

**SOAH DOCKET NO. 582-15-2082
TCEQ DOCKET NO. 2015-0069-MSW**

APPLICATION OF 130	§	BEFORE THE TEXAS COMMISSION
ENVIRONMENTAL PARK, LLC	§	ON
FOR PROPOSED PERMIT NO.	§	ENVIRONMENTAL QUALITY
2383	§	

**TJFA, L.P.'s & ENVIRONMENTAL PROTECTION IN THE INTEREST
OF CALDWELL COUNTY'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE EXCEPTIONS AND REPLIES TO EXCEPTIONS TO
THE PROPOSAL FOR DECISION**

TO GENERAL COUNSEL TUCKER ROYALL:

TJFA, LP and Environmental Protection in the Interest of Caldwell County (collectively, "Protestants") file this, their Unopposed Motion for Extension of Time to File Exceptions and Replies to Exceptions to the Proposal for Decision in the above-referenced matter, and in support thereof, would respectfully show the following:

BACKGROUND & BASIS FOR EXTENSION

The Administrative Law Judges issued their Proposal For Decision ("PFD") in this matter on February 17, 2017. Exceptions to the Proposal for Decision are currently due on March 9, 2017, and replies to exceptions are due on March 20, 2017. Protestants seek a two-business day extension of time to file exceptions, which would extend the deadline for exceptions up until March 13, 2017. Replies to the exceptions would, accordingly, be due March 23, 2017.

This request is not being sought for purposes of delay, but to ensure that the parties have sufficient time to address the PFD. The PFD is over 200 pages and addresses a number of issues. Counsel for Protestants has had a number of commitments in the past

week, including out-of-town commitments that have necessitated the requested additional time to thoroughly address the PFD.

CONFERENCE WITH OTHER PARTIES

Counsel has communicated with the remaining parties regarding this request to extend the deadlines for exceptions and replies to exceptions to the PFD. No parties oppose this request.

PRAYER

Based on the above reasons, Protestants respectfully request the Commission's General Counsel approve the following extensions of time to file exceptions to the Proposal for Decision and replies to exceptions, pursuant to his authority granted by 30 Texas Administrative Code § 80.257(b):

1. **Exceptions to the PFD:** March 9, 2017 to March 13, 2017
2. **Replies to Exceptions:** March 20, 2017 to March 23, 2017

Respectfully submitted,



Marisa Perales
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State Bar No: 24002750
Eric Allmon
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ATTORNEYS FOR PROTESTANTS

CERTIFICATE OF CONFERENCE

Counsel for Protestants has conferred with the remaining parties in this docket, and there is no opposition to the Motion for Extension of Time to File Exceptions and Replies to Exceptions to the Proposal for Decision.



Marisa Perales

CERTIFICATE OF SERVICE

By my signature, below, I hereby certify that a true and correct copy of the foregoing document has been served on the following attorneys of record by electronic mail, facsimile, or US Mail on this 7th day of March, 2017.



Marisa Perales

SERVICE LIST

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