



January 19, 2016

Sarah M. Stevenson
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VIA E-MAIL AND U.S. MAIL

Ms. Pam Castañeda (pam.castaneda@state.nm.us)
Administrator to Boards and Commissions
Environmental Improvement Board
Water Quality Control Commission
1190 St. Francis Drive, Room S2102
Santa Fe, NM 87502

Re: In the Matter of Enterprise Products Operating, LLC

Dear Ms. Castañeda:

Enclosed please find the original and 15 copies of Enterprise Products Operating, LLC's Stipulated Motion to Extend Deadline for Response to Requests for Admission. I would appreciate it if you would file the original and provide a file-stamped copy in the stamped, self-addressed return envelope.

Also enclosed is an original and 15 copies of a [Proposed] Order on Stipulated Motion to Extend Deadline for Response to Requests for Admission along with a second stamped, self-addressed return envelope for delivery of an endorsed copy of the Order following entry.

Thank you for your assistance.

Sincerely,

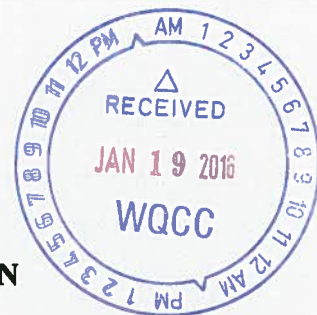
A handwritten signature in black ink that reads 'Wendy C. Olivas'.

Wendy C. Olivas
Assistant to Sarah M. Stevenson

/wco
Enclosures: as stated
cc via e-mail only: Allison Marks
W2623396.DOCX

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STATE OF NEW MEXICO
WATER QUALITY CONTROL COMMISSION



WQCC-15-05 (CO)

**IN THE MATTER OF Enterprise Products Operating, LLC,
a Texas limited liability company.**

**STIPULATED MOTION TO EXTEND DEADLINE FOR
RESPONSE TO REQUESTS FOR ADMISSION**

Comes now Enterprise Products Operating, LLC (“Enterprise”) and the New Mexico Oil Conservation Division (“OCD”) and moves the Hearing Officer to enter an order, pursuant to 20.1.3.19.H NMAC, extending the deadline for Enterprise to respond to OCD’s second set of requests for admissions up to and including February 1, 2016. A proposed order is submitted along with this Stipulated Motion.

Respectfully submitted this 19th day of January, 2016.

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

By: /s/ Sarah M. Stevenson

William C. Scott
Sarah M. Stevenson
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Albuquerque, New Mexico 87103-2168

Attorneys for Enterprise Products Operating, LLC -

NEW MEXICO ENERGY MINERALS AND NATURAL
RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

By: approved by email 1-19-16

Allison Marks, Assistant General Counsel
1220 S. St. Francis Drive
Santa Fe, NM 87505

Attorneys for Oil Conservation Division

CERTIFICATE OF SERVICE

I certify that on the 19th day of January, 2016, service of the original foregoing Motion to Conduct Additional Discovery was made, via electronic mail and first class mail, to:

Pam Castañeda
Administrator, Water Quality Control Commission
New Mexico Environment Department
Harold Runnels Building, Rm. N-120
1190 St. Francis Drive
Santa Fe, NM 87502
Pam.Castaneda@state.nm.us

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

By: /s/ Sarah M. Stevenson
Sarah M. Stevenson

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

WQCC-15-05 (CO)

**IN THE MATTER OF Enterprise Products Operating, LLC,
a Texas limited liability company.**

**[PROPOSED] ORDER ON STIPULATED MOTION TO EXTEND DEADLINE FOR
RESPONSE TO REQUESTS FOR ADMISSION**

THIS MATTER having come before the Hearing Officer on the Stipulated Motion to Extend Deadline for Response to Requests for Admission, and having considered the Stipulated Motion, I find the Stipulated Motion is well taken.

The Stipulated Motion is hereby GRANTED and Enterprise's response to the Oil Conservation Division's second set of requests for admissions shall be due February 1, 2016.

Hearing Officer