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June 8, 2016

**VIA EMAIL (R1\_Hearing\_Clerk\_Filings@epa.gov)**  
**AND FIRST CLASS MAIL**

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

**RE: In the matter of: Townsend Oil Co., Inc., CWA-01-2016-0040**

Dear Ms. Santiago,

Enclosed for filing in the above captioned matter, please find: (1) Respondent Townsend Oil Co., Inc.'s Unopposed Motion for Extension of Time to Respond to Complaint; and (2) Townsend Oil Co., Inc.'s Certificate of Service.

In accordance with the Standing Order Authorizing Filing and Service by Email in Proceedings Before the Region 1 Regional Judicial Officer, Townsend Oil Co., Inc. is filing the Unopposed Motion electronically.

Thank you for your attention to this matter.

Sincerely,

**BROWN RUDNICK LLP**



John W. Wadsworth

JWW/KPD/pam

Enclosures

cc: Rohemir Ramirez Ballagas, Esq. (w/enc. by Email and First Class Mail)  
Pamela Talbot (w/enc. by First Class Mail)

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 1**

**IN THE MATTER OF:**

TOWNSEND OIL CO., INC.  
27 Cherry Street  
Danvers, MA 01923

Respondent.

Docket Number: CWA-01-2016-0040

Complaint and Notice of  
Opportunity for Hearing

**UNOPPOSED MOTION FOR EXTENTION OF TIME TO RESPOND TO COMPLAINT**

In accordance with 40 C.F.R § 22.7, respondent Townsend Oil Co., Inc. (“Townsend Oil”) respectfully requests an extension of time until and including July 15, 2016 to respond to the Complaint and Notice of Opportunity for Hearing in this matter (“Complaint”). Counsel for Townsend Oil has consulted with the United States Environmental Protection Agency’s (“EPA”) enforcement counsel on the filing of this motion and he does not oppose the same.

As grounds for this motion, Townsend Oil states as follows:

1. Townsend Oil was served with the Complaint on May 16, 2016. Under 40 C.F.R. Part 22, Townsend Oil’s response to the Complaint currently is due on June 15, 2016.
2. The Complaint alleges Townsend Oil violated the Clean Water Act by failing to maintain and fully implement a Spill Prevention, Control, and Countermeasure Plan.
3. An extension of time until July 15, 2016 to respond to the Complaint will give Townsend Oil and its counsel sufficient time to investigate the allegations in the Complaint and file a response to the Complaint.
4. In addition, Townsend Oil’s counsel and the EPA’s enforcement counsel have conferred and agree that the requested extension will allow Townsend Oil and the EPA to

explore whether this matter can be resolved through settlement, and that they will explore the possibility of settlement between now and July 15, 2016.

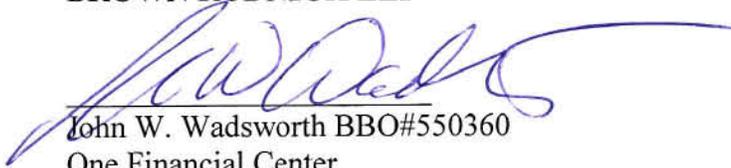
5. No party will be prejudiced by the requested extension, and, as noted, the EPA's enforcement counsel does not object to this motion.

6. By filing this motion, Townsend Oil is not waiving any rights or defenses with respect to the Complaint.

WHEREFORE, Townsend Oil respectfully requests that the Regional Judicial Officer enter an order extending the time by which Townsend Oil must respond to the Complaint up to and including July 15, 2016.

**TOWNSEND OIL CO. INC.,**  
**By its attorneys,**

**BROWN RUDNICK LLP**



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Dated: June 8, 2016



**TOWNSEND OIL CO. INC.,**  
**By its attorneys,**

**BROWN RUDNICK LLP**



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Dated: June 8, 2016