

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

_____)
In re:)
)
SAMSON RESOURCES COMPANY) _____ Appeal No. _____
SPRING CREEK COMPRESSOR)
STATION, LA PLATA COUNTY, CO)
)
[Docket No.: CAA-08-2013-0015])
_____)

MOTION FOR EXTENSION OF TIME

Appellant-Complainant, U.S. Environmental Protection Agency, Region 8, Office of Enforcement, Compliance and Environmental Justice (Movant), requests that the Environmental Appeals Board (EAB) grant a thirty (30) day extension of time to file a Motion for Reconsideration from the Final Order issued on September 30, 2013, in the above-captioned matter, and attached hereto.

Movant seeks this additional time because of the potential nationally significant issues associated with such a Motion for Reconsideration, and, consequently, the need to coordinate with U.S. Environmental Protection Agency (EPA) offices nation-wide.

Movant's counsel (the undersigned) believes that a thirty (30) day extension will allow Movant to provide a Motion for Reconsideration that appropriately presents the EPA's unified legal position, and further that granting the requested extension will not prejudice the Respondent-Appellee. Movant represents that Opposing Counsel does not oppose the motion, as confirmed by telephone on October 25, 2013.

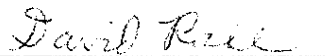
Regarding computation of time in this proceeding, the Final Order was issued on September 30, 2013. By rule, a motion for reconsideration shall be filed within 10 days after service of the final order. 40 C.F.R. § 22.32. This means a motion for reconsideration should have been filed with the EAB on or before October 10, 2013. However, due to the shutdown of the federal

government from October 1 through October 16, 2013, it was not possible for the undersigned to timely file a motion for reconsideration or a motion for extension of time to file such a motion.

Since the federal government resumed operations on October 17, 2013, which was the date Movant first saw the September 30, 2013 Final Order, and using that date for the purposes of computation, 40 C.F.R. § 22.7(a), the Motion for Reconsideration in this proceeding is timely filed on or before October 28, 2013. The undersigned respectfully requests the EAB find that the shutdown of the federal government constitutes either excusable neglect or legal impossibility regarding the undersigned's delinquency in timely filing a motion for reconsideration or a motion for extension of time to file such a motion. In the alternative, the undersigned respectfully requests the EAB grant this Motion for Extension of Time, and reserve for later determining whether excusable neglect or legal impossibility allow the otherwise out-of-time filing of a motion for reconsideration or a motion for extension of time to file such a motion in this proceeding.

For the reasons set forth above, Movant respectfully requests that its Motion for Extension of Time to file a Motion for Reconsideration be granted and that the EAB extend the deadline to file a Motion for Reconsideration to November 27, 2013.

Respectfully submitted,



David Rochlin
Enforcement Attorney
U.S. EPA Region 8
1595 Wynkoop St.
Denver, CO 80202
(303) 312-6892

Date: October 25, 2013

Attorney for Appellant-Complainant

CERTIFICATE OF SERVICE

I hereby certify that the original and one copy of the attached MOTION FOR EXTENSION OF TIME in the matter SAMSON RESOURCES COMPANY; DOCKET NO.: CAA-08-2013-0015, _____ EAB Appeal No. _____, was placed in the United States Postal Service, postage prepaid, and sent via first-class mail on October 25, 2013, to the following address:

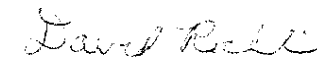
Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1200 Pennsylvania Avenue, NW
Mail Code 1103M
Washington, D.C. 20460-0001

Further, I hereby certify that one copy of the attached MOTION FOR EXTENSION OF TIME in the matter SAMSON RESOURCES COMPANY; DOCKET NO.: CAA-08-2013-0015, _____ EAB Appeal No. _____, was placed in the United States Postal Service, postage prepaid, and sent via first-class mail on October 25, 2013, to the following address:
Counsel for Respondent:

Scott C. Weatherholt, Assistant General Counsel
Legal Department-Samson Resources
Two West Second Street
Tulsa, OK 74103

Further, I hereby certify that one copy of the attached MOTION FOR EXTENSION OF TIME in the matter SAMSON RESOURCES COMPANY; DOCKET NO.: CAA-08-2013-0015, _____ EAB Appeal No. _____, was hand-delivered to the following address:

Regional Judicial Officer Elyana Sutin
U.S. EPA Region 8
1595 Wynkoop St.
Denver, CO 80202



David Rochlin
U.S. EPA Region 8
1595 Wynkoop St.
Denver, CO 80202
(303) 312-6892



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 WYNKOOP STREET
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

2013 SEP 30 PM 12:04

FILED
EPA REGION VIII
HEARING CLERK

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, of EPA’s Consolidated Rules of Practice, certain provisions of the attached Consent Agreement resolving this matter are hereby approved and incorporated by reference into this Final Order. Any paragraph that provides for compliance or corrective action in the Consent Agreement, including but not limited to, paragraphs 10-14, are not authorized under this Final Order.

Pursuant to 40 C.F.R. §22.1(c) Complainant shall prepare and both parties shall sign an Administrative Order on Consent or a functionally equivalent order that incorporates the compliance and corrective action provisions in the Consent Agreement, including but not limited to paragraphs 10-14. The parties shall file the Order on Consent with the Regional Hearing Clerk within 30 days of the signing of this Final Order.

Respondent is **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. Both Complainant and Respondent are hereby **ORDERED** to comply with the Final Order.

SO ORDERED THIS 30th DAY OF September, 2013.

Elyana R. Sutin
Regional Judicial Officer

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2013 SEP 30 PM 12:04

FILED
EPA REGION VIII
TRAINING CLERK

Docket No. CAA-08- 2013-0015

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

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. §52.21, Prevention of Significant Deterioration; 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.
3. By letter dated July 25, 2013, the United States Department of Justice has determined that the EPA's request for authority to commence an administrative enforcement action in this matter is appropriate, as allowed 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) 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.
9. Complainant alleges Respondent violated the Act at the Facility, specifically as follows:
 - a. Failure to obtain a PSD permit for the Facility before beginning construction of a major stationary source, a violation of 40 C.F.R. §52.21(a)(2);
 - b. Failure to submit notice of a subpart ZZZZ performance test at least 60 days before the test of engine E3, a violation of 40 C.F.R. §63.6654(g);
 - c. 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);
 - d. 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);
 - e. Failure to comply with subpart ZZZZ pressure drop operational limitations for engines E4-E9, violations of 40 C.F.R. §63.6600(b);
 - f. Failure to send 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);
 - g. 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);

- h. 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); and
- i. 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).

II. TERMS OF SETTLEMENT

- 10. Respondent agrees to install and operate, within six (6) 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.
- 11. Respondent agrees to submit to EPA Region 8, within three (3) 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).
- 12. Respondent agrees to submit, within three (3) 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 10 and 11 above.
- 13. Respondent agrees to pay the previously unpaid emission fees required by its Part 71 operating permit for the under-reported emissions for all the engines at the Facility. Respondent also agrees to pay the interest and penalties associated with its underpayment of those Part 71 operating permit emission fees. Within thirty (30) days after the date the final order is issued, Respondent shall pay to EPA, pursuant to 40 C.F.R. § 71.9, the sum of \$9,360.0, which is calculated based upon the information contained within Schedule I to this Agreement. Respondent shall make the payment by check payable to "Environmental Protection Agency" and sent by first class mail to:

United States Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center
P.O. Box Number 979078
St. Louis, MO 63197-9000

The amount will be deemed paid on the date it is postmarked. Respondent shall enclose a completed copy of EPA Form 5900-06 with the payment and send a copy of the check and the completed form to EPA Region 8, as provided in paragraph 16 below.

14. Respondent agrees to submit quarterly progress reports until such time as the conditions specified in the final order have been satisfied, commencing within ninety (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

15. The EPA has analyzed the facts and circumstances in this matter with the statutory factors described in section 113(d)(1)(B) of the Act. The EPA has determined that an appropriate civil penalty to resolve this matter is **SEVENTY-FIVE THOUSAND DOLLARS (\$75,000)**.
16. Respondent agrees to pay a civil penalty in the amount of **SEVENTY-FIVE THOUSAND DOLLARS (\$75,000)** in the manner described below in this paragraph:
 - a. Payment is due within thirty (30) calendar days from the date written on the final order, to be issued by the Regional Judicial Officer that adopts this Complaint and Consent Agreement. If the due date falls on a weekend or legal federal holiday, then the due date becomes the next business day. The date the payment is made is considered to be the date processed by the Bank described below. Payments received by 11:00 AM Eastern Time are processed on the same day; those received after 11:00 AM are processed on the next business day.
 - b. Payment shall be made by making a wire transfer as provided below or remitting a cashier's or certified check, including the name and docket number of this case, for the amount, payable to "*Treasurer, United States of America*," to:

CHECK PAYMENT:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

OVERNIGHT MAIL:

US Bank
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, MO 63101

Contact: Ms. Natalie Pearson
314-418-4087

WIRE TRANSFER:

Wire transfers should be directed to the Federal Reserve Bank of New York

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read AD 68010727
Environmental Protection Agency”

ACH (also known as REX or remittance express)

Automated Clearinghouse (ACH) for receiving US currency
PNC Bank
808 17th Street, NW
Washington, DC 20074
Contact B Jesse White 301-887-6548
ABA = 051036706
Transaction Code 22 – checking
Environmental Protection Agency

Account 310006
CTX Format

ON LINE PAYMENT:

There is now an On Line Payment Option, available through the Dept. of Treasury.

This payment option can be accessed from the information below:

WWW.PAY.GOV

Enter sfo 1.1 in the search field. Open form and complete required fields.

A copy of the check, or notification that the payment has been made by one of the other methods listed above, including proof of the date payment was made, shall be sent at the same time to:

Ms. Alexis North (8ENF-AT)
U.S. EPA Region 8
Technical Enforcement Program
1595 Wynkoop St.
Denver, CO 80202-1129

and

Ms. Tina Artemis
Regional Hearing Clerk (8RC)
U.S. EPA Region 8
1595 Wynkoop St.
Denver, CO 80202-1129

- c. In the event payment is not received by the specified due date, interest accrues from thirty (30) days prior to the applicable due date, at a rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717, and will continue to accrue until payment in full is received.
- d. In addition, a handling charge of fifteen dollars (\$15) shall be assessed the 31st day from the applicable due date, and each subsequent thirty-day period that the debt, or any portion thereof, remains unpaid. In addition, a six percent (6%) per annum penalty shall be assessed on any unpaid principal amount if payment is not received within ninety (90) days of the applicable due date. Payments are first applied to handling charges, six percent (6%) penalty interest, and late interest; then any balance is applied to the outstanding principal amount.
- e. 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.

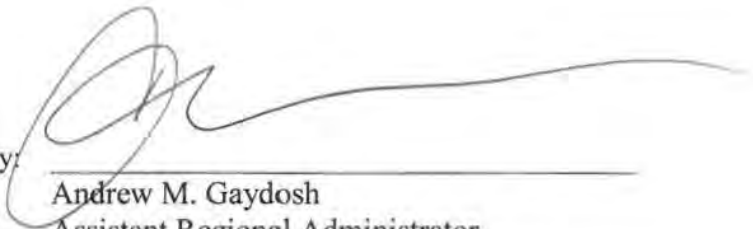
III. GENERAL PROVISIONS

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.
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 claims against Respondent for the specific violations alleged in this Agreement.
22. 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 approval of a Regional Judicial Officer.
23. Each Party shall bear its own costs and attorneys fees in connection with all issues associated with this Agreement.
24. 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: 9/26/13

By: 

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

SAMSON RESOURCES COMPANY

RESPONDENT.

Date: 9/19/2013

By: 

PRINTED NAME: Richard E Fraky

TITLE: EVP: Chief operating officer

Samson Resources

Samson Plaza
Two West Second Street
Tulsa, Oklahoma 74103-3103
USA
918/581-1791

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 O₂ sensors (E4 and E5) to develop a correlation between the O₂ 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:

1. 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:

1. 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.
2. 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:

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_x emissions to demonstrate compliance with the emissions limits in the permit.
2. 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.
3. 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:

1. 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.
2. 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.

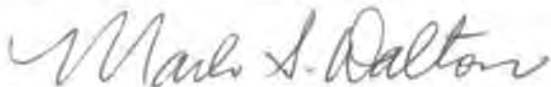
Notifications and Reporting Requirements:

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_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.

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

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.

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 Post PPM	CO Post PPM	O2 Post %Vol	NOx Pre PPM	CO Pre PPM	O2 Pre %Vol	CO2 Pre %Vol	Event	Date	Time	NOx Post PPM	CO Post PPM	O2 Post %Vol	NOx Pre PPM	CO Pre PPM	O2 Pre %Vol	CO2 Pre %Vol	Event	
5/9/12	8:45	8.12	44.08	0.00	0.00	0.00	-0.04	0.00	Initial Linearity	5/9/12	10:09	232.70	11.75	8.07	7.63	225.19	185.68	8.09	7.32	
5/9/12	8:46	8.11	44.07	0.01	-0.02	345.26	256.02	0.00		5/9/12	10:10	230.94	11.75	8.07	7.63	223.36	185.68	8.12	7.31	
5/9/12	8:47	7.68	78.67	0.30	-0.63	479.40	479.88	0.05	-0.10	5/9/12	10:11	215.87	11.87	8.07	8.63	221.59	186.69	8.10	7.31	
5/9/12	8:48	9.14	82.01	0.02	-0.04	478.07	478.06	-0.05	-0.11	5/9/12	10:12	240.91	11.52	8.06	7.62	220.40	185.58	8.08	7.58	
5/9/12	8:49	145.93	204.60	0.02	-0.05	0.14	-0.03	12.23	8.06	5/9/12	10:13	232.93	11.68	8.07	7.62	221.62	186.66	8.09	7.32	
5/9/12	8:50	480.88	204.80	0.05	-0.06	-0.05	-0.03	20.96	-0.02	5/9/12	10:14	231.46	10.62	8.06	7.62	220.58	186.68	8.05	7.31	
5/9/12	8:51	0.32	1.65	12.01	7.00	21.02	-0.04	0.16	9.06	5/9/12	10:15	234.24	11.52	8.06	7.62	218.36	186.68	8.07	7.31	
5/9/12	8:52	0.20	-1.89	20.82	4.85	-0.27	0.93	0.01	0.01	5/9/12	10:16	234.28	10.47	8.07	7.61	228.09	191.61	8.09	7.32	
5/9/12	8:53	8.08	0.03	0.02	-0.05	-0.16	0.95	0.01	-0.04	5/9/12	10:17	230.60	10.34	8.07	7.63	220.07	186.88	8.09	7.32	
5/9/12	8:54	8.07	5.04	0.01	0.00	-0.18	0.95	0.00	0.00	5/9/12	10:18	1.34	9.78	6.67	3.74	14.69	60.99	7.69	0.26	
5/9/12	8:55	44.96	43.05	0.01	-0.01	351.38	256.92	0.01	-0.02	5/9/12	10:19	0.35	-0.25	0.01	0.06	0.93	-3.31	0.01	0.01	
5/9/12	8:56	247.37	204.80	0.05	-0.02	-0.05	0.95	11.94	8.10	5/9/12	10:20	43.59	45.03	0.01	0.03	207.68	232.72	-0.02	-0.13	
5/9/12	8:57	187.05	204.80	0.02	-0.02	-0.19	0.95	12.07	8.01	5/9/12	10:21	342.00	204.80	0.02	0.01	-0.35	1.91	12.00	7.88	
5/9/12	8:58	0.19	-0.95	12.04	8.03	-0.20	0.95	0.01	0.03	5/9/12	10:22	0.34	-1.25	11.97	8.08	242.63	188.66	8.12	7.80	
5/9/12	8:59	0.06	0.17	0.02	0.00	-0.23	0.95	0.02	-0.03	5/9/12	10:23	272.83	16.71	8.02	7.56	236.49	198.17	8.08	7.41	
5/9/12	9:00	260.01	15.47	0.06	7.52	248.76	185.88	8.16	7.17	5/9/12	10:24	176.16	16.64	8.00	7.57	231.63	189.66	8.08	7.43	Start Run 3
5/9/12	9:01	153.99	23.24	0.08	7.52	246.79	181.89	8.26	7.23	5/9/12	10:25	174.48	16.87	7.99	7.57	247.80	189.66	8.08	7.41	
5/9/12	9:02	248.81	22.88	0.09	7.53	234.13	179.89	8.27	7.26	5/9/12	10:26	280.03	16.82	7.99	7.57	235.58	191.63	8.10	7.46	
5/9/12	9:03	149.74	22.74	0.09	7.54	233.68	180.88	8.23	7.29	5/9/12	10:27	275.10	16.87	7.98	7.57	244.87	190.64	8.08	7.48	
5/9/12	9:04	359.81	12.53	0.07	7.56	233.54	180.87	8.24	7.32	5/9/12	10:28	275.47	13.86	7.99	7.57	246.71	190.64	8.09	7.49	
5/9/12	9:05	149.82	12.52	0.08	7.56	230.22	178.00	8.24	7.31	5/9/12	10:29	271.36	13.85	7.99	7.57	242.17	189.63	8.10	7.51	
5/9/12	9:06	251.34	12.10	0.08	7.57	232.30	181.88	8.22	7.33	5/9/12	10:30	275.55	13.72	7.99	7.57	247.51	190.63	8.10	7.50	
5/9/12	9:07	352.91	21.96	0.07	7.58	234.76	181.87	8.23	7.36	5/9/12	10:31	273.10	13.65	8.00	7.51	243.36	191.64	8.10	7.52	
5/9/12	9:08	251.11	21.64	0.08	7.58	233.25	180.86	8.23	7.33	5/9/12	10:32	269.56	13.65	8.02	7.97	237.58	190.29	8.12	7.53	
5/9/12	9:09	246.74	21.47	0.08	7.58	231.08	179.88	8.25	7.35	5/9/12	10:33	268.99	13.73	8.02	7.51	238.19	190.63	8.11	7.53	
5/9/12	9:10	246.18	21.31	0.07	7.59	230.22	181.87	8.24	7.35	5/9/12	10:34	267.17	13.61	8.02	7.58	241.76	189.64	8.10	7.52	
5/9/12	9:11	252.58	21.18	0.09	7.59	230.58	180.86	8.24	7.35	5/9/12	10:35	268.97	18.87	8.02	7.59	244.60	192.62	8.11	7.56	
5/9/12	9:12	270.94	20.63	0.09	7.59	230.30	179.86	8.24	7.35	5/9/12	10:36	266.04	14.66	8.02	7.59	238.00	192.61	8.10	7.56	
5/9/12	9:13	342.43	20.82	0.08	7.60	232.14	181.86	8.24	7.35	5/9/12	10:37	263.83	14.58	8.02	7.60	243.23	190.62	8.10	7.55	
5/9/12	9:14	342.43	20.62	0.08	7.60	233.97	180.85	8.23	7.35	5/9/12	10:38	266.51	14.25	8.03	7.60	238.15	188.62	8.10	7.54	
5/9/12	9:15	186.66	20.40	0.08	7.60	233.97	182.84	8.27	7.35	5/9/12	10:39	263.72	14.16	8.03	7.60	237.85	189.63	8.09	7.54	
5/9/12	9:16	346.88	20.25	0.07	7.60	229.44	181.85	8.29	7.36	5/9/12	10:40	261.56	14.10	8.02	7.62	238.46	190.61	8.08	7.53	
5/9/12	9:17	247.15	19.78	0.08	7.60	231.95	181.85	8.29	7.35	5/9/12	10:41	265.17	13.95	8.03	7.63	239.51	192.61	8.10	7.47	
5/9/12	9:18	281.09	19.70	0.06	7.60	234.13	181.85	8.31	7.35	5/9/12	10:42	263.38	13.74	8.03	7.64	231.57	191.62	8.10	7.51	
5/9/12	9:19	231.13	19.47	0.07	7.59	235.25	183.84	8.31	7.38	5/9/12	10:43	266.56	13.24	7.98	7.64	232.52	192.58	8.09	7.52	
5/9/12	9:20	340.80	19.40	0.07	7.59	236.76	180.84	8.31	7.38	5/9/12	10:44	264.21	13.04	8.01	7.63	232.10	193.61	8.10	7.52	
5/9/12	9:21	347.71	19.13	0.07	7.59	228.93	180.85	8.33	7.36	5/9/12	10:45	260.87	12.74	8.01	7.63	235.05	191.61	8.09	7.52	
5/9/12	9:22	249.08	18.38	0.07	7.59	233.42	182.83	8.30	7.35											
Run 1 Average										Run 3 Average										
5/9/12	9:23	147.72	18.30	0.07	7.59	228.77	180.83	8.34	7.36	5/9/12	10:46	0.28	-3.69	0.09	1.37	-3.89	0.05	0.13		
5/9/12	9:24	249.93	18.28	0.06	7.58	230.11	182.82	8.31	7.36	5/9/12	10:47	0.00	-0.43	0.00	0.02	0.36	0.89	0.02	0.02	
5/9/12	9:25	219.26	18.33	0.07	7.59	230.20	180.82	8.26	7.35	5/9/12	10:48	36.53	34.72	0.00	0.03	245.98	246.72	-0.01	-0.09	
5/9/12	9:26	244.56	18.03	0.05	7.59	232.12	182.81	8.26	7.34	5/9/12	10:49	246.50	204.80	0.02	0.02	0.76	0.89	13.80	7.83	
5/9/12	9:27	247.73	17.89	0.07	7.58	232.88	183.81	8.29	7.35	5/9/12	10:50	0.38	-1.13	11.93	8.03	236.23	182.61	8.12	7.33	
5/9/12	9:28	239.29	17.61	0.07	7.58	232.62	180.81	8.32	7.34	5/9/12	10:51	284.48	16.55	8.03	7.54	248.30	181.62	8.10	7.31	
5/9/12	9:29	245.09	17.56	0.05	7.58	234.34	181.82	8.30	7.35	5/9/12	10:52	284.92	16.60	8.01	7.54	248.57	180.61	8.12	7.37	
5/9/12	9:30	251.13	17.36	0.05	7.58	232.56	181.82	8.30	7.35	5/9/12	10:53	288.43	16.67	8.00	7.55	254.86	181.61	8.10	7.31	
5/9/12	9:31	248.08	17.07	0.06	7.58	232.15	181.81	8.30	7.34	5/9/12	10:54	288.00	16.40	8.00	7.55	251.28	180.60	8.11	7.38	
5/9/12	9:32	241.72	16.86	0.06	7.58	234.26	181.81	8.29	7.34	5/9/12	10:55	285.34	16.05	8.00	7.55	248.75	178.92	8.12	7.39	
5/9/12	9:33	249.93	16.50	0.06	7.59	233.73	181.81	8.28	7.34	5/9/12	10:56	284.46	16.19	8.00	7.55	244.91	178.61	8.12	7.39	
5/9/12	9:34	234.06	16.50	0.05	7.59	228.37	181.80	8.29	7.35	5/9/12	10:57	239.10	16.39	7.99	7.55	248.11	177.60	8.13	7.40	
5/9/12	9:35	224.24	16.15	0.06	7.58	230.31	181.80	8.30	7.34	5/9/12	10:58	239.53	15.99	7.98	7.55	241.54	178.61	8.08	7.40	
5/9/12	9:36	210.29	16.01	0.05	7.59	231.62	182.31	8.30	7.35	5/9/12	10:59	271.30	16.13	7.99	7.54	245.58	178.62	8.10	7.40	
5/9/12	9:37	144.56	15.99	0.06	7.58	229.78	181.79	8.32	7.40	5/9/12	11:00	279.58	15.84	7.99	7.55	242.67	178.			

Datalog Record Spring Creek CDP, Unit #4

Date	Time	NOx Post PPM	CO Post PPM	O2 Post %Vol	CO2 Post %Vol	NOx Pre PPM-C3	CO Pre PPM	O2 Pre %Vol	CO2 Pre %Vol	Event	Date	Time	NOx Post PPM	CO Post PPM	O2 Post %Vol	CO2 Post %Vol	NOx Pre PPM-C3	CO Pre PPM	O2 Pre %Vol	CO2 Pre %Vol	Event
5/9/12	13:08	-0.02	-0.13	0.00	0.03	-0.22	2.89	-0.01	0.00		5/9/12	14:04	0.00	0.28	0.00	0.06	0.24	3.99	-0.00	0.03	
5/9/12	13:09	43.72	48.22	0.00	0.00	284.50	278.26	-0.06	-0.07		5/9/12	14:05	43.75	48.20	0.00	0.05	283.44	278.20	-0.07	-0.06	
5/9/12	13:10	248.00	264.80	0.01	-0.02	-0.89	2.99	3.00	8.00		5/9/12	14:06	248.74	264.80	0.01	0.01	0.16	3.99	31.50	1.80	
5/9/12	13:11	0.10	0.77	1.00	5.00	-2.50	3.99	12.00	7.00		5/9/12	14:07	-0.11	-0.15	11.87	8.03	261.91	363.65	0.33	0.99	
5/9/12	13:34	238.28	3.31	0.41	7.27	201.50	382.65	0.47	3.41		5/9/12	14:08	282.98	4.07	0.52	7.40	252.59	372.04	0.40	0.82	
5/9/12	13:35	233.33	3.37	0.40	7.28	204.31	382.65	0.49	3.41	Start Run 1	5/9/12	14:09	282.62	4.00	0.51	7.41	251.92	371.31	0.40	0.81	Start Run 3
5/9/12	13:36	228.08	3.38	0.42	7.28	195.01	380.66	0.52	3.39		5/9/12	14:10	280.42	3.75	0.52	7.41	257.95	373.65	0.38	0.82	
5/9/12	13:37	227.38	3.31	0.44	7.29	196.27	381.68	0.50	3.40		5/9/12	14:11	281.67	3.65	0.52	7.41	256.42	373.64	0.38	0.81	
5/9/12	13:38	219.93	3.39	0.44	7.29	190.98	379.67	0.53	3.39		5/9/12	14:12	286.70	3.78	0.52	7.42	260.25	373.63	0.37	0.82	
5/9/12	13:39	215.19	3.40	0.44	7.30	197.15	380.65	0.52	3.40		5/9/12	14:13	288.13	4.01	0.50	7.44	265.24	373.64	0.34	0.84	
5/9/12	13:40	233.94	3.65	0.41	7.31	219.81	384.66	0.50	3.41		5/9/12	14:14	284.39	3.65	0.50	7.44	251.49	373.65	0.35	0.84	
5/9/12	13:41	240.92	3.51	0.39	7.33	213.24	381.66	0.49	3.36		5/9/12	14:15	273.62	3.78	0.53	7.43	242.77	370.64	0.37	0.83	
5/9/12	13:42	240.45	3.50	0.42	7.32	210.00	382.64	0.51	3.44		5/9/12	14:16	271.84	3.78	0.53	7.44	241.70	370.64	0.35	0.84	
5/9/12	13:43	240.20	3.45	0.40	7.33	208.25	381.66	0.49	3.44		5/9/12	14:17	290.46	3.78	0.52	7.44	266.68	370.64	0.26	0.86	
5/9/12	13:44	235.13	3.59	0.42	7.33	205.85	380.65	0.52	3.44		5/9/12	14:18	284.38	3.79	0.52	7.44	260.91	370.64	0.29	0.86	
5/9/12	13:45	231.34	3.46	0.41	7.33	208.01	381.66	0.50	3.33		5/9/12	14:19	299.53	3.78	0.52	7.45	261.32	373.64	0.32	0.86	
5/9/12	13:46	236.39	3.51	0.42	7.33	213.30	382.65	0.50	3.36		5/9/12	14:20	303.10	3.64	0.52	7.44	256.87	373.63	0.31	0.83	
5/9/12	13:47	238.41	3.40	0.40	7.34	209.10	382.65	0.49	3.33		5/9/12	14:21	293.01	3.99	0.50	7.44	255.20	372.64	0.30	0.84	
5/9/12	13:48	248.20	3.34	0.38	7.36	217.37	383.66	0.48	3.38		5/9/12	14:22	316.30	3.79	0.50	7.44	266.34	373.63	0.30	0.83	
5/9/12	13:49	243.14	3.31	0.41	7.34	211.81	382.23	0.49	3.35		5/9/12	14:23	287.62	4.00	0.50	7.42	255.75	373.64	0.27	0.79	
5/9/12	13:50	249.14	3.44	0.40	7.35	224.97	383.66	0.47	3.35		5/9/12	14:24	299.45	3.79	0.50	7.43	264.50	373.63	0.23	0.79	
5/9/12	13:51	248.18	3.44	0.40	7.33	226.49	383.66	0.49	3.33		5/9/12	14:25	302.83	3.79	0.50	7.43	258.70	373.63	0.23	0.79	
5/9/12	13:52	258.11	3.46	0.40	7.35	221.44	383.66	0.48	3.34		5/9/12	14:26	302.88	3.63	0.52	7.42	271.83	374.63	0.20	0.80	
5/9/12	13:53	258.50	3.51	0.40	7.34	218.00	380.65	0.49	3.33		5/9/12	14:27	286.81	3.44	0.52	7.42	264.40	373.64	0.23	0.80	
5/9/12	13:54	255.23	3.45	0.40	7.31	227.73	383.65	0.45	3.38		5/9/12	14:28	293.73	3.48	0.51	7.40	267.27	373.63	0.16	0.79	
5/9/12	13:55	246.30	3.31	0.40	7.35	223.84	383.64	0.47	3.40		5/9/12	14:29	280.44	3.78	0.53	7.41	268.85	374.63	0.22	0.78	
5/9/12	13:56	247.26	3.49	0.40	7.35	208.63	382.63	0.48	3.37		5/9/12	14:30	283.14	3.64	0.50	7.39	261.57	372.64	0.26	0.77	
Run 1 Average											Run 3 Average										
239.05 3.46 0.41 7.33 210.00 382.50 0.49 3.37											290.70 3.76 0.50 7.43 250.00 373.77 0.30 0.82										
5/9/12	13:57	-0.02	-0.08	0.00	0.03	0.82	3.33	-0.02	0.11		5/9/12	14:31	0.02	-0.44	0.00	0.00	0.48	0.99	0.00	-0.03	
5/9/12	13:58	43.82	48.88	0.00	0.03	243.51	258.27	-0.06	0.04		5/9/12	14:32	43.77	48.86	0.00	0.05	240.20	253.26	-0.07	-0.19	
5/9/12	13:59	205.68	264.50	0.01	0.00	-1.90	2.99	11.00	8.23		5/9/12	14:33	248.18	264.80	0.00	0.00	-1.51	1.00	12.00	1.00	
5/9/12	13:40	-0.04	-0.90	11.00	8.03	231.72	386.66	0.44	3.45		5/9/12	14:34	-0.07	-0.44	11.00	8.03	233.48	379.64	0.45	3.23	
5/9/12	13:41	246.23	3.65	0.38	7.35	232.43	384.66	0.44	3.33		5/9/12	14:35	270.56	3.69	0.52	7.28	246.99	378.63	0.44	3.24	
5/9/12	13:42	238.99	3.44	0.40	7.34	231.87	382.65	0.46	3.35	Start Run 2	5/9/12	14:36	265.87	3.68	0.51	7.29	248.75	380.63	0.44	3.24	Start Run 4
5/9/12	13:43	240.71	3.51	0.39	7.35	216.92	382.64	0.44	3.34		5/9/12	14:37	258.08	3.91	0.53	7.27	237.22	379.63	0.45	3.21	
5/9/12	13:44	239.79	3.51	0.38	7.36	222.68	387.64	0.42	3.35		5/9/12	14:38	255.02	3.50	0.53	7.27	248.73	379.64	0.45	3.24	
5/9/12	13:45	243.66	3.43	0.40	7.34	220.91	383.65	0.45	3.35		5/9/12	14:39	259.77	3.99	0.52	7.28	253.81	380.63	0.42	3.23	
5/9/12	13:46	249.39	3.31	0.38	7.37	223.03	383.65	0.41	3.38		5/9/12	14:40	252.46	3.43	0.52	7.29	242.70	374.64	0.40	3.21	
5/9/12	13:47	241.60	3.31	0.40	7.36	231.05	382.64	0.44	3.33		5/9/12	14:41	253.21	3.30	0.54	7.27	247.23	379.61	0.41	3.20	
5/9/12	13:48	239.61	3.51	0.40	7.35	233.67	385.65	0.45	3.33		5/9/12	14:42	254.06	3.68	0.54	7.29	233.25	376.60	0.41	3.23	
5/9/12	13:49	239.61	3.51	0.40	7.35	233.67	385.65	0.45	3.33		5/9/12	14:43	255.45	3.56	0.53	7.29	231.40	375.63	0.38	3.23	
5/9/12	13:50	232.24	3.45	0.40	7.36	206.30	380.65	0.46	3.36		5/9/12	14:44	251.09	3.29	0.55	7.28	235.11	378.63	0.38	3.26	
5/9/12	13:51	237.44	3.40	0.41	7.35	212.26	384.65	0.44	3.40		5/9/12	14:45	251.21	3.22	0.53	7.29	241.80	379.64	0.38	3.26	
5/9/12	13:52	244.36	3.23	0.39	7.36	228.43	386.64	0.42	3.41		5/9/12	14:46	254.62	3.64	0.54	7.29	236.05	376.64	0.38	3.26	
5/9/12	13:53	241.60	3.23	0.39	7.35	231.91	383.65	0.45	3.39		5/9/12	14:47	253.99	3.29	0.56	7.29	230.40	373.63	0.38	3.29	
5/9/12	13:54	240.67	3.38	0.38	7.36	207.44	385.65	0.43	3.40		5/9/12	14:48	248.00	3.36	0.56	7.29	239.16	379.64	0.37	3.29	
5/9/12	13:55	240.70	3.23	0.39	7.35	234.64	388.64	0.43	3.43		5/9/12	14:49	246.27	3.43	0.54	7.30	233.89	378.63	0.37	3.27	
5/9/12	13:56	243.48	3.43	0.38	7.35	234.44	387.62	0.45	3.42		5/9/12	14:50	244.87	3.43	0.55	7.30	242.14	379.63	0.36	3.29	
5/9/12	13:57	233.91	3.69	0.42	7.34	223.66	387.64	0.47	3.46		5/9/12	14:51	248.05	3.29	0.54	7.31	236.51	380.62	0.36	3.30	
5/9/12	13:58	242.34	3.58	0.40	7.36	233.77	386.65	0.42	3.48		5/9/12	14:52	238.02	3.07	0.52	7.32	230.98	380.62	0.34	3.29	
5/9/12	13:59	241.82	3.46	0.40	7.36	220.81	380.64	0.46	3.38		5/9/12	14:53	254.38	3.42	0.51	7.31	249.93	378.63	0.37	3.29	
5/9/12	14:00	250.43	3.09	0.42	7.35	226.89	382.59	0.46	3.37		5/9/12	14:54	249.83	3.41	0.53	7.31	242.14	378.28	0.34	3.29	
5/9/12	14:01	253.22	3.23	0.39	7.37	228.15	381.65	0.45	3.37		5/9/12	14:55	249.29	3.43	0.53	7.31	242.13	378.36	0.33	3.30	
5/9/12	14:02	245.11	3.29	0.41	7.36	233.48	388.63	0.47	3.37		5/9/12	14:56	248.71	3.44	0.53	7.31	242.10	378.44	0.33	3.30	
5/9/12	14:03	244.18	3.15	0.41	7.36	232.51	388.64	0.47	3.35		5/9/12	14:57	244.00	3.08	0.54	7.29	237.75	376.60	0.41	3.23	
Run 2 Average											Run 4 Average										
243.01 3.26 0.40 7.35 217.63 386.92 0.45 3.42											253.40 3.29 0.54 7.29 242.14 378.50 0.39 3.26										
5/9/12	14:58	0.00	-0.43	0.00	0.07	0.36	0.80	0.00	0.02		5/9/12	14:59	0.53	48.32	-0.00	0.05	383.34	288.22	-0.01	-0.09	
5/9/12	15:00	246.88	264.80	0.02	0.02	0.76	0.80	11.00	8.83		5/9/12	15:01	0.58	-1.12	11.87	8.07	256.25				

Datalog Record Spring Creek CDP, Unit #5

Date	Time	NOx-Peak PPM	CO-Peak PPM	O2-Peak %Vol	CO2-Peak %Vol	NOx-Peak PPM-C3	CO-Peak PPM	O2-Peak %Vol	CO2-Peak %Vol	Event	Date	Time	NOx-Peak PPM	CO-Peak PPM	O2-Peak %Vol	CO2-Peak %Vol	NOx-Peak PPM-C3	CO-Peak PPM	O2-Peak %Vol	CO2-Peak %Vol	Event
5/9/12	10:47	0.00	-0.01	0.00	0.01	0.16	0.39	0.01	0.02		5/9/12	12:14	0.00	0.00	0.01	0.01	1.14	0.01	0.12	0.01	
5/9/12	10:48	16.11	48.72	0.00	0.03	243.24	246.72	-0.01	-0.09		5/9/12	12:15	43.91	45.07	0.01	-0.01	244.06	236.28	-0.08	-0.13	
5/9/12	10:49	246.90	204.00	0.02	0.02	0.76	0.88	11.90	2.83		5/9/12	12:16	245.07	204.80	0.02	-0.04	-1.45	0.01	12.05	3.00	
5/9/12	10:50	0.38	1.15	11.07	0.07	236.23	382.61	0.12	1.13		5/9/12	12:17	-0.09	0.14	12.00	-2.94	235.27	441.62	0.28	1.18	
5/9/12	11:24	278.75	0.84	0.01	7.04	333.01	419.64	0.29	5.31		5/9/12	12:18	279.92	0.16	0.19	7.44	247.42	417.00	0.12	1.97	
5/9/12	11:25	382.00	0.70	0.06	7.44	332.49	426.74	0.28	7.30		5/9/12	12:19	273.68	0.29	0.15	7.45	254.64	436.61	0.27	7.81	Start Run 3
5/9/12	11:26	342.46	0.62	0.00	7.44	341.29	421.64	0.27	7.30		5/9/12	12:20	275.97	0.29	0.14	7.44	245.90	431.61	0.30	7.89	
5/9/12	11:27	341.95	0.75	0.01	7.44	338.46	419.64	0.27	7.28		5/9/12	12:21	272.31	0.90	0.14	7.44	237.43	431.62	0.29	7.44	
5/9/12	11:28	285.26	0.61	0.04	7.44	257.20	418.64	0.27	7.28		5/9/12	12:22	267.12	0.16	0.20	7.42	235.76	430.31	0.32	7.41	
5/9/12	11:29	285.76	0.62	0.03	7.43	247.61	413.64	0.28	7.26		5/9/12	12:23	261.36	0.21	0.22	7.42	236.32	426.62	0.33	7.42	
5/9/12	11:30	276.26	0.56	0.00	7.42	248.00	415.64	0.32	7.28		5/9/12	12:24	258.03	0.36	0.23	7.40	224.36	421.67	0.31	7.42	
5/9/12	11:31	349.06	0.65	0.07	7.43	249.21	418.64	0.30	7.28		5/9/12	12:25	264.00	0.28	0.22	7.41	238.03	436.62	0.31	7.41	
5/9/12	11:32	275.79	0.77	0.07	7.43	251.91	419.64	0.30	7.28		5/9/12	12:26	270.11	0.08	0.20	7.42	246.93	434.67	0.31	7.44	
5/9/12	11:33	244.52	0.57	0.06	7.43	258.71	420.63	0.28	7.28		5/9/12	12:27	273.41	0.28	0.19	7.41	250.61	434.61	0.29	7.45	
5/9/12	11:34	274.12	0.67	0.04	7.43	253.71	421.64	0.27	7.28		5/9/12	12:28	273.94	0.49	0.19	7.42	246.96	433.62	0.32	7.44	
5/9/12	11:35	261.31	0.80	0.04	7.43	263.65	424.64	0.27	7.28		5/9/12	12:29	266.18	0.14	0.17	7.44	238.83	441.61	0.37	7.46	
5/9/12	11:36	285.56	0.31	0.04	7.43	251.80	420.63	0.30	7.27		5/9/12	12:30	260.62	0.01	0.19	7.42	255.89	436.62	0.32	7.45	
5/9/12	11:37	284.48	0.56	0.03	7.42	251.23	419.64	0.30	7.26		5/9/12	12:31	267.14	0.01	0.18	7.43	262.84	441.61	0.38	7.45	
5/9/12	11:38	282.68	0.21	0.00	7.41	258.09	421.64	0.30	7.26		5/9/12	12:32	279.93	0.49	0.18	7.43	236.76	439.62	0.30	7.44	
5/9/12	11:39	318.75	0.21	0.00	7.41	252.45	418.64	0.31	7.26		5/9/12	12:33	278.94	0.56	0.17	7.44	254.19	436.61	0.28	7.45	
5/9/12	11:40	308.18	0.23	0.00	7.42	263.97	423.61	0.27	7.24		5/9/12	12:34	274.88	0.00	0.19	7.42	246.74	433.61	0.32	7.44	
5/9/12	11:41	288.55	0.15	0.04	7.42	253.54	417.61	0.29	7.27		5/9/12	12:35	265.00	0.08	0.18	7.42	251.00	438.61	0.31	7.45	
5/9/12	11:42	360.09	0.15	0.00	7.41	256.55	416.64	0.32	7.26		5/9/12	12:37	279.00	0.43	0.18	7.42	251.74	433.61	0.31	7.45	
5/9/12	11:43	375.90	0.28	0.00	7.41	258.49	417.61	0.31	7.26		5/9/12	12:38	275.20	0.28	0.18	7.43	249.26	439.61	0.29	7.45	
5/9/12	11:44	377.80	0.21	0.01	7.42	259.76	419.64	0.30	7.24		5/9/12	12:39	276.14	0.00	0.17	7.44	252.14	439.62	0.26	7.45	
5/9/12	11:45	285.11	0.24	0.04	7.42	261.49	421.64	0.29	7.23		5/9/12	12:40	276.72	0.20	0.18	7.43	252.80	437.60	0.28	7.45	
5/9/12	11:46	241.18	0.17	0.00	7.41	262.50	419.64	0.30	7.26		Run 3 Average	274.63	0.26	0.19	7.43	247.99	435.83	0.30	7.44		
Run 1 Average	281.18	0.44	0.04	7.43	256.19	419.58	429	7.27		5/9/12	12:41	0.07	0.00	0.00	-0.00	-0.10	0.00	-0.02	-0.01		
5/9/12	11:47	0.00	0.12	0.01	-0.02	0.48	0.01	0.00	-0.03		5/9/12	12:42	43.64	40.81	0.00	-0.01	344.43	236.71	-0.07	-0.12	
5/9/12	11:48	44.43	40.05	0.01	-0.04	244.42	294.78	0.02	-0.16		5/9/12	12:43	245.13	204.80	0.01	-0.03	-1.72	0.00	12.04	7.05	
5/9/12	11:49	240.71	204.00	0.02	-0.07	-1.19	0.00	12.15	8.00		5/9/12	12:44	0.00	-0.27	12.00	8.00	312.44	421.62	0.41	7.22	
5/9/12	11:50	0.76	-0.16	11.00	2.80	255.71	443.61	0.24	7.40		5/9/12	12:45	345.44	1.03	0.31	7.36	220.60	428.62	0.38	7.33	
5/9/12	11:51	312.00	0.91	0.18	7.40	247.50	432.61	0.33	7.41		5/9/12	12:46	246.06	1.41	0.30	7.37	222.99	431.62	0.33	7.34	Start Run 4
5/9/12	11:52	294.00	0.84	0.15	7.42	258.00	427.62	0.33	7.44		5/9/12	12:47	247.25	1.20	0.29	7.37	222.55	429.63	0.30	7.34	
5/9/12	11:53	315.01	0.78	0.19	7.41	254.00	426.63	0.34	7.41		5/9/12	12:48	249.00	1.19	0.30	7.37	221.21	431.60	0.32	7.35	
5/9/12	11:54	278.00	0.93	0.18	7.41	259.01	428.63	0.33	7.41		5/9/12	12:49	251.00	1.11	0.28	7.34	222.00	431.62	0.30	7.34	
5/9/12	11:55	263.11	0.80	0.18	7.41	244.52	432.63	0.33	7.40		5/9/12	12:50	254.00	1.08	0.28	7.39	223.34	431.62	0.36	7.34	
5/9/12	11:56	377.80	0.08	0.13	7.44	270.82	443.61	0.28	7.40		5/9/12	12:51	251.03	1.04	0.28	7.39	223.47	433.61	0.35	7.35	
5/9/12	11:57	375.18	0.63	0.11	7.43	260.81	438.62	0.29	7.40		5/9/12	12:52	245.47	1.14	0.28	7.39	220.58	429.62	0.39	7.32	
5/9/12	11:58	346.70	0.70	0.12	7.44	258.22	429.63	0.32	7.40		5/9/12	12:53	249.04	1.19	0.29	7.39	220.60	432.61	0.35	7.35	
5/9/12	11:59	274.99	0.84	0.18	7.42	257.00	426.63	0.36	7.44		5/9/12	12:54	248.67	1.13	0.28	7.39	229.33	431.62	0.35	7.34	
5/9/12	12:00	341.67	0.50	0.17	7.42	244.00	433.62	0.32	7.43		5/9/12	12:55	245.00	1.19	0.28	7.39	221.04	428.61	0.37	7.33	
5/9/12	12:01	315.78	0.70	0.13	7.44	249.81	444.62	0.26	7.40		5/9/12	12:56	239.13	1.12	0.28	7.39	200.68	422.34	0.38	7.31	
5/9/12	12:02	319.22	0.89	0.11	7.41	251.34	438.21	0.30	7.40		5/9/12	12:57	250.11	1.44	0.31	7.38	216.46	427.61	0.37	7.33	
5/9/12	12:03	366.63	0.89	0.14	7.44	240.67	429.63	0.33	7.44		5/9/12	12:58	254.82	0.98	0.30	7.39	208.26	423.62	0.38	7.33	
5/9/12	12:04	338.11	0.63	0.15	7.42	232.72	425.62	0.36	7.41		5/9/12	12:59	218.85	1.26	0.30	7.39	216.49	429.61	0.35	7.36	
5/9/12	12:05	342.81	0.42	0.16	7.43	247.63	431.62	0.32	7.43		5/9/12	13:00	215.93	0.85	0.28	7.40	209.09	423.62	0.34	7.34	
5/9/12	12:06	344.41	0.49	0.15	7.41	254.96	439.63	0.29	7.40		5/9/12	13:01	214.97	0.98	0.30	7.34	209.41	423.62	0.37	7.35	
5/9/12	12:07	273.12	0.44	0.14	7.43	246.05	441.61	0.28	7.46		5/9/12	13:02	215.84	1.25	0.29	7.34	210.75	426.62	0.37	7.35	
5/9/12	12:08	251.11	0.49	0.11	7.45	250.82	430.62	0.31	7.41		5/9/12	13:03	216.12	1.28	0.29	7.39	209.41	423.61	0.34	7.34	
5/9/12	12:09	266.94	0.49	0.16	7.42	254.92	428.62	0.36	7.41		5/9/12	13:04	215.11	0.89	0.30	7.36	207.75	423.62	0.41	7.35	
5/9/12	12:10	304.16	0.42	0.18	7.43	253.25	436.62	0.34	7.42		5/9/12	13:05	214.86	1.21	0.30	7.39	214.24	423.61	0.34	7.36	
5/9/12	12:11	304.44	0.63	0.14	7.42	255.20	434.63	0.31	7.41		5/9/12	13:06	214.80	0.90	0.30	7.39	210.53	422.37	0.38	7.31	
5/9/12	12:12	315.50	0.46	0.12	7.43	251.72	441.62	0.29	7.41		5/9/12	13:07	225.11	0.78	0.28	7.40	200.61	423.61	0.37	7.28	
5/9/12	12:13	312.14	0.62	0.12	7.43	252.21	432.62	0.30	7.42		Run 4 Average	241.89	1.17	0.29	7.39	218.05	427.83	0.37	7.34		
Run 1 Average	246.87	0.63	0.15	7.43	248.13	434.60	432	7.44		5/9/12	13:08	-0.01	-0.10	0.00	-0.01	-0.22	0.00	-0.01	-0.04		
5/9/12	13:09	43.72	44.21	0.00	0.00	344.30	236.70	-0.06	-0.17		5/9/12	13:10	245.40	204.80	0.01	-0.02	-0.89	0.00	12.01	8.00	
5/9/12	13:11	-0.10	0.37	11.0																	

CERTIFICATE OF SERVICE

The undersigned certifies that the original of the attached Combined Complaint and Consent Agreement in the matter of Samson Resources Company Spring Creek Compressor Station was filed with the Regional Hearing Clerk on September 26, 2013.

Further, the undersigned certifies that, on the same day, a true and correct copy of the document was hand-delivered to Cynthia Reynolds, Director, EPA Air & Toxics Technical Enforcement Program, 1595 Wynkoop Street, Denver CO 80202, and mailed by first-class U.S. Mail to Scott Weatherholt, Assistant General Counsel - Operations, at Samson Plaza, Two West Second Street, Tulsa, OK 74103.

Date: Sept. 26, 2013

David Rochlin

David Rochlin
Senior Enforcement Attorney
U.S. Environmental Protection
Agency

CERTIFICATE OF SERVICE

The undersigned certifies that the original of the attached **COMBINED COMPLAINT, CONSENT AGREEMENT and FINAL ORDER** in the matter **SAMSON RESOURCES COMPANY, SPRING CREEK COMPRESSOR STATION, LA PLATA COUNTY, CO; DOCKET NO.: CAA-08-2013-0015**. The documents were filed with the Regional Hearing Clerk on September 30, 2013.


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 on September 30, 2013 to:

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

And emailed to:

Kim White
U. S. Environmental Protection Agency
Cincinnati Finance Center
26 W. Martin Luther King Drive (MS-0002)
Cincinnati, Ohio 45268

September 30, 2013


Tina Artemis
Paralegal/Regional Hearing Clerk

