

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

RECEIVED OCD

**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 2<sup>nd</sup> day of September, 2009 as follows:

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