From: Steven Donziger [sdonziger@gmail.com]

Sent: Sunday, March 01, 2009 7:18 PM

To: Doug Beltman

Subject: Re: Pls answer questions

@page Section1 {size: 8.5in 11.0in; margin: 1.0in 1.25in 1.0in 1.25in; mso-header-margin: .5in; mso-footer-margin: .5in; mso-paper-source: 0; } UNKNOWN { FONT-SIZE: 12pt; MARGIN: 0in 0in 0pt; FONT-FAMILY: " mso-style-parent: " quot: ; mso-pagination: widow-orphan; Times: ; mso-fareast-font-family: " } DIV.Section1 { page: Section1 } OL { MARGIN-BOTTOM: 0in } UL { MARGIN-BOTTOM: 0in }

Yes. My own calculations. If that doesn't suffice then kiss my butt.

Sent via BlackBerry by AT&T

From: "Doug Beltman"

Date: Sun, 1 Mar 2009 10:18:18 -0700

To: Steven Donzigersdonziger@gmail.com>

Subject: RE: Pls answer questions

Steven:

re: the 30 times Valdez. Valdez was 10.8 million gallons of oil, so 30 times is 324 million gallons of oil, or 7.7 million barrels. I have never seen where this 30 times number comes from, and don't recall seeing estimates of the amount of crude spilled that match the 324 million gallons figure. For my own edification and so I can respond if ever asked, do you know where the 30 times number comes from?

thanks.

Doug

Douglas Beltman
Executive Vice President
Stratus Consulting Inc.
303.381.8000
303.381.8200 (fax)
www.stratusconsulting.com

From: Steven Donziger [mailto:sdonziger@gmail.com]

Sent: Saturday, February 28, 2009 4:35 PM

To: Doug Beltman

PLAINTIFF'S EXHIBIT

1110

11 Civ. 0691 (LAK)

1

Cc: Karen Hinton
Subject: Pls answer questions
Doug
Can you pls write short answers to 1-4 and 6 for the reporter for the Christian Science Monitor. She seems a little confused. Pls send to me first and I will edit and then send to her. I want her to also call you and interview you. Pls confirm.
Thanks, SRD
1) Is the black stuff bubbling up at Texacos remediated site (Sacha 56) petroleum or some kind of toxic sludge?
2) Does Chevron claim the black stuff is not toxic?
3) Is this an example of how the remediation was ineffective?
4) Isnt it common for hydrocarbons that are buried to resurface after time?
5) Is it true that the dumping represented 30x the Exxon Valdez disaster?
6) Chevron says during the relevant time 97% of the pits in the U.S. were unlined. Is this true?
7) In terms of the words you wrote, I would add that it was not only done in violation of Ecuadors laws, it was also done in violation of U.S. laws, oil industry custom at the time, and the provision in Texacos operating contract requiring it to use modern technology and standards.
8) My preferred title is legal advisor to the plaintiffs.

Steven Donziger
212-570-4499 (land)
212-409-8628 (fax)
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917-566-2526 (cell)

Steven R. Donziger

Law Offices of Steven R. Donziger, P.C.

245 W. 104th St., #7D

New York, New York 10025

Email: sdonziger@gmail.com