

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6

In the Matter of

Docket No. CWA-06-2015-1717

Evangeline Enterprises, L.L.C.

Proceeding to Assess a Class II
Civil Penalty under Section 309(g)
Of the Clean Water Act

Respondent

ADMINISTRATIVE COMPLAINT

Facility Number: LAU004016

MOTION FOR AN ADDITIONAL 90 DAY EXTENSION OF TIME

Comes now **Evangeline Enterprises, L.L.C.** by and through its counsel, **Jade Roland Andrus- Andrus & Andrus LLC**, pursuant to Rule 22.7(b), *et al* of the Consolidated Rules of Practice (40 C.F.R. ' 22.7(b)) and respectfully asserts that a 90 day extension of time to answer was granted by this court on March 10, 2015. **Evangeline Enterprises, L.L.C.** by and through its counsel, **Jade Roland Andrus- Andrus & Andrus LLC** requests an additional **NINETY (90) day** extension of time to file its Answer to Administrative Complaint and as good cause therefore states as follows:

Evangeline Enterprises, LLC is actively communicating with the U.S. Environmental Protection Agency to resolve this subject matter of the Complaint. Evangeline Enterprises, LLC has a meeting with the Louisiana Department of Environmental Quality on June 23, 2015 to determine if Evangeline Enterprise, LLC remediation plan is viable. The results of that meeting will be immediately conveyed to the U.S. Environmental Protection Agency and a follow up meeting with the U.S. Environmental Protection Agency will be held.

As such, Evangeline Enterprises, LLC respectfully requests the aforementioned Motion for an Additional 90 Day Extension of Time to Answer be granted.

Prior to filing this Motion, the undersigned counsel contacted opposing counsel, **Ellen Chang Vaughn**, as to the extension requested herein and said opponent indicated that she does **NOT** oppose the Motion.

X

Dated: June 5, 2015

JADE ROLAND ANDRUS

Andrus & Andrus, LLC

La. Bar Roll # 26,173

Attorney for Evangeline Enterprises, LLC

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Lafayette, La. 70506

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CERTIFICATE OF SERVICE

I certify that the foregoing **MOTION FOR AN ADDITIONAL 90 DAY EXTENSION OF TIME** dated June 5, 2015 was sent this day in the following manner to the addressees listed below:

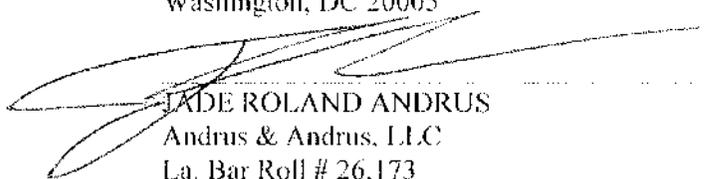
Via Overnight Courier to:

Regional Hearing Clerk
U.S. EPA - Region 6
1445 Ross Avenue- Suite 1200
Dallas, Texas 75202-2733

Via Overnight Courier and facsimile to:

Ellen Chang Vaughn
Attorney for U.S. Environmental Protection Agency
1445 Ross Avenue- Suite 1200
Dallas, Texas 75202-2733

Presiding Judge: Unknown at this time
U.S. Environmental Protection Agency
Office of Administrative Law Judges
1200 Pennsylvania Ave., N.W.
Mail Code 1900L
Washington, DC 20005



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Dated: June 5, 2015