

There is a Proposed Settlement in a class action brought against EQT Production Company on behalf of certain royalty owners who had voluntary leases.

You may be able to obtain benefits

A court authorized this notice. This is NOT a solicitation from a lawyer.

A Proposed Settlement has been reached in a lawsuit against EQT Production Company. The lawsuit is about the alleged underpayment of royalty payments made by EQT on the production of gas in Virginia. EQT denies the Plaintiff's allegations and intends to oppose such allegations in the absence of this settlement.

You are a member of the Settlement Class if you fall within the class definition described under Question 3, below.

A SUMMARY OF YOUR RIGHTS AND CHOICES	
REMAIN A SETTLEMENT CLASS MEMBER	To remain a member of the Settlement Class, you do not need to take any action. Class Members will be able to get money from the Proposed Settlement as outlined in Question 5. Due Date: <u>Automatic Distribution</u>
EXCLUDE YOURSELF FROM THE PROPOSED SETTLEMENT	You can exclude yourself from (opt out of) the Proposed Settlement and not be bound by the Court's rulings. You will also not share in the distribution of monetary relief. See Questions 7 and 8. Due Date: <u>Post-marked on or before June 24, 2019</u>
OBJECT OR COMMENT ON THE PROPOSED SETTLEMENT	If you are a Settlement Class Member, you can appear and object to or comment on the Proposed Settlement in the lawsuit on your own or through your own lawyer. See Question 13. Due Date: <u>Post-marked on or before June 24, 2019</u>

1. Why did I receive this notice?

The Court sent you this notice to inform you of a proposed settlement of certain claims in a class action lawsuit styled *Huffman v. EQT Production Company*, No. 1:10-cv-00041, United States District Court for the Western District of Virginia. This notice outlines the terms of the proposed Settlement, who is a Settlement Class Member, your right to remain a member of the Settlement Class, how Settlement funds will be paid, how to comment on or object to the Proposed Settlement, and how to exclude yourself from the Settlement Class.

Judge James P. Jones of the United States District Court for the Western District of Virginia is overseeing this class action.

The person who brought the Lawsuit is the "Plaintiff," and the party being sued is the "Defendant."

QUESTIONS? CALL 1-833-747-6672 OR VISIT WWW.VAGASCASES.COM

2. What is this lawsuit about?

The lawsuit claims that EQT did not properly calculate “royalties” (money owed for gas production). It claims that EQT did this by basing its royalty payments on prices that were lower than they should have been. Plaintiff asked EQT to pay monetary damages and prejudgment interest and for other relief. Claims related to deductions of post-production costs and expenses taken from royalty payments are not part of this settlement.

EQT contends that it did not underpay royalty payments. It denies Plaintiff’s claims but has agreed to settle the class action based on the time and expense of continuing the lawsuit.

A more complete description of the Lawsuit is available at www.VaGasCases.com, or in the file for the Lawsuit maintained by the United States District Court for the Western District of Virginia. See Question 17, below. Additionally, should you have questions regarding the Lawsuit, such questions can be submitted in writing to Class Counsel at the addresses provided under Question 13 of this Notice.

3. How do I know if I am part of the Settlement Class?

You are included in the Breach of Contract Class if you:

- Have or had a gas lease with EQT of a certain type;
- Have (or had) gas production under that lease from the Nora Field in Virginia and the lease does not contain language expressly authorizing the lessee to deduct or expressly precluding the lessee from deducting the cost of gathering, treating, compression, dehydration, processing, and/or transportation when calculating royalty payments and whose leases are identical to a certain types of lease categorized by Plaintiff’s expert, according to business records maintained by EQT; **and**
- Have received (or are due) royalty payments anytime since June 8, 2005, from EQT.

You are not included in either Class if you operate a gas well in Virginia, or if you hold a working interest ownership in a well operated by EQT in Virginia.

The full class definition is included in the Settlement Agreement available at www.VAGasCases.com.

Some corporations, partnerships, or other entities included in the Class definition may now be dissolved. If you have succeeded to the interest of such a dissolved corporation, partnership, or other entity, you should immediately contact the Settlement Administrator at 1-833-747-6672 or the following address:

Virginia Gas Cases – Huffman Class
c/o JND Legal Administration
P.O. Box 91345
Seattle, WA 98111
Toll-Free: (833) 747-6672

If you are a Settlement Class Member and the Judge approves the Proposed Settlement, you will be bound by all orders and judgments of the Court and by the Court’s final resolution of the Settlement Class claims in the Lawsuit. See Question 13 for your right to comment on or object to the Proposed Settlement.

4. How do I know if my well or lease is included in the Proposed Settlement?

You are included in the proposed Settlement if you fall within the Settlement Class definition described under Question 3, above, and you are not excluded from the Settlement Class for any of the reasons described under Question 3, above.

If you have any questions about whether you are part of the Settlement Class, please visit www.VaGasCases.com, or call (toll-free) 1-833-747-6672. You may also contact Class Counsel.

Please do not contact the Court.

5. What does the Proposed Settlement provide?

The proposed Settlement provides monetary relief for Settlement Class Members relating to the prices on which gas royalty payments made during the Class Period by EQT were based.

Under the Settlement, EQT will make a payment to the Settlement Class of \$152,500. The payment will be distributed among the Class Members on a pro-rata basis, net of Court-awarded attorneys' expenses and administrative costs, and in accordance with the Settlement Agreement's Plan of Distribution.

In exchange for the benefits received by the Class, EQT will be released from claims the Settlement Class Members may have against EQT based on the prices on which EQT based royalty payments, in accordance with the Settlement Agreement. The settlement does not include claims relating to deductions for expenses that EQT may have taken from royalty payments. The release would extend to EQT and those having a working interest in its wells (including Range Resources-Pine Mountain, Inc.) and their parents, present and former subsidiaries and affiliated entities, and their predecessors, successors and assigns, and each of their present, former, and future officers, directors, employees, agents, successors, assigns, attorneys, and legal representatives.

The Settlement affects only EQT-related entities and does not affect how any other non-EQT-related entity calculates and/or pays royalties. The Settlement does not affect any other case pending in the Western District of Virginia concerning the payment of gas royalties.

6. What do I need to do to remain a Settlement Class Member?

If you want to remain a Settlement Class Member, **you do not need to take any action whatsoever.** Class Counsel will represent your interests as a member of the Settlement Class.

7. Can I get out of the Settlement Class?

If you don't want to be in the Settlement Class and you want to keep the right to sue EQT about the same claims on your own, you must take steps to get out of the Settlement Class. This is called excluding yourself from or "opting out of" the Settlement Class. By excluding yourself, you keep the right to file your own lawsuit. If you exclude yourself from the Settlement Class, you will not receive any benefits from the Proposed Settlement.

8. How do I get out of the Proposed Settlement?

To exclude yourself from (“opt out of”) the Settlement Class, you must send a letter personally signed by you that includes all of the following:

Your name, address, and telephone number;

The following Civil Action Number: 1:10-cv-00041; and

A statement that you want to be excluded from the Settlement Class.

Your request for exclusion letter must be mailed first class, postage pre-paid, **postmarked on or before June 24, 2019**, to:

Virginia Gas Cases Exclusions – Huffman Class
c/o JND Legal Administration
P.O. Box 91345
Seattle, WA 98111

You cannot exclude yourself from only part of the Settlement or Settlement Class. You must either remain a Settlement Class Member or exclude yourself from the entire Settlement. Also, please remember that you can't exclude yourself by phone or by sending an email.

9. Do I have lawyers representing my interests in the case?

The Court has appointed the following law firms to represent the Class:

Larry D. Moffett
Daniel Coker Horton & Bell, P.A.
P.O. Box 1396
Oxford, MS 38655-1396

Don Barrett
Barrett Law Group
Post Office Drawer 927
Lexington, MS 39095

Peter G. Glubiak
Glubiak Law Office
P.O. Box 27
King William, VA 23086

David S. Stellings
Daniel Seltz
Lieff, Cabraser, Heimann &
Bernstein, LLP
250 Hudson St., 8th Floor
New York, NY 10013

Jackson S. White, Jr., VSB #03677
The White Law Office
P.O. Box 286
Abingdon, VA 24212

These lawyers are called “Class Counsel.” You do not have to directly pay Class Counsel. If you want your own lawyer, and to have that lawyer appear in court, you may hire one at your own expense.

10. How will the lawyers be compensated?

Class Counsel will request that the Court award Class Counsel reimbursement of a portion (totaling no more than \$74,000) of their Litigation Expenses, approve an Incentive Payment to the Class Representative. Class Counsel are not seeking an award of attorneys' fees. The Court, at its own discretion, may award less than these requested amounts without further notice to the Settlement Class Members. Any expense reimbursement administrative

QUESTIONS? CALL 1-833-747-6672 OR VISIT WWW.VAGASCASES.COM

costs, and incentive payments awarded by the Court will be paid from the Settlement Funds. Again, if you choose to hire your own attorney, you will be responsible for that attorney's fees and expenses.

11. Should I get my own lawyer?

You don't need to hire your own lawyer but you may elect to do so. If you want your own lawyer to speak for you or to appear in Court, you or your lawyer must file a Notice of Appearance. (See question 16 to find out how to submit a Notice of Appearance). If you hire a lawyer to appear for you in the lawsuit, you will have to pay that lawyer on your own.

12. Who is the Class Representative and how is he compensated?

The Court has appointed the Plaintiff as Class Representative. The Class Representative works with Class Counsel on behalf of all Settlement Class Members to present the views of typical Settlement Class Members to Class Counsel and the Court. The Class Representative may be entitled to an Incentive Payment Award not to exceed \$2,500.

13. Can I object or comment on the Proposed Settlement?

If you have comments about, or disagree with, any aspect of the Proposed Settlement, including the requested attorneys' fees, you may express your views to the Court through a written response to the Proposed Settlement. Only Settlement Class Members who have not opted out can object or comment. The written comment or objection should include your name, address, and telephone number. In addition, any objection must include (a) a written statement of your objection, (b) a written statement of the grounds or reasons for your objection, and (c) copies of any papers, briefs, or other documents supporting your objection. The document must be signed to ensure the Court's review. In order to be considered by the Court, your comment or objection must be postmarked on or before June 24, 2019, and mailed to:

Clerk of the Court
United States District Court, Western District of Virginia
180 Main Street
Abingdon, VA 24210

Your comment or objection must clearly state that it relates to the following Civil Action Number: 1:10-cv-00041.

The comment or objection must also be mailed to the following attorneys:

Counsel for the Class:	Counsel for EQT:
Larry D. Moffett Daniel Coker Horton & Bell, P.A. P.O. Box 1396 Oxford, MS 38655-1396	Wade Massie Penn, Stuart & Eskridge P.O. Box 2288 Abingdon, VA 24212

14. Will there be a hearing on the Proposed Settlement?

The Court will hold a Final Approval Hearing on July 26, 2019, to consider whether the Proposed Settlement is fair, reasonable, and adequate. The Hearing will be at the United States Courthouse, 180 Main Street, Abingdon, VA, 24210, at 10:30 a.m. At the Hearing, the Court will decide whether to approve the Proposed Settlement and the motion for attorneys' fees and expenses. If comments or objections have been received, the Court will consider them at this time.

Note: The Hearing may be postponed to a different date without additional notice.

15. Must I attend the Hearing?

Attendance is not required, even if you properly mailed a written objection or comment. Class Counsel is prepared to answer the Court's questions, including concerning objections or comments. If you or your lawyer still want to attend the Hearing, you are welcome to come at your own expense. However, it is not necessary that you attend. If you filed an objection to or comment about the Settlement, as long as the objection or comment was postmarked before the deadline, the Court will consider it, regardless of whether you or your privately-retained attorney appear at the Hearing.

16. May I speak at the Hearing?

If you want to speak or have your own lawyer speak at the Final Approval Hearing, you must give the Court a paper that is called a "Notice of Appearance." The Notice of Appearance must refer to *Huffman v. EQT Production Company*, No. 1:10-cv-00041, United States District Court for the Western District of Virginia, and state that you or your lawyer wish to enter an appearance at the Final Approval Hearing. It must also include your name, address, telephone number, and signature. Your "Notice of Appearance" must be postmarked no later than July 16, 2019. You cannot speak at the Hearing if you asked to be excluded from the Proposed Settlement Class.

The Notice of Appearance must be filed with the Court at the address provided under Section 13 above and also mailed to the attorneys listed in Section 13 above.

In addition, your document must clearly state that it relates to the following Civil Action Number: 1:10-cv-00041.

17. How do I get more information about the Proposed Settlement?

This notice summarizes the Proposed Settlement and your rights and options as a Settlement Class Member. To find out more information, call (833) 747-6672, or write to Virginia Gas Cases – Huffman Class, c/o JND Legal Administration, P.O. Box 91345, Seattle, WA 98111.

If you have a question about whether or not you are in the Settlement Class, or about your rights and options as a Settlement Class Member, you may contact the Class Counsel (see Question 9).

All court records, including the Settlement Agreement and other documents for the Lawsuit, may be examined in person and copied at the United States District Court, Western District of Virginia, United States Courthouse, 180 Main Street, Abingdon, VA 24210.

PLEASE DO NOT TELEPHONE THE COURT, THE CLERK OF THE COURT, OR EQT.

QUESTIONS? CALL 1-833-747-6672 OR VISIT WWW.VAGASCASES.COM