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2007 SEP 26 10:51 AM
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VIA FEDERAL EXPRESS
#7925 6973 7378

September 26, 2007

Ms. Tina Artemis
Regional Hearing Clerk
U.S. ENVIRONMENTAL PROTECTION AGENCY (8RC)
1595 Wynkoop Street
Denver, Colorado 80202-1129

RE: Samson Resources Company
Docket No. CWA-08-2007-0016
Respondent's Motion for Extension of Time for Submission of its Answer to
Complaint and Request for Hearing

Dear Ms. Artemis:

Enclosed please find the original of the Respondent's Motion for Extension of Time for Submission of its Answer to Complaint and Request for Hearing for the above-referenced matter along with a stamped, self-addressed envelope for you to return a file stamped copy of the same and a copy of the Order to the undersigned.

Your assistance in this matter is appreciated. Should you have any questions, comments or concerns regarding this matter, please feel free to call me at (918) 591-1038.

Very truly yours,

Noah J. Fontanez
Staff Attorney

NJF:sam

Enclosures

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

2007 SEP 27 PM 2:46

BEFORE THE ADMINISTRATOR

2007 SEP 27 PM 2:46

In Re)
)
Samson Resources Company)
Two West Second Street)
Tulsa, Oklahoma 74103)
)
Respondent)

Docket No. CWA-08-2007-0016

**RESPONDENT'S MOTION FOR EXTENSION OF TIME FOR SUBMISSION
OF ITS ANSWER TO COMPLAINT AND REQUEST FOR HEARING**

COMES NOW, Respondent Samson Resources Company ("Samson") and files its Motion for Extension of Time for Submission of its Answer to Complaint and Request for Hearing pursuant to 40 C.F.R. § 22.7 of EPA's Consolidated Rules of Practice with such request being for an extension of time of thirty (30) days in the above numbered and styled matter and in support of which would respectfully show as follows:

1. The Respondent's answer and request for hearing is due on or about October 5, 2007.
2. The complaint was filed on September 4, 2007; however, Samson's last communication with the EPA regarding the issues related to the matter was almost 18 months ago when Samson submitted its written response of May 8, 2006 to EPA's Information Request. Accordingly, Samson must locate individuals with knowledge of the matter and all relevant documentation.
3. The parties have also communicated and contemplate settlement and require more time to fully discuss the possibility of such settlement.

WHEREFORE, the forgoing matters being good cause and will not result in prejudice to the other parties, Samson respectfully requests a thirty (30) day extension within which to file its Answer to Complaint and Request for Hearing.

Respectfully submitted,



Noah J. Fontanez
Oklahoma State Bar No. 19458

Two West Second Street
Tulsa, Oklahoma 74103

Attorney for Samson Resources Company

CERTIFICATE OF SERVICE

I, Noah J. Fontanez do hereby certify that on September 26, 2007, I did mail, by FedEx Overnight, a copy of the foregoing Respondent's Motion for Extension of Time for Submission of its Answer to Complaint and Request for Hearing to:

Tina Artemis
Regional Hearing Clerk
U.S. Environmental Protection Agency (8RC)
1595 Wynkoop Street
Denver, Colorado 80202-1129

James B. Martin
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Wendy I. Silver
Senior Attorney, Legal Enforcement Program
U.S. Environmental Protection Agency – Region VIII
1595 Wynkoop Street
Denver, Colorado 80202-1129



Noah J. Fontanez

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

In Re)	
)	
Samson Resources Company)	Docket No. CWA-08-2007-0016
Two West Second Street)	
Tulsa, Oklahoma 74103)	
)	
Respondent)	

**ORDER GRANTING
RESPONDENT'S MOTION FOR EXTENSION OF TIME FOR SUBMISSION
OF ITS ANSWER TO COMPLAINT AND REQUEST FOR HEARING**

Upon consideration of the Respondent's Motion for Extension of Time for Submission of its Answer to Complaint and Request for Hearing, it is this _____ day of _____, 2007 hereby

ORDERED that the Motion be and is hereby GRANTED, and that the time for submission of the Respondent's Answer to Complaint and Request for Hearing is extended until November 5, 2007.

For the Administrator

copies to:

Tina Artemis
Regional Hearing Clerk
U.S. Environmental Protection Agency (8RC)
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Denver, Colorado 80202-1129

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Colorado Department of Public Health and Environment
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