

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 EXTENSION OF TIME FOR FILING OF
PREHEARING EXCHANGE**

Respondent Thomas Petroleum, LLC, Pilot Thomas Logistics, LLC, and complainant EPA (the "Parties") come now and ask the court to extend time for the parties to file their prehearing exchanges.

Because of the proximity of the prehearing exchange schedule to holidays and vacation schedules, the Parties are concerned that stakeholders and employees of the Parties necessary to complete and evaluate the prehearing exchanges will not be available. The Parties are also concerned that the current schedule will cause substantial inconvenience and hardship for counsel as well as for those other stakeholders and employees.

Additionally, the Parties have found negotiations have slowed entering the holiday season as counsel and stakeholders have been unavailable during this time.

The Parties wish to ensure that counsel and necessary stakeholders are available with sufficient time to address the many alleged violations in the complaint, and also wish to continue to conduct meaningful settlement negotiations with all necessary stakeholders available. Accordingly, the Parties jointly request a 60-day extension of time, and propose the following schedule:

February 18, 2020

Complainant's Initial Prehearing Exchange

March 11, 2020

Respondents' Prehearing Exchange(s)

March 25, 2020

Complainant's Rebuttal Prehearing Exchange

DATED: December 6, 2019

Respectfully submitted,

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THOMAS PETROLEUM, LLC

PILOT THOMAS LOGISTICS, LLC

U.S. ENVIRONMENTAL PROTECTION
AGENCY, REGION 6

JAMES MURDOCK

Digitally signed by JAMES MURDOCK
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James Murdock

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ATTORNEY FOR COMPLAINANT

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2019, the foregoing Joint Motion to Extend Deadline for Filing of Prehearing Exchange ("Joint Motion") was filed in the OALJ E-Filing System.

James Murdock



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BEFORE THE ADMINISTRATOR

In the Matter of:

Thomas Petroleum, LLC, and Pilot Thomas Logistics, LLC

Respondents.

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Docket No. EPCRA-06-2019-0501

ORDER GRANTING PARTIES' JOINT MOTION FOR EXTENSION OF TIME

On December 6, 2019, the parties filed a joint motion for extension of time for filing of prehearing exchanges, stating concerns that the proximity of the prehearing exchange schedule to holidays and vacations will make it difficult and inconvenient to meet the deadlines in the schedule. The parties also state that their efforts to settle the case "have slowed entering the holiday season as counsel and stakeholders have been unavailable during this time."

In light of the parties' request for additional time and indications of their good faith effort to settle this matter, the prehearing exchanges shall be filed pursuant to the following schedule:

- February 18, 2020 Complainant's Initial Prehearing Exchange
March 11, 2020 Respondents' Prehearing Exchange(s)
March 25, 2020 Complainant's Rebuttal Prehearing Exchange

SO ORDERED.

Christine Donelian Coughlin Administrative Law Judge

Dated: Washington, D.C.