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February 27, 2019

***Via Federal Express***

Ms. Lorena Vaughn  
Regional Hearing Clerk (6RC-D)  
U.S. EPA - Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: No. EPCRA-06-2019-0501, *In the Matter of Thomas Petroleum, LLC, Pilot Thomas Logistics, LLC*, U.S. Environmental Protection Agency, Region 6, Dallas, Texas

Dear Ms. Vaughn:

Enclosed please find an original and one copy of Thomas Petroleum LLC, Pilot Thomas Logistics, LLC and U.S. EPA Region 6's Joint Motion to Extend Deadline for Filing of Respondent's Answer and Request for Hearing for filing in the above captioned matter.

Very truly yours,



Ragna Henrichs  
Senior Counsel

ROH:mhb

cc: ***Via Federal Express***

James Murdock  
Office of Regional Counsel  
U.S. EPA – Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

David Riley  
EPCRA 313 Enforcement Officer  
U.S. EPA – Region 6 (EN-H3)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS

FILED  
2019 FEB 28 PM 3:58  
REGIONAL HEARING CLERK  
EPA REGION VI

IN THE MATTER OF:

THOMAS PETROLEUM, LLC  
PILOT THOMAS LOGISTICS, LLC

RESPONDENT

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DOCKET NO. EPCRA-06-2019-0501

**JOINT MOTION TO EXTEND DEADLINE FOR FILING OF  
RESPONDENT'S ANSWER AND REQUEST FOR HEARING**

Respondent Thomas Petroleum, LLC, Pilot Thomas Logistics, LLC was served on February 19, 2019, with the U.S. Environmental Protection Agency's ("EPA") Complaint in this matter. Respondent and EPA (the "Parties") wish to allow Respondent sufficient time to respond to the 135-count Complaint, and also wish to conduct settlement negotiations to resolve the allegations in the Complaint and to avoid the expense of prolonged litigation to resolve this matter. Accordingly, the Parties jointly request a 60-day extension of the deadline for filing Respondent's Answer and Request for Hearing to May 20, 2019 to provide a period for good faith settlement negotiations.

DATED: February 26, 2019

Respectfully submitted,

PORTER HEDGES LLP



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ATTORNEY FOR RESPONDENTS

THOMAS PETROLEUM, LLC

PILOT THOMAS LOGISTICS, LLC

U.S. ENVIRONMENTAL PROTECTION  
AGENCY, REGION 6



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**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2019, the original and one copy of the foregoing Joint Motion to Extend Deadline for Filing of Respondent's Answer and Request for Hearing ("Joint Motion") was sent to the Regional Hearing Clerk, U.S. EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, via Federal Express.

  
Ragna Henrichs