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January 15, 2017

**VIA CERTIFIED MAIL**

Jane Smith, Esq.  
Executive Vice President and General Counsel  
ABC Corporation  
123 Main Street  
Everywhere, TX 75205

**Re: Notice of Release or Threatened Release  
Notice of Intent to Undertake Removal Action**

Dear Ms. Smith:

Please be advised that I have been retained by XYZ Corporation (“Client”). I am writing this letter to you as the authorized representative for ABC Corporation and to inform you of potential environmental contamination of my Client’s property located at 123 Elm Street, Everywhere, Texas (“Property”) that was caused by the historic ownership and operations of ABC Corporation on my Client’s Property or on nearby property or properties that was owned and operated by ABC Corporation. Unfortunately, we believe that such operations may have resulted in the release of solid waste into the environment, causing extensive soil and groundwater contamination of my Client’s Property.

My Client will endeavor to determine and remediate any contamination on its Property under the State’s Voluntary Cleanup Program. While my Client is just beginning the process, it will continue to move forward with the activities necessary to address any contamination.

This letter provides notice to you pursuant to Section 361.344 of the Texas Solid Waste Disposal Act (“Act”), that there has potentially been a release and a threatened release of solid and/or industrial solid or hazardous waste into soils and groundwater at the Property, and of my Client’s intention to take necessary steps to eliminate such potential release under the supervision of the State of Texas. The solid and/or industrial solid or hazardous waste in the soils and groundwater is the result of the historical ownership and operations of ABC Corporation.

My Client will seek recovery of all costs initially incurred as well as its future costs and expenses incurred from ABC Corporation as a “person responsible for solid waste,” as defined by

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Section 361.271 of the Act. ABC Corporation is a person responsible for solid waste because it performed operations on my Client's Property or on nearby property or properties that may have resulted in the generation, placement, spilling, releasing and/or migration of solid wastes on or onto my Client's Property. Past owners and operators as well as future owners and operators will be liable for any potential cleanup under the Act.

I am requesting that you contact me on or before **February 15, 2017** so that we can discuss how to address the potential contamination and the responsibility of ABC Corporation. If no resolution is reached by that date, my Client will have no recourse but to institute action under the Act to seek recovery of its costs in remediating the contamination on its Property caused by ABC Corporation's operations.

Should you have any questions concerning the foregoing, please do not hesitate to call.

Very truly yours,

A handwritten signature in black ink that reads "Michael R. Goldman". The signature is written in a cursive, flowing style.

Michael R. Goldman  
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E-Mail: [michael@goldmanlawpc.com](mailto:michael@goldmanlawpc.com)