

STATE OF NEW MEXICO
WATER QUALITY CONTROL COMMISSION



IN THE MATTER OF PROPOSED AMENDMENTS
TO 20.6.2, THE COPPER MINE RULE,

No. WQCC 12-01(R)

New Mexico Environment Department,
Petitioner.

JOINT MOTION TO EXTEND FILING OF POST-HEARING BRIEFS

The Office of the Attorney General, Gila Resources Information Project/Turner Ranch Properties, Inc., Amigos Bravos and William C. Olson (collectively, "Parties") hereby jointly request an extension of time, until August 16, 2013, to file post-hearing briefs in this matter. As grounds for this motion, the Parties state:

1. Pursuant to the Hearing Officer's order, the statement of reasons and closing argument in this matter are due July 12, 2013.
2. The post-hearing briefing in this matter is exceptionally complex, and requires the parties to review and synthesize hundreds of pages of pre-filed written testimony and exhibits, ten days of oral technical testimony, and three days of public testimony.
3. Given the extensive hearing record, the Parties' limited resources and their counsels' work schedules, the Parties need additional time to adequately prepare post-hearing briefs.
4. The Parties request until August 16, 2013 to file post-hearing briefs.
5. The Parties sought concurrence in this request from the other parties in this matter. The New Mexico Environment Department ("NMED") and Freeport McMoRan, Inc. do not object to the extension as long as argument and deliberations on NMED's rulemaking

petition are held during the Water Quality Control Commission's September 2013 meeting. The New Mexico Mining Association has not responded to the Parties' request.

For the foregoing reasons, the Parties respectfully request until August 16, 2013 to file post-hearing briefs in this matter.

Respectfully submitted,

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Certificate of Service

I certify that the following were served with the foregoing pleading by email on June 25, 2013:

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