IN THE MATTER OF THE APPLICATION OF THE BOARD
OF COUNTY COMMISSIONERS OF RIO ARRIBA COUNTY
FOR CANCELLATION OR SUSPENSION OF APPLICATIONS
FOR PERMITS TO DRILL (APD'S) FILED BY APPROACH
OPERATING, LLC, RIO ARRIBA COUNTY, NEW MEXICO

CASE NO. 14134

IN THE MATTER OF THE APPLICATION OF APPROACH
OPERATING, LLC FOR APPROVAL OF SIX APPLICATIONS FOR
PERMITS TO DRILL, RIO ARRIBA COUNTY, NEW MEXICO

CASE NO. 14141

NOTICE OF INTERVENTION

Pursuant to NMAC 19.15.4.11(A), the Rice Family Living Trust ("the Trust") hereby

provides its Notice of Intervention in the above captioned proceedings. The Trust will be

represented in these proceedings by:

Steven Sugarman
1210 Luisa Street, Suite 2
Santa Fe, NM 87505
phone: (505)672-5082
e-mail: stevensugarman@hotmail.com
fax: (302) 689-0819

The Trust is intervening in these matter because it has an interest as a landowner in the

Rito de Tierra Amarilla watershed in the protection and preservation of surface water quality and

groundwater quality in the watershed. The Trust also has an interest in the protection of human

health and the environment in the Rito de Tierra Amarilla watershed. These various interests are

subject to impairment by the Applicant's proposal to drill various wells in the Rito de Tierra

Amarilla watershed. In order to protect and vindicate these interests, the Trust hereby intervenes

in these matters

Respectfully submitted,

_____/s/ Steven Sugarman_____
Steven Sugarman
1210 Luisa Street, Suite 2
Santa Fe, NM 87505
(505) 672-5082

I hereby certify that a true and correct copy of the foregoing was sent by e-mail to Ms.
Cheryl Bada (attorney for the Commission) at cbada@state.nm.us, by e-mail to Mr. J. Scott Hall
(attorney for the Applicant) at shall@montand.com, and by e-mail to Mr. Adan Trujillo (attorney
for Rio Arriba County) at adantrujillo@gmail.com on this 30th day of September, 2009.

_____/s/ Steven Sugarman_____
Steven Sugarman