

ORIGINAL

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**DYNO NOBEL INC.,
COMPLAINANT,**

v.

**KANEB PIPE LINE PARTNERS, L.P.,
RESPONDENT.**

Docket No. 42081



**MOTION FOR EXTENSION OF TIME
TO ANSWER COMPLAINT**

**ENTERED
Office of Proceedings**

JUN 26 2003

**Part of
Public Record**

COMES NOW, Kaneb Pipe Line Partners, L.P. ("Kaneb" or "Defendant"), by and through its counsel, and submits this Motion For an Extension of Time to Answer the Complaint submitted in this proceeding.

On June 16, 2003, Dyno Noble Inc. ("Complainant") filed with the Surface Transportation Board ("Board") a complaint against Kaneb, challenging certain rate increases with respect to shipments of anhydrous ammonia. Kaneb's answer to the Complaint is due on Monday, July 7, 2003, the first business day after the three-day Independence Day weekend.

Section 1104.7(b) of the Board's Rules of Practice permits an extension of time upon a showing of "good cause." Kaneb hereby requests an extension of time to August 1, 2003, to file its answer, and submits the following statements as grounds for support of this motion:

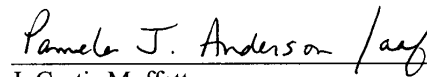
- 1) Kaneb needs additional time to file its answer given that Kaneb's president will be out of the country for two weeks, until July 5, 2003, only

two days before Kaneb's answer is due. Kaneb's president has specific knowledge of the subject matter delineated in the Complaint, and such information is necessary for Kaneb to conduct a thorough investigation of the allegations contained in the Complaint; and

- 2) Complainant does not oppose granting the requested extension. Kaneb and the Complainant have entered into a stipulation in which the Complainant has agreed that the due date for filing an answer to the Complaint be extended to August 1, 2003.¹

WHEREFORE, in consideration of the above and foregoing, Kaneb respectfully requests that the Board issue an order extending the time for filing an answer to the Complaint to August 1, 2003.

Respectfully submitted,


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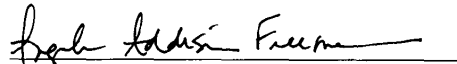
Dated: June 26, 2003

¹ Also pursuant to the stipulation, Kaneb has agreed that for purposes of this proceeding, Kaneb Pipe Line Operating Partnership, L.P. is deemed a defendant together with Kaneb Pipe Line Partners, L.P. for purposes of the Complaint.

CERTIFICATE OF SERVICE

Pursuant to Rule 1104.12 of the Surface Transportation Board's Rule on Service of Pleadings and Papers, I hereby certify that I have this day served a copy of the foregoing document by first-class U.S. mail, postage prepaid, on all parties of record in this proceeding, Docket No. 42081.

Dated at Washington, D.C., this 26th day of June 2003.


Angela Addison Freeman

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