

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
) PCB No. 13-072
 v.) (Water – Enforcement)
)
 PETCO PETROLEUM CORPORATION,)
)
 Respondent.)

REQUEST FOR AN EXTENSION OF TIME FOR PETCO PETROLEUM CORPORATION TO ANSWER OR OTHERWISE RESPOND TO THE FIRST AMENDED COMPLAINT

COMES NOW Respondent Petco Petroleum Corporation (“Petco”), by and through its undersigned counsel, and for its Request for an Extension of Time to Answer or Otherwise Respond to the First Amended Complaint, states as follows:

1. On October 20, 2022, the Board adopted the People’s First Amended Complaint in the above-captioned case for filing.
2. On October 25, 2022, Hearing Officer Webb entered an Order providing that Respondent Petco shall respond or otherwise file a motion pertaining to the First Amended Complaint on or before December 19, 2022.
3. The First Amended Complaint contains 73 separate counts pertaining to alleged releases of crude oil and/or salt water in Fayette and Jefferson Counties that occurred between February 22, 2010 and May 17, 2013.
4. Given the passage of time between the alleged incidents and now, Petco is in the process of verifying certain information regarding the allegations contained in the First Amended Complaint. That process is taking time, and the upcoming holidays further complicate the gathering of information.

5. As a result, Petco requests that the Board grant it an additional thirty (30) days—up to and including Wednesday, January 18, 2023—in which to file its Answer and/or otherwise file a motion pertaining to the First Amended Complaint.

6. Counsel for the Parties have communicated regarding this request for extension. The People do not object to the requested extension.

WHEREFORE, Respondent Petco Petroleum Corporation respectfully requests that the Hearing Officer and Board grant this Request for Extension and enter an Order providing that Petco Petroleum Corporation have an additional thirty (30) days—up to and including Wednesday, January 18, 2023—in which to file its Answer and/or otherwise file a motion pertaining to the First Amended Complaint.

Respectfully submitted,

/s/ Paul T. Sonderegger

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 13, 2022, the foregoing was filed via the Board's electronic filing system providing notice of the same to all the clerk and all counsel of record.

/s/ Paul T. Sonderegger