

  
MODRALL SPERLING  
LAWYERS

September 16, 2015

Via E-mail: [pam.castaneda@state.nm.us](mailto:pam.castaneda@state.nm.us)  
And U.S. Mail

Ms. Pam Castaneda  
Administrator to Boards and Commissions  
Environmental Improvement Board  
Water Quality Control Commission  
1190 St. Francis Drive, Room S2102  
Santa Fe, NM 87502



William C. Scott  
505.848.1824  
Fax: 505.449.2024  
bscott@modrall.com

**Re: In the Matter of Enterprise Products Operating, LLC**

Dear Ms. Castañeda:

Accompanying this letter are the original and 15 copies of Enterprise Products Operating, LLC's Stipulated Motion to Extend Deadline for Response to Requests for Admission along with a Proposed Order on same in this case. I would appreciate it if you would file the original and provide a file-stamped copy in the stamped, self-addressed return envelope.

Thank you for your assistance.

Sincerely,

William C. Scott

WCS/bm

Enclosures

cc: Allison Marks

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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 first request for admissions up to and including October 14, 2015. A proposed order is submitted along with this Stipulated Motion.

Respectfully submitted this 16<sup>th</sup> day of September, 2015.

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

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

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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 09/16/15

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

*Attorneys for Oil Conservation Division*

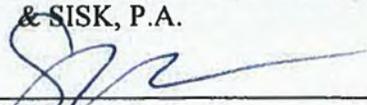
**CERTIFICATE OF SERVICE**

I certify that on the 16<sup>th</sup> day of September, 2015, 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: \_\_\_\_\_

  
William C. Scott

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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 first request for admissions shall be due October 14, 2015.

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Hearing Officer