

**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** **CASE NO. 14134**

2009 SEP -2 P 4: 30

**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

J. Scott Hall, Esq.
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 982-3873
Attorneys for Approach Operating, LLC

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:

Ted J. Trujillo, Esq.
Adan Trujillo, Esq.
P. O. Box 2185
Espanola, NM 87532-2185
(505) 753-4750 [facsimile]

Cheryl L. Bada, Esq.
New Mexico Energy Minerals and Natural
Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505-4000
(505) 476-3220 [facsimile]

J. Scott Hall

J. Scott Hall

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