UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 6** 21 OCT 18 PM 2: 01

		2.00110 111 3.01
In the Matter of	§	Docket No. SDWA-06-2021-1297 CLERK
Leroy Tours Gerald Water Supply	§	EPA REGION VI
	§	
Corporation	§	Proceeding to Assess a Civil Penalty
	§	Under Section 1414g-3(g)(3) of The
Respondent .	§	Safe Drinking Water Act
PWS ID# TX1550027	§	
	§	

RESPONDENT LEROY TOURS GERALD WATER SUPPLY CORPORATION'S AGREED MOTION FOR EXTENSION TO ANSWER AND REQUEST A HEARING

TO THE REGIONAL HEARING CLERK (6RC-D):

Comes Now, Respondent Leroy Tours Gerald Water Supply Corporation ("LTG WSC"), P.O. Box 22, Leroy, Texas 76654, and files this Agreed Motion for Extension to Answer and Request a Hearing to the Administrative Complaint filed by the Director of the Enforcement and Compliance Assurance Division of EPA, Region 6 ("Complainant"), and in support thereof shows the following:

I.

The above referenced Administrative Complaint was served in the President of the LTG WSC by certified mail on September 22, 2021; therefore, LTG WSC's Answer and deadline to Request a Hearing is October 22, 2021. LTG WSC conferred informally with EPA on October 13, 2021 regarding the alleged violations. During the informal conference, the parties discussed the possibility of settlement through informal meetings with EPA and agreed on action to be taken in the next thirty days toward resolution of the issues raised in the Complaint. For this reason, LTG WSC requests a thirty-day extension of time to file its Answer and Request for Hearing until November 21, 2021. EPA was consulted regarding this request and concurs.

For these reasons, Respondent respectfully requests that the request for extension of time to answer and request a hearing be granted, and Respondent be given until November 22, 2021 to file an Answer and Request a Hearing, and for such other relief to which it shows itself to be entitled.

Respectfully submitted,

BY:

ANGELA E. TEKELL State Bar No. 19763930 Tekell & Tekell, LLP 400 Austin Avenue

Suite 1000

Waco, Texas 76701

(254)776-5095

angela@tekell-law.com

ATTORNEY FOR RESPONDENT LTG WSC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Respondent's Agreed Motion for Extension to Answer and Request a Hearing has been served upon Complainant, as indicated below, on this the 18th day of October 2021, as follows:

> Efren Ordoñez (6RC-EW) U.S. EPA, Region 6 1201 Elm Street, Suite 500 Dallas, Texas 75270-2102 Ordonez.efren@epa.gov

Regional Hearing Clerk (6RC-D) U.S. EPA, Region 6 1201 Elm Street, Suite 500 Dallas, Texas 75270-2102 Vaughn.lorena@epa.gov

Megan Hamilton Manager, Drinking Water Section **Enforcement Division** Texas Commission on **Environmental Quality** Megan.hamilton@tceq.texas.gov

ANGELA E. TEKELL