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

_			
	In re:)	
	Eagle Oil & Gas Co.)	
	Sheldon Dome Field)	
	Phoenix Production Company,)	
	± •	,	NDDEG 4 131 15 00 15 00
	Rolff Lake Unit and Sheldon Dome Field)	NPDES Appeal Nos. 15-02, 15-03, 15-04 & 15-05
		,	13-04 & 13-03
	Wesco Operating Inc.)	
	Tensleep #1 (Winkleman Dome) and)	
	Sheldon Dome Field NW)	
		Ś	
	NPDES Permit Nos. WY-0020338,)	
	WY-0024945, WY-0024953,	Ś	
	· · · · · · · · · · · · · · · · · · ·	,	
	WY-0025232, WY-0025607)	
)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME

On May 8, 2015, the Environmental Appeals Board (the "Board") issued an order setting deadlines of May 18, 2015 for petitioners to supplement their petitions, and of June 17, 2015 for EPA Region 8 (the "Region") to submit its consolidated response with an index and relevant portions of the administrative record and for the Northern Arapaho Tribe ("NAT") to file its response. Permittee Phoenix Production Company ("Phoenix") respectfully requests, pursuant to 40 C.F.R. § 124.19(f) and (g), that the Board grant a 30 day extension for each of the aforementioned deadlines until June 17, 2015 and July 17, 2015, respectively.

Phoenix requests this extension in order to provide time for settlement negotiations with each of the parties to this consolidated action, and to avoid unnecessary use of resources and

expense preparing supplemental petitions and responses that may be avoided entirely should

those negotiations be successful.

Phoenix has requested the position of all of the parties regarding this request and none

oppose.

For the reasons stated above, Phoenix requests an extension of the deadline for petitioners

to submit supplemental petitions until June 17, 2015 and of the deadline for the Region and NAT

to submit their responses until July 17, 2015.

Dated: May 15, 2015

Respectfully Submitted,

/s/Daniel H. Leff

Daniel H. Leff

John C. Martin

Susan M. Mathiascheck

Crowell & Moring, LLP

1001 Pennsylvania Ave., N.W.

Washington, D.C. 20004

(202) 624-2500 (telephone)

(202) 628-5116 (fax)

dleff@crowell.com

jmartin@crowell.com

smathiascheck@crowell.com

Counsel for Phoenix Production

Company

2

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 40 C.F.R. § 124.19(i), I have, on this 15th day of May, 2015, caused the forgoing Motion for Extension of Time to be served upon the following persons, by first class mail, at the addresses below:

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

Peter J. DeMarco Matthew McFeeley Natural Resources Defense Council 1152 15th Street, N.W., Suite 300 Washington, D.C. 20005

Sarah Tallman Natural Resources Defense Council Chicago, IL 60606 20 N. Wacker Dr. Suite 1600

Kelly A. Rudd Berthenia S. Crocker Andrew W. Bladwin Baldwin, Crocker, Rudd, P.C. P.O. Box 1229 Lander, WY 82520 Jeff Ruch Executive Director Public Employees for Environmental Responsibility 2000 P Street, N.W., Suite 240 Washington, DC 20036

Lee H. Johnson Johanna Hamburger Carlson, Hammond & Paddock, LLC 1900 Grant Street, Suite 1200 Denver, CO 80203

Respectfully Submitted,

/s/Daniel H. Leff
Daniel H. Leff
Crowell & Moring, LLP
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004
dleff@crowell.com
(202) 624-2546 (telephone)
(202) 628-5116 (fax)

Counsel for Phoenix Production Company