

## Appendix One

### **Summary of Judicial Inspection Evidence**

**(as of May 1, 2006)**

|   |              |
|---|--------------|
| Sites inspected:                            | <b>42</b>    |
| Inspection reports submitted by Chevron     | <b>34</b>    |
| Inspection reports submitted by Plaintiffs  | <b>32</b>    |
| Inspection report issued by the Court       | <b>1</b>     |
| Number of samples collected by both parties | <b>1,563</b> |

*Results demonstrate conclusively that the people of the region face no significant oil-related health or environmental risk from areas remediated by Texpet.*

| CHEVRON EXPERT REPORTS  | PLAINTIFFS EXPERT REPORTS  |
|---|--|
| <b>34</b> expert reports submitted as of May 1, 2006                            | <b>32</b> Plaintiff expert reports submitted <ul style="list-style-type: none"> <li>• 2 reports submitted without any laboratory data for samples collected</li> </ul> |
| 1003 samples collected, tested and reported                                     | 560 samples collected by plaintiffs' technical experts, only 360 tested and reported   |
| 128 drinking water samples collected, tested and reported                       | 31 drinking water samples collected, only 15 tested and reported   |
| 97 surface water samples collected, tested and reported                         | 34 surface water samples collected, only 25 tested and reported  |
| 654 soil samples collected, tested and reported                                 | 385 total soil samples collected, only 239 tested and reported   |
| 198 soil samples collected, tested and reported from Texpet remediated areas    | 71 samples tested and reported from Texpet remediated areas  |
| 456 soil samples collected, tested and reported outside Texpet remediated areas | 167 samples tested and reported from outside Texpet remediated areas   |

Appendix Two

**Findings as of May 1, 2006 and Supporting Data**

| FINDINGS TO DATE   | SUPPORTING DATA  |
|--|--|
| <p><b>There is no risk to public health or environment from oilfield operations</b></p>      | <p><b><i>No Significant Health Risk from Petroleum in areas remediated by Texpet.</i></b></p> <ul style="list-style-type: none"> <li>• 98% surface water meets international drinking water standards* for petroleum hydrocarbons.</li> <li>• 99% drinking water samples meet international standards* for petroleum hydrocarbons, (including benzene, toluene, ethylbenzene, or xylenes, (BTEX), polycyclic aromatic hydrocarbons (PAHs)), and heavy metals. Hydrocarbon residue found in Texpet remediated pits is typically highly weathered, immobile, and does not present a threat to public health or the environment.</li> <li>• BTEX, PAHs and metals are at safe levels in soils in all Texpet remediated areas.</li> <li>• Plaintiffs' attorneys and their supporters are mischaracterizing the purpose of remediation. Remediation does not mean the removal of every trace of hydrocarbons but rather the removal of conditions that may pose a risk to human health or the environment.</li> </ul> |
| <p><b>Animal and human waste in the local water supply poses a serious health threat</b></p> | <p><b><i>Highly Elevated Concentrations of Coliform Bacteria in the Local Water Supply Found in 97% Drinking Water Samples Analyzed:</i></b></p> <ul style="list-style-type: none"> <li>• There is a proven association between microbial contamination indicated by the presence of these bacteria and illnesses reported in the Amazon. Guidelines published by the World Health Organization (WHO), state that microbial contamination poses a serious hazard to the health of persons who use such water for consumption or personal hygiene.</li> <li>• The presence of coliform bacteria is not related to oilfield activities.</li> </ul>   |
| <p><b>Texaco Petroleum's Remediation Program Proven Effective</b></p>                        | <p><b><i>Laboratory Data Presented to Court Validates Effectiveness of the 1995-98 Texpet Remediation Program.</i></b></p> <ul style="list-style-type: none"> <li>▪ 99% samples taken at Texpet remediated areas demonstrate that the GOE requirements were met.</li> <li>▪ There is no need for additional remediation, except for in those areas where Petroecuador has had spills or has not met their remediation responsibilities.</li> </ul>   |

\* International drinking water standards in place at time of remediation, as defined by Ecuador 2144, World Health Organization guidelines and USEPA Maximum Contaminant Levels for drinking water.