

THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NEW JERSEY DEPARTMENT OF	§	
ENVIRONMENTAL PROTECTION and	§	
THE ADMINISTRATOR OF THE NEW	§	Hon. Garrett E. Brown, Jr.
JERSEY SPILL COMPENSATION FUND,	§	U.S. District Judge
Plaintiffs,	§	
	§	
	§	
v.	§	Hon. Patty Schwartz
	§	U.S. Magistrate Judge
	§	
	§	
OCCIDENTAL CHEMICAL	§	Civil Action No.
CORPORATION, TIERRA SOLUTIONS,	§	2:06-CV-00401-GEB-PS
INC., MAXUS ENERGY CORPORATION,	§	
REPSOL YPF, S.A., YPF, S.A., YPF	§	
HOLDINGS, INC., AND CLH HOLDINGS,	§	
Defendants.	§	

DEFENDANTS' RULE 26(a) DISCLOSURES

Repsol YPF, S.A. ("Repsol"), YPF, S.A. ("YPF"), YPF Holdings, Inc. ("YPFH"), and CLH Holdings, Inc. ("CLHH") (collectively "the non-resident Defendants") submit their Rule 26(a) Disclosures pursuant to Federal Rule of Civil Procedure 26 as follows:

RULE 26(a)(1)(A)

Name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

Mr. H. R. Smith (Dick)
Assistant General Counsel
1330 Lake Robbins Dr., Suites 300/400
The Woodlands, TX 77380
Phone: (281) 681-7200

Mr. Smith has discoverable information on the lack of contacts between CLHH/YPFH with the State of New Jersey and the corporate separateness between YPFH/CLHH and Maxus and Tierra.

Gabriel Leiva
Controller
Avenida Roque, Sáenz Peña 777
1364 Buenos Aires, Argentina
Phone: +5411 4329 5531

Mr. Leiva has discoverable information on the lack of contacts between YPF with the State of New Jersey and the corporate separateness between YPF and Maxus and Tierra.

Enrique Locutura
Chief Executive Officer
Avenida Roque
Sáenz Peña 777
1364 Buenos Aires, Argentina
Phone: +5411 4324 0097

Mr. Locutura has discoverable information on the lack of contacts between YPF with the State of New Jersey and the corporate separateness between YPF and Maxus and Tierra.

Marcos Mozetic
Repsol YPF
Paseo de la Castellana, 278 - 280
28046 Madrid, Spain.
Phone number: +34 91 348 80 00

Mr. Mozetic has discoverable information on the lack of contacts between Repsol with the State of New Jersey and the corporate separateness between Repsol and Maxus and Tierra.

Rule 26(a)(1)(B)

A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

The non-resident Defendants have produced all responsive, non-privileged documents and made e-mail available to be searched pursuant to the Court's Order.

RULE 26(a)(1)(C)

A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

Not applicable. The non-resident Defendants are not seeking damages.

RULE 26(a)(1)(D)

For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

There is no applicable insurance.

Respectfully submitted,

Bracewell & Giuliani, L.L.P.

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YPF Holdings, Inc. and CLH Holdings

Of Counsel:

Marc J. Gross, Esq.
Jeffrey A. Sirot, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the non-resident Defendants' Rule 26(a) Disclosures have been forwarded to counsel of record by electronic transmission, on this 27th day of September, 2006, as follows:

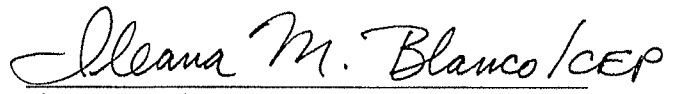
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