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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

IN THE MATTER OF:)
George T. Taylor & Son, Inc.)
d/b/a "Taylor Energy")
152 Broad Brook Rd.)
Broad Brook, Connecticut)
)
)
)
)
Respondent.)

JOINT MOTION FOR EXTENSION OF
TIME TO FILE ANSWER TO
COMPLAINT

Docket No. CWA-01-2009-0002

JOINT MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT

1. Pursuant to 40 C.F.R. § 22.7(b), the United States Environmental Protection Agency ("EPA") and George T. Taylor & Son, Inc. ("Respondent"), (collectively "the Parties"), jointly request that the due date for Respondent to file an Answer *In the Matter of George T. Taylor & Son, Inc.*, CWA-01-2009-0002 be extended to May 18, 2009.
2. EPA initiated this matter by filing a Complaint on December 12, 2008, which was received by Respondent on December 15, 2008.
3. Based on prior joint motions from the Parties, the Presiding Officer has extended Respondent's deadline for filing an Answer to April 17, 2009.
4. The Parties met on January 14, 2009 to discuss the likelihood of settlement in this matter and made progress towards resolution of this matter.

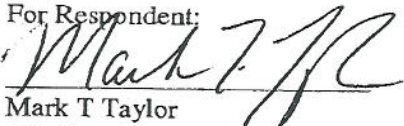
5. Subsequent to the January 14th meeting, Respondent has provided to EPA financial documents related to Respondent's "ability to pay" the proposed penalty.

6. After concluding its "ability to pay" analysis by the end of March, EPA provided Respondent with a Consent Agreement and Final Order, and an Order on Consent for signature.

7. Respondent has requested additional time to allow its accountant to review the terms of the settlement to ensure that the company can fulfill its obligations under the terms of the settlement.

8. In light of the foregoing, and pursuant to 40 C.F.R. § 22.7(b), the Parties wish to continue settlement negotiations without unnecessary commitment of Respondent's resources, and request that Respondent be granted until May 18, 2009, to file an Answer to the Complaint.


For Respondent:



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Dated: 4-13-2009

For EPA:


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Dated: 4/13/09

In the Matter of: George T. Taylor & Son, Inc. d/b/a "Taylor Energy",
Docket No. CWA-01-2009-0002

CERTIFICATE OF SERVICE

I certify that the foregoing JOINT MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT was sent to the following persons, in the manner specified, on the date below:

Original and one copy
hand-delivered:

Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region 1
One Congress Street (RAA)
Boston, MA 02114-2023

Copy via first class mail to:

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Fax: 860-623-1356
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Dated: 4/13/09



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