

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS

IN THE MATTER OF:

THOMAS PETROLEUM, LLC  
PILOT THOMAS LOGISTICS, LLC

RESPONDENT

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DOCKET NO. EPCRA-06-2019-0501

**JOINT MOTION FOR APPOINTMENT OF NEUTRAL AND  
TOLLING OF TIME TO FILE DISPOSITIVE MOTIONS**

The parties file this motion according to the Presiding Officer's Prehearing Order dated November 8, 2019, which orders the parties to file any joint motion for the appointment of a neutral pursuant to 40 C.F.R. § 22.18(d)(3) within seven days of the deadline for Complainant's Rebuttal Prehearing Exchange. Complainant filed its Rebuttal Prehearing Exchange on March 24, 2020 and the parties now seek the appointment of a neutral to facilitate possible settlement of this matter.

The Presiding Officer's Prehearing Order also gave the parties 30 days from the deadline for Complainant's Rebuttal Prehearing Exchange to file dispositive motions regarding liability under 40 CFR § 22.20. Consistent with the parties' request for the appointment of a neutral, the parties also request an order tolling the allowed 30 days while alternative dispute resolution is pending.

*(Signatures on following page)*

DATED: March \_\_, 2020

Respectfully submitted,

U.S. ENVIRONMENTAL PROTECTION  
AGENCY, REGION 6


**JAMES MURDOCK** Digitally signed by JAMES MURDOCK  
Date: 2020.03.30 08:18:03 -05'00'

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ATTORNEY FOR COMPLAINANT

DATED: March 27, 2020

PORTER HEDGES LLP



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