

Texas New York Washington, DC Connecticut Seattle Dubai London John A. Riley Partner

512.542.2108 Office 800.404.3970 Fax

John.Riley@bgllp.com

Bracewell & Giuliani LLP 111 Congress Avenue Suite 2300 Austin, Texas 78701-4061

March 30, 2012

Via electronic and United States mail

Mr. Steven E. Chester
Deputy Assistant Administrator
Office of Enforcement & Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Room 3213 ARS/MC 2201 ARS
Washington, D.C. 20460

Re: Withdrawal of the December 7, 2010 order issued to Range Production Company and Range Resources Corporation pursuant to Section 1431 of the Safe Drinking Water Act, 42 U.S.C. § 300i.

Dear Mr. Chester:

Range Production Company and Range Resources Corporation (although separate legal entities for convenience are collectively referred to as, "Range"), in connection with United States Environmental Protection Agency's ("EPA") withdrawal of its December 7, 2010 Imminent and Substantial Endangerment Administrative Order ("Administrative Order") issued to Range pursuant to Section 1431 of the federal Safe Drinking Water Act, 42 U.S.C. § 300i and the related joint stipulation to dismiss EPA's enforcement action against Range filed in the United States District Court for the Northern District of Texas, Docket Number: 3:11-cv-00116-F, commit to sample twenty private water wells which are located in southern Parker County, Texas on a quarterly basis for one year. The specific wells are listed in Attachment A to this letter and their location is shown in Attachment B, a diagram that has been previously provided to EPA.

More specifically, Range will conduct four sampling events, approximately every three months, over the next year at each of these identified private water wells, subject to Range's good faith efforts to secure (Range will not pay for access to these water wells) and securing the well owners' consent, and will analyze the samples for dissolved gases: carbon dioxide, hydrogen, nitrogen, and methane; and organics: benzene, toluene, ethyl benzene, and xylene, in accordance with EPA sanctioned test methods. Also, at a minimum, the carbon and hydrogen isotopic compositions of any methane, ethane, and propane gas constituents found in the samples will be analyzed in accordance with an independently certified methodology. As it deems appropriate, Range may also conduct additional concentration, compositional, or isotopic analyses on these samples. For example, Range may elect to perform isotopic or compositional



Mr. Steven E. Chester March 30, 2012 Page 2

analyses of carbon dioxide or nitrogen to properly determine the origin of any methane gas found in the samples. In any event, all sampling and analyses will be conducted in accordance with EPA protocols by certified laboratories and all analyses, including the direct laboratory data, will be provided to EPA upon receipt of the data or analyses by Range.

Also, Range will review its prior submittals to EPA Region 6 and, to the extent that laboratory data in Range's possession from the Railroad Commission of Texas January 2011 proceeding was not previously provided, Range will have that additional data delivered to EPA Region 6.

Range anticipates starting the sampling program described above within 30 days of the date that the Administrative Order is formally withdrawn by EPA and the enforcement action is dismissed. As noted above, the four quarterly sampling events proposed for each of the 20 wells will be scheduled approximately three months apart subject to landowner approval.

Please do not hesitate to contact me if you have any questions or require further information regarding this matter.

Sincerely.

John A. Riley

cc:

Mr. David P. Poole General Counsel Range Production Company