

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



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

No. WQCC 12-01(R)

**New Mexico Environment Department,
Petitioner.**

MOTION TO EXTEND FILING OF POST-HEARING BRIEFS

I, William C. Olson, hereby request an extension of time, until September 13, 2013, to file post-hearing briefs in this matter. I submit the following grounds for this motion:

1. Pursuant to the June 25, 2013 “Joint Motion to Extend the Filing of Post-Hearing Briefs”, which was approved by the Hearing Officer on June 26, 2013, the statement of reasons and closing argument in this matter are due August 16, 2013.
2. The post-hearing briefing in this matter is exceptionally complex, and requires me 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. I am a member of the public representing the public interest in the protection of ground water in New Mexico and as such do not have legal, technical or administrative staff to assist me, as do other parties in this matter.
4. I also operate a small business and have recently received unexpected business that has impacted my schedule for preparation of post-hearing documents.
5. Given the extensive hearing record, my limited resources and unexpected business conflicts I need additional time to adequately prepare post-hearing briefs.
6. An extension of the deadline does not prejudice any party in this matter and maintains continuity in the rulemaking process while allowing public members to meaningfully participate in a hearing of this magnitude.

7. I sought concurrence in this request from the other parties in this matter. The Gila Resources Information Project/Turner Ranch Properties, Inc., Amigos Bravos and New Mexico Office of the Attorney General do not object to the extension. The New Mexico Environment Department ("NMED"), Freeport McMoRan, Inc. and the New Mexico Mining Association object to the extension.

8. In light of the upcoming filing deadline, I request expedited consideration of this motion.

For the foregoing reasons, I respectfully request until September 13, 2013 to file post-hearing briefs in this matter.

Respectfully submitted,

WILLIAM C. OLSON



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Certificate of Service

I certify that the following were served with the foregoing pleading by mail or hand delivery on July 30, 2013:

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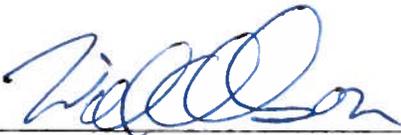
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