

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6

In the Matter of

Chevron Mining Inc.,  
A Colorado Company, Respondent

DOCKET NO. CWA-06-2014-1832

**COMPLAINANT'S MOTION FOR EXTENSION OF  
PREHEARING ORDER DEADLINES**

COMES NOW COMPLAINANT, the Director of the Compliance Assurance and Enforcement Division, United States Environmental Protection Agency (EPA), Region 6, by and through his attorney, and provides this Motion for Extension of Prehearing Order Deadlines regarding the "PREHEARING ORDER" issued by the Administrative Law Judge, Christine D. Coughlin, on February 2, 2015 that required the Parties to comply with specified deadlines. For the reasons specified below, Complainant requests a forty-five (45) extension of all deadlines starting with the date of the prehearing exchange deadline set for March 20, 2015, for the following reasons:

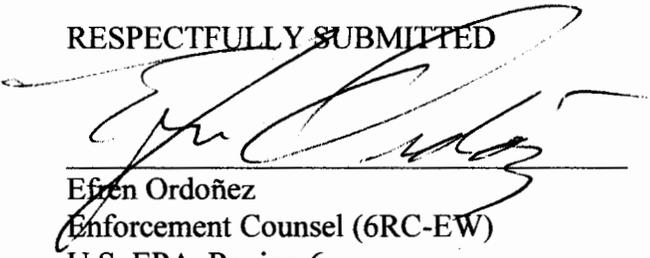
1. As a result of negotiations, the Parties have reached a settlement in principle.

Complainant's attorney has drafted a proposed Consent Agreement and Final Order ("CAFO"), which has been reviewed and approved by EPA. The proposed CAFO was mailed to Respondent's attorney and received by her on March 10, 2015. Once Respondent reviews, signs, and returns the CAFO to Complainant, Complainant's attorney shall place the CAFO in the concurrence process to obtain Complainant's signature.

2. It is the expectation of Complainant that the fully executed CAFO will be finalized and filed before the expiration of the proposed extension period.
3. This Motion for Extension of Prehearing Order Deadlines has been discussed with Respondent's attorney, and Respondent's attorney concurs with the 45 day extension request.
4. The requested extension is not sought for the purpose of delay, but rather for the purpose of seeking and finalizing settlement to avoid the expense and time associated with administrative litigation. This purpose is also encouraged in Section VII of the administrative Complaint, and in federal environmental regulations at 40 C.F.R. § 22.18.

FOR THESE REASONS, Complainant respectfully requests that this Motion be granted and that the PREHEARING ORDER deadlines be extended by 45 days.

RESPECTFULLY SUBMITTED



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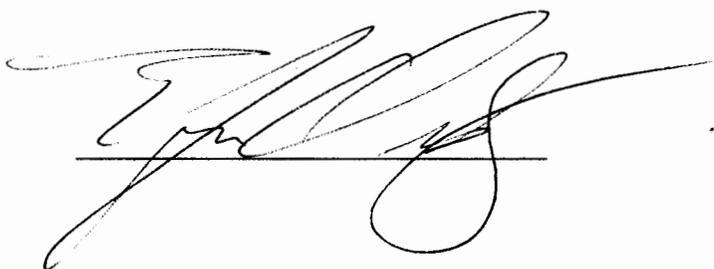
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CERTIFICATE OF SERVICE

I certify that the original of the foregoing COMPLAINANT'S MOTION FOR EXTENSION OF PREHEARING ORDER DEADLINES was electronically filed with EPA Headquarters Clerk, and true and correct copy was sent to the following on this the 12<sup>th</sup> of March, 2015 in the following manner:

Via Electronic Mail:

Ms. Sara M. Burgin, Esq.  
Katten Muchin Rosenmann LLP  
One Congress Plaza  
111 Congress Ave., Suite 1000  
Austin, Texas 78701-4073  
Sara.burgin@kattenlaw.com

A handwritten signature in black ink, appearing to be "Sara M. Burgin", written over a horizontal line. The signature is stylized and cursive.