

RRC Docket No. 7B-0268629
January 19, 2011

Witnesses to be Presented by Range

Mike Middlebrook is a petroleum engineer and Range's Vice President of Operations who will testify about Range's operations in the Barnett Shale, its drilling of the Teal and Butler wells, and Range's response to the Railroad Commission investigation of the Lipsky complaint.

Norm Warpinski, Ph.D. is an expert on microseismic and hydraulic fracturing. He will testify about the hydraulic fracturing of wells in the Barnett Shale generally and those in Parker County specifically, and he will demonstrate that hydraulic fracturing can not be a contributing cause to the presence of natural gas in the Lipsky water well.

Mark McCaffrey, Ph.D. is an expert on geochemical gas fingerprinting and has been engaged in that discipline for more than 20 years. Dr. McCaffrey will testify that the EPA's attempt to perform geochemical gas fingerprinting is fundamentally flawed and cannot be used to match gas from the Lipsky water well to either the Barnett Shale reservoir or to Range's wells or accurately identify the source of the gas. Using the correct scientific methodology for geochemical gas fingerprinting, Dr. McCaffrey will testify that the source of the gas in the Lipsky water well is the shallow Strawn formation immediately below the aquifer and not the Barnett Shale.

John C. McBeath, P.E. is an expert petroleum engineer who will testify about the history of gas in water wells in this area of the State, and that those occurrences are unrelated to oil and gas development or Range's wells. Mr. McBeath will also testify as to the mechanical integrity of Range's wells and that pressure tests and cement bond logs confirm that Range's wells can be ruled out as a possible source for the gas in the Lipsky well.

Charles W. Kreidler, Ph.D. is an expert hydrogeologist who will testify that the gas found in the Lipsky well occurs as a result of a widespread naturally occurring geologic contact between the shallow Strawn gas-bearing formation and the shallow Cretaceous fresh water-bearing formation which lies on top of the Strawn.

Keith Wheeler, P.G., C.P.G. is geologist and an expert on hydrology who oversaw the comprehensive water well and gas sampling project undertaken by Range in response to the Railroad Commission's investigation of the Lipsky complaint. Mr. Wheeler will testify that extensive sampling of water wells in the area of the Lipsky well indicates that there is absolutely no public health or safety issue related to any of the water wells, including the Lipsky well.