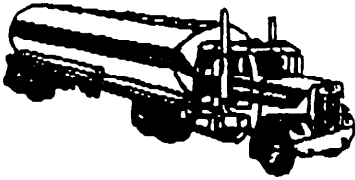


126043



Al Park Petroleum, Inc.



"Large or Small, Give us a Call"

Main Office: 275 12th Street

P.O. Box 1800 • Elko, Nevada 89803

(775) 738-FUEL • Toll Free (800) 232-FUEL • Fax: (775) 738-6172

April 2, 2001

Julie Anna Cirillo, Chief Safety Officer
Federal Motor Carrier Safety Administration
Attention: Steven B. Farbman, Adjudications Counsel
Room 3419
400 7th Street, SW
Washington, D.C. 20590
Telefax: (202) 366-7908

DEPT OF TRANSPORTATION
01 APR 10 PM 3:06

Dear Ms. Cirillo:

12
7

Re: Docket Nos. FMCSA-2000-6907 And FMCSA-2000-6930 - 7
Agency Case #NV-96-023 & NV-97-003-630

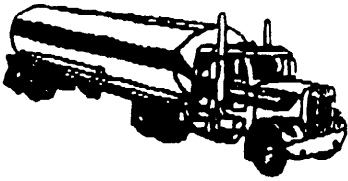
Herewith is our reply to the motion of Opposition filed by Claimant in the above proceedings.

Thanking you in advance for your consideration in this matter.

Sincerely,

Galen Schorsch
Al Park Petroleum, Inc.

Reno: (775) 331-FUEL • Salt Lake City, Utah: (801) 596-FUEL • Eureka: (775) 237-5040
Battle Mountain: (775) 635-9059 • Winnemucca: (775) 623-2677 • Ely: (775) 289-FUEL



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SERVICE LIST

U.S. DOT Docket

U.S. Department of Transportation

400 Seventh St., SW Room PL-401

Washington, D.C. 20590

Julie Anna Cirillo, Chief Safety Officer

Federal Motor Carrier Safety Administration

Attention: Steven B. Farbman, Adjudications

Room 3419

400 7th Street, SW

Washington, D.C. 20590

Telefax: (202) 366-7908

William Bensmiller, State Director

Federal Motor Carrier Safety Administration

705 North Plaza Street, Suite 220

Carson City, Nevada 89701

Telefax: (775) 687-3803

Mary Helen Delgado, Trial Attorney

Federal Motor Carrier Safety Administration

201 Mission Street, Suite 2100

San Francisco, CA 94105

Telefax: (415) 744-2665

The attached letter has been mailed to the above mailing list via First Class Mail on April 2, 2001

Galen Schorse
Al Park Petroleum, Inc.

Reno: (775) 331-FUEL • Salt Lake City, Utah: (801) 596-FUEL • Eureka: (775) 237-5040
Battle Mountain: (775) 635-9059 • Winnemucca: (775) 623-2677 • Ely: (775) 289-FUEL

**BEFORE THE
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION**

Federal Motor Carrier Safety Administration)	
Claimant)	Docket Nos. FMCSA-2000-6907
)	
Vs.)	REPLY TO OPPOSITION
)	OF RESPONDENT'S
Al Park Petroleum, Inc.)	REQUEST OF MARCH 23, 2001
Respondent)	FOR EXTENSION OF TIME

Comes now Al Park Petroleum, Inc., (respondent) to respectfully request the Chief Safety Officer consider our request for an extension of time based on the following facts and circumstances.

The Claimant has stated that our request for an extension of time should be denied on the grounds that our response was due by March 6, 2001 and that our request of March 23 was late filed.

Respondent believes that his response dated February 26 and received by the 27th constitutes a request for an extension of time and our letter of March 23, 2001 was following the directive contained in claimants letter of February 28, 2001, wherein the last paragraph states " If you decide to request an extension, you must file the original request with the U.S. DOT Dockets and you must send copies to all persons on the attached service list."

In addition, our letter of February 26th and March 23rd are basically the same letter,

except that we directed copies to the service list.

REASONS FOR REQUEST

There are several reasons for the extension of time request:

- (1) Seeking counsel that is qualified to address the highly specialized nature of the complaints in the subject Motion, not all attorneys have the expertise in the area of transportation rules and regulations and are not readily available in this area.
- (2) Whether we appoint a new consul or retain a consultant who has an expertise in transportation matters, in either case, they must examine the record already established, including the 25 plus pages in the *Motion for Final Order*.
- (3) In the advent an extension is not granted, and if the full penalty is imposed, there is little chance that this company will survive in its present form, on any form for that matter. Al Park Petroleum, Inc. currently has 85 employees and taking into consideration the families involved, this could impact in the least 255 people.

The town of Elko, Nevada according to the 1990 census has a population of 14,736.

Which makes Al Park a vital part of the makeup of the town and this layoff could effect many more.

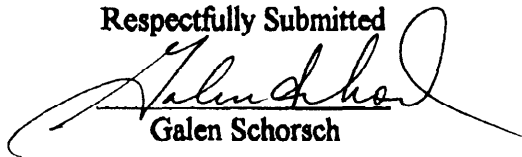
CONCLUSION

The respondent takes this matter with the utmost gravity and has not intended to convey any other message, when any "free enterprise" venture such as Al Park Petroleum, Inc. Is faced with a fine which is beyond its ability to pay and survive, then this we consider is serious.

Preparations are currently underway to provide a reply to the original motion and this could be ready for filing with 10 working days.

Therefore, respondent respectfully request that the March 23, 2001 request for an extension be granted.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Galen Schorsch", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

Galen Schorsch