would the Division advise us to proceed on this matter?

Thank you for your time and help, please let me know if you have any questions.

[OCD Permitting - Incidents](#)

Many thanks,

*Tom Bynum*



Saptec-Eco, LLC  
(580) 748-1613



## ***Appendix D***

Photographic Documentation













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

General Information  
Phone: (505) 629-6116

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

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

QUESTIONS

Action 414880

QUESTIONS

Operator: RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID: 330220
	Action Number: 414880
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Prerequisites	
Incident ID (n#)	nGRL0936533622
Incident Name	NGRL0936533622 WATKINS 32 STATE #001 @ 30-025-31735
Incident Type	Oil Release
Incident Status	Remediation Plan Received
Incident Well	[30-025-31735] WATKINS 32 STATE #001
Incident Facility	[fGRL0936531881] Watkins 32 State Battery

Location of Release Source

Please answer all the questions in this group.

Site Name	WATKINS 32 STATE #001
Date Release Discovered	11/25/2009
Surface Owner	State

Incident Details

Please answer all the questions in this group.

Incident Type	Oil Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Cause: Freeze   Fitting   Crude Oil   Released: 14 BBL   Recovered: 9 BBL   Lost: 5 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	Not answered.
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.



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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 2

Action 414880

**QUESTIONS (continued)**

Operator: RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID: 330220
	Action Number: 414880
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

**Initial Response**

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Michael Lee Title: COO Email: michael@raybawoperating.com Date: 12/23/2024
--	---

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

QUESTIONS, Page 3

Action 414880

**QUESTIONS (continued)**

Operator: RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID: 330220
	Action Number: 414880
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	0
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	02/03/2025
On what date will (or did) the final sampling or liner inspection occur	02/10/2025
On what date will (or was) the remediation complete(d)	02/17/2025
What is the estimated surface area (in square feet) that will be reclaimed	1500
What is the estimated volume (in cubic yards) that will be reclaimed	100
What is the estimated surface area (in square feet) that will be remediated	1500
What is the estimated volume (in cubic yards) that will be remediated	100

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.



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**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 4

Action 414880

**QUESTIONS (continued)**

Operator: RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID: 330220
	Action Number: 414880
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	LEA LAND LANDFILL [FEEM0112342028]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Michael Lee Title: COO Email: michael@raybawoperating.com Date: 12/23/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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

General Information  
Phone: (505) 629-6116

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

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

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Action 414880

QUESTIONS (continued)

Operator:  RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID:  330220
	Action Number:  414880
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No



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Action 414880

QUESTIONS (continued)

Operator: RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID: 330220
	Action Number: 414880
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
Requesting a remediation closure approval with this submission	No

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CONDITIONS

Action 414880

CONDITIONS

Operator: RAYBAW Operating, LLC 2626 Cole Avenue Dallas, TX 75204	OGRID: 330220
	Action Number: 414880
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Remediation plan approved. Submit a report via the OCD permitting portal by March 28, 2025.	12/26/2024