

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

2008 JUN 10 AM 10:55

Docket No.: SDWA-08-2008-0047

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In the Matter of: )  
)  
P&M Petroleum Management, LLC ) **MOTION FOR EXTENSION**  
) **OF TIME TO ANSWER**  
)  
Respondent. )  
)


The United States Environmental Protection Agency, Region 8 (EPA), by its undersigned attorney, with the concurrence of Mr. Jerry L. Calley, Managing Member of P&M Petroleum Management, LLC, requests that an extension be granted so that P&M Petroleum Management, LLC will have until at least July 18, 2008 to file an answer in this matter. This motion is made pursuant to the section 22.16 of the Consolidated Rules of Practice, 40 C.F.R. §22.16.

EPA requests that this motion be granted since EPA and P&M Petroleum Management, LLC have been engaged in fruitful settlement negotiations. Additionally, in a recent inspection of the wells at issue last week, EPA discovered what it believes to be additional violations. P&M Petroleum Management, LLC is aware of this new development and that EPA intends to amend the complaint to include these new alleged violations. The parties wish to avoid the need for P&M Petroleum Management, LLC to expend the time and resources to formally file an answer by the current deadline which is on or around June 13, 2008.

Therefore, counsel for EPA, with the concurrence of Mr. Calley, moves that an extension of time be granted for P&M Petroleum Management, LLC to file an answer until at least July 18, 2008.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of June, 2008.

United States Environmental Protection Agency, Region 8

By:   
James H. Eppers  
Senior Attorney  
Counsel for EPA

P&M Petroleum Management, LLC  
Docket No. SDWA-08-2008-0047

CERTIFICATE OF SERVICE

I hereby certify that the original and one true copy of this Motion For Extension Of Time To Answer were hand carried to the Regional Hearing Clerk, EPA Region 8, 1595 Wynkoop Street, Denver, Colorado, and that a true copy was sent via First Class U.S. Mail to:

Jerry L. Calley  
Managing Member  
P&M Petroleum Management, LLC  
518 17<sup>th</sup> Street Suite 230  
Denver, CO 80202

Dated: 6/10/08

By: Judith McTernan  
Judith McTernan