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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

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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

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DOCKET NO. EPCRA-06-2019-0501

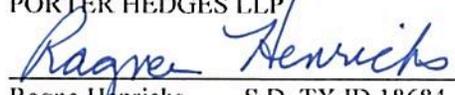
**JOINT MOTION TO EXTEND DEADLINE FOR FILING OF
RESPONDENT'S ANSWER AND REQUEST FOR HEARING**

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



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PILOT THOMAS LOGISTICS, LLC

U.S. ENVIRONMENTAL PROTECTION AGENCY,
REGION 6



James Murdock
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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 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

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