



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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**SEP 15 2015**

Ref: 8ENF-L

**MEMORANDUM**

**SUBJECT:** In the Matter of Samson Resources Company  
Combined Complaint and Consent Agreement  
Docket No. **CWA-08-2015-0028**

**FROM:** Suzanne Bohan, Assistant Regional Administrator   
Office of Enforcement, Compliance and Environmental Justice

**TO:** Honorable Elyana R. Sutin, Regional Judicial Officer

With this memorandum, the Office of Enforcement, Compliance and Environmental Justice (ECEJ) is transmitting a combined complaint and consent agreement (CCCA) in the above-referenced matter. We request that you issue a final order approving it, subject to the public notice and comment provisions described below.

The EPA has taken this action under the authority of section 311(b)(6)(B)(ii) of the Clean Water Act (CWA), 33 U.S.C. § 1321(b)(6)(B)(ii). In the CCCA, the EPA alleges that Samson Resources Company (Samson) discharged approximately 400 barrels of produced water and 10 barrels of crude oil from an underground produced water transfer injection line on June 24, 2013 in violation of section 311(b)(3) of the CWA, 33 U.S.C. § 1321(b)(3). The EPA also alleges that Samson's Spill Prevention, Control and Countermeasure (SPCC) plan was inadequate because it did not include a contingency plan for the injection line that failed in violation of 311(j) of the CWA, 33 U.S.C § 1321(j). Upon consideration of the factors set forth in section 311(b)(8) of the CWA, 33 U.S.C. § 1321(b)(8), EPA has determined that a civil penalty of one hundred and fifty thousand dollars (\$150,000.00) is appropriate to settle this matter. The proposed settlement is consistent with applicable settlement penalty policies.

The EPA issued a public notice of this proposed settlement on September 15, 2015, pursuant to section 309(g)(4) of the CWA, 33 U.S.C. § 1319(g)(4). ECEJ requests that you defer signature on any final order to allow for ECEJ to address any comments that may have been submitted during the public comment period. ECEJ will notify you when the public comment period has closed.

Samson is represented by Michael Brown, Samson Resources, Two West Second Street, Tulsa, Oklahoma 74103-3103. His telephone number is (918) 591-1090, and his email address is [michaelb@samson.com](mailto:michaelb@samson.com).

The EPA attorney for this matter is Abigail Dean, Enforcement Attorney, at (303) 312-6106.

cc: Michael Brown



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