

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY, REGION 6
DALLAS, TEXAS

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In the matter of:

Quantum Resources Management, L.L.C.
Houston, Texas

RESPONDENT

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Docket No. CWA-06-2013-1763

RESPONDENT'S MOTION FOR
EXTENSION OF DEADLINE TO FILE
AN ANSWER AND REQUEST A
HEARING

**RESPONDENT'S MOTION FOR EXTENSION OF DEADLINE
TO FILE AN ANSWER AND REQUEST A HEARING**

Respondent Quantum Resources Management, L.L.C. ("Respondent") respectfully requests that the Regional Judicial Officer grant a 21-day extension of time for Respondent to file its answer and request a hearing in the above-captioned matter for the reasons discussed below.

1. The present deadline for Respondent to file an answer and request a hearing in the above-captioned matter is May 11, 2013.

2. Respondent desires a 21-day extension for good cause, namely for the purpose of reaching a resolution regarding the above-captioned matter with Complainant, U.S. Environmental Protection Agency, Region 6 ("Complainant").

3. Respondent and Complainant have conferred regarding the proposed 21-day extension, and Complainant does not oppose the extension.

4. The requested extension would move the deadline to file an answer and request a hearing in the above-captioned matter to June 1, 2013.

5. The requested extension is not sought for the purpose of delay, but rather for the purpose of seeking a resolution to avoid the expense and time associated with administrative

litigation. This purpose is also encouraged in Section VI of the Complaint, and in federal environmental regulations at 40 C.F.R. § 22.18.

FOR THESE REASONS, Respondent respectfully requests that this Motion be granted and that Respondent's deadline to file an answer and request a hearing in the above-captioned matter be extended by 21 days to June 1, 2013.

Respectfully Submitted,

LOCKE LORD LLP



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ATTORNEYS FOR RESPONDENT

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2013, RESPONDENT'S MOTION FOR EXTENSION OF DEADLINE TO FILE AN ANSWER AND REQUEST A HEARING was sent to the following persons, in the manners specified:

Original and one copy via courier:

Regional Hearing Clerk (6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

One copy via CMRRR and e-mail:

Mr. Efren Ordoñez (6RC-EW)
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Gerald D. Higdon