



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

2014 APR 29 PM 2: 32

Docket No. CAA-08-2013-0015

FILED  
EPA REGION VIII  
HEARING OFFICE

IN THE MATTER OF:	)	
	)	
SAMSON RESOURCES COMPANY	)	<b>COMBINED COMPLAINT AND CONSENT AGREEMENT</b>
SPRING CREEK COMPRESSOR	)	
STATION, LA PLATA COUNTY, CO	)	
	)	
Respondent.	)	

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**

1. 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.
7. 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 rich-burn 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: 02/13/14

By: Eddie A. Seira  
for Andrew M. Gaydosh  
Assistant Regional Administrator  
Office of Enforcement, Compliance and  
Environmental Justice

SAMSON RESOURCES COMPANY

RESPONDENT.

Date: 1/30/2014

By: A. C. Kidd

NAME: Andrew Kidd

TITLE: Senior Vice President & General Counsel

# Samson Resources

Samson Plaza  
Two West Second Street  
Suite 2040 Denver, CO 80202  
USA  
(303) 733-1777

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 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<sub>x</sub> 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<sub>x</sub> concentration or one that measures exhaust O<sub>2</sub> concentration. Therefore, testing was conducted on two engines equipped with NO<sub>x</sub> sensors (engines "E1" and "E3") and two engines equipped with O<sub>2</sub> 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<sub>x</sub> sensors (E1 and E3) to develop a correlation between the NO<sub>x</sub> set point on the engine control panel and the post catalyst NO<sub>x</sub> 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<sub>x</sub> sensors.

A total of eight 20-minute tests were conducted on the engines equipped with O<sub>2</sub> sensors (E4 and E5) to develop a correlation between the O<sub>2</sub> set point on the engine control panel and the post catalyst NO<sub>x</sub> 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 O<sub>2</sub> 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:

1. NO<sub>x</sub> 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:

1. On all engines equipped with a NO<sub>x</sub> sensor as a part of the air fuel ratio controller system ("AFRC"), the permittee shall install NO<sub>x</sub> sensors and a display for the NO<sub>x</sub> set point for the AFRC.
2. On all engines equipped with an O<sub>2</sub> sensor as a part of the AFRC, the permittee shall install O<sub>2</sub> sensors and a display for the O<sub>2</sub> set point for the AFRC.

Testing Requirements:

1. 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<sub>x</sub> emissions to demonstrate compliance with the emissions limits in the permit.
2. The performance tests for NO<sub>x</sub> 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<sub>x</sub> emissions.
3. Upon change out of the NO<sub>x</sub> or O<sub>2</sub> 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<sub>x</sub> emissions remain within permit limits.
4. An exhaust NO<sub>x</sub> ceiling monitoring value shall be established for each engine that is equipped with NO<sub>x</sub> sensors as part of the AFRC during the performance test. This monitoring point shall be established by determining the NO<sub>x</sub> set point in ppm required for the engine to be in compliance with the 2.3 g/bhp-hr NO<sub>x</sub> emission limit.

5. An exhaust O<sub>2</sub> concentration floor monitoring value shall be established for each engine that is equipped with O<sub>2</sub> sensors as part of the AFRC during the performance test. This monitoring point shall be established by determining the O<sub>2</sub> percent in the exhaust required for the engine to be in compliance with the 2.3 g/bhp-hr of NO<sub>x</sub> emission limit.

Monitoring Requirements:

1. The permittee shall measure NO<sub>x</sub> 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<sub>x</sub> emissions.
2. The permittee shall assess the NO<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> concentrations in ppm.
2. The permittee shall keep records of all testing and monitoring required by this permit.

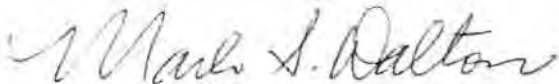
Notifications and Reporting Requirements:

1. 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<sub>x</sub> concentration and calculated NO<sub>x</sub> emission rate in g/bhp-hr.
    - iii. The 20-minute average O<sub>2</sub> concentration and calculated NO<sub>x</sub> emission rate in g/bhp-hr.
    - iv. The following calculation shall be used to convert ppm to g/bhp-hr.

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

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](mailto:mdalton@samson.com).

Sincerely,  
SAMSON RESOURCES COMPANY



Mark Dalton  
General Manager Environmental & Safety Services

Enclosure

Cc: File  
Scott C. Weatherholt, Assistant General Counsel – Operations

## Datalog Record Spring Creek CDP, Unit #1

Date	Time	NOx PPM	CO PPM	O2 PPM	CO2 PPM	NOx PPM	CO PPM	O2 PPM	CO2 PPM	Event	Date	Time	NOx PPM	CO PPM	O2 PPM	CO2 PPM	NOx PPM	CO PPM	O2 PPM	CO2 PPM	Event	
5/8/12	4:47	8.13	-0.09	8.00	8.00	8.00	-0.04	-0.01	8.01	Initial Linearity	5/8/12	10:09	252.70	11.79	8.07	7.63	222.19	363.88	8.02	7.52		
5/8/12	4:48	8.16	-0.07	8.07	8.02	245.26	256.92	8.00	8.04		5/8/12	10:10	250.89	11.79	8.07	7.63	222.36	363.88	8.02	7.51		
5/8/12	4:49	8.18	-0.06	8.05	8.00	247.86	259.44	8.00	8.04		5/8/12	10:11	252.87	11.81	8.07	7.63	223.59	363.88	8.02	7.51		
5/8/12	4:50	8.21	-0.05	8.12	8.03	478.07	478.90	8.00	8.14		5/8/12	10:12	249.91	11.72	8.06	7.62	220.80	363.88	8.08	7.50		
5/8/12	4:51	8.24	-0.04	8.19	8.04	8.14	8.03	12.23	8.00		5/8/12	10:13	252.83	11.85	8.07	7.62	221.52	363.88	8.09	7.52		
5/8/12	4:52	8.27	-0.03	8.26	8.05	8.16	8.03	20.96	4.07		5/8/12	10:14	251.46	11.82	8.06	7.62	220.58	363.88	8.07	7.51		
5/8/12	4:53	8.31	-0.02	8.35	8.06	8.17	8.02	31.02	8.04	NOx Converter Efficiency Check	5/8/12	10:15	254.24	11.82	8.06	7.62	221.36	363.88	8.07	7.51		
5/8/12	4:54	8.32	-0.01	8.41	8.07	20.92	4.05	40.27	8.05		5/8/12	10:16	254.28	11.82	8.07	7.61	220.89	363.88	8.09	7.52		
5/8/12	4:55	8.33	0.00	8.49	8.08	8.18	8.04	50.95	8.06		5/8/12	10:17	250.80	11.74	8.07	7.61	220.07	363.88	8.04	7.52		
5/8/12	4:56	8.34	0.01	8.57	8.09	8.19	8.03	61.63	8.07		5/8/12	10:18	251.14	11.74	8.06	7.61	219.64	363.88	8.09	7.52		
5/8/12	4:57	8.35	0.02	8.65	8.10	8.20	8.02	72.31	8.08		5/8/12	10:19	8.31	-0.23	8.02	8.06	8.83	1.91	8.00	8.01		
5/8/12	4:58	8.36	0.03	8.73	8.11	8.21	8.01	82.99	8.09		5/8/12	10:20	43.59	45.03	8.00	8.05	247.00	232.72	8.02	8.13		
5/8/12	4:59	8.37	0.04	8.81	8.12	8.22	8.00	93.67	8.10		5/8/12	10:21	242.00	204.80	8.02	8.01	8.35	1.92	12.00	7.94		
5/8/12	4:59	8.38	0.05	8.89	8.13	8.23	7.99	104.35	8.11		5/8/12	10:22	8.34	-0.25	11.97	8.08	242.65	368.66	8.02	7.40		
5/8/12	5:00	8.39	0.06	8.97	8.14	8.24	7.98	115.03	8.12		5/8/12	10:23	272.93	16.71	8.02	7.56	256.89	360.17	8.09	7.31		
5/8/12	5:00	8.40	0.07	9.05	8.15	8.25	7.97	125.71	8.13		5/8/12	10:24	276.16	16.64	8.00	7.53	251.65	369.66	8.08	7.31	Start Run 1	
5/8/12	5:01	8.41	0.08	9.13	8.16	8.26	7.96	136.39	8.14		5/8/12	10:25	274.48	16.47	7.99	7.53	247.60	369.66	8.08	7.35		
5/8/12	5:01	8.42	0.09	9.21	8.17	8.27	7.95	147.01	8.15		5/8/12	10:26	240.67	16.42	7.99	7.53	251.58	361.65	8.09	7.40		
5/8/12	5:02	8.43	0.10	9.29	8.18	8.28	7.94	157.64	8.16		5/8/12	10:27	275.16	16.37	7.98	7.53	248.67	369.66	8.09	7.44		
5/8/12	5:03	8.44	0.11	9.37	8.19	8.29	7.93	168.26	8.17		5/8/12	10:28	273.47	16.30	7.99	7.53	246.73	369.66	8.09	7.49		
5/8/12	5:04	8.45	0.12	9.45	8.20	8.30	7.92	178.89	8.18		5/8/12	10:29	271.78	16.23	7.99	7.53	242.17	369.66	8.10	7.54		
5/8/12	5:05	8.46	0.13	9.53	8.21	8.31	7.91	189.51	8.19		5/8/12	10:30	270.09	16.16	7.99	7.53	247.53	369.66	8.10	7.59		
5/8/12	5:06	8.47	0.14	9.61	8.22	8.32	7.90	200.14	8.20		5/8/12	10:31	271.18	16.09	8.00	7.53	241.36	369.66	8.10	7.62		
5/8/12	5:07	8.48	0.15	9.69	8.23	8.33	7.89	210.76	8.21		5/8/12	10:32	269.50	16.02	8.02	7.53	231.58	369.26	8.12	7.63		
5/8/12	5:08	8.49	0.16	9.77	8.24	8.34	7.88	221.39	8.22		5/8/12	10:33	268.89	15.95	8.02	7.53	230.19	369.63	8.13	7.63		
5/8/12	5:09	8.50	0.17	9.85	8.25	8.35	7.87	232.01	8.23		5/8/12	10:34	267.27	15.88	8.02	7.53	228.80	369.63	8.13	7.62		
5/8/12	5:10	8.51	0.18	9.93	8.26	8.36	7.86	242.64	8.24		5/8/12	10:35	266.66	15.81	8.02	7.53	227.41	369.63	8.13	7.62		
5/8/12	5:11	8.52	0.19	10.01	8.27	8.37	7.85	253.26	8.25		5/8/12	10:36	265.04	15.74	8.02	7.53	226.02	369.63	8.13	7.62		
5/8/12	5:12	8.53	0.20	10.09	8.28	8.38	7.84	263.88	8.26		5/8/12	10:37	263.43	15.67	8.02	7.53	224.63	369.63	8.13	7.62		
5/8/12	5:13	8.54	0.21	10.17	8.29	8.39	7.83	274.50	8.27		5/8/12	10:38	261.81	15.60	8.02	7.53	223.24	369.63	8.13	7.62		
5/8/12	5:14	8.55	0.22	10.25	8.30	8.40	7.82	285.12	8.28		5/8/12	10:39	260.20	15.53	8.02	7.53	221.85	369.63	8.13	7.62		
5/8/12	5:15	8.56	0.23	10.33	8.31	8.41	7.81	295.74	8.29		5/8/12	10:40	258.59	15.46	8.02	7.53	220.46	369.63	8.13	7.62		
5/8/12	5:16	8.57	0.24	10.41	8.32	8.42	7.80	306.36	8.30		5/8/12	10:41	256.97	15.39	8.02	7.53	219.07	369.63	8.13	7.62		
5/8/12	5:17	8.58	0.25	10.49	8.33	8.43	7.79	316.98	8.31		5/8/12	10:42	255.36	15.32	8.01	7.53	217.68	369.63	8.13	7.62		
5/8/12	5:18	8.59	0.26	10.57	8.34	8.44	7.78	327.60	8.32		5/8/12	10:43	253.75	15.25	8.01	7.53	216.29	369.63	8.13	7.62		
5/8/12	5:19	8.60	0.27	10.65	8.35	8.45	7.77	338.22	8.33		5/8/12	10:44	252.14	15.18	8.01	7.53	214.90	369.63	8.13	7.62		
5/8/12	5:20	8.61	0.28	10.73	8.36	8.46	7.76	348.84	8.34		5/8/12	10:45	250.53	15.11	8.01	7.53	213.51	369.63	8.13	7.62		
5/8/12	5:21	8.62	0.29	10.81	8.37	8.47	7.75	359.46	8.35		5/8/12	10:46	248.92	15.04	8.01	7.53	212.12	369.63	8.13	7.62		
5/8/12	5:22	8.63	0.30	10.89	8.38	8.48	7.74	370.08	8.36		5/8/12	10:47	247.31	14.97	8.01	7.53	210.73	369.63	8.13	7.62		
5/8/12	5:23	8.64	0.31	10.97	8.39	8.49	7.73	380.70	8.37		5/8/12	10:48	245.70	14.90	8.01	7.53	209.34	369.63	8.13	7.62		
5/8/12	5:24	8.65	0.32	11.05	8.40	8.50	7.72	391.32	8.38		5/8/12	10:49	244.09	14.83	8.01	7.53	207.95	369.63	8.13	7.62		
5/8/12	5:25	8.66	0.33	11.13	8.41	8.51	7.71	401.94	8.39		5/8/12	10:50	242.48	14.76	8.01	7.53	206.56	369.63	8.13	7.62		
5/8/12	5:26	8.67	0.34	11.21	8.42	8.52	7.70	412.56	8.40		5/8/12	10:51	240.87	14.69	8.01	7.53	205.17	369.63	8.13	7.62		
5/8/12	5:27	8.68	0.35	11.29	8.43	8.53	7.69	423.18	8.41		5/8/12	10:52	239.26	14.62	8.01	7.53	203.78	369.63	8.13	7.62		
5/8/12	5:28	8.69	0.36	11.37	8.44	8.54	7.68	433.80	8.42		5/8/12	10:53	237.65	14.55	8.01	7.53	202.39	369.63	8.13	7.62		
5/8/12	5:29	8.70	0.37	11.45	8.45	8.55	7.67	444.42	8.43		5/8/12	10:54	236.04	14.48	8.01	7.53	201.00	369.63	8.13	7.62		
5/8/12	5:30	8.71	0.38	11.53	8.46	8.56	7.66	455.04	8.44		5/8/12	10:55	234.43	14.41	8.01	7.53	199.61	369.63	8.13	7.62		
5/8/12	5:31	8.72	0.39	11.61	8.47	8.57	7.65	465.66	8.45		5/8/12	10:56	232.82	14.34	8.01	7.53	198.22	369.63	8.13	7.62		
5/8/12	5:32	8.73	0.40	11.69	8.48	8.58	7.64	476.28	8.46		5/8/12	10:57	231.21	14.27	8.01	7.53	196.83	369.63	8.13	7.62		
5/8/12	5:33	8.74	0.41	11.77	8.49	8.59	7.63	486.90	8.47		5/8/12	10:58	229.60	14.20	8.01	7.53	195.44	369.63	8.13	7.62		
5/8/12	5:34	8.75	0.42	11.85	8.50	8.60	7.62	497.52	8.48		5/8/12	10:59	227.99	14.13	8.01	7.53	194.05	369.63	8.13	7.62		
5/8/12	5:3																					



## Datalog Record Spring Creek CDP, Unit #4

Date	Time	N15-P	E15-P	E12-P	E12-P	N15-P	E15-P	E12-P	E12-P	Event	Date	Time	N15-P	E15-P	E12-P	E12-P	N15-P	E15-P	E12-P	E12-P	Event
		PPM	%Vol	%Vol	%Vol	PPM	PPM	%Vol	%Vol				PPM	PPM	%Vol	%Vol	PPM	PPM	%Vol	%Vol	
5/9/12	13:08	4.01	0.13	0.00	0.03	45.22	2.99	0.01	0.01		5/9/12	14:04	0.00	0.23	0.00	0.00	0.24	2.99	0.00	0.01	
5/9/12	13:09	13.72	44.31	0.00	0.00	244.50	259.76	0.06	0.07		5/9/12	14:05	11.75	45.28	0.00	0.01	243.44	239.76	0.07	0.06	
5/9/12	13:10	243.40	0.00	0.01	0.02	0.88	1.99	12.01	0.00		5/9/12	14:06	243.31	204.00	0.01	0.01	0.16	1.99	11.96	7.00	
5/9/12	13:11	0.00	0.01	11.97	7.00	2.56	3.99	12.04	5.00		5/9/12	14:07	0.11	0.13	11.97	4.01	263.91	163.65	0.35	0.99	
5/9/12	13:12	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:08	262.98	1.07	0.12	3.00	252.99	122.64	0.00	0.02	
5/9/12	13:13	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:09	262.62	0.06	0.11	0.01	251.92	171.91	0.00	0.00	Start Row 1
5/9/12	13:14	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:10	260.42	0.10	0.12	0.01	251.95	171.65	0.00	0.00	
5/9/12	13:15	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:11	263.07	0.05	0.12	0.01	250.82	173.64	0.00	0.00	
5/9/12	13:16	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:12	260.76	0.10	0.12	0.02	250.75	173.63	0.00	0.00	
5/9/12	13:17	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:13	261.15	0.01	0.10	0.04	249.24	173.64	0.00	0.00	
5/9/12	13:18	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:14	264.79	0.05	0.10	0.04	251.46	173.65	0.00	0.00	
5/9/12	13:19	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:15	259.62	0.10	0.11	0.03	247.77	170.64	0.00	0.00	
5/9/12	13:20	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:16	259.65	0.10	0.11	0.03	247.77	170.64	0.00	0.00	
5/9/12	13:21	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:17	259.64	0.10	0.11	0.03	247.77	170.64	0.00	0.00	
5/9/12	13:22	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:18	260.76	0.10	0.12	0.04	249.91	170.64	0.00	0.00	
5/9/12	13:23	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:19	260.72	0.10	0.12	0.04	249.91	170.64	0.00	0.00	
5/9/12	13:24	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:20	263.10	0.04	0.12	0.04	250.43	172.63	0.00	0.00	
5/9/12	13:25	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:21	263.01	0.06	0.10	0.04	251.26	172.64	0.00	0.00	
5/9/12	13:26	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:22	260.90	0.06	0.10	0.04	248.39	170.63	0.00	0.00	
5/9/12	13:27	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:23	262.62	0.00	0.10	0.04	251.73	172.64	0.00	0.00	
5/9/12	13:28	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:24	260.68	0.00	0.10	0.04	248.90	172.64	0.00	0.00	
5/9/12	13:29	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:25	262.63	0.00	0.10	0.04	248.76	172.63	0.00	0.00	
5/9/12	13:30	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:26	262.68	0.00	0.10	0.04	251.43	174.63	0.00	0.00	
5/9/12	13:31	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:27	260.61	0.04	0.10	0.04	248.80	174.64	0.00	0.00	
5/9/12	13:32	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:28	263.13	0.04	0.10	0.04	248.17	174.63	0.00	0.00	
5/9/12	13:33	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:29	260.43	0.00	0.10	0.04	248.83	170.63	0.00	0.00	
5/9/12	13:34	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:30	263.13	0.04	0.10	0.04	248.17	174.63	0.00	0.00	
5/9/12	13:35	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		Row 3 Average	290.70	1.76	0.30	0.43	259.89	173.77	0.30	0.42		
5/9/12	13:36	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:31	0.07	-0.44	0.00	0.03	0.68	0.99	0.01	-0.03	
5/9/12	13:37	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:32	43.57	44.46	0.00	0.01	246.20	203.76	0.01	0.19	
5/9/12	13:38	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:33	244.58	204.40	0.00	0.00	1.51	1.00	12.03	7.00	
5/9/12	13:39	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:34	0.03	-0.64	11.99	0.01	233.48	170.63	0.00	0.00	
5/9/12	13:40	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:35	230.56	0.09	0.12	0.28	246.99	170.63	0.00	0.00	
5/9/12	13:41	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:36	263.83	0.00	0.11	0.29	248.75	170.63	0.00	0.00	Start Row 2
5/9/12	13:42	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:37	258.48	0.01	0.11	0.21	237.22	170.63	0.00	0.00	
5/9/12	13:43	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:38	259.02	0.10	0.11	0.21	249.75	170.64	0.00	0.00	
5/9/12	13:44	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:39	259.10	0.00	0.12	0.26	253.41	170.63	0.00	0.00	
5/9/12	13:45	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:40	252.46	0.10	0.12	0.29	247.76	174.64	0.00	0.00	
5/9/12	13:46	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:41	252.23	0.10	0.10	0.21	247.25	170.63	0.00	0.00	
5/9/12	13:47	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:42	254.06	0.00	0.10	0.24	247.25	170.64	0.00	0.00	
5/9/12	13:48	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:43	255.45	0.00	0.10	0.29	244.94	174.64	0.00	0.00	
5/9/12	13:49	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:44	251.09	0.20	0.10	0.28	248.41	174.64	0.00	0.00	
5/9/12	13:50	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:45	252.26	0.22	0.10	0.29	241.40	170.64	0.00	0.00	
5/9/12	13:51	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:46	254.62	0.00	0.10	0.29	246.05	170.64	0.00	0.00	
5/9/12	13:52	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:47	253.60	0.10	0.10	0.29	246.40	174.63	0.00	0.00	
5/9/12	13:53	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:48	248.09	0.10	0.10	0.29	248.16	174.64	0.00	0.00	
5/9/12	13:54	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:49	246.27	0.10	0.10	0.24	243.89	170.63	0.00	0.00	
5/9/12	13:55	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:50	249.81	0.10	0.10	0.04	242.74	170.63	0.00	0.00	
5/9/12	13:56	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:51	248.00	0.10	0.10	0.10	248.72	170.62	0.00	0.00	
5/9/12	13:57	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:52	248.02	0.00	0.10	0.10	248.72	170.62	0.00	0.00	
5/9/12	13:58	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:53	244.58	0.12	0.10	0.10	249.93	170.63	0.00	0.00	
5/9/12	13:59	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:54	249.85	0.10	0.10	0.10	242.18	170.64	0.00	0.00	
5/9/12	14:00	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:55	249.29	0.10	0.10	0.10	242.18	170.64	0.00	0.00	
5/9/12	14:01	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:56	248.73	0.10	0.10	0.10	242.18	170.64	0.00	0.00	
5/9/12	14:02	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:57	251.06	0.00	0.10	0.10	247.75	170.64	0.00	0.00	
5/9/12	14:03	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		Row 4 Average	253.46	1.29	0.34	0.29	242.14	170.56	0.19	0.26		
5/9/12	14:04	15.24	0.13	0.01	0.01	201.94	197.65	0.11	0.11		5/9/12	14:58	0.00	-0.43	0.00	0.07	0.36	0.89	0.01	0.02	
5																					

## Datalog Record Spring Creek CDP, Unit #5

Date	Time	NOx Post PPM	CO Post %Vol	O2 Post %Vol	NOx Pre PPM(C)	CO Pre PPM	O2 Pre %Vol	CO2 Pre %Vol	Event	Date	Time	NOx Post PPM	CO Post %Vol	O2 Post %Vol	CO2 Post %Vol	NOx Pre PPM(C)	CO Pre PPM	O2 Pre %Vol	CO2 Pre %Vol	Event	
5/9/12	09:37	0.09	-0.43	0.00	0.07	0.36	0.89	0.01	0.02	5/9/12	12:14	0.00	0.00	0.01	0.03	1.34	0.01	0.12	0.05		
5/9/12	09:38	0.53	-0.72	0.00	0.05	245.74	246.72	-0.01	-0.09	5/9/12	12:15	43.91	45.07	0.01	0.01	244.06	256.78	0.09	0.13		
5/9/12	09:39	246.50	247.50	0.02	0.02	0.76	0.89	11.95	7.85	5/9/12	12:16	245.07	247.50	0.02	0.04	1.37	0.01	12.05	8.00		
5/9/12	09:40	0.38	-1.17	71.97	0.07	236.25	362.63	8.12	3.33	5/9/12	12:17	0.00	0.00	0.14	12.00	255.23	443.62	8.28	7.33		
5/9/12	09:41	279.77	0.44	8.00	0.0	279.00	379.88	8.26	3.33	5/9/12	12:18	279.92	0.36	8.19	8.66	287.42	477.60	8.32	8.17	Start Run 1	
5/9/12	09:42	292.00	0.70	8.00	0.0	702.48	620.34	8.26	7.30	5/9/12	12:19	279.87	0.26	8.18	8.91	287.80	352.63	8.36	7.45		
5/9/12	09:43	292.44	0.62	8.00	0.0	261.26	321.64	8.27	7.30	5/9/12	12:20	272.31	0.30	8.18	8.84	277.41	371.62	8.29	7.44		
5/9/12	09:44	291.47	0.47	8.00	0.0	258.40	409.69	8.27	7.28	5/9/12	12:21	267.12	0.36	8.20	7.82	275.36	390.79	8.32	7.43		
5/9/12	09:45	285.26	0.63	8.04	0.0	251.20	408.64	8.27	7.28	5/9/12	12:22	261.36	0.21	8.22	7.82	270.32	328.62	8.33	7.42		
5/9/12	09:46	283.78	0.62	8.03	0.0	247.63	413.64	8.28	7.26	5/9/12	12:23	260.03	0.36	8.23	7.80	274.10	325.63	8.34	7.42		
5/9/12	09:47	278.20	0.56	8.00	0.0	228.00	411.64	8.27	7.28	5/9/12	12:24	264.00	0.24	8.22	7.80	270.07	340.62	8.33	7.43		
5/9/12	09:48	289.00	0.63	8.07	0.0	249.23	418.64	8.26	7.29	5/9/12	12:25	270.11	0.00	8.26	7.82	276.89	418.63	8.33	7.43		
5/9/12	09:49	275.36	0.77	8.07	0.0	252.94	419.64	8.30	7.28	5/9/12	12:26	273.41	0.20	8.18	7.83	276.63	438.63	8.29	7.45		
5/9/12	09:50	284.52	0.67	8.06	0.0	254.33	420.63	8.28	7.28	5/9/12	12:27	273.88	0.30	8.19	7.82	280.96	427.62	8.32	7.43		
5/9/12	09:51	279.42	0.67	8.03	0.0	253.71	421.64	8.27	7.28	5/9/12	12:28	268.16	0.23	8.17	7.81	283.87	441.63	8.27	7.46		
5/9/12	09:52	281.31	0.60	8.04	0.0	263.65	424.64	8.27	7.28	5/9/12	12:29	260.62	0.00	8.19	7.82	283.98	436.62	8.32	7.45		
5/9/12	09:53	285.54	0.63	8.04	0.0	253.30	426.63	8.30	7.27	5/9/12	12:30	267.14	0.00	8.18	7.83	282.08	441.63	8.28	7.45		
5/9/12	09:54	284.87	0.56	8.03	0.0	253.23	419.64	8.30	7.26	5/9/12	12:31	267.14	0.00	8.18	7.83	281.78	441.63	8.28	7.45		
5/9/12	09:55	282.60	0.23	8.06	0.0	258.00	421.63	8.30	7.26	5/9/12	12:32	270.93	0.36	8.17	7.81	281.09	439.63	8.28	7.45		
5/9/12	09:56	289.75	0.23	8.06	0.0	252.87	418.64	8.31	7.26	5/9/12	12:33	274.48	0.00	8.18	7.82	280.54	441.63	8.32	7.44		
5/9/12	09:57	289.00	0.23	8.00	0.0	265.95	422.63	8.27	7.28	5/9/12	12:34	262.90	0.00	8.18	7.82	281.00	439.63	8.31	7.45		
5/9/12	09:58	281.31	0.39	8.03	0.0	273.44	417.63	8.24	7.27	5/9/12	12:35	267.77	0.23	8.15	7.81	282.57	443.60	8.27	7.45		
5/9/12	09:59	280.00	0.39	8.00	0.0	276.43	418.64	8.32	7.26	5/9/12	12:36	270.00	0.33	8.18	7.82	281.78	439.63	8.31	7.45		
5/9/12	10:00	273.36	0.29	8.06	0.0	274.49	417.63	8.31	7.26	5/9/12	12:37	275.26	0.28	8.18	7.81	280.26	439.63	8.29	7.45		
5/9/12	10:01	273.90	0.23	8.03	0.0	270.36	419.64	8.30	7.24	5/9/12	12:38	276.93	0.00	8.17	7.81	282.14	439.62	8.26	7.45		
5/9/12	10:02	285.31	0.24	8.04	0.0	261.69	421.64	8.29	7.25	5/9/12	12:39	276.23	0.20	8.18	7.81	282.10	437.60	8.30	7.45		
5/9/12	10:03	283.18	0.17	8.06	0.0	264.58	419.64	8.29	7.26												
Run 1 Average										Run 1 Average											
5/9/12	10:04	0.00	0.13	0.03	-0.02	0.49	0.01	0.00	-0.03	5/9/12	12:40	0.03	0.00	0.00	0.00	0.18	0.00	-0.02	0.01		
5/9/12	10:05	0.48	0.43	0.03	0.03	244.42	254.78	0.02	0.18	5/9/12	12:41	43.88	45.01	0.00	0.00	244.43	256.77	0.07	0.12		
5/9/12	10:06	246.73	248.00	0.02	0.00	1.19	0.90	12.17	8.00	5/9/12	12:42	245.17	248.00	0.01	0.00	1.72	0.99	12.04	7.85		
5/9/12	10:07	0.39	0.39	11.95	0.00	255.73	419.63	8.26	7.40	5/9/12	12:43	0.00	0.21	12.00	8.00	252.44	429.62	8.31	7.22		
5/9/12	10:08	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:44	245.44	0.13	8.13	7.81	250.96	429.62	8.34	7.41		
5/9/12	10:09	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:45	249.66	0.30	8.20	7.81	252.99	441.62	8.31	7.41	Start Run 2	
5/9/12	10:10	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:46	249.44	0.19	8.20	7.81	252.21	429.63	8.30	7.41		
5/9/12	10:11	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:47	249.44	0.19	8.20	7.81	252.21	429.63	8.30	7.41		
5/9/12	10:12	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:48	253.30	0.13	8.20	7.81	252.90	433.62	8.30	7.41		
5/9/12	10:13	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:49	256.34	0.20	8.20	7.80	253.51	433.62	8.30	7.41		
5/9/12	10:14	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:50	253.61	0.14	8.20	7.80	252.67	433.62	8.30	7.41		
5/9/12	10:15	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:51	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:16	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:52	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:17	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:53	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:18	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:54	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:19	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:55	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:20	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:56	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:21	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:57	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:22	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:58	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:23	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	12:59	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:24	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:00	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:25	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:01	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:26	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:02	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:27	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:03	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:28	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:04	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:29	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:05	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:30	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:06	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:31	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:07	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:32	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:08	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:33	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:09	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:34	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:10	249.44	0.14	8.20	7.80	250.96	429.62	8.30	7.41		
5/9/12	10:35	283.78	0.56	8.00	0.0	251.20	419.64	8.31	7.45	5/9/12	13:11	249.44	0.14	8.20	7.80	250.9					

**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 April 29, 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 April 29, 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 Rochlin  
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



Tina Artemis  
Paralegal/Regional Hearing Clerk

