UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

IN THE MATTER OF:)
BP America Production Company,	Docket No. CWA-08-2014-0037
	JOINT NOTICE OF SETTLEMENT, REQUEST FOR STAY OF ALL CASE DEADLINES,
Respondent.) AND <u>REQUEST FOR EXPEDITED</u>) <u>RULING</u>
)
)

The Parties, the United States Environmental Protection Agency Region 8 and BP

America Production Company (hereinafter the "Parties"), respectfully submit this Joint Notice of Settlement, Request for Stay of All Case Deadlines, and <u>Request for Expedited Ruling</u> as follows:

Joint Notice of Settlement, Request for Stay of All Case Deadlines, and Request for Expedited Ruling

The Parties have reached a settlement in principle of the above-captioned matter.

Accordingly, the Parties request a 30-day stay 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 30-day stay of all case deadlines be GRANTED.

Dated: January 30, 2015

MuleM. allott

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 30th day of January, 2015, an original and one true and correct copy of the foregoing **JOINT NOTICE OF SETTLEMENT**, **REQUEST FOR STAY OF ALL CASE DEADLINES**, **AND** *REQUEST FOR EXPEDITED RULING* were 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 30th day of January, 2015, one true and correct copy of the foregoing JOINT NOTICE OF SETTLEMENT, REQUEST FOR STAY OF ALL CASE DEADLINES, AND <u>REQUEST FOR EXPEDITED RULING</u> was served on each of the following by electronic mail and Federal Express overnight service:

Margaret J. (Peggy) Livingston
Enforcement Attorney
Office of Enforcement, Compliance and Environmental Justice
U.S. Environmental Protection Agency (8ENF-L)
1595 Wynkoop Street
Denver, Colorado 80202-1129