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October 3, 2007

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Office of the General Counsel for Ocean Services
National Oceanic and Atmospheric Administration
U.S. Department of Commerce
1305 East-West Highway, Room 6111, SSMC 4
Silver Spring, MD 20910

Re: *Consistency Appeal by Weaver's Cove Energy, LLC*
Consistency Appeal by Mill River Pipeline, LLC

Dear Sirs:

I enclose for filing on behalf of the Massachusetts Office of Coastal Zone Management (MCZM), in each of the above-referenced consistency appeals, a reply to the joint opposition of Weaver's Cove and Mill River Pipeline to respondents' motions to enlarge time.

Thank you for your attention to these matters.

Sincerely,

Carol Iancu
Assistant Attorney General
Environmental Protection Division

cc: Bruce F. Kiely, Esq. *(By US Mail and Electronic Mail)*
G. Mark Cook, Esq. *(By US Mail and Electronic Mail)*
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UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF COMMERCE

WEAVER'S COVE ENERGY, LLC Appellant, v. MASSACHUSETTS OFFICE OF COASTAL ZONE MANAGEMENT, Respondent.	Case No. _____
MILL RIVER PIPELINE, LLC Appellant, v. MASSACHUSETTS OFFICE OF COASTAL ZONE MANAGEMENT, Respondent.	Case No. _____

REPLY TO JOINT OPPOSITION OF WEAVER'S COVE ENERGY, LLC, AND MILL RIVER PIPELINE, LLC, TO RESPONDENTS' MOTIONS TO ENLARGE TIME

Nowhere in the lengthy, joint opposition filed by Weaver's Cove Energy, LLC, and Mill River Pipeline, LLC (collectively, "Appellants"), to the motions of respondent Massachusetts Office of Coastal Zone Management ("MCZM") for an enlargement of time to file its principal briefs in the above-captioned consistency appeals do they allege any specific unfairness or prejudice that they would suffer by a 26 day extension of the briefing schedule. Moreover, their suggestion that it would make the proceedings inefficient is groundless. Pursuant to 16 U.S.C. § 1465(b) and (c), and based on the September 26, 2007 publication of the notices of appeals, the records of the appeals will not be closed until approximately March 4, 2008, and the deadline for the Secretary's decision would not be until after approximately May 5, 2008. An extension of 26 days to the briefing schedule will not harm

the efficiency of these proceedings. Thus, pursuant to its broad authority under 15 C.F.R. 930.127(e)(1), granting MCZM's motions would both "ensure efficiency and fairness."

Therefore, and for the reasons stated in MCZM's motions, MCZM respectfully requests that in each of the appeals, the Secretary extend the time by which MCZM must file its principal brief from October 26, 2007, to November 21, 2007, and adjust accordingly the time by which the Appellants' reply brief must be filed from November 15, 2007, to December 11, 2007.

Respectfully submitted,

MASSACHUSETTS OFFICE OF
COASTAL ZONE MANAGEMENT

By its attorney,

MARTHA COAKLEY
ATTORNEY GENERAL

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Dated: October 3, 2007

CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2007, I caused a true and accurate copy of the foregoing Reply to Joint Opposition of Weaver's Cove Energy, LLC, and Mill River Pipeline, LLC, to Respondents' Motions to Enlarge Time to be served by first-class mail, postage prepaid, and electronic copies to be sent to the following:

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