



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202 - 2733**

JAN 6 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7014 0150 0000 2453 3481

Ms. Nancy Bryant
Regulatory Manager
5416 Highway 290 W
Brenham, Texas 77833

Re: GeoSouthern Energy Corporation, Docket No. CAA-06-2015-3303

Dear Ms. Bryant:

Enclosed are the Administrative Order on Consent (AOC) and the Consent Agreement and Final Order (CAFO) that will be filed with the Regional Hearing Clerk.

As provided in the CAFO, GeoSouthern Energy Corporation is required to pay the civil penalty of \$30,000.00 within thirty (30) days from the effective date of the CAFO.

As provided in the AOC, GeoSouthern Energy Corporation shall comply with the general duties to identify hazards, design and maintain a safe facility, and mitigate releases that do occur as identified in paragraph 20 of the AOC.

If you have any questions regarding this AOC and CAFO, please contact Jeffrey Clay, Assistant Regional Counsel, at (214) 665-7297.

Sincerely,

A handwritten signature in black ink, appearing to read "John Blevins", with a stylized flourish extending to the right.

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6
DALLAS, TEXAS

FILED

2015 JAN -8 PM 1:18

REGIONAL HEARING CLERK
EPA REGION VI

In the Matter of:

GeoSouthern Energy Corporation
The Woodlands, Texas

Respondent

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§
§

EPA Docket No.
CAA-06-2015-3305

CONSENT AGREEMENT AND FINAL ORDER

The Director of the Compliance Assurance and Enforcement Division of the United States Environmental Protection Agency ("EPA"), Region 6 ("Complainant") and GeoSouthern Energy Corporation ("Respondent") in the above-referenced proceeding, hereby agree to resolve this matter through the issuance of this Consent Agreement and Final Order ("CAFO").

I. PRELIMINARY STATEMENT

1. This proceeding for the assessment of civil penalties is brought by EPA pursuant to sections 113(a)(3) and 113(d)(1)(B) of the Clean Air Act, as amended ("Act" or "CAA"), 42 U.S.C. §§ 7413(a)(3) and 7413(d)(1)(B), and is simultaneously commenced and concluded through the issuance of this CAFO pursuant to 40 C.F.R. §§ 22.13(b), 22.18(b)(2) and (3), and 22.34.

2. For purposes of this proceeding, Respondent admits the jurisdictional allegations contained herein; however, Respondent neither admits nor denies the specific factual allegations contained in this CAFO.

3. Respondent explicitly waives any right to contest the allegations and its right to appeal the proposed Final Order set forth herein, and waives all defenses, which have been raised or could have been raised to the claims set forth in this CAFO.

4. Compliance with all the terms and conditions of this CAFO shall only resolve Respondent's liability for federal civil monetary penalties for those violations and facts alleged in this CAFO.

5. Respondent consents to the issuance of this CAFO and to the assessment and payment of the stated civil penalty in the amount and by the method set forth in this CAFO.

II. ALLEGATIONS

6. Respondent is a privately held company authorized to do business in the State of Texas.

7. Respondent owns a natural gas processing well site named Oro Negro Unit 2#1H ("Facility") located near the city of Westhoff, Texas.

8. The Respondent operates a natural gas well at the Facility, which includes a separator used for separating well fluids produced from the natural gas well into gaseous and liquid components and a tank battery which consists of interconnected storage tanks situated to receive output from the natural gas well and separator.

9. Natural gas is a highly flammable gaseous hydrocarbon mixture containing methane, ethane, propane and butane, which are extremely hazardous substances listed in Table 3 of 40 CFR § 68.130 that may ignite, flashback or explode when exposed to a source of ignition.

10. On Monday, February 3, 2014, multiple maintenance projects were underway at the Facility.

11. A coil tubing job was underway on one part of the Facility. Cuttings and crude oil from the coil tubing job were placed in the water storage tank for storage.

12. A welder and assistant were tasked with connecting a two inch water line running from the water tank.

13. Hydrocarbon vapors collected in the two inch line due to the offloading of cuttings and crude oil that had been placed in the water tank from a coil tubing job.

14. Crude oil, and associated hydrocarbon vapors, is an extremely hazardous substance.

15. When the welder struck an arc on the two inch line, the flammable vapors ignited and traveled down the two inch line until they reached the water tank, which then exploded.

16. The welder was working without a hot work permit and failed to realize that the two inch line and the water tank contained flammable hydrocarbon vapors.

17. As a result of the fire and explosion the entire production tank battery, production vessels, and production piping had to be demolished.

18. The hazards associated with welding in and around piping that contains flammable or explosive substances are well established as are the standards for preventing or minimizing fires while welding in such areas.

19. Pursuant to section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), an owner/operator of a stationary source producing, processing, handling or storing substances listed pursuant to section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance, has a general duty to: (1) identify hazards which may result from accidental releases of such substances using appropriate hazard

assessment techniques; (2) design and maintain a safe facility, taking such steps as are necessary to prevent releases; and (3) minimize the consequences of accidental releases that do occur.

20. Respondent is a “person” as that term is defined by section 302(e) of the CAA, 42 U.S.C. § 7602(e).

21. The Facility is a “stationary source” as that term is defined by section 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412(r)(2)(C).

22. Respondent is the “owner or operator” as those terms are defined by section 112(a)(9) of the CAA, 42 U.S.C. § 7412(a)(9), of a stationary source.

23. At the Facility, Respondent produces, processes, handles, or stores substances listed in, or pursuant to, CAA § 112(r)(3) or other extremely hazardous substances identified as such due to toxicity, reactivity, flammability, volatility, or corrosivity.

24. The release of natural gas and crude oil and associated vapors at the Facility on February 3, 2014, constituted an “accidental release” as that term is defined by section 112(r)(2)(A) of the CAA, 42 U.S.C. § 7412(r)(2)(A).

25. Respondent failed to design and maintain a safe facility and did not take such necessary steps to prevent accidental releases by not ensuring safety during hot welding, including failing to issue a hot work permit for the hot work taking place at the facility.

26. Respondent’s failure constitutes a violation of the general duty clause in section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1).

27. Respondent is therefore subject to the assessment of penalties pursuant to sections 113(a)(3) and 113(d)(1)(B) of the CAA, 42 U.S.C. §§ 7413(a)(3) and 7413(d)(1)(B), for at least one day of violation of the general duty clause of section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1).

III. TERMS OF SETTLEMENT

A. CIVIL PENALTY

28. Pursuant to the authority granted in sections 113(a)(3) and 113(d)(1)(B) of the CAA, 42 U.S.C. §§ 7413(a)(3) and 7413(d)(1)(B), and taking into consideration the size of the Respondent's business, the economic impact of the penalty on the Respondent's business, the Respondent's full compliance history and good faith efforts to comply, the duration of the violation, payment by Respondent of penalties previously assessed for the same violation (if any), the economic benefit of noncompliance, and the seriousness of the violation, as well as other factors which justice may require, EPA and Respondent agree that an appropriate penalty to settle this matter is \$ 30,000.

29. Respondent shall pay the assessed penalty within thirty (30) days of the effective date of this CAFO. Respondent shall pay the assessed civil penalty by certified check, cashier's check, or wire transfer, made payable to "Treasurer, United States of America, EPA – Region 6." Payment shall be remitted in one of three ways: regular U.S. Postal mail (including certified mail), or U.S. Postal Service express mail - the check should be remitted to:

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

For overnight mail (non-U.S. Postal Service), the check should be remitted to:

U.S. Bank
Government Lockbox 979077
U.S. EPA, Fines and Penalties
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101
Phone No. (314) 418-1028

For wire transfer, the payment should be remitted to:

Federal Reserve Bank of New York
ABA: 021030004
Account No. 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, NY 10045

Field Tag 4200 of the Fedwire message should read "D 68010727 Environmental Protection Agency"

PLEASE NOTE: Docket number CAA-06-2015-3305 shall be clearly typed on the check to ensure proper credit. If payment is made by check, the check shall also be accompanied by a transmittal letter and shall reference the Respondent's name and address, the case name, and the docket number of this CAFO. If payment is made by wire service, the wire transfer instructions shall reference the Respondent's name and address, the case name, and the docket number of this CAFO. The Respondent shall also send a simultaneous notice of such payment, including a copy of the check and transmittal letter or wire transfer instructions to the following:

Samuel Tates
Chief, Surveillance Section (6EN-AS)
Compliance Assurance and Enforcement Division
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Lorena Vaughn
Regional Hearing Clerk (6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Respondent's adherence to these instructions will ensure that proper credit is given when penalties are received in the Region.

30. Respondent agrees not to claim or attempt to claim a federal income tax deduction or credit covering all or any part of the civil penalty paid to the United States Treasurer.

31. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, unless otherwise prohibited by law, EPA will assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim. Interest on the civil penalty assessed in this CAFO will begin to accrue thirty (30) days after the effective date of the CAFO and will be recovered by EPA on any amount of the civil penalty that is not paid by the due date. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a). Moreover, the costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. *See* 40 C.F.R. § 13.11(b).

32. EPA will also assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) day period that the penalty remains unpaid. In addition, a penalty charge of up to six percent per year will be assessed monthly on any portion of the debt which remains delinquent more than ninety (90) days. *See* 40 C.F.R. § 13.11(c). Should a penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. *See* 31 C.F.R. § 901.9(d). Other penalties for failure to make a payment may also apply.

B. PARTIES BOUND

33. The provisions of this CAFO shall apply to and be binding upon the parties to this action, their officers, directors, agents, employees, successors, and assigns.

The undersigned representative of each party to this CAFO certifies that he or she is fully authorized by the party whom he or she represents to enter into the terms and conditions of this CAFO and to execute and to legally bind that party to it.

C. RETENTION OF ENFORCEMENT RIGHTS

34. EPA does not waive any rights or remedies available to EPA for any other violations by the Respondent of Federal or State laws, regulations, or permitting conditions.

35. Nothing in this CAFO shall relieve the Respondent of the duty to comply with all applicable provisions of section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68.

36. Nothing in this CAFO shall limit the power and authority of EPA or the United States to take, direct, or order all actions to protect public health, welfare, or the environment, or prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants, or contaminants at or from the Facility. Furthermore, nothing in this CAFO shall be construed to prevent or limit EPA's civil and criminal authorities, or that of other Federal, State, or local agencies or departments to obtain penalties or injunctive relief under other Federal, State, or local laws or regulations.

37. In any subsequent administrative or judicial proceeding initiated by the Complainant or the United States for injunctive relief, civil penalties, or other appropriate relief relating to the Facility, Respondent shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel,

issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the Complainant or the United States in the subsequent proceeding were or should have been brought in the instant case, except with respect to the claims that have been specifically resolved pursuant to this CAFO.

D. COSTS

38. Each party shall bear its own costs and attorney's fees. Furthermore, Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under 5 U.S.C. § 504 and 40 C.F.R. Part 17.

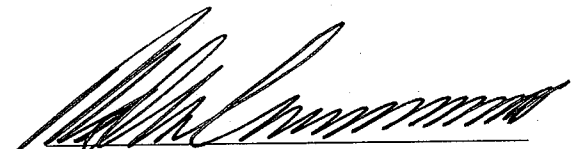
E. EFFECTIVE DATE

39. This CAFO becomes effective upon filing with the Regional Hearing Clerk.

**THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS
CONSENT AGREEMENT AND FINAL ORDER:**

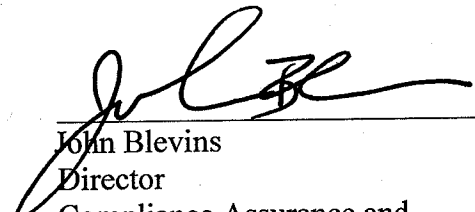
FOR THE RESPONDENT:

12/18/14
Date


GeoSouthern Energy Corporation
By: MARGARET WOODWARD MILLESTON
ITS: VICE PRESIDENT

FOR THE COMPLAINANT:

1.6.14
Date


John Blevins
Director
Compliance Assurance and
Enforcement Division

FINAL ORDER

Pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22, the foregoing Consent Agreement is hereby ratified. This Final Order shall not in any case affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This Final Order shall resolve only those causes of action alleged in this CAFO. Nothing in this Final Order shall be construed to waive, extinguish, or otherwise affect Respondent's (or its officers, agents, servants, employees, successors, or assigns) obligation to comply with all applicable federal state, and local statutes and regulations, including the regulations that were the subject of this action. The Respondent is ordered to comply with the terms of settlement as set forth in the Consent Agreement. Pursuant to 40 C.F.R. § 22.31(b), this Final Order shall become effective upon filing with the Regional Hearing Clerk.

Date: _____

1/8/15



Thomas Rucki
Regional Judicial Officer

CERTIFICATE OF SERVICE

I hereby certify that the original and a copy of the foregoing Consent Agreement and Final Order (CAFO) was hand-delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733, and that a true and correct copy of the CAFO was placed in the United States Mail, to the following by the method indicated:

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: # 70140156000024533481

Nancy Bryant
Regulatory Manager
Director of Operations
5416 Highway 290 W
Brenham, Texas 77833

Date: 1-8-2015

Sandra Hardy
U.S. EPA, Region 6
Dallas, Texas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

FILED
2015 JAN -8 PM 1:18

REGIONAL HEARING CLERK
EPA REGION VI

IN THE MATTER OF:

GeoSouthern Energy Corporation
Westhoff, Texas

Respondent

Proceeding under Section
113 of the Clean Air Act

ADMINISTRATIVE

ORDER ON CONSENT

Docket CAA-06-2015-3303

I. INTRODUCTION

1. The following Findings are made and an Administrative Order on Consent issued pursuant to Section 113(a)(3) of the Clean Air Act ("CAA"), 42 U.S.C. § 7413(a)(3), for Respondent's failure to comply with Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), with regard to a fire and explosion at GeoSouthern Energy Corporations Oro Negro Unit 2#1H well and facility, near Westhoff, Texas. The parties to this Administrative Order on Consent are the United States Environmental Protection Agency, Region 6 ("EPA" or "EPA Region 6") and GeoSouthern Energy Corporation ("Respondent").

2. This Administrative Order on Consent ("Order") is entered into upon mutual agreement by the parties. Accordingly, Respondent consents to and agrees not to contest EPA's jurisdiction to issue this Order or enforce its terms. Further, Respondent will not contest EPA's jurisdiction to either compel compliance with this Order in any subsequent enforcement proceedings, whether administrative or judicial, or to require Respondent's full compliance with the terms of this Order or impose sanctions for violations of this Order. Respondent consents to the terms of this Administrative Order on Consent.

3. This Order shall apply to and be binding upon Respondent, its agents, successors and assigns and upon all persons, contractors, and consultants acting under or for Respondent. No change in ownership or corporate or partnership status of Respondent will in any way alter the status of Respondent or its responsibilities under this Order.

II. STATUTORY AND REGULATORY AUTHORITY

4. Pursuant to Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), owners and operators of stationary sources producing, processing, handling, or storing substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other

extremely hazardous substance, have a general duty to (a) identify hazards which may result from accidental releases of such substances using appropriate hazard assessment techniques; (b) design and maintain a safe facility taking such steps as are necessary to prevent releases; and (c) minimize the consequences of accidental releases that do occur. This section of the CAA is referred to as the "General Duty Clause."

5. The extremely hazardous substances identified pursuant to Section 112(r)(3) include specifically listed substances ("Regulated Substances") or "other extremely hazardous substances."

6. Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), authorizes EPA to issue compliance orders for violations of the Act, including violations of Section 112(r), 42 U.S.C. § 7412(r). A copy of the order must be sent to the relevant State air pollution control agency. An order relating to a violation of Section 112 of the CAA can take effect immediately upon issuance.

7. The authority to issue orders pursuant to Section 113(a)(3) of the CAA has been delegated to EPA Region 6's Regional Administrator, and in turn to the Director of EPA Region 6's Compliance Assurance and Enforcement Division.

III. EPA REGION 6 FINDINGS

8. GeoSouthern Energy Corporation owns and operates a natural gas processing well site near Westhoff, Texas ("Facility"). The facility includes a production tank battery, production vessels, and other production equipment related to the extraction of natural gas.

9. GeoSouthern Energy Corporation is a "person" within the meaning of Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

10. The Facility is a "stationary source" as that term is defined at Section 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412(r)(2)(C).

11. The Facility is a production natural gas well primarily engaged in the production, processing, storing, and handling of natural gas and associated by-products.

12. Natural gas, and its associated vapors, are extremely hazardous substances due to their explosive and flammable properties.

13. Located at the facility is a water tank. A two inch line connects the water tank to other equipment at the facility.

14. The Respondent determined that an additional two inch line should be connected to the two inch line running from the water tank.

15. On February 3, 2014, the Respondent sent a welder to the facility to connect the additional two inch line that would connect to the already existing two inch line running from the water tank. No blind was placed between the water tank and the area where the work was to be performed. No hot work permit was issued for the work.

16. When the welder began welding vapors in the two inch line ignited and the fire traveled the length of the two inch line causing a fire and explosion in the water tank, which damaged the entire production tank battery, production vessels, and production piping.

17. A second work project was taking place at the facility and unbeknown to the welder, waste from that project, which included flammable liquids and vapors, had been placed in the water tank for storage. No hot work permit had been issued for the welding work at the Facility related to the two inch line.

18. Pursuant to Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), owners and operators of stationary sources producing, processing, handling, or storing substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance, have a general duty to (a) identify hazards which may result from accidental releases of such substances using appropriate hazard assessment techniques; (b) design and maintain a safe facility taking such steps as are necessary to prevent releases; and (c) minimize the consequences of accidental releases that do occur.

19. EPA finds that GeoSouthern Energy Corporation is subject to the requirements of Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1) and that Respondent violated those general duties on February 3, 2014 at the Facility.

IV. ORDER ON CONSENT

20. Accordingly, pursuant to Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), it is hereby ordered that Respondent GeoSouthern Energy Corporation which has consented to the terms of this Order, shall comply with the general duties to identify hazards, design and maintain a safe facility, and mitigate releases that do occur as follows:

- a. Identify and engage a third-party health and safety expert to perform a hazard analysis on Respondent's hot work activities generally. The expert shall be recognized as an expert on hot work safety and shall prepare a written report analyzing the hot work practices related to oil and gas production facilities currently in place at Respondent's facilities. The report shall also identify applicable standards associated with hot work and the manner in which other parties have implemented practices to satisfy those standards. The requirements of this paragraph shall be completed and the Report submitted to Respondent within 180 days of the effective date of this Administrative Order.

- b. The Respondent will provide a copy of the hot work expert's report and recommendations to EPA within 14 days after the Respondent receives the report.
- c. The Respondent will provide to EPA within 45 days after Respondent receives the hot work expert's report a plan (such as revisions to Standard Operating Procedures) that shows how practices recommended by the hot work expert will be implemented by the Respondent. If respondent chooses not to implement the recommendations of the expert then they must explain in writing why they have chosen to not implement the expert's recommendation.
- d. EPA acknowledges that GeoSouthern Energy Corporation may have already instituted some of these requirements.
- e. All work and certifications required under this Administrative Order must be completed within the durations specified in this Administrative Order on Consent.

21. Notifications:

- a. Submissions required by this Order shall be in writing and shall be mailed to the following addresses with a copy also sent by electronic mail:

U.S. Environmental Protection Agency
Region 6 (Mail Code: 6EN-AA)
1445 Ross Avenue
Dallas, Texas 75202-2733
Attention: Tony Robledo
robledo.tony@epa.gov

- b. EPA will send all written communications to the following representative(s) for Respondent:

Nancy Bryant
Regulatory Manager
5416 Highway 290 W
Brenham, Texas 77833

22. All documents submitted to EPA in the course of implementing this Order shall be available to the public unless identified as confidential by Respondent pursuant to 40 C.F.R. Part 2, Subpart B and determined by EPA to merit treatment as confidential business information ("CBI") in accordance with applicable law.

V. GENERAL PROVISIONS

23. The provisions of this Order shall apply to and be binding upon GeoSouthern Energy Corporation its officers, directors, agents, and employees.

24. The provisions of this Order shall be transferrable to any other party, upon sale or other disposition of the corporation. Upon such action, the provisions of this Order shall then apply to and be binding upon any new owner/operator, its officers, directors, agents, employees, and any successor(s) in interest.

25. Nothing in this Order shall be construed to affect EPA's authority under Section 114 of the Act, 42 U.S.C. § 7414.

26. Nothing contained in this Order shall affect the responsibility of GeoSouthern Energy Corporation to comply with all applicable Federal, State, or local laws or regulations, including Section 303 of the Act, 42 U.S.C. § 7603.

27. Any and all information required to be maintained or submitted pursuant to this Order is not subject to the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501 et seq., because it seeks to collect information from specific individuals or entities to assure compliance with this administrative action.

28. This Order is not intended to be nor shall it be construed to be a permit. Further, the parties acknowledge and agree that EPA's approval of this Order does not constitute a warranty or representation that requirements provided hereunder will meet the requirements of the General Duty Clause. Compliance by Respondent with the terms of this Order shall not relieve Respondent of their obligations to comply with the CAA or any other applicable local, State, or federal laws and regulations.

29. EPA reserves all of its statutory and regulatory powers, authorities, rights, and remedies, both legal and equitable, which may pertain to Respondent's failure to comply with any of the requirements of this Order. This Order shall not be construed as a covenant not to sue, release, waiver, or limitation of any rights, remedies, powers, and/or authorities, civil or criminal, which EPA has under any statutory, regulatory, or common law authority of the United States.

30. This Order does not resolve any civil or criminal claims of the United States for the violations alleged in this Order; nor does it limit the rights of the United States to obtain penalties or injunctive relief under the CAA or other applicable federal law or regulations.

31. Respondent does not admit any of the factual or legal determinations made by the EPA in this Order. Respondent waives its right to contest EPA's jurisdiction to issue or enforce this Order. Respondent waives its right to contest the terms of this Order. Respondent has entered into this Order in good faith without trial or adjudication of any issue of fact or law. Respondent consents to the terms of this Order.

32. Respondent waives any right to judicial review of this Administrative Order.

33. The parties shall bear their own costs and fees in this action, including attorney's fees.

VI. FAILURE TO COMPLY

34. Failure to comply with this Order may result in an enforcement action for appropriate injunctive relief and penalties pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b) or, in appropriate cases, criminal penalties.

VII. ENFORCEMENT

35. This Administrative Order does not in any way impair EPA's rights to enforce the Clean Air Act..

36. Be advised that issuance of this Order does not preclude EPA from electing to pursue any other remedies or sanctions authorized by law in this or any other matter.

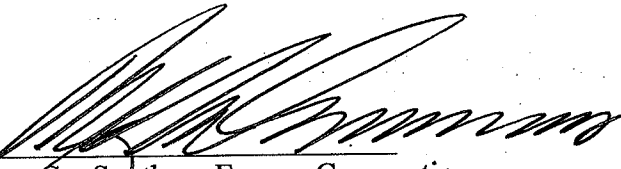
VIII. EFFECTIVE DATE

37. This Order shall become effective upon the date of signature by EPA.

Re: GeoSouthern Energy Corporation
CAA-06-2015-3303

IT IS SO AGREED:

DATE: 12/18/14

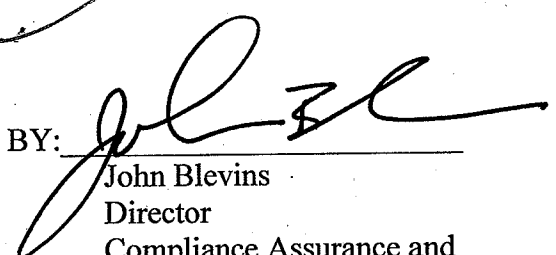
BY: 

GeoSouthern Energy Corporation

By: MARGARET WOODWARD MOLLESON
ITS: VICE PRESIDENT

IT IS SO ORDERED:

DATE: 1-6-14

BY: 

John Blevins

Director

Compliance Assurance and
Enforcement Division

Re: GeoSouthern Energy Corporation
CAA-06-2015-3303

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Administrative Order on Consent (AOC) was placed in the United States Mail, to the following by the method indicated:

Nancy Bryant
Regulatory Manager
5416 Highway 290 W
Brenham, Texas 77833

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: # 70140150000024533481

Date: 1-8-2015

Sandra Hardy
U.S. EPA, Region 6
Dallas, Texas