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October 23, 2012

VIA FEDERAL EXPRESS

Hon. Helen S. Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, New York 10007-1866

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2012 OCT 24 A 11:33
REGIONAL HEARING
CLERK

Re: *United Refining Company – Docket No. RCRA-02-2012-7504*
Request for Extension

Dear Judge Ferrara:

Our firm represents United Refining Company (“URC”) in connection with the referenced matter. URC received the U.S. Environmental Protection Agency’s September 25, 2012 correspondence and Complaint, Compliance Order and Notice of Opportunity for Hearing (the “Complaint”) on October 5, 2012.

Pursuant to Section 22.7(b) of the Consolidated Rules of Practice, this letter is submitted to request an extension of time to answer the Complaint. Specifically, URC respectfully requests a 60-day extension of time, until January 3, 2013, to serve an answer to the Complaint and, if necessary, to request a hearing in this matter. The reason for this request is to allow the parties sufficient time to conduct an informal conference to determine if the matter can be resolved without a hearing. Please note that I have conferred with EPA Assistant Regional Counsel Gary H. Nurkin regarding this request, and Mr. Nurkin expressed no objection to the requested extension based on the desire to arrange an informal conference.

Please note that I have submitted the original of this letter and one copy to Karen Maples, the Regional Hearing Clerk, and an electronic copy of this letter to Mr. Nurkin.

Thank you for your time and consideration, and please call if you have questions.

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Sincerely,

BOND, SCHOENECK & KING, PLLC

By: 

Robert R. Tyson

Att: Certificate of Service

cc: Gary Nurkin, Esq. (via e-mail only)
Assistant Regional Counsel
USEPA, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

Karen Maples (via Federal Express)
Regional Hearing Clerk
USEPA, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

John R. Wagner, Esq. (URC) (via e-mail only)

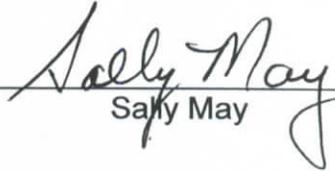
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of United Refining Company
Docket No. RCRA-02-2012-7504

CERTIFICATE OF SERVICE

Sally May, certifies that on October 23, 2012, she served the original and one copy of the **Request for Extension** in this proceeding by enclosing a true and correct copy of said document in a postage prepaid, properly addressed overnight mailer and depositing same in an official depository of Federal Express overnight delivery service at One Lincoln Center, Syracuse, New York upon:

Karen Maples
Regional Hearing Clerk
USEPA, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866


Sally May

DATED: October 23, 2012