

**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION COMMISSION**

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**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**

2009 SEP -2 P 4: 29

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

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

CASE NO. 14278

MOTION FOR CONTINUANCE

Approach Operating, LLC, ("Approach"), through its undersigned attorneys, Montgomery and Andrews, P.A., (J. Scott Hall) moves the Commission chairman enter his order continuing the hearing on the merits of the Applications in these matters presently set for September 9, 2009. At this time, Approach requests the hearing be continued as may be appropriate until after the resolution of the Motion For Conditional Approval Of Applications For Permits To Drill And For Dismissal filed on August 31, 2009. Approach Operating, LLC proposes to address the motion to the Commission on September 9, 2009 in lieu of the hearing on the Applications. Opposing counsel has not responded to efforts to communicate regarding this matter.

WHEREFORE, Approach Operating, LLC requests the Commission chairman enter his Order continuing the hearing on these Applications as indicated.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on this 2nd day of September, 2009 as follows:

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J. Scott Hall

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