

RECEIVED

JUL 28 2008

**EPA ORC
Office of Regional Hearing Clerk**

July 23, 2008

Wanda Santiago
Regional Hearing Clerk
U.S. EPA
One Congress Street
Boston, MA 02114

Re: Robert and Gayle Greenhill
Tomhegan Township, Maine
EPA Docket No.: CWA 01-2008-0065

Dear Ms. Santiago,

Please find enclosed a Consented-To Motion for Extension of Time prepared on behalf of Robert and Gayle Greenhill in the above referenced matter. On July 14, 2008, I met in person with Attorney Margery Adams and Wetland Enforcement Officer Mr. Mark Mahoney and discussed settlement of the above referenced matter. Ms. Adams verbally agreed that an extension is appropriate to allow for completion of the settlement negotiations, she consented to the extension of time and she requested that I follow up with a motion for extension.

Please let me know if you have any questions.

Sincerely,



Virginia E. Davis

VED:jac
cc: Margery L. Adams

1359314.1

Preti Flaherty Beliveau & Pachios LLP Attorneys at Law

45 Memorial Circle | Augusta, ME 04330 | TEL 207.623.5300 | FAX 207.623.2914 | Mailing address: P.O. Box 1058 | Augusta, ME 04332-1058

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
BEFORE THE ADMINISTRATOR

RECEIVED

JUL 28 2008

EPA ORC
Office of Regional Hearing

IN THE MATTER OF:

ROBERT and GAYLE GREENHILL
Tomhegan Township, Maine
Docket No. CWA-01-2008-0065

EPA DOCKET NO.:
CWA 01-2008-0065

Proceeding under Section 309(g) of the
Clean Water Act, 33 U.S.C. § 1319(g)

CONSENTED-TO MOTION FOR EXTENSION OF TIME

Respondent Robert and Gayle Greenhill (“Respondent”), by and through undersigned counsel, moves for an extension of time to September 10, 2008, to file an answer or otherwise to respond to the Administrative Complaint, Notice of Proposed Assessment of civil Penalty, and Notice of Opportunity for Hearing (“Complaint”) in the above-referenced matter pursuant to Rule 22.7 of the Consolidated Rules of Practice Governing the Administrative Assessment and Civil Penalties.

Counsel for Respondent has communicated with Counsel for Complainant U.S. EPA, Margery L. Adams and has obtained consent for the requested extension of time from the present deadline to answer the Complaint. In support of this motion, Respondent states the following:

1. It is in the best interest of the parties and the process to: (a) avoid the likely unnecessary expense to Respondent of having to prepare and file an Answer to the Complaint, (b) continue to devote the parties' resources toward final settlement and preparation/negotiation of the settlement documents, and (c) allow for minimal but sufficient time for Respondent to prepare and file an Answer to Complaint in the unlikely event that the parties cannot reach closure on final settlement.

2. Respondent requests that the deadline for submission of an Answer to the Complaint be extended to September 10, 2008.

3. Counsel for the U.S. EPA has consented to the requested extension of time.

WHEREFORE, Respondent respectfully requests that this tribunal extend the time allowed for answer or other response to the Amended Complaint until September 10, 2008.

DATED: July 23, 2008

Respectfully Submitted,
ROBERT and GAYLE GREENHILL
By Their Attorney,
PRETI, FLAHERTY, BELIVEAU, &
PACHIOS, LLP

By: Virginia E. Davis
Virginia E. Davis, Esq.
45 Memorial Circle
P. O. Box 1058
Augusta, ME 04332-1058
Telephone: (207) 623-5300
Facsimile: (207) 623-2914