



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

John Corra, Director

April 2, 2012

Mr. Scott Rose
Samson Resources Company
Two West Second Street
Oklahoma City, OK 74103

RE: Notice of Violation

Dear Mr. Rose:

Enclosed you will find a Notice of Violation (NOV) issued to Samson Resources Company by the Department of Environmental Quality, Air Quality Division, for venting vapors from the Barricade 11-7, Barricade 41-1 and Barricade 24-36 facilities located in Sweetwater County, Wyoming. These violations of permit CT-11712, CT-12038 and CT-11711 were observed by Mr. Jeff Wendt on March 8, 2012.

As the Department and this Division consider the failure to comply with air quality permitting requirements to be a serious matter, I am considering recommending the Department refer this violation to the State Attorney General's office requesting a suit be filed in District Court to recover appropriate penalties. If you would like to discuss settlement of this Notice of Violation prior to referral to the Attorney General's office, please contact Ms. Karen J. Godman, Air Quality Compliance Program Principal, at 307-777-8601 no later than ten (10) days after receipt of this letter.

Should you have any questions or comments regarding this matter, please feel free to contact me or Ms. Karen Godman.

Sincerely,

Steven A. Dietrich
Administrator
Air Quality Division

cc: Robert Gill
Tont Hoyt
Nancy Vehr
Keith Guille



**BEFORE THE
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE OF WYOMING**

**IN THE MATTER OF THE NOTICE OF VIOLATION)
ISSUED TO SAMSON RESOURCES COMPANY,) DOCKET NO. 4977-12
MR. SCOTT ROSE,)
ENVIRONMENTAL SPECIALIST,)
TWO WEST SECOND STREET,)
OKLAHOMA CITY, OKLAHOMA 74103)**

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Samson Resources Company to be in violation of permits CT-11712, CT-12038 and CT-11711 issued in accordance with W.S. 35-11-801 of the Wyoming Environmental Quality Act and Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations at the Barricade 11-7, Barricade 41-1 and Barricade 24-36 located in Sweetwater County, Wyoming.

2. W.S. 35-11-801(a) states, "In granting permits, the Director may impose such conditions as may be necessary to accomplish the purpose of this act which are not inconsistent with the existing rules, regulations and standards."

3. Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations prescribes the applicability and procedures for issuing permits to sources under Wyoming's construction and modification permitting program.

4. Permit CT-11712 was issued to Samson Resources Company on July 6, 2011 for the Barricade 11-7 facility. Both conditions 12 and 16 require vapors to be controlled as follows:

Condition 12:

"Vapors from all condensate tanks and all active produced water tanks, including tank flash and S/W/B vapors, shall be routed to the combustion device..."

Condition 16:

"Emission control equipment, including the VOC and HAP emission control system or device, all vent lines, connections, fittings, valves, relief valves, hatches or any other appurtenance employed to contain and collect vapors and transport them to the emission control system or device, shall be maintained and operated during any time the wells are producing such that the emissions are controlled at all times.

5. On March 8, 2012, Mr. Jeff Wendt, Air Quality Division Engineer, observed venting vapors from thief hatches on both a condensate and water tank. Not routing vapors from the condensate and water tanks to the combustion device are violations of conditions 12 and 16 of permit CT-11712.

6. Permit CT-12038 was issued to Samson Resources Company on August 2, 2011 for the Barricade 41-1 facility. Both conditions 12 and 16 require vapors to be controlled as follows:

Condition 12:

“Vapors from all condensate tanks and all active produced water tanks, including tank flash and S/W/B vapors, shall be routed to the combustion device...”

Condition 16:

“Emission control equipment, including the VOC and HAP emission control system or device, all vent lines, connections, fittings, valves, relief valves, hatches or any other appurtenance employed to contain and collect vapors and transport them to the emission control system or device, shall be maintained and operated during any time the wells are producing such that the emissions are controlled at all times.

7. On March 8, 2012, Mr. Jeff Wendt, Air Quality Division Engineer, observed venting vapors from a thief hatch and an Enardo valve. Not routing vapors from the condensate tanks to the combustion device are violations of conditions 12 and 16 of permit CT-12038.

8. Permit CT-11711 was issued to Samson Resources Company on July 6, 2011 for the Barricade 24-36 facility. Both conditions 12 and 16 require vapors to be controlled as follows:

Condition 12:

“Vapors from all condensate tanks and all active produced water tanks, including tank flash and S/W/B vapors, shall be routed to the combustion device...”

Condition 16:

“Emission control equipment, including the VOC and HAP emission control system or device, all vent lines, connections, fittings, valves, relief valves, hatches or any other appurtenance employed to contain and collect vapors and transport them to the emission control system or device, shall be maintained and operated during any time the wells are producing such that the emissions are controlled at all times.

9. On March 8, 2012, Mr. Jeff Wendt, Air Quality Division Engineer, observed venting vapors from thief hatches and an Enardo valve. Not routing vapors from the condensate tanks to the combustion device are violations of conditions 12 and 16 of permit CT-11711.

10. Said violations consist of failing to route vapors from the condensate tanks to the combustion device in violation of permits CT-11712, CT-12038 and CT-11711.

11. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental Quality Act] ... is subject to a penalty not to exceed ten thousand dollars (\$10,000.00) for each violation for each day during which the violation continues, a temporary or permanent injunction, or both a penalty and an injunction.

12. This notice is being sent to you pursuant to W.S. 35-11-701(c), which requires that, in any case of the failure to correct or remedy an alleged violation, the Director of the Department of Environmental Quality shall cause a written notice to be issued and served upon the person alleged to be responsible.

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Notice of Violation
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DATED this 2nd day of APRIL, 2012.



Steven A. Dietrich
Administrator
Air Quality Division



John W. Corra
Director
Department of Environmental Quality

Please direct all inquiries to Steven A. Dietrich, Administrator, Division of Air Quality, Department of Environmental Quality, Herschler Building, 2nd Floor, 122 W. 25th Street, Cheyenne, Wyoming 82002. (Telephone: 307/777-7393.)