Filed: 1/5/2021 4:08:08 PM WEQC

Matt J. Micheli, P.C., WY Bar No. 6-3839 Macrina M. Jerabek, WY Bar No. 7-5757 HOLLAND & HART LLP 2515 Warren Avenue, Suite 450 P.O. Box 1347 Cheyenne, WY 82003-1347 Telephone: (307) 778-4200 Facsimile: (307) 778-8175 mjmicheli@hollandhart.com mmjerabek@hollandhart.com

ATTORNEYS FOR PETITIONER CITATION OIL & GAS CORP.

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL STATE OF WYOMING

| In the Matter of: |) | |
|---------------------------------|---|--------------------|
| Citation Oil & Gas Corp. |) | Docket No. 20-2601 |
| Air Quality Permit No. P0027427 |) | |
| Through Permit No. P0027433 |) | |

CITATION OIL & GAS CORP.'S UNOPPOSED MOTION FOR EXTENSION OF SUMMARY JUDGMENT RESPONSE/REPLIES DEADLINES

Citation Oil & Gas Corp. ("Citation"), by and through undersigned counsel, respectfully moves for an extension of time in which the parties submit summary judgment response/replies.

As grounds for this Motion, Citation states as follows:

- 1. The Council's Scheduling Order filed December 3, 2020, set forth the following deadlines:
- a. January 8, 2021 Citation's reply/response to its Motion for Summary Judgment and DEQ's Cross Motion for Summary Judgment; and
 - b. January 15, 2021 DEQ's reply to its Cross Motion for Summary Judgment.
- Citation requests an extension because of unforeseen family circumstances.
 Citation also requests a corresponding extension for the DEQ's deadline.
 - 3. DEQ agrees with both extension requests.
 - 4. Citation requests extensions up to and including:

- a. January 12, 2021 Citation's reply/response to its Motion for Summary Judgment and DEQ's Cross Motion for Summary Judgment; and
 - b. January 20, 2021 DEQ's reply to its Cross Motion for Summary Judgment.
- 5. This Motion is timely filed, and the extensions will not conflict with or have any impact on the hearing on motions for summary judgment already scheduled for February 25.

WHEREFORE, Citation requests an Order extending Citation's reply/response to its Motion for Summary Judgment and DEQ's Cross Motion for Summary Judgment to January 12, 2021, and DEQ's reply to its Cross Motion for Summary Judgment to January 20, 2021.

Dated January 5, 2021.

Matt J. Micheli, P.C., WY Bar No. 6-3839 Macrina M. Jerabek, WY Bar No. 7-5757

HOLLAND & HART LLP

2515 Warren Avenue, Suite 450

P.O. Box 1347

Cheyenne, WY 82003-1347

Telephone: (307) 778-4200 Facsimile: (307) 778-8175 mjmicheli@hollandhart.com mmjerabek@hollandhart.com

ATTORNEYS FOR PETITIONER CITATION OIL & GAS CORP.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this January 5, 2021, in accordance with the requirements of Chapter 2, Section 4(a) of the Department of Environmental Quality Rules of Practice and Procedure, this Citation Oil Corp.'s Motion for Summary Judgment was filed via hand delivery on:

Chairman of the Environmental Quality Council, 2300 Capitol Ave.
Hathaway Bldg. 1st, Room 136
Cheyenne, WY 82002

and served via registered mail, return receipt requested, on the following, and delivered by hand as well:

Todd Parfitt Director of the Department of Environmental Quality 200 West 17th Street Cheyenne, WY 82002

Nancy E. Vehr Administrator of the Air Quality Division Department of Environmental Quality 200 West 17th Street Cheyenne, WY 82002

James Kaste
Deputy Attorney General State of Wyoming
123 Capitol Building
Cheyenne, WY 82002

15978748 v1