



101 Constitution Avenue, NW
Washington, DC 20080
www.washgas.com

December 5, 2011

National Park Service
Environmental Compliance and Response Branch
Attn: Shawn P. Mulligan
Senior Environmental Program Advisor
1050 Walnut Street, Suite 220
Boulder, CO 80302

Vincent L. Ammann, Jr.
Vice President and
Chief Financial Officer
(202) 624-6737
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Dear Mr. Mulligan:

I am the Chief Financial Officer of Washington Gas Light Company ("Washington Gas"), located at 101 Constitution Ave. NW, Washington, D.C. This letter is submitted to fulfill the requirements of Section XII (Performance Guarantee), Paragraph 40(e) of the CERCLA Consent Decree Associated with the Washington Gas East Station Site ("Consent Decree") between the United States, the District of Columbia, and Washington Gas.

Paragraph 40(e) of the Consent Decree requires a demonstration by Washington Gas that it meets the financial test criteria of 40 CFR § 264.143(f) with respect to the "Estimated Cost of the Work", plus the amounts of any other federal or District environmental obligations financially assured through the use of a financial test or guarantee. Section 264.143(f)(3) requires a letter signed by the firm's chief financial officer worded as specified in Section 264.151(f). Part 264 of 40 CFR pertains to hazardous waste treatment, storage, and disposal facilities; Section 264.151(f) is in Subpart H, which establishes the financial assurance requirements for closure and post-closure care of such facilities. The wording of this letter has been modified from that proscribed by Section 264.151(f) to reflect the letter's application to a CERCLA response action rather than a hazardous waste facility closure.

Washington Gas guarantees performance of the CERCLA response actions (the "Work" as defined in Paragraph 4 of the Consent Decree) required to be performed by Washington Gas under the Consent Decree at the Site (also as defined in Paragraph 4 of the Consent Decree). Washington Gas owns portions of the Site. The current United States and District of Columbia Estimated Cost of the Work is \$5,000,000.

Alternative II

1. The current Estimated Cost of the Work covered by the financial assurance test is \$5,000,000.
2. Washington Gas does not own or operate any hazardous waste management facilities for which financial assurance for closure or post-closure care is demonstrated either to EPA or a State through any financial assurance mechanism specified in 40 CFR Parts 264 and 265 or equivalent or substantially equivalent federal or State mechanisms.
3. Washington Gas does not own or operate any Permitted Underground Injection Control facilities for which financial assurance for plugging and abandonment is required under Part 144.


4. Washington Gas does not have any other federal or any District of Columbia environmental obligations financially assured through the use of a financial test or guarantee.

Washington Gas is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

Washington Gas' fiscal year ends on September 30. The figures for the following items are derived from Washington Gas' independently audited, year-end financial statements for the latest completed fiscal year, ended September 30, 2011:

1. Sum of the current Estimated Cost of Work and any other environmental investigation and cleanup responsibilities - \$5,000,000.
2. Current bond rating of the most recent issuance of this firm and name of the rating service: A+ from Standard & Poor's, A2 from Moody's and AA- from Fitch.
3. Date of issuance of the bond - December 3, 2010
4. Date of maturity of the bond - December 3, 2040
5. Tangible net worth - \$1,018,308,000
6. Total assets in the U.S (required only if less than 90% of the firm's assets are in the U.S.) - N/A- more than 90% of the firm's assets are in the U.S.
7. Is line 5 at least \$10 million? - Yes
8. Is line 5 at least 6 times line 1? - Yes
9. Are at least 90% of the firm's assets located in the U.S.? - Yes

I hereby certify that the information provided herein is true and conforms to the requirements of Paragraph 40(e) of the Consent Decree.



Vincent L. Ammann, Jr.

Vice President and Chief Financial Officer

Date: 12/5/11