



December 14, 2015

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

Ms. Pam Castañeda ([pam.castaneda@state.nm.us](mailto: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, WQCC 15-05 (CO)*

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 a Proposed Order on Stipulated Motion to Extend Deadline for Response to Requests for Admission for review and consideration.

Thank you for your assistance, and please let us know if you have any questions or need anything further.

Sincerely,

Wendy C. Olivas  
Assistant to Sarah M. Stevenson

/wco  
Enclosures: as stated  
cc: Allison Marks  
W2602019.DOCX

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STATE OF NEW MEXICO  
WATER QUALITY CONTROL COMMISSION



**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 January 25, 2016. A proposed order is submitted along with this Stipulated Motion.

Respectfully submitted this 14th day of December, 2015.

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

By: /s/ Sarah M. Stevenson

William C. Scott  
Sarah M. Stevenson  
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*Attorneys for Enterprise Products Operating, LLC*

NEW MEXICO ENERGY MINERALS AND NATURAL  
RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

By: approved by email 12-11-15

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 14th day of December, 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](mailto:Pam.Castaneda@state.nm.us)

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

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

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