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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

**MAR 29 2012**

Robert Patrick  
Regional Judicial Officer  
United States Environmental Protection Agency  
Region 7  
901 North Fifth Street  
Kansas City, Kansas 66101

Re: B & A Petroleum Corporation  
RCRA-07-2010-0019

Dear Judge Patrick:

In response to your ruling issued in this matter on February 23, 2012, entitled RULING ON COMPLAINTANT'S MOTION FOR DEFAULT ORDER, the complainant is hereby filing its FIRST AMENDED COMPLAINT. Complainant has not filed a request for leave to file this amended complaint as 40 C.F.R. § 22.14(c) states "The complainant may amend the complaint once as a matter of right at any time before the answer is filed." Complainant has not amended this complaint previously and the Respondent has never filed an answer to the original complaint.

Please note that substantive changes to the following paragraphs have been made from the original complaint filed in this matter to the FIRST AMENDED COMPLAINT: Paragraphs 6, 14a, 14b, 15, 21, 21a, 33, 34, 35, 38, 39, 44, 60, 62, 66 and 69. Other changes from the original to the amended complaint were made for the purpose of language conformity. These latter changes make no change to the substance of the original complaint.

Sincerely,

Raymond C. Bosch  
Assistant Regional Counsel  
(913) 551-7501

cc: Mohammed Ali, B & A Petroleum Corporation