

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

**IN THE MATTER OF:**

**WASTE CONTROL SPECIALISTS LLC'S )  
PETITION FOR REVIEW AND NOTICE )  
OF APPEAL OF THE GROUND WATER )  
QUALITY BUREAU OF THE )  
NEW MEXICO ENVIRONMENT )  
DEPARTMENT'S REJECTION OF WASTE )  
CONTROL SPECIALISTS LLC'S )  
WITHDRAWAL OF ITS APPLICATION FOR )  
DISCHARGE PERMIT AND )  
DETERMINATION THAT A DISCHARGE )  
PERMIT IS REQUIRED )  
)  
)  
**WASTE CONTROL SPECIALISTS LLC, )  
)  
Petitioner. )  
\_\_\_\_\_ )****

**Docket No.  
WQCC 17-01(A)**



**JOINT MOTION OF WASTE CONTROL SPECIALISTS AND THE NEW MEXICO  
ENVIRONMENT DEPARTMENT TO EXTEND ALL BRIEFING DEADLINES,  
AND FOR A CONTINUANCE OF THE APRIL 11, 2017 MOTIONS HEARING**

Waste Control Specialists LLC (“WCS”) and the New Mexico Environment Department (“NMED”) (collectively the “Parties”) jointly move the Commission for a thirty (30) day extension of all briefing deadlines in this appeal, including briefing on two pending motions and the full briefing on the merits. The Parties also request a one month continuance of the hearing on the two pending motions that is currently scheduled for the April 11, 2017 Commission meeting, such that the motions will be heard, if at all, during the Commission’s regularly scheduled May hearing. As grounds for this Joint Motion, the Parties state:

1. WCS and NMED are actively engaged in promising settlement discussions which have the potential to resolve the issues in this appeal and allow for a jointly submitted request for dismissal of the entire appeal.

2. No prejudice will result for any party or member of the public if this Joint Motion is granted.

WHEREFORE, the Parties request that the Commission grant a 30-day extension for all briefing in this appeal, and a one month continuation of the currently scheduled April 11, 2017 motions hearing.

Jointly Submitted,

**MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.**

By:  \_\_\_\_\_

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**NEW MEXICO ENVIRONMENT DEPARTMENT**

By: Electronically approved 4/5/17

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2017, a copy of the Joint Motion of Waste Control Specialists and the New Mexico Environment Department to Extend All Briefing Deadlines, and For a Continuance of the April 11, 2017 Motions Hearing was hand delivered to:

Pam Castaneda  
Commission Administrator  
Water Quality Control Commission  
New Mexico Environment Department  
1190 Saint Francis Drive  
Santa Fe, NM 87502  
[Pam.Castaneda@state.nm.us](mailto:Pam.Castaneda@state.nm.us)

And emailed and mailed to:

John T. Grubescic  
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*Counsel for the Water Quality Control Commission*

**MODRALL, SPERLING, ROEHL, HARRIS  
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