

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

IN THE MATTER OF:)	
BP America Production Company, Respondent.	Docket No. CWA-08-2014-0037 JOINT REQUEST FOR EXTENSION OF STAY OF A CASE DEADLINES, AND REQUEST FOR EXPEDITED RULING RULING	LL
	, ,	

The United States Environmental Protection Agency Region 8 and BP America

Production Company (hereinafter the "Parties"), respectfully submit this Joint Request for

Extension of Stay of All Case Deadlines, and Request for Expedited Ruling as follows:

On January 30, 2015, the Parties filed Joint Notice of Settlement, Request for Stay of all Case Deadlines, and Request for Expedited Ruling. The Parties requested a 30-day stay. That request was granted on February 2, 2015.

The settlement in principle includes a supplemental environmental project and the Parties have been in consultation with the Southern Ute Indian Tribe to finalize a plan for that project.

The Parties also have been exchanging proposed wording for the consent agreement to submit to EPA Region 8's Regional Judicial Officer, and expect to reach agreement in the near future on the relevant wording of the consent agreement. Accordingly, the Parties request a 15-day extension of all case deadlines. The Parties will provide notice when the settlement has been finalized.

WHEREFORE, the Parties respectfully request their joint request for a 15-day stay of all case deadlines be GRANTED.

Dated: March 3, 2015

Andrea Wang

Nicole M. Abbott

DAVIS GRAHAM & STUBBS LLP

1550 17th Street, Suite 500

Denver, CO 80202

Telephone: 303.892.9400 Facsimile: 303.893.1379

Email: andrea.wang@dgslaw.com

nicole.abbott@dgslaw.com

Attorneys for Respondent

Margaret J. (Peggy) Livingston
Margaret J. (Peggy) Livingston

Office of Enforcement, Compliance and

Environmental Justice

U.S. Environmental Protection Agency

(8ENF-L)

1595 Wynkoop Street

Denver, Colorado 80202-1129

Telephone: 303.312.6858 Facsimile: 303.312.7202

Email: livingston.peggy@epa.gov

Attorney for Complainant

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March 2015, a true and correct electronic copy of the foregoing JOINT REQUEST FOR EXTENSION OF STAY OF ALL CASE DEADLINES, AND <u>REQUEST FOR EXPEDITED RULING</u> was served on the following via EPA's E-Filing System:

Sybil Anderson, Headquarters Hearing Clerk Office of Administrative Law Judges U.S. Environmental Protection Agency Ronald Reagan Building, Room M1200 1300 Pennsylvania Avenue, NW Washington, D.C. 20004

I further hereby certify that on this 3rd day of March, 2015, one true and correct copy of the foregoing JOINT REQUEST FOR EXTENSION OF STAY OF ALL CASE DEADLINES, AND <u>REQUEST FOR EXPEDITED RULING</u> was served on each of the following by electronic mail:

Andrea Wang
Nicole M. Abbott
DAVIS GRAHAM & STUBBS LLP
1550 17th Street, Suite 500
Denver, CO 80202
Email: andrea.wang@dgslaw.com
nicole.abbott@dgslaw.com

Margaret J. (Peggy) Livingston

Margaret J. (Peggy) Livingston

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

IN THE MATTER OF: BP America Production Company, Respondent.) Docket No. CWA-08-2014-0037) ORDER GRANTING JOINT REQUEST FOR STAY OF ALL CASE DEADLINES)
The Parties have filed a Joint Request for <u>Request for Expedited Ruling</u> in the above-caption been discussing language of a consent agreement parties further state that they will provide notice reviewed this request and the status of this matter deadlines is GRANTED.	at and a supplemental environmental project. The when the settlement is finalized. Having
SO ORDERED on thisday of	2015.
	By: Christine Donelian Coughlin Administrative Law Judge