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Of Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Answers and Objections to Interrogatories of Defendant CLH Holdings has been forwarded to counsel of record by electronic transmission and/or personal delivery, on this 19th day of June 2006, as follows:

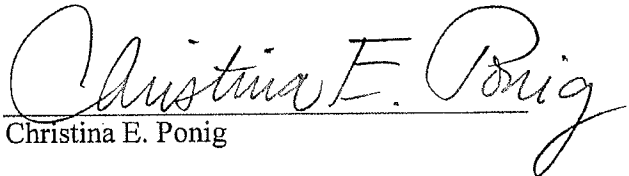
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Interrogatory No. 1:

Identify and describe each and every transaction, contract, agreement, and/or understanding (including inter-company transactions, contracts, agreements, and/or understandings) between or among the Repsol Group and/or any of its members concerning New Jersey, including, but not limited to, compliance with the Environmental Laws, Environmental Contamination, and/or Hazardous Substances in New Jersey, and including, but not limited to, the management of Environmental Liabilities, compliance with Environmental Laws, Environmental Contamination, and/or Hazardous Substances, and all financial records related to same.

**ANSWER**

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only.

CLHH is not responsible for, and does not direct, communications of its subsidiaries with the State of New Jersey.

Subject to these objections, please refer to documents produced in response to Requests for Production 1, 2, 3, and 4. F.R.C.P. 33(d).

Interrogatory No. 2:

Identify each and every officer, director, manager, and executive of the Repsol Group and/or any of its members. In identifying such persons, include their names, addresses, titles, employers, primary office location, any other office locations, relevant Repsol Group entity, and respective years of employment and/or affiliation. If the responsive person had more than one title and/or position, identify each title and/or position and the respective years of employment, and/or relationship and/or affiliation at each title and/or position. Similarly, if the responsive person was employed by or affiliated with more than one Repsol Group entity, identify each Repsol Group entity and the respective years of employment and/or affiliation with each Repsol Group entity. Further, for each responsive person, identify whether they have now or ever have had any responsibility for or involvement in compliance with Environmental Laws, Environmental Contamination and/or Hazardous Substances in New Jersey, including but not limited to the management of, accounting for, and reporting of Environmental Liabilities, compliance with Environmental Laws, Environmental contamination, and/or Hazardous Substances.

**ANSWER**

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only. CLHH further objects to this interrogatory because the terms "manager" and "executive" are vague and undefined and because the interrogatory is overly broad and burdensome.

CLHH is not responsible for, and does not direct, communications of its subsidiaries with the State of New Jersey.

Subject to these objections, please refer to documents produced in response to Request for Production 10. F.R.C.P. 33(d).

Interrogatory No. 3:

Identify each and every employee, contractor, or representative of the Repsol Group and/or any of its members who has now or ever had any responsibility for or involvement in compliance with Environmental Laws, Environmental Contamination, and/or Hazardous Substances in New Jersey, including but not limited to the management of, accounting for, and reporting of Environmental Liabilities, compliance with Environmental Laws, Environmental Contamination, and/or Hazardous Substances. In identifying such persons, include their names, addresses, titles, employers, primary office location, any other office locations, relevant Repsol Group entity, and respective years of employment and/or affiliation. If the responsive person had more than one title and/or position, identify each title and/or position and the respective years of employment and/or relationship or affiliation at each title and/or position. Similarly, if the responsive person was employed by or affiliated with more than one Repsol Group entity, identify each Repsol Group entity and the respective years of employment and/or affiliation with each Repsol Group entity.

ANSWER

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only. CLHH further objects to this interrogatory because "representative" is vague and not defined and because the interrogatory is overly broad and burdensome.

Subject to these objections, CLHH does not have an employee or contractor with responsibility for, or involvement in compliance with Environmental Laws, Environmental Contamination, and/or Hazardous Substances of New Jersey.

CLHH is not responsible for, and does not direct, communications of its subsidiaries with the State of New Jersey.

Interrogatory No. 4:

Identify each and every of your employees, contractors, and/or representatives and each and every of your former employees, contractors, and/or representatives who currently or has ever worked, contracted, or represented at a location of another Repsol Group entity and/or who currently or has ever worked for, contracted with, or represented another Repsol Group entity. In identifying such persons, include their names, addresses, titles, employers, primary office location, any other office locations, relevant Repsol Group entity, and respective years of employment and/or affiliation. If the responsive person had more than one title and/or position, identify each title and/or position and the respective years of employment and/or relationship or affiliation at each title and/or position. Similarly, if the responsive person was employed by or affiliated with more than one Repsol Group entity, identify each Repsol Group entity and the respective years of employment and/or affiliation with each Repsol Group entity.

**ANSWER**

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only. CLHH further objects to this interrogatory because "representative" is vague and not defined and because the interrogatory is overly broad and burdensome; it would be incredibly burdensome to attempt to obtain this information which has no relevance to the jurisdictional issues before this Court.

Subject to the foregoing objections, CLHH does not have any employees in the State of New Jersey. CLHH is not responsible for , and does not direct, communications of its subsidiaries with the State of New Jersey.

**Interrogatory No. 5:**

Identify and describe the corporate structure and the processes of corporate governance, control, and management of the operations of the Repsol Group and each of its members, including, but not limited to, ownership, finances, management, and control, and identify and describe the reasons for and the bases, purposes, and actual and/or intended effects of such structures, processes, and management.

**ANSWER**

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only. Subject to this objection, CLHH refers to documents produced in response to Request for Production 10. F.R.C.P. 33(d).

**Interrogatory No. 6:**

Identify and describe all business and other purposes for: the Assumption Agreement, dated August 14, 1996; the Contribution Agreement, dated August 14, 1996; and the reorganization of assets and liabilities by and between YPF, YPF International Ltd., YPF Holdings, Inc., CLH Holdings, Chemical Land Holdings, Inc. (n/k/a Tierra), and Maxus during that time period.

**ANSWER**

CLHH responds that the Assumption Agreement and Contribution Agreement identify and describe fully their purposes.

**ANSWER**

**Interrogatory No. 7:**

Identify and describe any and all contacts with or concerning New Jersey, including but not limited to the types of contacts identified by the courts as relevant to the inquiry as to personal jurisdiction in *Rocker Management, L.L.C. v. Lernout & Hauspie Speech Products, N. V.*, No. Civ. A. 00-5965 JCL, 2005 WL 3658006 (D.N.J. 2005) and cases cited therein, *Pfundstein v. Omnicom Group Inc.*, 666 A.2d 10131 285 N.J. Super. 245 (App. Div. 1995) and cases cited

therein, and *Toys R Us, Inc. v. Step Two, S.A.*, 318 F.3d 446 (3rd Cir. 2003) and cases cited therein.

**ANSWER**

CLHH does not have contacts with the State of New Jersey. CLHH objects to this interrogatory on the basis that it directs the person verifying these answers to review and analyze the above-referenced cases, AND the cases cited therein, to determine what kinds of contacts were identified therein as relevant to the personal jurisdiction inquiry and then somehow determine whether CLHH has such contacts; it is, therefore, improper. *See Lugo, et al. v. Heckler*, 98 F.R.D. 709, 714-715 (E.D. Pa. 1983) ("[N]o party should be required to do independent research in order to acquire information with which to answer interrogatories."), *citing Kluchenac v. Oswald & Hess Co.*, 20 F.R.D. 87, 88-89 (W.D. Pa. 1957).

Subject to these objections, the person verifying CLHH's answers to these interrogatories has not read the above-referenced cases and does not know what contacts were involved.

CLHH is a Delaware business corporation with its principal place of business in The Woodlands, Texas. CLHH does not have a designated agent for service of process in New Jersey. CLHH does not maintain an office in New Jersey. CLHH makes no business decisions in New Jersey and has no contracts with any residents of New Jersey. CLHH does not recruit any employees out of New Jersey. CLHH does not buy or sell goods or services in New Jersey. CLHH does not own any real property located in New Jersey. Further, CLHH has no phone listing in New Jersey and does not advertise in New Jersey. CLHH does not maintain a bank account in New Jersey, nor does it transact banking business in New Jersey. CLHH does not pay any taxes in New Jersey. CLHH does not control the environmental practices of Tierra and Maxus. CLHH does not control the activities of Tierra or Maxus. CLHH does not control the marketing or operational policies of Tierra or Maxus. CLHH respects the separate corporate existence of Tierra or Maxus. CLHH does not maintain a web site.

**Interrogatory No. 8:**

Identify and describe how the Repsol Group and each of its members manages, accounts for, and reports Environmental Liabilities, compliance with Environmental Laws, Environmental Contamination, and Hazardous Substances, including identifying and describing any inter-company agreements, processes, understandings, or involvement in the same by one member of the Repsol Group with respect to any other member of the Repsol Group.

**ANSWER**

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only.

Subject to this objection, CLHH does not perform this function in connection with the State of New Jersey. CLHH is not responsible for, and does not direct, communications of its subsidiaries with the State of New Jersey.

Interrogatory No. 9:

Identify any and all agents, consultants, and other third parties doing business or otherwise acting on your behalf in New Jersey, including, but not limited to, any and all attorneys, consultants, agents, representatives, and lobbyists. For each identified person, identify and describe the scope of the representation and any and all documents and communications concerning the representation, including, but limited to, contracts, agreements, and/or understandings, by or between any member of the Repsol Group and such identified person.

ANSWER

CLHH objects to the definition of "Repsol Group." CLHH responds to these interrogatories on behalf of CLHH only. CLHH objects to "agents, consultants, and other third parties doing business or otherwise acting on your behalf in New Jersey" as vague and undefined.

CLHH is not responsible for, and does not direct, communications of its subsidiaries with the State of New Jersey.

Subject to these objections, CLHH is being represented by attorneys in this lawsuit.

Interrogatory No. 10:

Identify and describe the annual total value of all business transactions that inured to you from New Jersey for each of the last five (5) years, including, but not limited to, all assets, liabilities, income and expenses.

ANSWER

CLHH objects to this interrogatory because the term "inured" is vague and undefined. Subject to this objection, there is none.

CLHH is not responsible for, and does not direct, communications of its subsidiaries with the State of New Jersey.

CLHH is a Delaware business corporation with its principal place of business in The Woodlands, Texas. CLHH does not have a designated agent for service of process in New Jersey. CLHH does not maintain an office in New Jersey. CLHH makes no business decisions in New Jersey and has no contracts with any residents of New Jersey. CLHH does not recruit any employees out of New Jersey. CLHH does not buy or sell goods or services in New Jersey. CLHH does not own any real property located in New Jersey. Further, CLHH has no phone listing in New Jersey and does not advertise in New Jersey. CLHH does not maintain a bank account in New Jersey, nor does it transact banking business in New Jersey. CLHH does not pay any taxes in New Jersey. CLHH does not control the environmental practices of Tierra and Maxus. CLHH does not control the activities of Tierra or Maxus. CLHH does not control the marketing or operational policies of Tierra or Maxus. CLHH respects the separate corporate existence of Tierra or Maxus. CLHH's web site operator does not intentionally target New Jersey, nor does CLHH solicit business in New Jersey via its web site.



