

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8 2014 MAY - 1 AM 8: 43 1595 WYNKOOP STREET DENVER, CO 80202-1129 Phone 800-227-8917 http://www.epa.gov/region08

DOCKET NO.: CAA-08-2013-0015

IN THE MATTER OF:)	
SAMSON RESOURCES COMPANY)	FINAL ORDER
SPRING CREEK COMPRESSOR)	
STATION, LA PLATA COUNTY, CO)	
)	
RESPONDENT)	

Pursuant to 40 C.F.R. §22.13(b) and 22.18(b)(2) of EPA's Consolidated Rules of Practice, the Consent Agreement resolving this matter is hereby approved and incorporated by reference into this Final Order. The Respondent is hereby **ORDERED** to comply with all of the terms of the Consent Agreement, effective immediately upon receipt by Respondent of this Consent Agreement and Final Order.

SO ORDERED THIS 15+	DAY OF _	May	, 2014
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Regional Judicial Officer

In the Matter of: Samson Resources Company

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

Docket No. CAA-08-2013-0015

2014 APR 29 PM 2: 32

EPA REGION VIII NEARING DI ERK

IN THE MATTER OF:)
SAMSON RESOURCES COMPANY)
SPRING CREEK COMPRESSOR)
STATION, LA PLATA COUNTY, CO)
Respondent.))

COMBINED COMPLAINT AND CONSENT AGREEMENT

Complainant, United States Environmental Protection Agency, Region 8 (the EPA or Complainant), and Respondent, Samson Resources Company (Samson or Respondent) (together, the Parties), hereby consent and agree as follows:

I. PRELIMINARY MATTERS

- This Combined Complaint and Consent Agreement (Agreement) is entered into by the Parties to settle alleged violations of the federal Clean Air Act (Act), 42 U.S.C. §§ 7401-7671, specifically 40 C.F.R. part 60, Standards of Performance for New Stationary Sources; and 40 C.F.R. part 63, National Emission Standards for Hazardous Air Pollutants.
- 2. This matter is subject to the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, and the Revocation, Termination or Suspension of Permits (Consolidated Rules), 40 C.F.R. part 22. This Agreement contains all terms of the settlement agreed to by the parties. It is entered into by the Parties for the purpose of simultaneously commencing and concluding this matter, as authorized by 40 C.F.R. §22.13(b), and executed pursuant to 40 C.F.R. §22.18(b)(2) and (3) of the Consolidated Rules. It also supersedes any prior agreements or understandings, whether written or oral, between the parties with respect to these alleged violations.
- 3. The EPA and the United States Department of Justice have jointly determined that this matter is appropriate for an administrative penalty assessment, as authorized by section 113(d)(1) of the Act, 42 U.S.C. §7413(d)(1). Accordingly, the EPA has jurisdiction over this matter pursuant to section 113(d)(1)(B) and 113(d)(2)(B) of the Act.

- 4. Respondent admits the jurisdictional allegations in this Agreement, but neither admits nor denies the specific factual allegations or legal conclusions made by Complainant herein.
- 5. Complainant asserts that settlement of this matter is in the public interest, and Complainant and Respondent agree that entry of a final order approving this Agreement without further litigation and without adjudication of any issue of fact or law is the most appropriate means of resolving this matter. Respondent waives its rights to contest the allegations in the Complaint and to appeal the final order issued by the Regional Judicial Officer approving this Consent Agreement.
- 6. This Agreement, upon incorporation into a final order, applies to and is binding upon the EPA and upon Respondent, and Respondent's officers, directors, employees, agents, successors, and assigns. Any change in ownership or corporate status of Respondent including, but not limited to, any transfer of assets or real or personal property shall not alter Respondent's responsibilities under this Agreement.
- Respondent is an Oklahoma corporation, with its principal place of business located in Oklahoma. Respondent is, therefore, a "person" as defined in §7602(e) of the Act.
- 8. Respondent owns and operates the Spring Creek Compressor Station (the Facility) located in La Plata County, Colorado, on the Southern Ute Indian Reservation.

II. ALLEGED VIOLATIONS

- 9. Complainant alleges Respondent violated regulations implementing the Act at the Facility, specifically as follows:
 - a. Failure to submit notice of a part 63 subpart ZZZZ performance test at least 60 days before the test of engine E3, a violation of 40 C.F.R. §63.6654(g)
 - b. Failure to do an initial subpart ZZZZ performance test for engine E3 within 180 days of start-up, a violation of 40 C.F.R. §63.7(a)(2)
 - c. Failure to submit a Notice of Compliance Status Report within 60 days after doing the subpart ZZZZ performance test, for engines E4, E5, E6, E7, E8 and E9, violations of 40 C.F.R. §63.6630(c)
 - d. Failure to comply with subpart ZZZZ pressure drop operational limitations for engines E4-E9, violations of 40 C.F.R. §63.6600(b)
 - e. Failure to send part 60 subpart JJJJ initial notification of start-up for engine E3, a violation of 40 C.F.R. §60.4245(c) and §60.7(a)(1)
 - f. Failure to submit notice of a subpart JJJJ performance test for engine E3 at least 30 days before the test, a violation of 40 C.F.R. §60.4243(b)(2)(ii) and §60.8(d)

- g. Failure to do an initial subpart JJJJ performance test for engine E3 within 180 days of start-up, a violation of 40 C.F.R. §60.4243(b)(2)(ii) and §60.8(a)
- h. Failure of engine E3 to comply with nitrogen oxide emission limitations in July 2011 testing, a violation of 40 C.F.R. §60.4233(e).

III. TERMS OF SETTLEMENT

- 10. All the violations alleged in paragraph 9 above have been corrected. As a condition of settlement, Respondent agrees to the non-penalty provisions below in paragraphs 11-15. In consideration for Respondent's agreement to perform these non-penalty obligations, the EPA is agreeing to the Covenant Not to Sue in paragraph 21 below. In addition, in accordance with section 113(d)(2)(B) of the Act, the EPA has compromised the maximum civil penalty of \$37,500 per day per violation authorized in this matter, applying the factors set forth in section 113(e) of the Act and the 1991 Clean Air Act Civil Penalty Policy, including Respondent's significant cooperation in agreeing to perform the non-penalty obligations in paragraphs 11–15 below.
- 11. Respondent agrees to install and operate, within four months of the date the final order approving this Agreement is issued, a three-way catalyst control on the richburn engine at the Howard Salt Water Disposal facility and two oxidation catalysts on two engines E1 and E2 at the Jaques Compressor Station. The use of these types of catalysts shall continue indefinitely, as long as these engines continue to operate.
- 12. Respondent agrees to submit to EPA Region 8, within two months of the date the final order is issued, a synthetic minor permit application for the Spring Creek facility, in accordance with the Federal Minor New Source Review Program regulations at 40 C.F.R. §49.151. The application shall reflect, in addition to all other applicable requirements, the emission limits, work practice and operation requirements, testing requirements, monitoring requirements, recordkeeping requirements and notification and reporting requirements contained on pages 2-4 of the October 10, 2012 letter from Mark Dalton to Cindy Beeler (Attachment A to this Agreement).
- 13. Respondent agrees to submit, within three months of the date the final order is issued, updated Part 70 operating permit applications to the Southern Ute Indian Tribe to reflect the requirements of paragraphs 11 and 12 above.
- 14. The EPA acknowledges that Respondent has already paid (i) all previously unpaid emission fees required by its Part 71 operating permit for the under-reported emissions for all the engines at the Facility and (ii) interest and penalties associated with its underpayment of those Part 71 operating permit emission fees, in the total sum of \$9,360 pursuant to the Final Order issued in Docket No. CAA-08-2013-0015, and no further permit fees, interest or penalties are owed to the United States

for the specified engines at the Facility at this time. Respondent agrees that the penalty shall never be claimed as a federal or other tax deduction or credit.

15. Respondent agrees to submit quarterly progress reports, commencing within 90 days of the date the final order approving this Agreement is issued. The purpose of such reports is to provide the status of Respondent's efforts to comply with the terms of settlement in this Agreement. Submissions of reports required by this Paragraph, shall be addressed to:

Air & Toxics Technical Enforcement Program Director U.S. EPA Region 8 (Mail Code 8ENF-AT) 1595 Wynkoop St. Denver, CO 80202-1129

- 16. The EPA analyzed the facts and circumstances in this matter based on the statutory factors described in section 113(d)(1)(B) of the Act. The EPA determined that an appropriate civil penalty to resolve this matter is SEVENTY-FIVE THOUSAND DOLLARS (\$75,000). In light of the unusual procedural history of this matter (see Environmental Appeal Board rulings in Appeal Nos. 13-03, 13-04 and 13-05), and the fact that Respondent has paid the sum of \$75,000 to the U.S. Treasury in connection with the Final Order issued in Docket No. CAA-08-2013-0015, no further penalty payment is owed to the United States. Respondent agrees that the penalty shall never be claimed as a federal or other tax deduction or credit.
- 17. Failure by Respondent to comply with any of the terms of this Agreement shall constitute a breach of the Agreement and may result in referral of the matter to the United States Department of Justice for enforcement of this Agreement and for such other relief as may be appropriate.
- 18. Nothing in this Agreement shall be construed as a waiver by the EPA or any other federal entity of its authority to seek costs or any appropriate penalty associated with any collection action instituted as a result of Respondent's failure to perform pursuant to the terms of this Agreement.

IV. GENERAL PROVISIONS

- 19. Each undersigned representative of a Party to this Agreement certifies that he or she is fully authorized by the Party represented to bind the Party to the terms and conditions of this Agreement and to execute and legally bind that Party to this Agreement. The Parties agree that each Party's obligations under this Agreement constitute sufficient consideration for the other Party's obligations under the Agreement.
- 20. The Parties agree to submit this Agreement to the Regional Judicial Officer, with a request that it be incorporated into a final order.

- 21. This Agreement, upon incorporation into a final order by the Regional Judicial Officer and full satisfaction by the Parties, shall be a complete, full and final settlement of the United States' civil penalty claims against Respondent for the specific violations alleged in this Agreement. In addition, in exchange for the Respondent's promise to fulfill the conditions contained in paragraphs 11-15 above, the EPA agrees not to sue Respondent for injunctive or other equitable relief for the specific violations alleged in this matter, but such covenant terminates if Respondent fails to timely and satisfactorily complete every material condition stated in paragraphs 11-15 above. Should the covenant terminate, Complainant may compel Respondent to perform any or all of those conditions and seek other relief in a civil action pursuant to the Clean Air Act, pursuant to contract law, or both. In addition, the Parties agree that the covenant not to sue described above constitutes sufficient consideration for Respondent's obligations in Paragraphs 11-15 above.
- 22. By signing this Consent Agreement, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response, and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.
- 23. The EPA reserves the right to revoke this Consent Agreement and accompanying settlement penalty if and to the extent the EPA finds, after signing this Consent Agreement, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to the EPA, and the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein.
- 24. The substantive terms, conditions, and compliance requirements of this Agreement may not be modified or amended except upon the written agreement of the Parties, and incorporation in a revised final order by a Regional Judicial Officer.
- 25. Each Party shall bear its own costs and attorneys fees in connection with all issues associated with this Agreement.
- 26. Respondent remains obligated to comply with all requirements of the Act and its implementing regulations.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 8, Office of Enforcement, Compliance, and **Environmental Justice**

COMPLAINANT.

Date: _ 62/13/14

Eddie (). x Jura By:

Andrew M. Gaydosh Assistant Regional Administrator Office of Enforcement, Compliance and **Environmental Justice**

SAMSON RESOURCES COMPANY

RESPONDENT.

Date: 1/30/2014

By:

NAME: Andrew Kidd

TITLE: Senior Vice President & General Counsel

Samson Resources

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October 10, 2012

Ms. Cindy Beeler Technical Enforcement, 8ENF-AT U.S. Environmental Protection Agency 1595 Wynkoop Street Denver, CO 80202-1129

RE: Requested Modifications for Anticipated Title V Permit(s) Samson Resources Company's Spring Creek Compressor Station Facility LaPlata County, Colorado

Dear Ms. Beeler:

Samson Resources Company ("Samson") previously voluntarily disclosed potential violations of the Clean Air Act at its Spring Creek Compressor Station facility located in LaPlata County. Colorado ("Spring Creek Facility") to the U.S. Environmental Protection Agency ("EPA") pursuant to the EPA's policy for Self Policing: Discovery, Disclosure, Correction and Prevention of Violations updated in the Federal Register Volume 65 Number 70 on April 11, 2000. As a result, Samson has voluntarily conducted testing at its Spring Creek Facility in an effort to identify additional methods by which Samson can ensure compliance with applicable environmental laws, rules and/or and regulations. The testing was conducted to determine if compliance monitoring parameters could be identified as part of a method to demonstrate continuous compliance with a NO_x emission standard that Samson will propose for its pending Part 71 permit (Title V permit). The engines operated at the Spring Creek facility are equipped with one of two types of sensors that control the air fuel ratio, one which measures exhaust NO_X concentration or one that measures exhaust O2 concentration. Therefore, testing was conducted on two engines equipped with NO_x sensors (engines "E1" and "E3") and two engines equipped with O2 sensors (engines "E4" and "E5"). The results of the testing can be seen in the attached datalog records for engines E1, E3, E4, and E5,

A total of seven 20-minute tests were conducted on the engines equipped with NO_X sensors (E1 and E3) to develop a correlation between the NO_X set point on the engine control panel and the post catalyst NO_X concentration. Samson believes that these tests are representative of the methodology to be used in calibrating the engines and expected results of all engines at the Spring Creek Facility equipped with NO_X sensors.

A total of eight 20-minute tests were conducted on the engines equipped with O_2 sensors (E4 and E5) to develop a correlation between the O_2 set point on the engine control panel and the post catalyst NO_X emissions. Samson believes that these tests are representative of the methodology

to be used in calibrating the engines and expected results of all engines at the Spring Creek Facility equipped with O₂ sensors.

Each engine has a control panel with air fuel ratio controller system ("AFRC") set points that control the emissions from the particular engine. In order to run the engines in compliance with all applicable permits. Samson plans to adjust the set points on the engine control panel in a manner that is designed to ensure the engines comply with applicable emissions requirements. The AFRC set points can only be adjusted through the use of a computer using Caterpillar software that is physically connected to the control panel. The set points can only be changed by Samson mechanics or third party mechanics hired by the Samson Midstream group, not by operations personnel at the Spring Creek Facility.

With this information. Samson proposes the following language be included in the forthcoming Title V permit:

Emissions Limits:

 NO_X emissions from engines E1, E2, E3, E4, E5, E6, E7, E8, E9, and E10 shall not exceed 2.3 g/bhp-hr or 24.8 tpy per engine.

Work Practice and Operational Requirements:

- On all engines equipped with a NO_X sensor as a part of the air fuel ratio controller system ("AFRC"), the permittee shall install NO_X sensors and a display for the NO_X set point for the AFRC.
- On all engines equipped with an O₂ sensor as a part of the AFRC, the permittee shall install O₂ sensors and a display for the O₂ set point for the AFRC.

Testing Requirements:

- Reference method performance tests shall be conducted for engine units E1, E2, E3, E4, E5, E6, E7, E8, E9, & E10, if the particular engine is in service, to measure NO_X emissions to demonstrate compliance with the emissions limits in the permit.
- The performance tests for NO_X shall be conducted in accordance with the test methods specified in 40 CFR part 60, Appendix A. EPA Reference Method 7E or ASTM D-6438-03 shall be used to measure NO_X emissions.
- Upon change out of the NO_X or O₂ sensor (whichever is applicable), a portable analyzer test shall be conducted in order to calibrate the set-point for the new sensor to ensure that NO_X emissions remain within permit limits.
- 4. An exhaust NO_X ceiling monitoring value shall be established for each engine that is equipped with NO_X sensors as part of the AFRC during the performance test. This monitoring point shall be established by determining the NO_X set point in ppm required for the engine to be in compliance with the 2.3 g/bhp-hr NO_X emission limit.

5. An exhaust O₂ concentration floor monitoring value shall be established for each engine that is equipped with O₂ sensors as part of the AFRC during the performance test. This monitoring point shall be established by determining the O₂ percent in the exhaust required for the engine to be in compliance with the 2.3 g/bhp-hr of NO_X emission limit.

Monitoring Requirements:

- The permittee shall measure NO_X emissions from engines E1-E10, if the particular engine is in service, at least semi-annually to demonstrate compliance with the emissions limits for NO_X emissions.
- The permittee shall assess the NO_X emissions from engines E1-E10, if the particular engine is in service, with a portable analyzer for 20 minutes at least once per quarter to confirm the unit's respective AFRC set points are adequate to achieve compliance with the emissions limits for NO_X emissions.

Recordkeeping Requirements:

- 1. The permittee shall comply with the following recordkeeping requirements:
 - a. Records of all 20-minute portable analyzer assessments conducted pursuant to Monitoring Requirements, Paragraph 2, above, shall be maintained. The records of the portable analyzer assessments shall include the following:
 - i. The date the assessment was conducted.
 - ii. The time the assessment was conducted.
 - iii. 20-minute average NO_X concentrations in ppm.
- 2. The permittee shall keep records of all testing and monitoring required by this permit.

Notifications and Reporting Requirements:

- The permittee shall submit to EPA, as a part of the semi-annual monitoring reports required in this permit, the following records:
 - a. The results of 20-minute portable analyzer assessments, conducted pursuant to Monitoring Requirements, Paragraph 2, above and will at a minimum include the following data as appropriate for each engine:
 - i. The date and time the assessment was conducted.
 - ii. The 20-minute average NO_X concentration and calculated NO_X emission rate in g/bhp-hr.
 - iii. The 20-minute average O₂ concentration and calculated NO_x emission rate in g/bhp-hr.
 - iv. The following calculation shall be used to convert ppm to g/bhp-hr.

$$\left(\frac{EF}{hp - hr} \right) = \frac{(NO_x \ ppmd) \ \left(1.194x 10^7 \ \frac{lb \ NO_x}{scf - ppm} \right) \left(454 \ \frac{g}{lb} \right) \left(8710 \ \frac{dscf}{MMBtu} \right) \left(\frac{20.9}{20.9 - \%O_2} \right) \left(8367 \ \frac{Btu}{hp - hr} \right) }{\left(\frac{10^6 \ Btu}{MMBtu} \right)}$$

If you have any questions regarding this information or the Spring Creek Facility please do not hesitate to contact me at 918-591-1369 or at mdalton@samson.com.

Sincerely, SAMSON RESOURCES COMPANY

Mark S. Dalton

Mark Dalton General Manager Environmental & Safety Services

Enclosure

Cc: File

Scott C. Weatherholt, Assistant General Counsel - Operations

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Bas	A Sorrage	247 84	21.02	***	14	112.55	184.14	8.24	7.54		1912	10.47	1+ 2% 81.099	-0.45	13.00	41524	0.30	0.99	10.00	1002	
4.12	12.14	1.00.00	14.26	*		2144.11	181.42		1.144		1412	10.48	4/35	44 72	10 141	11.07	245.74	246.73	-13.177	+1.179	
9.12	5.29	1.14.74	15.74	2.44	1.4.4	2 44 20	1913 42	* 24-	- 15		19.94.12	111-479	246.50	JUNE DES	19.02	11.112	11.715	11 11	11.95	7 85	
0.12	11.28	188.00	10.00	+ 41	- 44	292 (2)	162.61	+ 28	1.44		\$912	281 744	41.54	5 200	11.97	8.475	24.24	102.01	114	1.64	
1917	9.27	141.12	17.04	·* H*	1.14	12.04	102.05	4.25	1.47		1912	(11-11)	268.99	10.71	6.02	1.44	248 58	161.67	4.34	11.1	
14.12	+ 24	114.29	1000	310	174	212.42		4.142	1.1.14		-546.12	int2	244.92	18-541	- N 10 E	14	194.41	SMP 61	412	1.84	
1112	1.28	241.04	11.00	4.11	1.54	244.74	161.82	8.49	2.35		19.95	10.71	288.81	land .	5.00	1.64	244.965	141.64	#10	1.34	
912	10.164	294.11	109	8.81	1.74	212.94	181.42	4.305	2.74		59.12	111.7.8	288 181	15.40	8.182	1.44	215.28	AMO BAL	8.11	1.99	
9.12	4.42	10.00	11.40	A 141	1.58	232.15	101.01	# 345 # 256	1.14		5412	THE V.S.	282 14	16.09	5 (6)	1.44	298-14	178.92	+12	7-19	
36.12	4.22	284.04	76.76	3 18	/ 14	214 24	101.01	+ 28	- 44		\$9.12	149.9.7	25.45 1.64	to be	1.99	141	244 11	1.17 642	4.24	* 444	
	11.14	114.00	14. 141	8 415	1.18	128.94	18.1	1.24	1.95		5.9-12	\$11.3A	The ka	10.00	1.44	1.8.5	341.54	\$18 el		* 40	
612	9.11	226.28	10.10		148	238.11	10.00	6.34	1.14		274.62	111.912	3/4 44	84.44	1.44	0.40	146.64	6.19 42	8.10	Yake	
10.01	10.10	210.24	10-01	1.01	1.54	25(62	142.57	16.96	1.94		5.4.12	11.00	274 14	11.44	1 97	545.1	242.67	1.000	4.11	1.441	
+11	4.4	144.18	11.048	1.00	178	229 78	19.5 10	# 32	- 44		1.9.62	11.02	211.94	11-10	+ 6/2	14.0	242.35	173.45	4.93	1.44	
1640	4.18	241.24		(m.44)	1.14	214.04	187.76	* 32	1.87		14.15	11.02	2-2 **	80.41	• 02	147	241.90	179-64		- 21	
w ka	4.14	12.34	-ak 210	0.92	0.01	2.21	-0.07	0.04	0.02		59-17	11.04	214.48	15.02	* 62		242.24	THER.		49	
10.17	11 art	10.2.8	48.49	0.005	10.0	44.93 249-26	245.97	-0.07	0.70		TOTIZ	12.04	211 41	1 - 4Z	A 191	14	101.14	1 1 641	4.15	142	
4.1	2.42	in the second	45 09	12.10	11.004	244.97	256.95	-11 196	0.070		1/4 12	12 304	2:241	1121	9.61	148	218.1.	1 1 161			
410	- 44	44.11	Jing day.	wint-	34.84	40.14	Artes	12.15	441		+ 10 13	17.10	2.1.4	15.14		-14	719.26	1.8.61	#+¥	42	
10.1	* 24	244.24	Trial and	4.62	wig-	44.6.5	11:12	12.10	a 62		1912	12.90	2/214	15.55	* 417	18	1.01.00	118.61	6.18	1.41	
=()	si bi	6.1a	11.00	100		H +	162.06	+ 14	· #												
971	10.04	ina r	1.44	# 107	44	761 15	148.77		- 67	100.00											
14.1	16.87	20.84	- 49	+ 184.	1	226.84	-6.5 **	8146	- 54	Start Ham 2.											
471	14.84	The a	24	# 188. + 186.	1.49	22 a 24 22 a 28	144.1	* 14 * 19	192												
14.1 L	1998) 1998	Tines	14 14 18	4.14	12	224.28	141 21	• 11													
	+11	111.02	1-71	*12	1.4	132 AI	1441	+ 12	1.64												
No.		10.0	11.18*	+ 100	54	321.14	145.78		- 94												
22	410	100	1.4.4	+18	Here's	126.13	144 14	+ 10													
9.11		200	1416		14	222.68	140.18	***	- 9												
14.2		15.0	14.0	* 11	- Ber	229-23	141.74	1.01	1.00												
843	19.34	10.10	414	• 13	THE .	228 /48	166 11	4.146	-												
612	4.17	1911 WE 2 1 9 10 10	18.27	# 240 # 42.7	INZ INZ	223.84	1860 FT	4 14	-58												
412	2.14	19-29	11.06	* 11.7	107	224 94	586.72	+ 10	- 54												
435	201.14	280.18	11.04		- 63	220 60	44.4.72	414	0.94												
+12	had they	4 12	1.5.4	6.00	1.14	227 28	(45 Pt	414	1.44												
9.12	Later.	210.00	1.4	# 44 C	- 0.5	226.10	100/2	A 11	19												
9.62	109.00.0	241.48	12.44	a at./	104	22/ 64	187.78	A (0.	* 44												
9.12		10.10	1-42	A Law	10.4	226 ull	18.5.00	8.12	1.42												
4.01	418.027	165.61	12.45	à rat	6.0	220.41	181.01	+11	2.42												
1.12	174.144	10.00	12.42	h 19	248	126-14	183.00	14.1.I.	2.52												
442	10.04	2:463	12.94	14-C40-	and A and	217.85	Made and	611	1.12												
			_		7.40	_		# 2J	7.51												
9.12 Ren	2 Average.	246.61	34.30	10.136		223.69	184.64														

Detr	/ lose	Sile Peril	TO Pest	CH2 Prest	COL Post	PPM C2	CO Pre	142 Pre Tabel	Cold Pre-	0 c anti	Date	Line	Sits Past	112 Fiel	132 Prest	CO2 Post	PPALCS	CO Pre-	102 194	1.412 Pre	Karmi
199.95	12.10	16.87	# 41	19 (10	AF ATT	0.38	0.94	0.01	# 02		1942	15.94	-0.10	-0.91	0.00	6.05	0.84	2.99	0.01	0.09	
1481	114.04	46-11	44.72	10.065	pile.	245.74	255 72	67.911	0.09		19.12	10.101	25.54	44.55	6.342	1.44	245.91	251.72	10.04	2010	
222.01	11.00	246.04	348.417	0.02	14442	10.16	1.88	11.95	1.85		7-942-	24.41	244.57	214.00	10 (18)	0.007	41.414	2.99	11.90	8 25	
1931	1.048	11.4	-1.5-	35.97	R 617	19.27	(92+)	* 12	2.46		1412	10.00	# 17	1.00	11.92	7.97	18111	42.4.18	1.99	10.19m	
											24.12	16.001	248 86	29.61	9.92	A-18.	242.004	422 * 8	4.80	122	
2.693	11.184	244.17	294, 9841	4.14	19	142.00	343.3-	4.41	- 29		24 12	10.004	283.14	2491		8.46	29Mil 32	454.15	A 84-	111	Start Ha
1963	21,110	44.64	20.14	# 15	127	296.11	442.9*	9.42	28	Start Han I	5.9.12	14-64	261.41	NT BIT	844	10	244.29	118.49			
19432	1.12	Cled Take	54.53	110	14.	244.40	681.16	+ 41	".27		2.11 15	hits mer	224.21	26.0	14.000	11.819	190.24	419 **	9.41	* 464	
1917	7+12	5m	24.34	111	16	2443.00.7	242.4.8	* 45	1.28		+ 4 12	14.47	254.85	29.86	n 12.*	41.493	641 to	414.24	+ 92	1.000	
19.12	10.44	24.5	20.00	8.08	14	246 -	882-15-	+ 42	28		+ + 15	10.00	247.78	24.85	8.82	6.994	519 +2	1199.745	***	14.9	
1910	16.0.8	Tentes.	28.961	* **	19	255 18	227.74	* 44	1.24		1415	10.200	2*0 (*	24.94	8.17	2.03	211 42	00+ 41k	414	1.1.2	
1412	Ci Vite	7.84.0.5	29.8		104	543 TH	312.11	8.42	- 160		1.4.12	10.10	279.30	24.12	1.10	A:141	Least 9-2	421.16		1.40	
14.72	2 1	THE NE	714 144	1.10	1.54	241 10	112.44		143		-6.9912	28-54	2/4/07	24 22	1.00	747	224.99	421 16		1.26	
1412	15.14	267.91	24 23		20	144.26	442.65	1.26	112		3.9612	1e-12 in-17	2165.85	24 16	8.76	7.08	229.03	114.56	5.74	111	
1412	15.7.4	364 17	29.31	A 141	1.26	244.11	141.54	4.42	1.11		3.9.12	in 14	244.22	24.41	1.0	102	21/2 44	254.55		1.14	
1.411	11.28	26744	74.44	+ 10	131	285.10	446.44	+ 1"	1.12		4.4.12	10.14	214 17	24.493	6.76	= 02	254.79	41.7.4.4	4 14	* 13.	
14112	24.25	144 1	14.24	4.16	1.00	284.44	449.95	1.47	1.12		84.12	10.10	292 34	28.25		-01	24.8.47	410.00		136	
1417	17.72	541.41	24.24	1.15	129	24 .88	442.14	1.17	1.12		19.12	10.17	216.47	29.87		- 442	214-12	214-24	4 74	1.24	
LANS.	14.24	See an	20.00		1.15	248.16			1.12		1.9.52	is in	246.25	24.40		1 845	212.13	215.31	8.94	115	
			1921	14.30	1.24	240.05	541.76	S.P.	112		1412	10.14	241 10	24.14		7.00	111 **	417.54	4.61	104	
19612	11.28	297 11 798 80	274.344	1.1.0	34	240.95		1.41	1.12		1412	10 29	241 10	27.95	a 141	a 100	Link The	41536	a 165	2.04	
-9.12	17.50	241 (H	191.00			217.14	446.78	1.1	15		1.412	10-23	244.52	25.00	A. 40.	1.44	22.00 200	Miler	A 80-	112	
1413	10.00	261.41	-1 10	* 1.1		141.91	141.15	5.45	147		1912	10.22	244.52	14.51	1.145	142	234.44	114.04	1 141	1.00	
1.913	11.78	28. 11	14 11	1.10		247.97	111.12	8.45	1.2		- 4.72	10.21	23.9.45	79.74		1.64	221.5%	416.15	4.11	19.	
1.8.10	10.70		14.94		1.1	2014.44	114.12	1.44	14		12	16.24	342.64	278		101	21 - 10	371.54	b.19.	- A.F	
1932	11.10	34244	17.70	4.78		149 87	117.11	1.44	ie.		1411	10.75	544.74	28.01	1.00	-44	41= 12	110.02	3.62	-10	
La La	10.00	241.11	79.77	4.00	114	-94 -3	110.48		1.67			1. Austage	248.48	28.97	8.82	4.94	211.23	419.83	4.41	7.13	
Hat	I herer	241.64	29.28	8.16	* 27	247.62	643.42	8.46	1.11		1412	10.25	41.0	+1.96	0.01	0.64	1.09	2.99	0.04	0.099	
1412	1.2	100	0.26		11.04	0.39	100	6.01	in 64		Aug 12	16.21	41.54	43.57	0.04	dias.	244.95	215.71	10 11.4	10.10	
-417	25.61	45.00	45.54		death.	243.18	252.91	41-015	14.02		1415	14.28	244.17	2166 1801	1100	0.00	11.64	1.00	75.85	8.01	
- 412	12.44	244.15	2164 401	41.141	41.140	.0. 40-	2.01	11.92	8.09		A 16 12	14.24	10.01	2.01	11.95	7.96	225.34	170.54	A NO	2.10	
194.37	10.10	0011	1110	t1.95	7.97	22.2 44	129 11	A 49	1.12		5412	16.96	344.011	24.8	9.36	114	1148-9-1	3-1.31	* 194	941	
- 44 J.L.	37.76	30.18	Patrone	+ 24	1.22	224.82	423.48	6.54	1.84		54.12	36.45	1.44.142	21.43	\$ 49	6.95	Evel 1.8	410.4	× 141	110	
2412	14.30	T'est.	21.00	8.81	1.94	\$10.41	826.76	wish.	1.46	Atari Hon 2.	1.14.62	16.92	141-04	2124	A. (to	= 14	1144-111	41-4 81	811	3.14	
-4-15	14.18	See 50	Int 17	- 20	1.26	145.74	425 te.	4.17	1.64		1.4.12	16.11	114.27	24.97	4.65	1.09	288.55	21.7 88	+11	1.4	
1.4.12	11.14	281 fet	100.00	2.67	1.14	127.4	825.11	**4	1.14		3.945	16.14	321.38	19-25	A.25	19	1.4.11	823.50	+19	1.0	
104.37	1.10	262.00	19-14	· * 4-	1.56	243-84	121.1	A 13	114		5.94.12	36.12	124.14	24. Y.I	12.4	1.8	7.9.16	217.84	P. (9)	- 19	
19.11	10.8	28.6 141	141.21	4.66	1.21	252.14	454.94	9.53	1.64		5.9.(2	14.56	-H=H	26.10	* FL	198	78.2.68	817.38		100	
-14.17	11.12	160.00	74.76	* 10	124	25231	4,08.14		14-		+ 9(7)	16.85	116.28	20.097	A 25	- * H	2.1167	\$5.5.4%	• 10	1.62	
1.412	12.93	294.17	16.164	* 4%	-2.0	7.94.251	457.94	4.7.7	1.25		+ + 1/	191.16	1.1.1.1.1.1.1.1.1	28, 160	+ 21	AW.	29-1346	1+1.10	* 1 *	16	
194.12	19 44	187.05	74 A.L.	4.54	1.22	211.14	111.50	4.79	= 82		59912	18:39	OLD.	[Atien	¥ 22	NR.	26.1.92	348.93		34	
1.412	11.21	2.6-90	181.700	1.12	22	228.14	414.95	A 714	2.62		59.17	15.90	941,24	23.45	9.24	1.00	298.83	79. 40	6.70		
1.44.32	10.00	104.15	ai 20	18741	21	222.04	411.24	9.80	7.81		+ 14 1.2	(6.4)	Unit Kit	-25.78	1.24	18	261.28	644.40	4.74	1	
1912	inter-	1.4.35	Terra	416	105	jite, ker	412.18	4.67	224		1.46.05	10.82	215.36	25.41	1.21	- 18	289.67	391.10	a 11		Start He
$= 2 \pi$	1. 0	12.1.14	20.00		14.	214.28	311.04	4.85	114		49.12	10.47	246.18	73.18	8 Zh	- Mr.	271-24	221 101 1021 101	# 2)	-	TURE BA
1.9-10	(+ 30)	1.02.00	19 120	1.94	1.00	260.00	819.14	• 5	1.000		1412	10.22	241.17	15.64	100	79	210.12	244 11	9-25		
- 432	1+ 20	(\$4.45	29.50	- 1 M	2.18	148.74	111.14	THE FAMIL	1.00		-9.12	14.45	288.54	21.40	8.24-	- Ann	214 24	142.50	1.25	v.	
7.9.12	14.41	227.818	19.75	# 1p.1	1.14	19294	81 m. NW	14.147	- 644		14.52	1 40 681	28-2-441	25.40	+ 2+ + 2+	- 14	242.98	142 14	+21	12	
1.0.11	(6-92)	224 10	29 29	8.193 10.141	1.14	141.45	401.1	9.02	7.00		54.12	10.47	281 79	24.14	a 101	1.	211.4	428.54	1.21	X	
2417	1.91	124 8	28.35		11.4	191.44	817.78	14.191	10.		1912	10.49	274.43	2- 34	* 15	1.54	21110	126 58	8.26	San.	
	14.94	1256.223	28.04	A. 164	1.44	1917 8 1	411.7	is ma	100		1912	20.49	214.91	20.00	+36	1.14	214.35	414 10	6.26		
100.12	10.55	22472		1.100		144 (4)	412.7	10.04	1.04		1912	310.24	21497	24.64	4.12	1.14	24432	41911	1.24		
1.0.12		12872		1.0	1.24	198.155	#0x =0	104	144.2		-942	10.47	319.25	21.14	4.42	1.18	211.64	618.11	1.24	1.0	
1912	14.48	221.44		1.00		198-198	11.5 10.	100	101		1412	16+8	278.80	25-24	A 12	1.54	247.98	119.15	× 15.	1.14	
_	2 herrage	145.57	29.84	8.77	* 18	211.83	414.19	8.79	7.19		1912	16.74	268 18	27.10	+ 12	1.14	ZU NO.	438.700	121		
		100					Summer of the		- wee		46.12	16.44	210.44	27.16	11.1	1.24	242.02	41- 89	* 70	- 14	
											1.16.12	14.96	264 14	28.91	+ 12	1.58	211.081	140.89	\$ 26	1.40	
											1.4.12	16.30	248.42	27.14		1.54	71/10	418.541	1.20	1.49	
											= = 32	10.16	210.09	25.98	* 12	P-13	2.00.57	417 84.	4.74		
											1.4.12	10.14	239.8.8	23.87		1.3.4	211 60	41" 44.	4.25	14	
											10422	1.1.00	204 62	24.84	. 74.	1.15	211.88	218 100	9.24	- 24	
											14-12	1.01	271.61	24.99	# 10	7.86	238.13	A14-1	7.24	- 49 -	
											1412	1102	264 82	23.76	+ 10	1.17	214.11	417.89	124	7.41	
											14.12	1101	272.11	28 %		i w	214 *1	£118.549	4.24	-42	
											14.15	1-04	271.19	28.98	9.40	- 35	215 30	140.49	1.28		
											Han	A Average	275.01	25.18	6.30	7.35	237.84	439,91	A.25	7_34	
											1912	17.05	-0.16	1.96	0.01	0.04	1.09	2.99	9.04	0.09	
											3.9.12	17.06	43.59	43.57	0.01	49.23	244.81	295.71	10.04	9.4	
											1.00	10.00	264.37	204.80	DOM:	10.000	10.0.0	1.00	11.99	8.01	
											1452	1.4.	194.94	2004.000	11.97	2.96	213-12	13174	1.84	1.99	

Dair	lim	MPs Peak	1 TP Post	102-Post	1912 Peet	ND CH	CO De	the For	1334-194	Even	Date	lime	Mis Post	ED Post	122 Peer	CO2-Peel	MOLEN PENC	FEF.Per	itt fire	COLPie Salad	Locut
web:	11.04	401	413	0.00	603	-0.22	2.99	-0.91	0.04		3402	34.04	0.00	0.28	0.00	10.00	0.74	2.99	-0.01	601	
4.62	15.000	45.72	44.31	57195	11 141	244 50	259 76	-67 586	8.07		1912	14.95	41.24	45.78	40 1343.	10.601	243.44	235.76	40.000	19 640	
9.10	of the	245.49	(164 Md)	11.611	11.62	47.8%	144	\$2.0t			1412	1610	245.31	21+4 MIT	60.004	43.617	at its	5.99	11.96	7.84	
41.5	1111	31.396	44.1	11 97	7 98	2.16	3.99	F2 (H)	188		1.9.12	1447	41.11	10.12	11.97	4.01	20.3.44	ister.	8.35	6.49	
											59.12	24.98	242.98	447	1.12	T Ad	242.14	172.04	5.40	4.82	
-0.	10.14	14.26	138		145	201.14	192.85	6.41	1.41		1412	14.00	262.62	ATR: 1	# 12	7.65	711-92	101.00	+ 44		Start Kee
9.1	10.71	1.1	3.1	x -01	- 28	346.71	14/we	9.44	1.84	Start How 1	59.12	14 10	2MI 42	1.10	8.12	47	271.95	376.64	+ 18	1.82	
×11	1.1.146	214,74	3.74	1.12	1.24	195.01	1991.041	4.52	1.94		54.42	24.11	281.67	3.67	8.42	1.41	7481.82	1275 848	4.74	3.83	
N.12	11.01	21.04	1.71	3.44	7.29	196.21	143.54	8.16	1.444		5.4.12	51.45	286 18	1.14	16. 162	. 112	2861.25	179.8.8	4.17	1.82	
A 15	10.14	214.41	1.70	A 44	24	11041-005	1.93.6/	#.9h	~ JW		4492	14.15	284 15	-2.411	A 101	. 44	2019.24	with any	3.14	5.8.6	
1917	1.04	111.14	1.997	0.44	1.14	145.15	7841-0-1	+ 12	144		14.15	14.14	28.5 14	1.0.4	- 8 NO	. 44	24.6.20	4.6 (17.9)	4.11	0.84	
	1.44	10.16	147	* U	1.1	0.048	784.000	8.50	1.40		网络银花	28.20	d'Ant	1.14		.45	142.14	10.64	÷ 37	1.81	
211	-144	Dermit	1.64	1919		11(24)	(51.0m	8.89	1.00		1.44.10	78.04	775.84		# 11	· •	24C 95	1.004	8.12	2.22	
14.41	14.45	14.8	188	2.62	12	2201940	142.64	**8	1.14		3/6-12	14.17	249.86	1.00	+ 37	1.94	194.64		4.26	1.94	
9.16	11.11	1.441.297	- 4 m	9 (bi)		2019-12.8	243.00	* 64	146		24.44	18.58	284.59	1.15	-16.52	1.49	2849.945	170.54	+ 74	5.64	
437	0.1.94	3.00.14	1.148	+ +2	. 6.2	205.85	THO I.A.	4.14	1.64		194.3.2	14.14	299 VZ	1.78	6.52	. 41	201.12	118.64	+ 12	is be	
2642	111.01	217.94	Liter-	+ 4/	1.94	200 (01	141.14	N 744	4.94		* N 62	14 24	10.4 310	1.64	A 17	1.43	1.20.9	172.61	6.17	1	
N.12	11.04	246.44	1.61	4.42	1.16	23.6.96	142.95	1.141	1 he		1.412	14.21	296.6 428	1.95	A 24	44	25.8.24	17244	4,111	4.64	
935	1114	274.41	-1.444	4.84	. 24	2019-201	162.61	+ 9y	10		4.4.15	18.22	1200.000	3.7%	8.96	7.68	348.59		× 10	.6.61	
14.25	21.44	244,594	1.10	- /-	-	$2I_{+}\pi_{+}$	197.66	1.0	1.54		19/12	14.21	20162	4.761	4.74	7.42	201.0	\$25 art	8.27	122	
211	11.67	24. 145	- 16		1.8	211.11	142.24	A 24	1.14			13.28	200.05	1.74	* 28.	1.69	25-4 191	17245	8.25	1 M	
11.	XA-Sec.	244.64	1.4	+ 44	10	224.90	10.7.744		1.10		10.12	14.25	1482 B N 1527 B R	1.74	4.25	1.42	15A 78	17261	* 25	7. 1842	
4.11	15.54	248.18	1.11	4.45		5.20 84	LAS DE	C 25	* 14		19412	18.21	241.51	1.44	h 21	143	268 64	1/1 14	8.2.5	1-341	
#15	17.42	29431	1.60	8.84	1.86	221.44	143.66	A 44			1412		249 /3	1.44	8.2	- 81	241.27	415.8.8	+ 1+	1- 1k	
512	1.4.4.	210.000	7.41		1.44	538.00	-66.9.5	N 49 1 25	1.19		1912	14.24	249.48		+ 37	1.41	2649.33	128.85	4.12	+74	
94	3108	202	140	1.00		222.04	185.67	8.47			69472	14.16	200.44	124	. 10	- 14	264.57			201	
3.15	11.60	246.101	+9	1.24	- 19	224.946	165.68	6.00	1.60			1 Average	290.70	1.74	1.30	7.41	259.84	471.77	8.10	8.82	
W .		14.5.96	1.74			210,88	142.50	8.49	7.37		1.5 12	14.11	0.97	4.64	0.00	0.05	0.55	0.99	100	-0.25	
Hes 1/	I tresage	274.04	1.4k	A. 61 0.00	7.33	0.82	5.05	-0.02	9.11		8912	24.12	45.57	44.86	U CAL	11.0-1	246 20	253.78	41 447	41.19	
	0.4	11.02	44.46	17.640.	0.03	245.51	256.77	-0.16	LT ELA		59.12	14.11	344.58	704 40	11.045	(1.683	131	1 1963	12.05	7.98	
9.37	11.34		201.00	10.041	Addate.	1.101	2.96	11.98	8.55		1912	14.34	0.01		11.99	101	234 68	179.64	* 61	24	
1011	1 de	243.69	10.962	41.39	8.40	211.12	140.04	5 34	145		1972	14.10	210.44	1.199	* 32	1.26	744-99	T-REAL	* 45	7.24	
100	11.89	200.21		1.34		2241	The lat	* 44			1992	14.10	285.81	1.444	+ 33	29	244.15	Table 1	1.64	124	Start Hab
	1.45	Diam'r.		5.30		211.41	INZ BA	1.40	149	Start Barr 2	1.4.72	14.10	/98.28	1.812	. 13 -	121	231.22	vinist.	6.25	1.54	
41	1.41	244-11	1.16		44	206.45	142.04	* # #	1.4	Areas in succession of	5912	14.34	(19.02)	A Tex		- 27	289.15	128.64	+ 41	1.24	
-v 17	11.88	2101.04	1.14		10	222 44	10 04	6.45	1.97		1912	14.10	5+14	1.184	4.45	1.78	752.41	10100	+ 42	÷P.	
1411	10.0-	24 h ser	1.41	* 84+	-4	220/0	1615.1		1.44		1912	13.40	252.44	5.45	+ X2	1.24	242 (0.	174 14	5.45	7.21	
111	11.40	284.94		1.14	1.41	328.95	146.44		1.48		1.4.12	18.81	112.24	5.948	4.14-	131	649.75	Ateal	A 182	7.26	
4.1	10.00	Tal ini-		- 167	1.16	210.01	14:50	4.44	1.44		1412	11.12	254146	0 48M	3.64	124	634.24	176.00	1.91	128	
4.12	17.84	Titel	a ar	4.64	Care.	221.4	187.65		147		39.82	18.47	715.4*	im.	4.71	24	211.94	1.944	1.14	1.25	
3.12	11.00	192.28	- k*	1.41	1.06	204 94	180.84	8.44	1.00		1412	24.94	271.04	1.24	. 14	24-	118.44	1.19.25	16.75	1.24	
412	11.540	DI N	1.114	.6.91	1.44	272 2m	184 6.7		- e4#		1412	14.44	211.24	1.22	A 74	24	24(18)	179.84	4.16	11 Z.M	
N 11	DOM:	211 29	1100	1. 1.4	1.10	104 12	10.2 4.4	* 4*	788.		5 94.22	14 M	254.62	144	. 14	29	276.05	1. 10 1-4	1.58	7.26	
WIL.	11.02	248.36	110	1.14	141	225.41	the bill	4.42			1.9.12	14.47	253.40	1.24	6.14	7.2%	214.44	Dant	6.38	T 20	
Cw12	area.	241 10	120	5 TH	1.94	214.99	10.4 6.1	4.35	7.5%		5992	14.64	248 141	1.14	8.40	24	239.30	1.14.14	# 5.4	24	
CM SHE	1134	calie 1	The	8.14	1.16	201204		141	1.841		1.49.72	14.84	246.27	141	8.34	1.10	23.8.44	its pl.	6.17	(#)	
		24.70	1000	A 14	100	154.64		8.81	Fig. a		59.82	24.54	349.81	346		144	242.74	174.01	.4.14	2.8	
***	110	121.00	134	1.14	10.	219.00	4142	4.47	144		-1412	14:11	214.00	5.78	A 14	- E.	276.72	tikes2	1.14	1.16	
10.72	1.437	211.98	110.0	× 42	18	221.04	10.64	4.41	1.000		19.12	14.52	218.62	1.01	1.12	2.92	798.54	100.67	9.78	25	
NUL	11.04	167.14	0.00		14	217 -0	186.55	A.8 ²	1.04		5 19 12	18.43	103.04	4.40	\$ 55	1.19	289.91	1.94.63	8.57	7.2%	
+ 10	1016	241.87	2.44	ar . 4+1	140.1	220.01	man 4	+ +0	The		3.9(12	14.54	249.41	3.81	# 11	1.0	292.19	679.28	8.08	24	
410	11.94	2141.8	1.186	18.45	1.10	126.89	142.74	× 4-	1.12		1.16.32	94.45	249.29	3.43	A 15	100	142.15	4752 AB		.kee	
10.11	\$ 41.1	10.14	120	4.76		1261*	dil pi	1.27	1.5.00		5.4.82	-16.34	248.19	3.84	B .14	12	242.110	179.84	# 1.5	- 561	
117	- Y 10.1-	20161	1.04	2.11	1.00	10.00	dan di l	8.4	1.14		15.12	1421	3116	2.19	3.14	- 34-	247.25	116.141	9.42	-	
\$12.	Line	781.15	1.11	141		. 535.63	149.64	+ 41	144			i doorage	241.84	5.28	8.54	1.29	242.84	\$78.54	8.19	7.24	
Kun	Carries 1	245.02	3.24	8 , 547	2.84	21741	186.12	6.45	145		5.9(12	14.18	10.09	-41.43	0.00	0.02	8.36	4.94	64.01	0.01	
											1.4610	11.24	16.51	44.72	D-181	11.891	245.74	259 73	28.710	-10.075	
											1.16.12	33.181	246.50	72+1. ME1	11 107	10.11.2	11 1	10.010	41.92	7.85	
											5.46.62	1-07	11.1.8	1.65	11 97	4.47	14.21	142.61	+11	1.9.8	

Compliance Services and Testing

Event	CO2 Pre-	est Per	CTI Pre	PPSLC3	C102.Fuel	(32-Past	CD Pest	NOx-Past FTM	Line	Detr	Even)	COL Pre Sabul	Siz.Per	FIN.	NOL-PIP PEM-CO	COLPast Sabel	"a Vet	PEM	PENI PANI	Lime	Itele
	0.05	6.13	0.01	1.14	10.01	9.01	0.00	0.06	1214	59.12		0.02	20,0	0.89	0.36	6.07	0.00	-0.43	0.09	111.161	4412
	.0.13	164 ADM	256.79	244.06	49.001	0.01	45.87	41.91	12.10	1.912		0.094	40.01	346.72	245 74	11.65	0.047	48 72	16.53	101.38	P.9.12
	8.06	12.05	0.07	1.4*	-40 Yek	1462	204.441	345.07	1236	59.12		7.85	11.95	8.89	19.76	11.412	0.02	2144 941	746.50	10.84	59.12
	T 28	+ 24	141 62	241.21	7.94	12.96	-10.24	-41.191	42.10	5.9.12		2.08	5.12	ha2 mil	274.24	8.62	21.92	4.94	0.18	754,5454	199.12
	- T	8.12	-11Tell	241.42	1.84	6.75	11.74	744.02	12.1*	5.9.12											
Starf Has	7.47	* E	THAT	19.94	- 45	4.79	4.26	219.68	12.14	19.12		1.84	4.29	11-1-2-8	5 × 9 100.	43	N 101	- * 4	28.0	31.29	194.62
	1.24	* 30	392,81	241.00	**	1.14	0.24	204)2.2H	1912	Start Run 1	7.10	9.28	420.14	112.48	- +4	110	10 70	283/64	12.25	1911
	141	8,24	111.67	212.6	. 84	9.24	11.149	212.11	12 24	59/12		1.064	+ 21	421.84	261.54	1.64	x-re-	0.62	242.04	12-26	1912
	* #1	+ 12	\$ 165 TA	235.00	TA2	8.20	48 1.00.	267.12	12 22	1.96.17		2.5	*#*	411.4.4	258 441	. 44	8.04	11.10	247.141	11.27	1912
	" 42	8.8.9	128.62	240.12	* 47	4.25	# 21	2h1 M	12.29	5912		- 28	7.21	413.24	25.6.70		* 29-4	116.4	245 29	11.29	0012
	4.82	8.44	423.63	224-04	1.941	* 28	II W.	240.04	12.24	1-14.12		2 Zh-	+ 2h	11141	247.61	1.10	6.121	11.62	261/16	11.29	1410
	1 84 T 84	+ 11	414.65	234.02	7.41	12	0.28	28-2 1411	14.2*	1942		28	4.12	#1++-4	248.181	42	4.00	11.10	2.98.30	21.40	14.12
	47	8.29	418.61	246-93 750-63	1.42	1 25A	11.184	21811	12.26	5.4.12		1.28		\$19.04	289.23	1.47	1.01		275.34	82.81	176.02
	-11	1.12		744 M	- 42		0.29	215.81	10.51	4.99.82		728	R 101	119.64	242.98			-	254 12	11.52	19.12
	- 44		441.61	258.81		111	0.49	211.04	12.28	5912		- 28	4.28	420101	258-10	147	* 100	D.F.T	279412	20.19	19.12
	- 2-	#32	#45 A.T	256.80		1.19	1000		12.29	1412		28	8.27	821.64	161.64	1.4.4	wind.	in her			14.12
	17		841 M	20.2 00	10	* 1*	10.000	2949-62	12.10	64 (2		28	# 21	424764	253 40	10	w the	10.000	(81) VI (83) 56	10.40	194.82
		4, 143	11912	256.78		1.25		219/104	12-12	6412		26	4 44	119-64	251.40	42		11 44	18.4 18	11.91	1.0.12
	- 4-		419.1.1	2-4 44		* 11	11.14	510.112	12.11	5.00 12		24		421.63	210.21	14	A 100	0.24	382.68	12 16	1.0.17
	- 14	1.1	245.81	188.94	- 62	3.04	12184	27.8.88	12.14	1912		- 24.	* 11	Ere ed.	252.45	141	* 1761	10.21	25% 0	11.14	41412
	85	* 17		141.00	10		True.	287 10	12.44	19.12		1.28	+ 27	672.61	28.5.10	1.62	4.14	19.71		11.84	19.2
	1	8.2"	451 441	262.41		8.75	m 2.6	281 00	3.00	0.00.12		190	* 24	417 101	292.84	1.67	# 04	IN X	298 11	0.0	init:
	1.0	1. 24	417.01	271.74	-e-		10.81		0.1	1.012		126	8.42	A	244.41	1.0		10.11		11.42	10.17
	3*	+ 25	#58 m \	2,44 24-	1.84	A. [B.	11.28-	216.36	12.14	6.9.12		- 20.	+ 11	4.7 63			4.141	10.20	118.14	= #1	i witz
	14	# 20-	419.8.2	212.14	44	81	10.041	276.38	12.14	19(12		124		AT9 nd	254.74	12	4.00	10.21	277.194	11.44	10.12
	1.	+ 24	417.60	25.2.39	47	* 15	40.90	279.77	12.40	19.17		-24	1 215	121.04	the set	42	4.141	0.74	285.11	10.05	19-11
	1.44	N.10	435.83	247.99	1.41	8.14	11.24	174.61	1 Average			2.20	10.	119.64	jed he	1.41	e.m.	.0.17	21.0	(1.46	1 10 12
	0.01	-0.02	4.99	41.18	0.00	6.00	009	THEFT	12.91	59.72		1.31	8.29	119,58	254.28	1.48	8.06	16.4.2	281.14	I have net	
	10.12	19 397	256.77	244.45	19.993	10 140	45.000	4118	12.42	5912		-0.07	0.00	0.01	0.49	-0.02	6.01	4.15	3.00	11.4	1012
	2.85	12.04	18.995	1.12	and .	49.044	Sea nor	245.61	12.41	1912			0.02	254.78	244.42	10.000	and .	45.07	**.51	1.84	14.12
		8.41	\$21 #Z	212-44	8.00	12.98	= 21	10.549	12.64	25.9.2		0.00	12.67	07140	1.19-	35.01	0.62	2148.621	246.71	17.85	5. W.Z.
	.6%	- 8-0.h	424.02	229.64	7 m	* 15	1.43.	245.44	12.40	19.12		- 441	# 25	645-011	100.00	2.98	11 45	11.58	0.75	11.64	tre LL
Stort ftan	66	19.11	44147	225.94	112	+ 10	1.96	246.04	12.46	1912		÷ 61		142.64	34: 10		\$ 15	Daves.	11-100	12.58	114.12
	1.88	8,119	429(11)	2224.4	161.1	4.29	1.70	245.21	124	19.12		- 44	8.55	42.42	213 (#)	12	0.15	11.0.4	1114.444	11-2	14.02
	1.44	4.45	41.40	25121	1.74		11 P 19	249.88	12.48	19.37		1.41	8 (a)	12ABL	236.10	(4.1)	4.79	14	31500	11.5.1	19.72
	1.4	A 19	475.42	232.441	1.0 %	+ 24	111	255 10	12.4%	1412		1.85	4.11	179.64	219.03	41	4 110	38.92	1410.510	18.58	1.99.1
	2.34	S. 14-	\$113.52	711.44	7.84	A 24	1.29	255.28	12.50	1.642		44	8.44	692:42	244.12	11	4.76	16.92	104.41	14.15	* *¥ ()
	- 36	+ 10	311.01	212.61	1.441	+ 21	L hit	25104	12+3-	马格波斯		7.84	+ 24-	445 8-1	210.92			10.08	1.58	18.54	- 16 (2
	XY	4.18	#2*+7	720.78	7.84	+ 24	1.44	261.67	2.42	- 10 17		1.45	8.21	111.02	2101.91	- 12	114	18.61	1.0.04	11.42	1912
	1.50	4.88	312.61	2341.045	1.10	1.24	1.10	249.04	1215	1412		141	8.12	324.63	244.25	44.	• (7	11.04	Her. He	12.00	1912
	18	9.94	493.95	124 11	1.10	1.20	1.65	244.01	12.48	1.412		1.84	# 36	4.26.411	237-281	1.32	6.14		718.94	12.69	4430
	- 14	# 17	\$28-01	229.04	1.04	* 2*	110	235 10	42.44	*** 12		1.80	* *2	*****	244.185	- 42	A 7.1	-17.748	2014	12.44	(#82
		14.14	472.58	299-58	++9	* 2*	1.12	219(1)	17.50	-917		1.44	* 24-	444.02	2014 11	141		11.41	30.0	15.03	CN-17
	1.15	4 14	42*41	216.46	1 18	4.56	1.84	25011	12.47	5.492		- 4e	9 545	138.21	221 44	. 10	A.11	11.84	214.23	12.02	1932
	1-án	. 1.	425.02	209 25	- 19	* 10	11-09	294 92	12.58	4.46.1.2			A 43	8246.7	24117	141	* 1.4	11.29	100.07	12.000	249
	-4		129.01	218.24			1.24	278.85	12.40	1412		143		825.62	242.72	42	4.52	10.1	398.11	12.8+d	9.12
	24		32552	200 41	- m	+ 10	11.00	217.95	11.005	1912		1.67	* 12	411.62	25187	47.		11.42	362.91	12.10	1942
	1.44		428.62	216.75	1.24	1.75	1.00	111.98	1+07	1912		1.00	17	AMANT	2-204		- K.)	1.02	29.0 11.	12.00	(4)5
	254		12-11	2091 41	+ 1%	1 24	1.20	214:32	14 39 1	1912		- 11	1.21	Set of	24.00	41	2.2	0.4%	212.12	12.00	19.12
			425.62	207-16	- 14	8.40	0.99	232 11	1104	1.912				Amer	541.42		*.0	11.49			1412
	1.16	* 14	127.63	214.29	- 39	4.50	1.2	218-40	1105	1412		1.42	8 Dy 8 14	428.62	234195	- 41	11		210.91	12 (94	
		* 18	422.4.1	210.11	- 14	4.40	10.000	217.40	11.04	19.12		1.42	111	430.6° 338.67	255 25		8.14	0.42	28-4 11.	12.10	(4)]
	2.14			208 41	- 40	+ 28		211 80	1107	1912		148	1.24	441.62	255 20	32	4.12	11.64	28.19 3.4	12 11	LW13
	116		477.61		1.00			241.84	i harrage			1.	8.10	441142			812	0.67	312.64	12.12	412
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Compliance Services and Testing

CERTIFICATE OF SERVICE

The undersigned certifies that the original of the attached COMBINED COMPLAINT AND CONSENT AGREEMENT in the matter of SAMSON RESOURCES COMPANY was filed with the Regional Hearing Clerk on <u>April 29</u>, 2014.

Further, the undersigned certifies that, on the same date, a true and correct copy of the document was sent by internal EPA mail to:

Elyana R. Sutin, Regional Judicial Officer U.S. EPA Region 8 1595 Wynkoop Street, Mail Code 8RC Denver, CO 80202

Further, the undersigned certifies that a true and correct copy of the document was sent by first class U.S. Mail on <u>April 29</u>, 2014, to:

Counsel for Respondent:

Scott C. Weatherholt Assistant General Counsel – Operations Samson Resources Company Samson Plaza Two West Second Street Tulsa, OK 74103

Date April 29, 2014

David Roke:

David Rochlin, Counsel for Complainant

CERTIFICATE OF SERVICE

The undersigned certifies that the original of the attached COMBINED COMPLAINT, CONSENT AGREEMENT in the matter SAMSON RESOURCES COMPANY, SPRING CREEK COMPRESSOR STATION, LA PLATA COUNTY, CO; DOCKET NO.: CAA-08-2013-0015. The COMBINED COMPLAINT, CONSENT AGREEMENT was filed with the Regional Hearing Clerk on April 29, 2014; the FINAL ORDER was filed on May 1, 2014.

Further, the undersigned certifies that a true and correct copy of the documents were delivered to, David Rochlin, Senior Enforcement Attorney, U. S. EPA – Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129. True and correct copies of the aforementioned documents were sent and placed in the United States mail certified/return receipt and emailed on May 1, 2014 to:

Scott Weatherholt Assistant General Counsel – Operations Samson Plaza Two West Second Street Tulsa, OK 74103 sweatherholt@samson.com

May 1, 2014

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Tina Artemis Paralegal/Regional Hearing Clerk

