

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. 1  
2009 MAR 12 11:10:05  
REGIONAL HEARING  
CLERK

In the Matter of:

GULF OIL LIMITED PARTNERSHIP,  
  
Respondent.

Docket No. CWA-02-2008-3401

**JOINT MOTION FOR EXTENSION OF TIME**

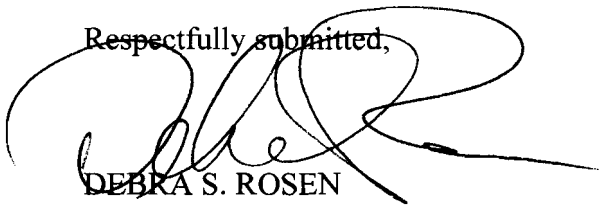
Pursuant to Section 22.7(b) of the “Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action, Orders and the Revocation, Termination or Suspension of Permits”, 40 C.F.R. §22.7(b) (“CROP”) Respondent requests an extension of time for the filing of the Consent Agreement and Final Order (“CAFO”) which has been agreed to by the parties and signed by the Respondent.

This motion is jointly made by Complainant and Respondent in order to allow additional time to file the CAFO which was to be filed by March 6, 2009 by the terms of the Initial Prehearing Order. Following the issuance of the Initial Prehearing Order which recognized that there was a settlement in principle of this matter, the parties had difficulty in reaching agreement on a material term of the CAFO. In order to preserve the settlement, alternative terms were ultimately agreed to by both parties which necessitated additional time to finalize the CAFO. The final CAFO was received from EPA for signature on February 23, 2009 and there was a slight delay in execution by the appropriate Gulf representative given scheduling issues.

The date for filing was incorrectly diaried so this extension request was not previously made. The parties jointly hereby respectfully request a short extension and ask that the date by

which a fully executed Consent Agreement and Final Order is filed memorializing the settlement of this matter be extended to March 20, 2009.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Debra S. Rosen', is written over the text 'Respectfully submitted,'.

DEBRA S. ROSEN  
Archer & Greiner, P.C.  
One Centennial Square  
Haddonfield, NJ 08033  
(609)795-2121

Dated: March 11, 2009  
3894955v1

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I served the attached Joint Motion for Extension of Time to the following persons, in the manner specified, on the date below:

Original and copy by overnight mail:

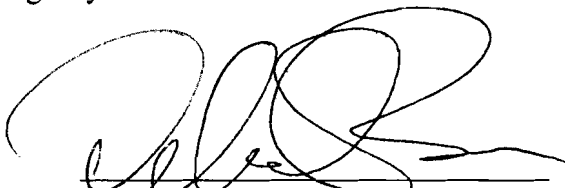
Karen Maples, Regional Hearing Clerk  
U.S. Environmental Protection Agency - Region II  
290 Broadway  
New York, NY 10007

Copy by facsimile and regular mail to:

Honorable Susan L. Biro  
Chief Administrative Law Judge  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
1099 14<sup>th</sup> Street, N.W.  
Suite 350  
Washington, DC 20005  
(Fax #202-565-0044)

Copy by facsimile and overnight mail:

Christopher Saporita, Esquire  
Assistant Regional Counsel  
U.S. Environmental Protection Agency  
290 Broadway, 16<sup>th</sup> Floor  
New York, NY 10007  
(Fax #212-637-3199)



DEBRA S. ROSEN, ESQUIRE

DATED: March 11, 2009  
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