

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

2014 DEC 18 PM 1:48

FILED  
EPA REGION VIII  
CLERK

IN THE MATTER OF )  
 )  
Robert Gregg Sease )  
 )  
Respondent. )  
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 )

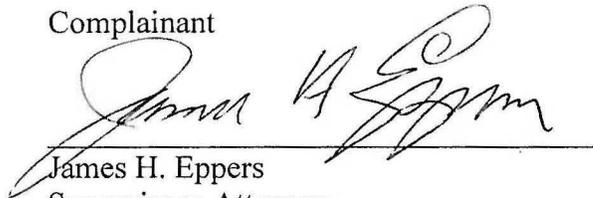
Docket No. CWA-08-2014-0018  
**COMPLAINANT'S  
MOTION TO AMEND  
CONSENT AGREEMENT**

The United States Environmental Protection Agency, Region 8 (EPA or Complainant) requests approval of the accompanying Addendum to Consent Agreement which amends the penalty installment dates found in paragraph 35(a) of the Consent Agreement entered into between the EPA and Robert Gregg Sease on March 27, 2014, and approved by the Regional Judicial Officer in the Final Order issued on May 13, 2014. This Motion and the Addendum to Consent Agreement have been concurred upon by counsel for Mr. Sease, Roger Cohen. All other terms and conditions of the Consent Agreement remain unchanged and in full effect.

Respectfully submitted this 18<sup>th</sup> day of December, 2014.

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY, REGION 8

Complainant



James H. Eppers  
Supervisory Attorney  
Legal Enforcement Program  
Office of Enforcement, Compliance  
and Environmental Justice  
U.S EPA Region 8  
1595 Wynkoop Street  
Denver, Colorado 80202  
Telephone Number: (303) 312-6893  
Facsimile Number: (303) 312-7202

Certificate of Service

The undersigned certifies that on the date indicated below, this Complainant's Motion to Amend Consent Agreement was distributed as follows:

One copy to via U.S. mail to:

Roger C. Cohen  
Snell & Wilmer L.L.P.  
1200 Seventeenth Street, Suite 1900  
Denver, CO 80202-5854

Original and one copy hand delivered to:

Tina Artemis  
Regional Hearing Clerk  
U.S. EPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202

One copy hand delivered to:

Hon. Elyana R. Sutin  
Regional Judicial Officer  
U.S. EPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202

Dated:

12/18/2014

Dayle Aldinger  
Dayle Aldinger

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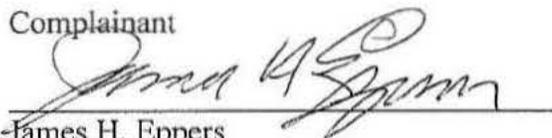


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PROTECTION AGENCY, REGION 8

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Dated: DEC 18 2014

  
Dayle Aldinger