

**STATE OF NEW MEXICO
WATER QUALITY CONTROL COMMISSION**

IN THE MATTER OF:)	
Water Protection Division of the)	WQCC 20-08 (CO)
New Mexico Environment Department,)	
v.)	
Cannon Air Force Base)	

Joint Motion for Extension of Discovery Deadlines

Come now the Water Protection Division of the New Mexico Environment Department (“Department”) and Cannon Air Force Base (“CAFB”) (collectively “the Parties”) and, pursuant to 20.1.3.15 NMAC, move that the hearing officer extend the deadlines for discovery responses while keeping the August 11, 2020 hearing date in this matter. As grounds for this motion, the Parties state as follows:

1. Pursuant to 20.1.3.10(B)(2)(b) NMAC, the Hearing Officer may rule upon motions and procedural requests that do not seek final resolution of the proceedings and issue all necessary orders.
2. This matter is scheduled for a hearing before the New Mexico Water Quality Control Commission on August 11, 2020.
3. The Parties served requests for production and requests for admissions on each other pursuant to 20.1.3.19(F) and (H) NMAC. The Department’s responses are due June 25, 2020, and CAFB’s responses are due July 1, 2020.
4. The Parties have engaged in productive settlement discussions and have reached an agreement to settle this matter without the need for a hearing. However, the Parties will need additional time to prepare and sign the final settlement documents.

5. The Parties wish to focus their resources on preparing final settlement documents rather than meeting current discovery deadlines.

WHEREFORE, the Parties respectfully request that the Hearing Officer delay the discovery response deadlines to Friday, July 10, 2020.

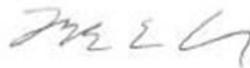
Respectfully submitted,

for the Water Protection Division

Christopher N. Atencio
Assistant General Counsel
New Mexico Environment Department
121 Tijeras Ave. NE, Ste. 1000
Albuquerque, NM 87102
(505) 222-9554
christopher.atencio@state.nm.us

Andrew P. Knight
Assistant General Counsel
New Mexico Environment Department
121 Tijeras Ave. NE, Ste. 1000
Albuquerque, NM 87102
(505) 222-9540
andrew.knight@state.nm.us

for Cannon Air Force Base



Maj. Mark E. Coon, Regional Counsel
AFLOA/JACE-ER
1492 First Street, Ste. 213
Dobbins Air Reserve Base, Georgia 30069
(678) 655-9535
mark.coom@us.af.mil

Certificate of Service

I hereby certify that a copy of this motion was emailed to the persons listed below on June 22, 2020. A copy will be mailed via First Class Mail upon request.

Robert F. Sanchez
New Mexico Office of the Attorney General
408 Galisteo St.
Santa Fe, NM 87501
rfsanchez@nmag.gov
Counsel for the Water Quality Control Commission



Christopher N. Atencio