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STATE OF NEW MEXICO  
ENVIRONMENT DEPARTMENT

IN THE MATTER OF  
THE UNITED STATES DEPARTMENT OF ENERGY  
AND THE REGENTS OF THE UNIVERSITY OF CALIFORNIA  
LOS ALAMOS, NEW MEXICO  
NM0890010515

COMPLIANCE ORDER  
HRM-98-02 (CO)

**NMED'S MOTION FOR LEAVE TO SERVE INTERROGATORIES**

The Secretary of Environment, acting through the Director of the Water and Waste Management Division of the New Mexico Environment Department ("NMED"), hereby moves the Hearing Officer for leave to serve its First Sets of Interrogatories to Respondents Regents of the University of California ("UC") and United States Department of Energy ("DOE") in the form attached to the accompanying proposed Order as Exhibit A. As grounds for this motion, NMED states that the grounds for allowing such discovery set forth in 20 N.M.A.C. 300.A. are met and this Motion is not opposed by counsel for UC and DOE.

WHEREFORE, NMED respectfully requests the hearing Officer to grant NMED leave to serve its first sets of Interrogatories to UC and DOE by approving the accompanying proposed Order.

Respectfully submitted,

NEW MEXICO ENVIRONMENT  
DEPARTMENT  
OFFICE OF GENERAL COUNSEL

  
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Certificate of Service

The undersigned hereby certifies that on this 11<sup>th</sup> day of December, 1998, he mailed true and correct copies of the foregoing Motion and accompanying proposed Order to:

Mr. Joseph B. Rochelle  
Los Alamos National Laboratory  
P.O. Box 1663, MS A187  
Los Alamos, NM 87545  
(505) 667-3766

and

Hortense Haynes  
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Department of Energy  
Los Alamos Area Office  
528 35<sup>th</sup> Street  
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Nicholas J. Perampiani