UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JAN 06 2012

**VIA OVERNIGHT DELIVERY**
**AND ELECTRONIC MAIL**

Mr. G. Kevin Cunningham
Vice President and General Counsel
Cabot Oil & Gas Corporation
Three Memorial City Plaza
840 Gessner Road, Suite 1400
Houston, TX 77024

**Re: Required Submission Of Information**
**Dimock Township Drinking Water Contamination**

Dear Mr. Cunningham:

The United States Environmental Protection Agency ("EPA") is investigating the source, extent and nature of a release, or threatened release, of hazardous substances or pollutants or contaminants into the environment in the vicinity of Dimock Township, Pennsylvania, more particularly described as an approximately 9.2 square mile area, bounded by geographic coordinates of South of 41 degrees 45 minutes 6 seconds latitude, East of -75 degrees 54 minutes 11 seconds longitude, North of 41 degrees 42 minutes 7 seconds latitude, and West of -75 degrees 50 minutes 48 seconds longitude, in Dimock and Springville Townships, Susquehanna County, Pennsylvania (the "Area of Concern" or "Facility"), and depicted on the enclosed Map (Enclosure 6). EPA's investigation requires inquiry into the identification, nature and quantity of materials that have been or are generated, treated, stored or disposed of at, or transported to the Area of Concern, and the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from the Area of Concern. As you may recall, EPA attorney Humane Zia discussed this matter with you on December 28, 2011.

Pursuant to the authority of Section 104(e)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e)(2), EPA hereby requires that Cabot Oil & Gas Corporation (hereinafter "Cabot," or "you," or "your")[1] furnish all information and documents in your possession, custody or control,

[1] As used in this required submission of information and defined in Enclosure 2 to this letter, "Cabot" or "you" or "your" means Cabot Oil & Gas Corporation, its agents and representatives, including, but not limited to, persons directly authorized to transact business on its behalf such as officers, directors, or partners with which it is affiliated, employees, accountants, engineers, contractors, or other persons who conduct business on its behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.



 DIM0190174

that are responsive to the "Information Required," attached as Enclosure 3 to this letter.

Compliance with this required submission of information is mandatory. Under Section 104 of CERCLA, EPA may pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information are provided in Enclosure 1 to this letter. All terms used in this letter shall have the meaning as defined in CERCLA. In addition, specific definitions, provided in Enclosure 2 to this letter, shall apply to those specific words as they appear in this letter.

You must respond in writing to this required submission of information within **seven (7) calendar days** of your receipt of this letter. All submissions provided pursuant to this letter shall be signed and dated by a responsible Cabot official and must include the following certification:

> ***"I certify under penalty of law that I have personally examined and am familiar with the information submitted in response to EPA's Required Submission of Information concerning the Dimock Township Drinking Water Contamination Area, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.***
>
> _____
> ***Name and official title***
>
> _____ _____
> ***Signature*** ***Date signed"***

If, for any reason, you do not provide all information responsive to this letter, then in your answer to EPA you must: (1) describe specifically what you did not provide, and (2) provide an appropriate reason why you did not provide the information.

All documents and information should be sent to:

Richard M. Fetzer
USEPA On-Scene Coordinator
100 Gypsum Road
Stroudsburg, PA 18360
Email: fetzer.richard@epa.gov

This required submission of information is not subject to the approval requirements of the

Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3521, because it does not meet the definition of a collection of information as defined in 5 C.F.R. §1320.3(c).

If you have any questions concerning this matter, please contact Ms. Humane Zia, Senior Assistant Regional Counsel, at (215) 814-3454.

Sincerely,

Ronald J. Borsellino, Director
Hazardous Site Cleanup Division

Enclosures:

1: Instructions
2: Definitions
3: Information Required
4: Business Confidentiality Claims/Disclosure Of Your Response to EPA Contractors and Grantees
5: List of Contractors That May Review Your Response
6: Map of Area of Concern

cc: Kenneth S. Komoroski, Esquire – Fulbright & Jaworski LLP
Carlyn Winter Prisk (3HS62)
Humane Zia (3HS41)
Richard Fetzer (3HS32)
PADEP

## Enclosure 1

## Instructions

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure 4, *Business Confidentiality Claims/Disclosure To EPA Contractors & Grantees Of Your Response*. You must clearly mark such information by either stamping or using any other form of notice that such information is trade secret, proprietary, or company confidential. To ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information. Please be aware that certain information with respect to hazardous substances is ***not*** entitled to protection as confidential information under CERCLA. In particular, information that is not entitled to confidential treatment includes: (i) the identity (trade name, common name or generic class) of any hazardous substance; (ii) the physical properties of such substance; (iii) the hazards to health or the environment posed by such substance; (iv) the potential routes of human exposure to such substance; (v) the location of disposal of any waste stream; (vi) any monitoring data or analysis pertaining to disposal activities; (vii) any hydrogeologic or geologic data; and (viii) any ground water monitoring data. See CERCLA Section 104(e)(7)(F), 42 U.S.C. § 9604(e)(7)(F).

2. Please provide a separate, detailed narrative response to each question and each subpart of a question set forth in this required submission of information. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this required submission of information, which may subject you to penalties.

3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this required submission of information, indicate by the number of the specific question(s) or subpart of the question to which it responds.

4. If information or documents not known or not available to you as of the date of submission of a response to this required submission of information should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.

5. Electronic Submittal. Except for maps and diagrams, EPA requests that you submit your responses as one or more electronic files in native format on a CD or similar media storage device, provided your electronic files are accompanied by a letter that identifies the file software and version, file name(s), size(s), date(s), and time(s) of creation. For laboratory data, please submit electronic data deliverables (EDD). The files on a CD or similar media storage device should be in a form that allows EPA to readily retrieve and utilize the information using commercially available software. If any information is contained in proprietary software, or any other format that is not easily understood, you must provide an easily understood format and include appropriate explanatory information to allow interpretation of the information.

## Enclosure 2

## Definitions

All terms used in this required submission of information shall have the meanings as defined in CERCLA. In addition, the following specific definitions shall apply to the following words as they appear in this letter.

1. "Area of Concern" means the approximately 9.2 square mile area, bounded by geographic coordinates of South of 41 degrees 45 minutes 6 seconds latitude, East of -75 degrees 54 minutes 11 seconds longitude, North of 41 degrees 42 minutes 7 seconds latitude, and West of -75 degrees 50 minutes 48 seconds longitude, in Dimock and Springville Townships, Susquehanna County, Pennsylvania.

2. "Cabot" or "you" or "your" means Cabot Oil & Gas Corporation, and its agents and representatives, including, but not limited to, persons directly authorized to transact business on its behalf such as officers, directors, or partners with which it is affiliated, employees, accountants, engineers, contractors, or other persons who conduct business on its behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

3. The terms "document" and "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, inter-office and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.

4. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 of the U.S. Code, (b) any element, compound, mixture, solution, or substance designated pursuant to Section 9602 of CERCLA, (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of the Solid Waste Disposal Act (42 U.S.C. § 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act, 42 U.S.C. § 6901 et seq., has

been suspended by Act of Congress), (d) any toxic pollutant listed under Section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act, 42 U.S.C. § 7412, and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to Section 2606 of Title 15 of the U.S. Code. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

5. The term "identify" with respect to a natural person means to provide that person's name, address, telephone number, title, and relationship to Cabot. The term "identify" with respect to a business entity means to provide that entity's name, address, and relationship to Cabot, and to provide the name, address, telephone number, and title of an individual who can provide information related to, and on behalf of, the entity.

6. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas)

8. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, 42 U.S.C. § 2011 et seq., if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Section 170 of such Act, 42 U.S.C. § 2210, or, for the purposes of Section 9604 of CERCLA or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under 42 U.S.C. §§ 7912(a)(1) and 7942(a) and (d) the normal application of fertilizer.

9. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.

## Enclosure 3

## Information Required

1. Identify all ground water and surface water sampling (including sampling of potable or potentially potable water supplies) performed by Cabot[2] at the Area of Concern, including all pre-drilling sampling and surveys, and provide the following:

    a. The physical location of all sampling performed, including the latitude and longitudinal coordinates for each sample taken;

    b. Sampling field logs, chain of custody documents, and analytical results;

    c. All laboratory analytical data and electronic data deliverables related to each sample analyzed, including QA/QC laboratory data;

    d. Any and all documents, communications, compilations, reports and/or analysis identifying, containing, describing, characterizing, or relying on any sampling or analytical data generated;

    e. For any sampling or analysis associated with residential or other potable water or potentially potable water supplies, identify the resident(s) or other end-user(s) or potential end-user(s) of the water supply and location by street address; and

    f. A compilation of information submitted in response to Question 1 that includes, at a minimum, the physical location from where the sample was obtained/collected, the unique sample identifier, the analytical result by constituent for each sample analyzed, and whether the analytical result exceeded any applicable federal or state requirement. Please provide this information in an electronic format (e.g., electronic spreadsheet).

2. Identify any and all ground water and surface water sampling analytical data (including any data of potable or potentially potable water supplies) in your possession regarding the Area of Concern, other than the data responsive to Question 1 above. If Cabot does not have any other data, please state so accordingly. Provide copies of all such sampling analytical results and related documents, including but not limited to the types of documents described in Question 1.a. through e., above.

3. Provide copies of any and all correspondence, agreements, and other documents related to Cabot's provision of drinking water to persons in the Area of Concern, within the last five years.

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[2] As used in this required submission of information and defined in Enclosure 2, "Cabot" means Cabot Oil & Gas Corporation, and its agents and representatives, including, but not limited to, persons directly authorized to transact business on its behalf such as officers, directors, or partners with which it is affiliated, employees, accountants, engineers, contractors, or other persons who conduct business on its behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

4. Identify each natural gas production well that was acquired by, drilled by or completed by Cabot or Cabot's agents or contractors acting on Cabot's behalf or under Cabot's control in the Area of Concern. For each such natural gas production well, provide:

   a. The American Petroleum Institute (API) number of the natural gas production well;

   b. The physical location of the well, including a physical address, county name, and longitude and latitude coordinates;

   c. The latitude and longitude coordinates for the location where the lateral portion of the well starts, and the latitude and longitude coordinates for the location where the lateral portion of the well ends;

   d. The spud-in date and completion date of the well; and

   e. The name, address, and telephone number of the company(ies) that drilled, fractured, stimulated or otherwise performed activities relating to natural gas extraction or production at the well.

5. Please identify all other persons who you believe have information responsive to the above questions.

## Enclosure 4

## Business Confidentiality Claims/Disclosure of Your Response To EPA Contractors and Grantees

### Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Part 2, Subpart B. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

### Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (See "Enclosure 5") to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this required submission of information, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreements(s) under the Senior Environmental Employee Program ("SEE Enrollees"). The SEE Program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE Enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure 5, you must notify EPA in writing at the time you submit such documents.

## Enclosure 5

## List of Contractors That May Review Your Response (rev 10/2011)

**Emergint Technologies, Inc.**
Contract # EP-W-11-025

**Booz-Allen & Hamilton**
Contract # GS-35F-0306J (GSA Schedule)

**CDM-Federal Programs Corporation**
Contract # EP-S3-07-06
Subcontractors: L. Robert Kimball & Associates Inc.
Page Technologies Inc.
Avatar Environmental LLC
Terradon Corporation

**Chenega Global Services, LLC**
Contract #EP-S3-09-02

**EA Engineering, Science and Technology, Inc.**
Contract #EP-S3-07-07
Subcontractor: URS

**Eisenstein Malanchuck, LLP**
Contract #EP-W-07-079
Subcontractors: R. M. Fields International, LLC
James C. Hermann & Associated
MacRae & Company, Inc.

**Guardian Environmental Services**
Contract # EP-S3-07-02
Subcontractor: Aerotech, Inc.
Guardian Equipment

**Hydrogeologic (HGL)**
Contract #EP-S3-07-05
Subcontractor: CH2MHill
Sullivan International

**Kemron**
Contract # EP-S3-07-03
Subcontractor: Clean Venture/Cycle Chem Inc.
CMC Inc.
Los Alamos Technical Assoc., Inc.
Carlucci Construction

**Weston Solutions**
Contract #EP-S3-1005

**Tech Law, Inc.**
Contract #EP-S3-1004

**Tetra Tech NUS, Inc.**
Contract #EP-S3-07-04

**WRS Infrastructure & Environment, Inc.**
Contracts # EP-S3-07-01 and #EP-S3-07-09
Subcontractors: AEG Environmental
Environmental Staffing
Veolia Environmental Services
Lewis Environmental Group

**Industrial Economics, Inc.**
Contract # EP-W-06-092

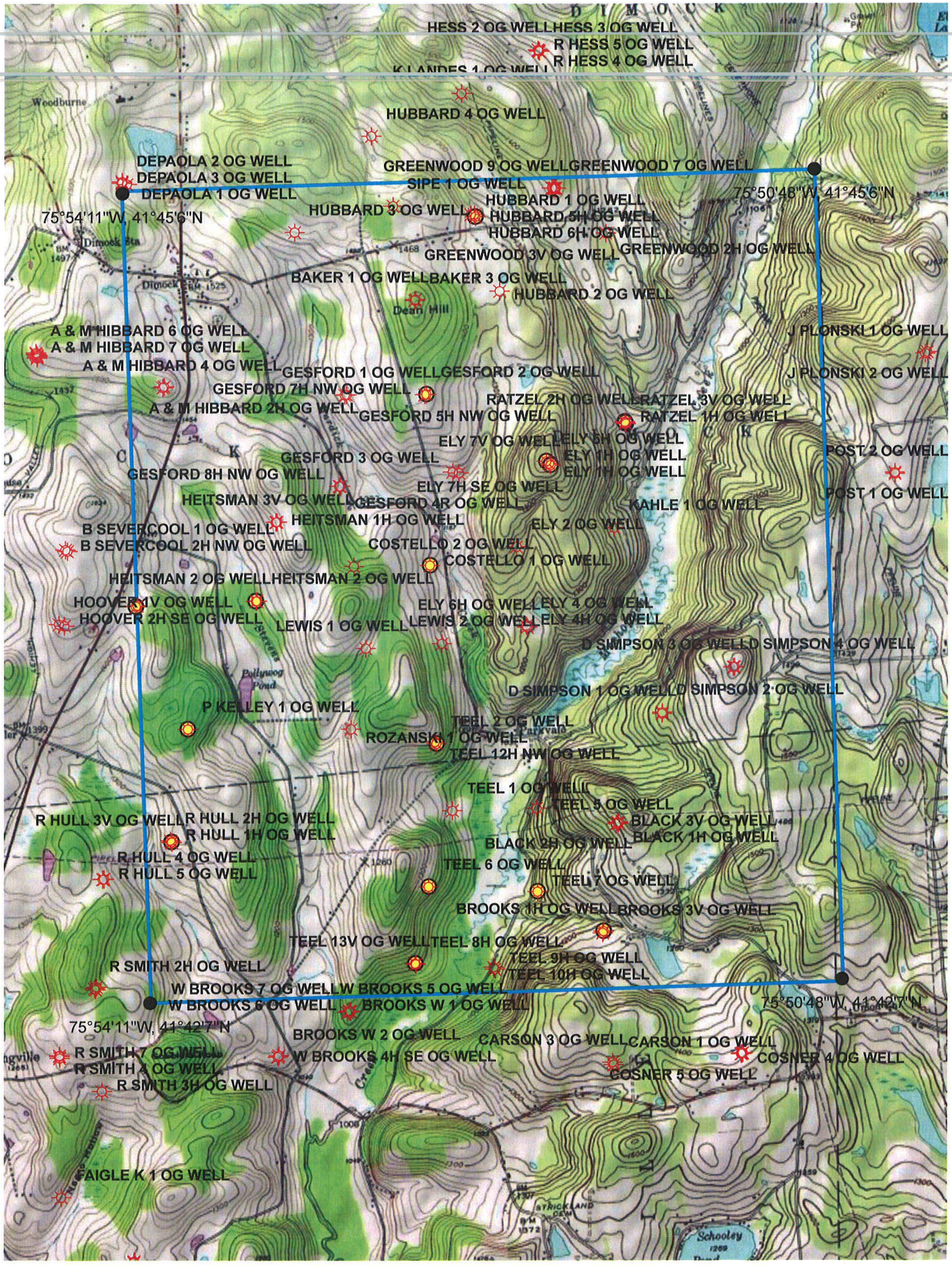
Cooperative Agreements

**National Association of Hispanic Elderly**
CA# Q83424401
CA # ARRA 2Q8343730-01

**National Older Workers Career Center**
CA# CQ-833987

**Enclosure 6**

**Map of Area of Concern**
(Attached)


HESS 2 OG WELL
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HUBBARD 4 OG WELL
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GREENWOOD 9 OG WELL
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SIPE 1 OG WELL
HUBBARD 1 OG WELL
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75°54'11"W, 41°45'6"N
75°50'48"W, 41°45'6"N
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GESFORD 1 OG WELL
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GESFORD 7H NW OG WELL
A & M HIBBARD 2H OG WELL
GESFORD 5H NW OG WELL
RATZEL 2H OG WELL
RATZEL 3V OG WELL
RATZEL 1H OG WELL
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ELY 7H SE OG WELL
HEITSMAN 3V OG WELL
GESFORD 4R OG WELL
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ELY 2 OG WELL
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COSTELLO 2 OG WELL
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HEITSMAN 2 OG WELL
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HOOVER 1V OG WELL
HOOVER 2H SE OG WELL
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P KELLEY 1 OG WELL
TEEL 2 OG WELL
ROZANSKI 1 OG WELL
TEEL 12H NW OG WELL
TEEL 1 OG WELL
TEEL 5 OG WELL
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R HULL 2H OG WELL
R HULL 1H OG WELL
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BROOKS 1H OG WELL
BROOKS 3V OG WELL
TEEL 13V OG WELL
TEEL 8H OG WELL
TEEL 9H OG WELL
TEEL 10H OG WELL
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BROOKS W 1 OG WELL
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75°54'11"W, 41°42'7"N
BROOKS W 2 OG WELL
CARSON 3 OG WELL
CARSON 1 OG WELL
R SMITH 7 OG WELL
W BROOKS 4H SE OG WELL
COSNER 4 OG WELL
R SMITH 4 OG WELL
COSNER 5 OG WELL
R SMITH 3H OG WELL
EAIGLE K 1 OG WELL
J PLONSKI 1 OG WELL
J PLONSKI 2 OG WELL
POST 2 OG WELL
POST 1 OG WELL
Woodburne
Dimock Sta
Dean Hill
Pollywog Pond
Schooley