

LAW OFFICE OF

Donald L.

Anglehart^{LLC}

One Broadway, 14th Floor
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By Hand

March 9, 2010

Wanda I. Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region I (RAA)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

*Re: In the Matter of Draper Energy Co., Inc. and
Energy North Incorporated, CWA-01-2009-0083*

Dear Ms. Santiago:

Enclosed is the original and one copy of the "Assented To Joint Motion of All Parties for Extension of Time for Respondents to File Answer," and accompanying certificate of service.

Thank you for your assistance.

Very truly yours,



Donald L. Anglehart

Enclosure

cc: Service List

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

RECEIVED

2010 MAR -9 P 2:57

REC'D

CLERK

IN THE MATTER OF:)

DRAPER ENERGY COMPANY,)
INCORPORATED,)
148 Forest Road)
Wilton, New Hampshire 03086)

ENERGY NORTH)
INCORPORATED)
1700 Shawsheen Street)
Tewksbury, Massachusetts 01867)

Respondents)
_____)

Docket No. CWA-01-2009-0083

ASSENTED TO JOINT MOTION OF ALL PARTIES
FOR EXTENSION OF TIME
FOR RESPONDENTS TO FILE ANSWER

Respondents, Draper Energy Company, Incorporated and Energy North Incorporated, and Complainant, Director of the Office of Environmental Stewardship, EPA, Region I, by their respective attorneys, hereby move for an extension of time for Respondents to file a written request for hearing and answer up to and including May 5, 2010.

In support of this motion, all parties state that productive settlement discussions have been held and have resulted in a settlement in principle that will include a possible Supplemental Environmental Project that is undergoing further review. It is expected that settlement of this matter will obviate the need for further

administrative proceedings. All parties believe that an extension of time will allow the parties to focus on finalizing the settlement, will minimize legal expense, and will encourage an efficient resolution of this matter. No prejudice to any party will result from the granting of this motion.

All parties assent to and join in this motion.


Respectfully submitted,

DRAPER ENERGY CO., INC.

ENERGY NORTH INCORPORATED

By its attorneys,
McLane, Graf, Raulerson &
Middleton, P.A.

By its attorney,
Law Office of Donald L. Anglehart, LLC

By: 
Gregory H. Smith
Michael J. Quinn
Mark C. Rouvalis
100 Market St., Suite 301
Portsmouth, NH 03801
(603) 436-2818

By: 
Donald L. Anglehart
One Broadway, 14th Floor
Cambridge, MA 02142
(617) 401-3350
email: don@anglehart.com

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION I

By its attorney,


Andrea Simpson, Senior Enforcement Counsel
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912
(617) 918-1738
email: simpson.andrea@epamail.epa.gov

Dated: March 9, 2010

**In the Matter of Draper Energy Co., Inc. and Energy North Incorporated
Docket No. CWA-01-2009-0083**

CERTIFICATE OF SERVICE

I certify that the foregoing "Assented to Joint Motion of All Parties for Extension of Time for Respondents to File Answer" was sent to the following persons, in the manner specified, on the date below:

*Original and one copy
hand-delivered:*

Wanda I. Santiago
Regional Hearing Clerk
U.S. EPA, Region I
Mail Code: ORA 18-1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

One copy hand-delivered:

Honorable Jill Metcalf
Regional Judicial Officer
U.S. EPA, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Andrea Simpson
Senior Enforcement Counsel
Office of Environmental Stewardship
U.S. EPA, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

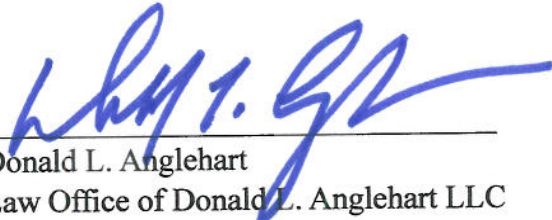
One copy by First-Class Mail:

Robert Farr, General Manager
Draper Energy Co., Inc.
148 Forest Road
Wilton, NH 03086

Mark. C. Rouvalis
McLane, Graf, Raulerson &
Middleton, P.A.
100 Market Street, Suite 301
Portsmouth, NH 03801

Pat O'Connell, Vice President
Energy North Incorporated
1700 Shawsheen Street
Tewksbury, MA 01876

Dated: March 9, 2010



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2010 MAR -9 P 2:58

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REGION I

By Hand

 COPY

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By its attorney,
Law Office of Donald L. Anglehart, LLC

By: 

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U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION I
By its attorney,



Andrea Simpson, Senior Enforcement Counsel
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region I
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Senior Enforcement Counsel
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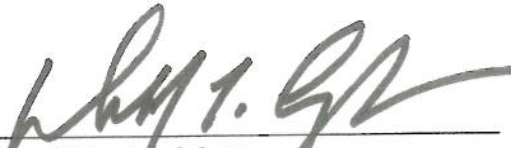
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