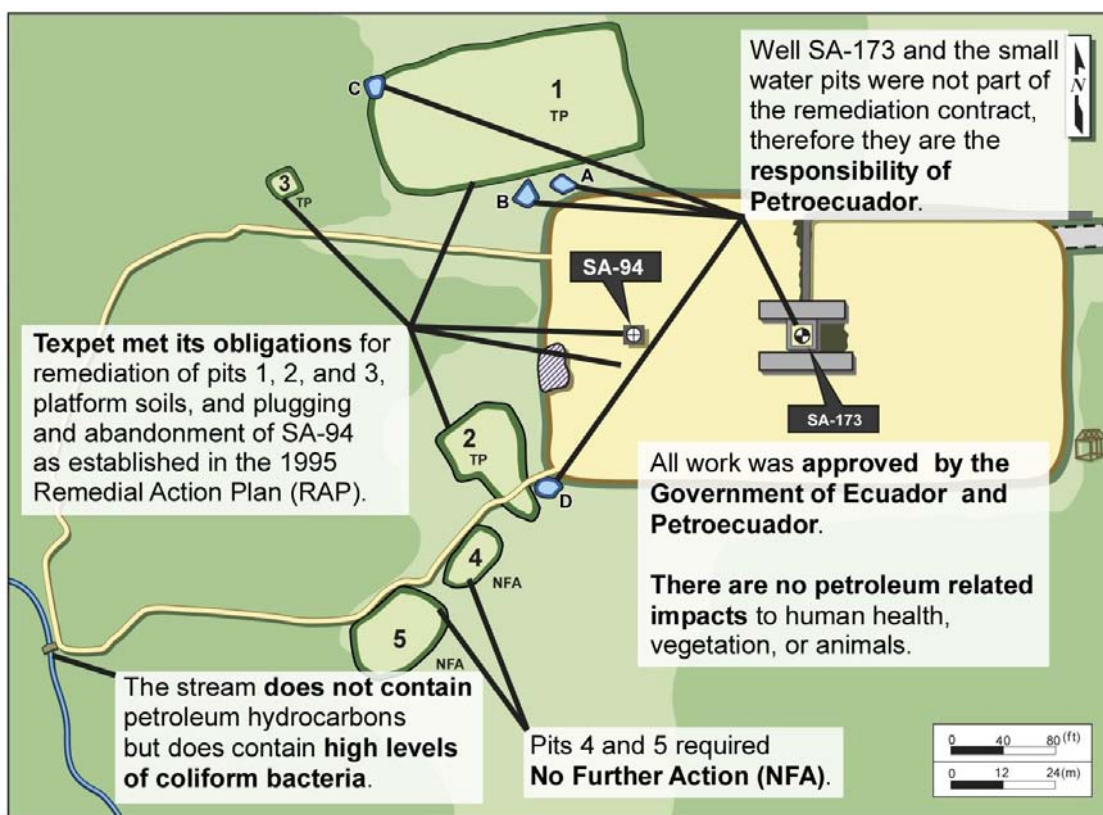


Report of Expert Mr. Ernesto Baca, P.E. Judicial Inspection of Well Sacha-94

María Aguinda et al v. ChevronTexaco Corporation
Proceeding No. 002-2003, Superior Court of Justice, Nueva Loja, Ecuador

1 EXECUTIVE SUMMARY

The main conclusions of the Judicial Inspection of well Sacha-94 (SA-94) are summarized in the following illustration and in the report that follows.



The May 4, 1995 agreement between Texaco, the Government of Ecuador and Petroecuador required the implementation of the following tasks at well SA-94:

- Investigation to determine the need for remediation of five pits,
- Remediation of pits 1, 2 and 3 at well SA-94,
- Plugging and abandoning well SA-94, and
- Remediation of oily soils at the platform of well SA-94.

The tasks were completed to the satisfaction of the Ecuadorian Government and Petroecuador. Texaco Petroleum Company (Texpet) was relieved of all its obligations, responsibilities and legal liabilities related to remediation of the pits on November 22, 1996, and of plugging and abandoning well SA-94 on May 14, 1997. All subsequent tasks were assumed by Petroecuador.

Pits 1, 2 and 3 were remediated, while pits 4 and 5 were designated as pits that required No Further Action (NFA). The remediated pits complied with the criterion of the Remediation Action Plan (RAP) for petroleum leachates (TPH – TCPL), and complied with international criteria applicable to all hydrocarbon parameters at that time. The remaining crude in the pits is highly weathered, immobile and not bioavailable (see Figure 12 and Appendixes H, O, P and U). There are no heavy metals exceeding the natural concentrations of the native soils at the site. Consequently, the residual petroleum does not pose a risk to human health, plants, animals or the environment surrounding the remediated areas of pits 1, 2 and 3. In the investigation performed during the Judicial Inspection, no other petroleum outside these zones was found.

The receiving surface water body nearest to well SA-94 is a stream approximately 120 m southwest of the platform. According to the chemical analyses of the area of pits 1 and 2 (see Tables 1, 2A and 2B), the soils do not have mobile compounds. Therefore, the weathered petroleum cannot impact the stream. The presence of coliform bacteria in the stream is not related in any way to the petroleum operations. No drinking water well was found in the areas surrounding well SA-94. It was observed during the Judicial Inspection of September 8, 2004, that a new family was building a house southeast of the platform.

Well SA-94 was plugged and abandoned in August 1996. During the plugging and abandoning of this well, four areas with oily soils in the platform were remediated. The soil remediation activities were part of plugging and abandoning well SA-94. It should be noted that the remediation of oily soils on the platform was a different activity from remediation of pits.