

STATE OF NEW MEXICO  
WATER QUALITY CONTROL COMMISSION



\_\_\_\_\_) )  
IN THE MATTER OF THE PROPOSED ) )  
AMENDMENTS TO STANDARDS FOR ) ) WQCC No. 14-05(R)  
INTERSTATE AND INTRASTATE WATERS, ) )  
20.6.4 NMAC ) )  
\_\_\_\_\_)

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**MOTION FOR EXTENSION OF TIME TO SUBMIT CLOSING ARGUMENTS AND  
PROPOSED STATEMENT OF REASONS**

**AND**

**REQUEST FOR EXPEDITED CONSIDERATION**

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Amigos Bravos respectfully requests an extension of time—to apply to all parties—to submit closing arguments and proposed statement of reason from Monday, December 14, 2015 to Friday, January 15, 2016. Given the looming deadline, Amigos Bravos also respectfully requests expedited consideration of this motion as soon as possible. In support of this motion, Amigos Bravos states as follows:

1. Counsel for Amigos Bravos conferred with the other parties in advance of filing this motion. The New Mexico Environment Department, Peabody, Chevron Mining, Freeport-McMoRan Chino Mines, and the San Juan Water Commission do not object to Amigos Bravos' request. Los Alamos National Laboratories and the Department of Energy, as of the date and time of this motion's filing, did not provide their position.
2. Counsel for Amigos Bravos is subject to two federal court brief deadlines in two separate federal appellate cases, *Diné Citizens Against Ruining Our Environment, et al. v. U.S. Office of Surface Mining, et al.*, Case No. 15-1126 (10<sup>th</sup> Cir.) and *Diné Citizens Against Ruining Our Environment, et al. v. Sally Jewell, et al.*, Case No. 15-2130 (10<sup>th</sup> Cir.). These briefs are due on December 14, 2015 and December 18, 2015 respectively.
3. Counsel for Amigos Bravos was also subject to a technical administrative comment deadline of December 10, 2015 regarding the Santa Fe National Forest's Forest Plan revision process and a similar technical administrative comment deadline of November 20, 2015 regarding the Carson National Forest's Forest Plan revision process.
4. Counsel for Amigos Bravos also holds end-of-the-year financial and managerial responsibilities for their firm, inclusive of business meetings with out-of-state consultants on December 11, 2015, organizational budgeting, and an organizational board meeting on December 14, 2015, both of which were scheduled prior to the Commission's November

9, 2015 notice of transcript filing which set the December 14, 2015 deadline for the parties' closing arguments and proposed statements of reasons.

5. Counsel for Amigos Bravos also has an out-of-state business trip scheduled for December 15-18, 2015, and a family vacation scheduled for December 18, 2015 through January 4, 2016, both of which were scheduled prior to the Commission's November 9, 2015 notice of transcript filing which set the December 14, 2015 deadline for the parties' closing arguments and proposed statements of reasons. These obligations make submission of closing arguments and proposed statements of reasons before the end of the year difficult.
6. Extending the deadline for closing arguments and proposed statements of reasons to January 15, 2016 would afford Amigos Bravos—and any other parties that are dealing with end-of-year commitments—the ability to fully review the transcript and full record to ensure that their arguments are as constructive and informative as possible.

Respectfully submitted this 10th day of December 2015.

By:



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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading was serviced by email, on December 10,

2015 to:

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