

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re: Phoenix Production Company,
Rolf Lake Unit,
NPDES Permit WY-0024945,
Sheldon Dome Field,
NPDES permit WY-0024953

_____ Appeal No. _____

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE PETITION FOR REVIEW**

Permittee Phoenix Production Company (“Phoenix”) respectfully requests, pursuant to 40 C.F.R. § 124.19(f) and (g), that the Environmental Appeals Board (“EAB”) grant a 30 day extension of time for it to file a petition for review of NPDES permits WY-0024945 and WY-0024953 (attached as exhibits). Assuming, *arguendo*, the 30 day deadline to file a petition for review runs from the day the permits were issued, March 12, 2015, the new deadline would be May 13, 2015.

Phoenix requests the extension so that it may engage in negotiations with the Environmental Protection Agency Region 8 (the “EPA”) and the Northern Arapaho and Eastern Shoshone Tribes, on whose Wind River Reservation the permitted facilities are sited. Based on preliminary conversations, Phoenix believes that, with an extension to allow for further discussion, there is a considerable probability that the parties will reach a negotiated solution without expending the time and resources of the EAB. If the parties are making progress toward such a solution but have not yet agreed upon one at the end of the extension period, Phoenix may request an additional extension of time.

Phoenix’s counsel have contacted counsel for the EPA, who do not oppose this motion.

For the reasons above, Phoenix respectfully requests that its Motion for Extension of Time to file its petition for review of the above-noted NPDES permits be granted, and that the EAB extend the deadline for the petition until May 13, 2015.

Date: April 13, 2015

Respectfully Submitted,

s/John C. Martin

John C. Martin

Susan M. Mathiascheck

Daniel H. Leff

Crowell & Moring, LLP

1001 Pennsylvania Ave., N.W.

Washington, D.C. 20004

jmartin@crowell.com

smathiascheck@crowell.com

dleff@crowell.com

(202) 624-2505 (telephone)

(202) 628-5116 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 40 C.F.R. § 124.19(i), I have, on this 13th day of April, 2015, caused the forgoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REVIEW to be served upon counsel for the U.S. Environmental Protection Agency, Region 8, by certified mail, at the address below:

Everett Volk, Esq.
US EPA, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Respectfully Submitted,

s/John C. Martin

John C. Martin
Crowell & Moring, LLP
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004
jmartin@crowell.com
(202) 624-2505 (telephone)
(202) 628-5116 (facsimile)