



**RANGE RESOURCES**

December 27, 2010

*Via Electronic Mail &  
Certified Mail, Return Receipt Requested*

Dr. Alfredo Armendariz  
Regional Administrator  
U.S. EPA, Region 6 (MC: 6EN)  
1445 Ross Ave., Suite 1200  
Dallas, Texas 75202-2733

Re: Docket No. SDWA-06-2011-1208  
Butler Unit, Lease No.: 253732, Well # 1-H  
Teal Unit, Lease No.: 253779, Well # 1-H

Dear Dr. Armendariz:

I am writing on behalf of Range Resources Corporation and its subsidiary Range Production Company (“Range”) regarding the meeting held on December 15<sup>th</sup> with a number of your staff regarding the above-referenced matter. Whether we’re discussing the issues of the EPA’s order of December 7th or not, Range knows that responsible natural gas is an exciting opportunity for our clean energy future and, simply put, too important for our country to not get it right. Range’s commitment to natural gas development includes being responsible, transparent and accountable in what we do.

We would like to thank you for making those staff and counsel responsible for this matter available to meet with us. It is unfortunate you were unable to join us as it would have allowed us to share directly with you the sincerity with which we are approaching this matter and our desire to demonstrate to you and the public that we are a responsible company committed to doing what is right. We were very pleased to learn that we agree on the two most critical points. One, both EPA and Range are concerned about the health and safety of the persons who live in the areas where we work. That is why we have taken the actions we have to date, which are outlined below. Second, it was very clear in our meeting that your data and analysis of the gas samples and ours demonstrates that the Range’s activities are not

the cause of the natural gas and hydrocarbons found in the water wells in question. More specifically, Range concurs with your technical staff's acknowledgement that hydraulic fracturing in the Barnett Shale cannot be the cause of natural gas occurring in the domestic water wells identified by the EPA. During the meeting we discussed with your staff that, in 2005, another domestic water well very near and drilled to approximately the same depth as the water wells in question produced significant volumes of natural gas that flared for days, which was four years before Range began its activity in the area. Since that time, as I am sure you are aware, other water well drilling companies have publicly stated that there have been similar cases of natural gas in the water aquifer over the course of the last several decades. It is therefore apparent that the EPA's sampling and analysis, upon which the order was based, does not and cannot support the conclusions in the order with regard to Range. Your staff seemed nearly as frustrated as we were by that fact and no one was able to articulate even a basic theory of how Range may be causing or contributing to the natural gas in the aquifer.

After our meeting with your staff we feel even stronger that we are not the cause of this problem. Despite not being the cause, we will continue, as we have been for several months, to assist the Texas Railroad Commission and the public in determining how this is happening and address this issue. As we've stated, public safety is a high priority for Range, which is why we've gone above and beyond the requests by the Railroad Commission much of which the EPA's December 7th order echoes. Some of these voluntary efforts include testing water wells for residents more than five miles from the location identified by the EPA, providing water for nearby residents who believe their water has or is impacted while a cause is determined, providing natural gas monitors for in-home usage, and other communication steps to make sure interested residents have access to the facts. By continuing to focus on Range without any factual support, you are foregoing the opportunity to join us in determining the cause of this matter.

Given the apparent mutual understanding and the fact that our respective data clearly show that we are not the cause of the natural gas in the identified water wells, we were very surprised when we received word the next day that the EPA did not withdraw its Order and pursue the source of the gas in these wells whether it proves to be naturally occurring or man-made. It's not our intent to place blame, but rather determine the cause of this issue that clearly existed years before Range's or any Barnett Shale related activities.

Public concern, like public safety is important to Range. People not only deserve affordable and clean energy, but have a right to clean water, air and a safe environment. Moreover, people should be able to go to bed at night knowing that companies like Range are doing the right thing and addressing concerns. It is our hope that we can work together to better address the concerns of the public with objective facts and appropriate actions.

Among other matters of interest to the public is whether Range will comply with the EPA's December 7th order. As indicated above and during our December 15th meeting with your staff, we have taken actions beyond what the EPA and the Railroad Commission has asked. Nonetheless we believe that acknowledging the validity of the EPA order is factually impossible for Range, since we know that we are not the source of the gas in the water wells and we have significant concerns about the way the order was issued without any prior notice or opportunity for Range to present important objective facts. However, we want to confirm to you that Range will continue to be accessible, transparent and accountable.

We would welcome the opportunity to meet in person with you and your staff to discuss these matters prior to the Texas Railroad Commission's January 10th meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Whitley". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mark D. Whitley,  
Senior Vice President  
Range Resources Corporation