

NATURAL RESOURCES DEFENSE COUNCIL EL TAR. AT PEALS BOARD

April 8, 2008

Via facsimile (202-233-0121) and Overnight Mail

Ms. Eurika Durr Clerk of the Board Environmental Appeals Board U.S. Environmental Protection Agency 1341 G Street, N.W., Suite 600 Washington, DC 20005

Re: In the Matter of ConocoPhillips, PSD Appeal No. 07-02

Dear Ms. Durr:

Enclosed please find an original and 5 copies of Petitioners' Response to Respondent ConocoPhillips' Renewal of Motion for Expedited Consideration.

Very truly yours,

Ann Alexander

Enc.

cc: attached service list (via facsimile only)

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BEFORE THE ENVIRONMENTAL APPEALS BOARD UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (?? - ? Milli: 04 WASHINGTON, D.C.

IMME. APPEALS BUARD

IN THE MATTER OF: CONOCOPHILLIPS COMPANY

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APPEAL NUMBER: 07-02 APPLICATION NUMBER: 06050052 FACILITY ID NUMBER: 119090AAA

NOTICE

PLEASE TAKE NOTICE that I have sent, by overnight mail, to the Clerk of the Environmental Appeals Board an original and 5 copies of a RESPONSE TO RENEWAL OF MOTION FOR EXPEDITED CONSIDERATION on behalf of Petitioners American Bottom Conservancy and Environmental Integrity Project, a copy of which is herewith served upon each of the representatives identified in the attached service list.

Respectfully submitted,

Ann Alexander Natural Resources Defense Council 101 North Wacker Drive, Suite 609 Chicago, Illinois 60606 312-780-7427 312-663-9900 (fax) AAlexander@nrdc.org Council for Petitioner American Bottom Conservancy

Ben Wakefield Environmental Integrity Project 1920 L Street NW, Suite 800 Washington, DC 20036 202-263-4450 bwakefield@environmentalintegrity.org Council for Petitioner Sierra Club

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ENVER. ASPEALS BOARD

IN THE MATTER OF:) CONOCOPHILLIPS) COMPANY) APPEAL NUMBER: 07-02 APPLICATION NUMBER: 06050052 FACILITY ID NUMBER: 119090AAA

RESPONSE TO RENEWAL OF MOTION FOR EXPEDITED CONSIDERATION

Petitioners American Bottom Conservancy and Sierra Club ("Petitioners") submit this response to the Renewal of Motion for Expedited Consideration ("Renewal Motion") submitted by Respondent ConocoPhillips Company ("ConocoPhillips").

Petitioners note that the Renewal Motion does not differ in relevant substance from ConocoPhillips' previously filed motions for expedited consideration, and therefore reiterate their response dated December 7, 2007. Petitioners further note that the Renewal Motion is ConocoPhillips' third request for expedited consideration, and that the Renewal Motion presents no newly-available information of which the Board is otherwise unaware. Such repeated duplicative filings are an unnecessary burden on the litigants and this Tribunal.

Respectfully submitted,

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Ben Wakefield Environmental Integrity Project 1920 L Street NW, Suite 800 Washington, DC 20036 202-263-4442 bwakefield@environmentalintegrity.org Council for Petitioner Sierra Club

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