

**PORTER  
HEDGES LLP**

**Ragna Henrichs**  
Senior Counsel  
(713) 226-6602 Phone  
(713) 226-6202 Fax  
rhenrichs@porterhedges.com

1000 Main Street, 36th Floor  
Houston, Texas 77002-6341  
(713) 226-6000 Main  
porterhedges.com

April 24, 2019

*Via Federal Express*

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

Re: No. EPCRA-06-2019-0501, *In the Matter of Thomas Petroleum, LLC, Pilot Thomas Logistics, LLC*, U.S. Environmental Protection Agency, Region 6, Dallas, Texas

Dear Ms. Vaughn:

Enclosed please find an original and one copy of Thomas Petroleum LLC, Pilot Thomas Logistics, LLC and U.S. EPA Region 6's Joint Motion to Extend Deadline for Filing of Respondent's Answer and Request for Hearing for filing in the above captioned matter.

Very truly yours,



Ragna Henrichs  
Senior Counsel

ROH:mhb

cc: *Via Federal Express*

James Murdock  
Office of Regional Counsel  
U.S. EPA – Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

David Riley  
EPCRA 313 Enforcement Officer  
U.S. EPA – Region 6 (EN-H3)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

FILED

2019 APR 24 PM 3:02

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS

REGIONAL HEARING CLERK  
EPA REGION VI

IN THE MATTER OF:

THOMAS PETROLEUM, LLC  
PILOT THOMAS LOGISTICS, LLC

RESPONDENT

§  
§  
§  
§  
§  
§  
§  
§

DOCKET NO. EPCRA-06-2019-0501

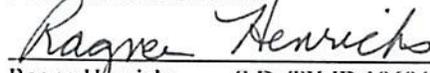
**JOINT MOTION TO EXTEND DEADLINE FOR FILING OF  
RESPONDENT'S ANSWER AND REQUEST FOR HEARING**

Respondent Thomas Petroleum, LLC, Pilot Thomas Logistics, LLC was served on February 19, 2019, with the U.S. Environmental Protection Agency's ("EPA") Complaint in this matter. In response to a Joint Motion by Respondent and EPA (the "Parties") requesting extension of the deadline for filing Respondent's Answer and Request for Hearing to May 20, 2019, this deadline was extended to April 29, 2019. The Parties have been exchanging information and conducting settlement negotiations and wish to continue settlement negotiations and allow Respondent additional time to respond to the 135-count Complaint to avoid the expense of prolonged litigation to resolve this matter. Accordingly, the Parties jointly request a further extension of the deadline for filing Respondent's Answer and Request for Hearing to May 20, 2019 to provide a period for good faith settlement negotiations.

DATED: April 24, 2019

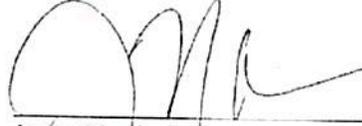
Respectfully submitted,

PORTER HEDGES LLP



Ragna Henrichs S.D. TX ID 18684  
1000 Main Street  
Suite 3600  
Houston, Texas 77002  
Telephone: (713) 226-6602  
Facsimile: (713) 226-6202  
Email: rhenrichs@porterhedges.com  
ATTORNEY FOR RESPONDENTS  
THOMAS PETROLEUM, LLC  
PILOT THOMAS LOGISTICS, LLC

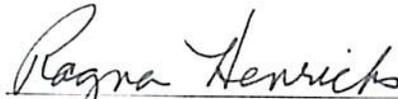
U.S. ENVIRONMENTAL PROTECTION AGENCY,  
REGION 6



James Murdock  
Assistant Regional Counsel  
RCRA & Toxics Enforcement Branch  
U.S. Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite 1200 (6RC-ER)  
Dallas, Texas 75202  
Telephone: (214) 665-7302  
Email: [Murdock.james@EPA.gov](mailto:Murdock.james@EPA.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 24, 2019, the original and one copy of the foregoing Joint Motion to Extend Deadline for Filing of Respondent's Answer and Request for Hearing ("Joint Motion") was sent to the Regional Hearing Clerk, U.S. EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, via Federal Express.

  
Ragna Henrichs