

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL PARKS CONSERVATION )  
ASSOCIATION, MONTANA ENVIRONMENTAL )  
INFORMATION CENTER, GRAND CANYON )  
TRUST, SAN JUAN CITIZENS ALLIANCE, )  
OUR CHILDREN'S EARTH FOUNDATION, )  
PLAINS JUSTICE, POWDER RIVER BASIN )  
RESOURCE COUNCIL, SIERRA CLUB, )  
AND ENVIRONMENTAL DEFENSE FUND )  
) )  
Plaintiffs, )  
) )  
v. )  
) )  
LISA JACKSON, in her official capacity as )  
Administrator, United States Environmental )  
Protection Agency, )  
) )  
Defendant. )  
\_\_\_\_\_ )

CIVIL ACTION NO.  
1: 11-cv-01548 (ABJ)

**STIPULATION TO AMEND CONSENT DECREE**

On March 30, 2012, the Court entered the Partial Consent Decree (“Consent Decree” or “Decree”) in this matter. Paragraph 7 of the Consent Decree provides: “The deadlines in Table A or B may be extended for a period of 60 days or less by written stipulation executed by counsel for EPA and Plaintiffs and filed with the Court.” In relevant part, Table A sets the deadlines by which the United States Environmental Protection Agency (“EPA”) must sign the notices of proposed rulemaking required by Paragraph 3 of the Decree.

The parties have agreed to extend for two weeks several immediate deadlines to facilitate a more comprehensive resolution of all outstanding issues that the parties anticipate submitting to the court shortly. Therefore, pursuant to Paragraph 7 of the Consent Decree, Plaintiffs and EPA hereby stipulate to extend the following deadlines in Tables A and B:

**TABLE A**

<b>Proposed Promulgation Deadlines</b>	<b>Final Promulgation Deadlines</b>	<b>State</b>
May 30, 2012	Sept. 14, 2012	Virgin Islands
May 30, 2012	Aug. 15, 2012	New Mexico (all remaining RH SIP elements)
May 30, 2012	Nov. 15, 2012	Alaska (all remaining RH SIP elements) Arizona Oklahoma (all remaining RH SIP elements) Texas Washington

**TABLE B**

<b>Proposed Promulgation Deadlines</b>	<b>Final Promulgation Deadlines</b>	<b>State</b>
	May 30, 2012	Tennessee (BART determination for Eastman Chemical)

Pursuant to the above-referenced paragraph 7 of the Consent Decree, the Court does not need to enter an order to effectuate an extension of this length.

SO STIPULATED:

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