

THE STATE OF TEXAS
SUBPOENA AND SUBPOENA DUCES TECUM

CAUSE NO. CV11-0798

STEVEN and SHYLA LIPSKY § IN THE DISTRICT COURT
 §
 §
v. §
 §
DURANT, CARTER, COLEMAN §
LLC, SILVERADO ON THE BRAZOS §
DEVELOPMENT COMPANY #1 §
LTD, JERRY V. DURANT, Individually §
JAMES T. COLEMAN, Individually, § PARKER COUNTY, TEXAS
ESTATE OF PRESTON CARTER, §
RANGE PRODUCTION COMPANY, §
And RANGE RESOURCES §
CORPORATION §
 §
v. §
ALISA RICH § 43RD JUDICIAL DISTRICT

TO: Sharon L. Wilson
1121 Belvedere Drive
Allen, TX 75013

YOU ARE HEREBY COMMANDED to appear at the instance of DEFENDANT RANGE PRODUCTION COMPANY at the place, date, and time specified below to testify in the above case at an oral deposition, and remain from day to day until the deposition is completed. The deposition will be taken orally, and will be videotaped.

DATE: March 14, 2012 or such other date as may be mutually convenient
TIME: 9:00 a.m.
PLACE: Law offices of Harris, Finley & Bogle, P.C.
777 Main Street, Suite 3600,
Fort Worth, Texas 76102
or such other location as may be mutually convenient

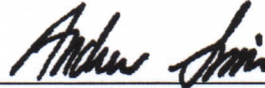
YOU ARE FURTHER COMMANDED to produce at the oral deposition the documents, tangible things, and electronic data requested in the Notice attached hereto as Exhibit A.

Further, data and information responsive to this Subpoena Duces Tecum that exists in electronic or magnetic form should also be produced in paper form in accordance with this Subpoena Duces Tecum and Rule 196.4 of the Texas Rules of Civil Procedure.

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON MAY BE DEEMED IN CONTEMPT OF THE COURT FROM WHICH THE SUBPOENA IS ISSUED OR A DISTRICT COURT IN THE COUNTY IN WHICH THE SUBPOENA IS SERVED, AND MAY BE PUNISHED BY FINE OR CONFINEMENT, OR BOTH.

This Subpoena Duces Tecum is issued at the instance Andrew D. Sims, Harris, Finley & Bogle, P.C., attorneys for Range Production Company, on February 22, 2012.

Respectfully submitted,



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And

David Poole
State Bar No. 16123750
RANGE RESOURCES CORPORATION
100 Throckmorton, Suite 1200
Fort Worth, TX 76102

**ATTORNEYS FOR DEFENDANT RANGE
PRODUCTION COMPANY**

WITNESS ACCEPTANCE

I acknowledge receipt of a copy of the foregoing subpoena duces tecum, together with the \$11 tendered therewith.

Date: _____

OFFICER'S RETURN

Came to hand this ____ day of _____, 2012, and executed this ____ day of _____, 2012, at _____ o'clock __.m. in the following manner:
by delivering to _____ a true copy hereof,
and tendering \$11.00, which _____ accepted.

Returned this ____ day of _____, 2012.

Authorized Person/Constable/Sheriff: _____

County of _____, State of Texas

By: _____

Fees: \$ _____
(Must be verified if served outside the State of Texas)

State of _____, County of _____
Signed and sworn to before me by the said _____ before me this ____ day of _____, 2012, to certify which witness my hand and seal of office.

[Seal]

County of _____, State of _____

Exhibit A

Instructions

- 1) The singular form of a word includes the plural form of that word and vice versa.
- 2) The conjunctions "and" and "or" shall each be individually interpreted in every instance as meaning "and/or" and shall not be interpreted disjunctively to exclude any information otherwise within the scope of any specification.
- 3) Pursuant to Rule 196.4, the requests herein specifically include any documents, data, or information which may exist in electronic or magnetic form. Such documents, data, or information is requested in the form in which it is maintained by you in the ordinary course of your business or affairs.
- 4) Whenever documents exist in the form of computer tape, magnetic disks, or other electronic form, whether as separate files or a part of larger documents, the documents are to be produced in accurate and error-free computer-readable format with sufficient data file or data layout information to allow the documents to be read.
- 5) The request for production of documents includes the file or files in which the documents are contained or compiled. The request further includes all copies of any particular document that varies in any material way from the original, e.g., all documents with written notations, highlighting or marking thereon, or attached thereto, including the color of any such notations, markings or highlightings. Requests include all document drafts.
- 6) If any document requested was in your possession or control, but no longer is in your possession or subject to your control, state what disposition was made of it, the reason and date of such disposition.

Definitions

1) "All documents" refers to every "document" (as that term is defined herein), whether an original or copy, known to any individual or business organization to which this request is addressed, or to any officer, director, managing agent, file supervisor, or record keeper for such individual or organization, and every document which can be located or discovered by such persons through reasonably diligent efforts. The term "all documents" does not include multiple, identical copies.

2) "Person" includes and means any individual or entity, including, but not limited to, all natural persons, sole proprietorships, organizations, associations, companies, partnerships, joint ventures, corporations, trusts and estates, or any other form of business entity as the case may be.

3) "Document" and "documents" mean: (i) any and all written, typed, printed, reproduced, filmed, electronic, or recorded material, or (ii) any and all photographs, movies, videotapes, pictures, plans, drawings, or other representations of any kind, which pertain, describe, refer, or relate to the subject matter of a particular request, including, without limitation, the following:

(a) abstracts, advertisements, agreements, articles, audio tapes, binders, books, blueprints, cables, calendars, charts, checks, contracts, correspondence, data, databases, desk calendars, diagrams, diaries, dictation, drafts, drawings, e-mail, estimates, facsimile transmissions, file folders (electronic), files (electronic or paper), films, graphic representations, graphs, hand held computers (Blackberry, iPhone, iPad, Palm Pilots, etc.), illustrations, information, instructions, invoices, journals, learned treatises, ledgers, letters, letters of intent, lists, logs, manuals, memoranda, messages, minutes, money orders, notes, note pads, orders, organizers, papers, PDAs (personal desk assistants / personal digital assistants), photographs, pictures, PIMs (personal information managers) plans, publications (scientific and medical), pamphlets, quotes, receipts, recordings, releases, reports, resumes, settlement agreements, sketches, specifications, statements, summaries, telegrams, telexes, transcription of notes, transcriptions of tapes or recordings, work papers, worksheets, visual tapes, and any other writings, or tangible things in which any writing, typing, printing, photostatic, or other forms of communications are recorded or reproduced, as well as all notations on the foregoing;

(b) any electronic compilation of words, including, but not limited to, data, files, or information, including e-mail, *.jpg, *.txt, *.tif, *.mpeg, *.wav, *.wpd, *.doc, *.xls files, which have been saved to a computer network, computer hard drive, or other medium regularly used to store such words, data, or electronic or digital information, and without regard to whether or not a copy exists in paper form;

(c) any electronically stored data on magnetic or optical storage media as an "active" file or files (readily readable by one or more computer applications or forensics software); any "deleted" but recoverable electronic files on said media; any electronic file

fragments (files that have been deleted and partially overwritten with new data); and slack (data fragments stored randomly from random access memory on a hard drive during the normal operation of a computer [RAM slack] or residual data left on the hard drive after new data has overwritten some but not all of previously stored data);

(d) originals and all other copies not absolutely identical to originals;

(e) all drafts and notes (whether typed, handwritten, or otherwise) made or prepared in connection with the document, whether used or not; and

(f) all file folders and envelopes containing documents.

4) "Communications" includes all emails, telephone logs, memoranda, letters, notes, correspondence, audio recordings, video recordings, and any other document evidencing or relating to the subject matter identified in the specific Request.

5) "Relating to," "regarding," or "referring to" mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon a stated subject matter.

6) "You" and "your," means Sharon Wilson, and any and all persons acting on your behalf.

7) "Residence" or "Property" means the approximate 13.7 acres of real property and improvements located at 127 River Oak Court, Weatherford, Texas, 76087, and made the subject of the above-numbered and styled cause.

8) "Water well" means the water well drilled on the Property located at 127 River Oak Court, Weatherford, Texas, 76087 that is the subject of the Lawsuit.

9) "Range" means Range Resources Corporation and Range Production Company, or either one of them, as well as any and all persons acting on their behalf.

10) "Lipsky" means Mr. or Mrs. Steven Lipsky, or both, and any persons acting on one or both of their behalves.

11) "Haley" means Mr. or Mrs. Rick Haley, or both, and any persons acting on one or both of their behalves.

12) "Wolf Eagle" means Wolf Eagle Environmental Engineers and Consultants or Wolf Eagle Environmental, LLC, and any other business name used by Alisa Rich for the environmental consulting company owned in whole or in part by Alisa Rich. The term "Wolf Eagle" also includes Alisa Rich individually.

13) The "EPA" means the United States Environmental Protection Agency, and includes all individuals acting on the EPA's behalf, including, but not limited to, Al Armendariz, John Blevins, Jerry Saunders, Chris Lister, Ron Van Wyk, Willie Lane, Jerry D. King, Carl E. Willis, Jeremy Seiger, Tucker Henson, Suzanne Murray, Ben Harrison, Cheryl Seager, James Allmand, James Jonas, Stephen Gilrein, David Garcia, Debra Griffin, Diana Taheri, Carol Peters, Esteban Hunter, Doug Beak, Michael Overbay, Cynthia Giles, Adam Kushner, Bernadette Rappold, Matt Bogoshian, Linda Huffman, Larry Starfield, Katherine McCabe, Mark Pollins, Chris Wills, Scott McDonald, and any experts utilized by the EPA.

14) "Peck Water Well Service" means Peck Water Well Service, Inc., and any other business name used by Larry Peck for water well drilling owned in whole or in part by Larry Peck, and any employees or representative acting on its behalf, or on behalf of Larry Peck.

15) "Silverado on the Brazos Homeowner's Association" means the any and all homeowners' associations to which property owners in the Silverado on the Brazos development may or must belong, as well as any employees or representative acting on its behalf.

16) "Butler Well" means the Butler Unit Well 1H (permitted at Atwood, JB Survey, Abstract #802, Hood County, 660 feet from then line and 986 from the SE line).

17) "Teal Well" means the Teal Unit Well 1H (permitted at Atwood, JB Survey, Abstract #802, Hood County, 703 feet from then line and 948 from the SE line).

18) "Gas Wells" mean the Butler Well and the Teal Well.

19) "Railroad Commission" means the Railroad Commission of Texas.

20) "TCEQ" means that Texas Commission on Environmental Quality.

21) "DOJ" means the United States Department of Justice and includes all individuals acting on the EPA's behalf.

22) "Members of media" means newspaper reporters, television reporters, online reporters, radio reporters, bloggers, or other similar reporters, and includes, but is not limited to, Chris Hawes of WFAA Channel 8.

23) "Plaintiff's Original Petition" or "Original Petition" means the original petition filed in the above-numbered and styled cause by Plaintiffs Steven and Shyla Lipsky.

24) The "Lawsuit" means Cause No. CV11-0798 styled Steven and Shyla Lipsky v. Range Production Company and Range Resources Corporation, et al. v. Alisa Rich pending in the 43rd Judicial District, Parker County, Texas.

REQUESTS FOR PRODUCTION

Please produce the following items and tangible things, including all documents relating thereto:

1. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing air quality and and/or water quality at or near the Property and/or natural gas drilling at or near the Property.
2. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing the claims made by the Lipskys in the Lawsuit.
3. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing the Water Well.
4. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing Wolf Eagle.
5. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing Alisa Rich.
6. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing the EPA.
7. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing Range.
8. All communications between you and Steven and Shyla Lipsky, or either of them, from 2009 until the present, regarding, relating to, or referencing the Railroad Commission.
9. All communications between you and Steven and Shyla Lipsky, or either of them, from 2005 through the present, regarding, relating to, or referencing the Property.
10. All pictures or videos sent to you by Steven and Shyla Lipsky, or either of them, from 2005 through the present, depicting the Property, or the Water Well, or purporting to show gas in the water well.
11. All communications between you and Wolf Eagle, Alisa Rich, or both, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.

12. All communications between you and the EPA, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
13. All communications between you and the DOJ, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
14. All communications between you and the U.S. Government Accountability Office, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
15. All communications between you and the TCEQ, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
16. All communications between you and the Texas Railroad Commission, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
17. All communications between you and Hayley, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
18. All communications between you and filmmaker Josh Fox, from 2009 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
19. All communications between you and Wilma Subra, the Subra Company, or both, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
20. All communications between you and Ramon Alvarez, the Environmental Defense Fund, or both, from 2009 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
21. All communications between you and Jeremy Nichols, Wild Earth Guardians, or both, from 2009 until the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
22. All communications between you and Tom "Smitty" Smith, Public Citizen, or both, from 2009 until the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.

23. All communications between you and Jim Schermbeck, Downwinders at Risk, or both, from 2009 until the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
24. All communications between you and Kelly Haragan, The Environmental Clinic of the University of Texas, or both, from 2009 until the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
25. All communications between you and Cirrus Associates, LLC, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
26. All communications between you and members of the media, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
27. All communications between you and the DOJ, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
28. All communications between you and Allen Stewart, David Ritter, Stephanie Brooks, James Claunch, or Kirk Claunch, from 2005 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
29. All communications between you and any other person, from 2009 through the present, regarding, relating to, or referencing the Property, the Water Well, Range, or the claims made in the Lawsuit.
30. All communications between you and any person, from 2005 through the present, regarding, relating to, or referencing testing of the Lipskys' water well.
31. All test results, laboratory results, analysis and reports, whether drafts or final, regarding the air quality, ambient air fugitive emissions, or alleged natural gas emissions, inside the residence at the Property or outside at the Property, or both.
32. All test results, laboratory results, analyses and reports, whether drafts or final, regarding the water well, or the quality of the water from the water well.
33. All reports, notes, memoranda, correspondence, maps, charts, diagrams, photographs, videotapes, exhibits, slides, models, compilations of data, and any other documents, materials or tangible things created or prepared by you, or otherwise in your possession, relating to the Property.

34. All reports, notes, memoranda, correspondence, maps, charts, diagrams, photographs, videotapes, exhibits, slides, models, compilations of data, and any other documents, materials or tangible things created or prepared by you, or otherwise in your possession, regarding, relating to, or referencing the water well.
35. All photographs and videotapes of the water well at the Property.
36. All documents regarding, relating to, or referencing posts or articles published on websites operated by you, in whole or in part, including but not limited www.texassharon.com, since 2005 relating to or mentioning Range.
36. All documents regarding, relating to, or referencing posts or articles published on websites operated by you, in whole or in part, including but not limited www.texassharon.com, since 2005 relating to or mentioning the Lawsuit or the claims made by the Lipskys in the Lawsuit.

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