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YPF Holdings, Inc. and CLH Holdings, Inc.

NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION,
THE COMMISSIONER OF THE NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL
PROTECTION AND THE ADMINISTRATOR
OF THE NEW JERSEY SPILL
COMPENSATION FUND,

Plaintiffs,

v.

OCCIDENTAL CHEMICAL CORPORATION,
TIERRA SOLUTIONS, INC., MAXUS ENERGY
CORPORATION, REPSOL YPF, S.A., YPF, S.A.,
YPF HOLDINGS, INC., AND CLH HOLDINGS,

Defendants.

:
: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION -ESSEX COUNTY

: DOCKET NO. ESX-L-9868-05

:
: **SUPPLEMENTAL**
: **DISCLOSURES OF DEFENDANTS**
: **YPF HOLDINGS, INC. AND**
: **CLH HOLDINGS, INC.**

Defendants YPF Holdings, Inc. (“YPFH”) and CLH Holdings, Inc. (“CLHH”) hereby make the following Supplemental Disclosures pursuant to Case Management Order III in the above-referenced litigation as guided by Rule 26(a)(1) of the Federal Rules of Civil Procedure.

RESERVATION OF RIGHTS

1. YPFH and CLHH reserve the right to object to the production of documents or other information on any grounds, including but not limited to relevance and undue burden, and to assert any applicable privilege, including but not limited to the attorney-client privilege, work product doctrine, the common interest doctrine, and any other basis for protection. These disclosures are not intended to prejudice or waive any privileges or objections that YPFH and CLHH may have with respect to any outstanding or subsequent requests for discovery.

2. YPFH and CLHH reserve the right to supplement, clarify, and revise these disclosures to the extent additional information becomes available or is obtained through discovery. YPFH and CLHH state that these disclosures are preliminary in nature and reserve the right to amend, revise, or restate them as the discovery process continues. In addition, YPFH and CLHH reserve the right to amend these disclosures to the extent the claim brought by or alleged against YPFH and CLHH in the litigation are amended.

Rule 26(a)(1)(A)

The name and, if known, the address and telephone number of each individual likely to have discoverable information, along with the subjects of that information, that the disclosing party may use to support its claim or defenses unless the use would be solely for impeachment:

Individual	Subject
Carlos Olivieri Former CFO of YPF May be contacted through counsel of record	Corporate separateness between YPF and its affiliated companies The formation of YPFH and CLHH Corporate organization and reorganization
Harvey R. ("Dick") Smith Former In-house Counsel, Maxus Energy Corporation; Former officer of YPFH and CLHH 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380 May be contacted through counsel of record	Corporate separateness between Repsol, YPF, YPFH, CLHH, Maxus, and Tierra Certain agreements and financial transactions of which he has knowledge The formation of YPFH and CLHH The lack of contacts between YPFH, CLHH, and the State of New Jersey
David Wadsworth Former General Counsel, Maxus Energy Corporation; Former director and officer of YPFH and CLHH 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380 May be contacted through counsel of record	Corporate separateness between Repsol, YPF, YPFH, CLHH, Maxus, and Tierra Certain agreements and financial transactions of which he has knowledge The formation of YPFH and CLHH

Rule 26(a)(1)(B)

A copy, or a description by category and location, of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims and defenses, unless the use would be solely for impeachment:

Documents by Category	Location:
<p>Corporate formation, organization, and finances of YPFH and CLHH and affiliated companies</p> <p><i>This category of documents may include, but is not limited, to analytical data, reports, correspondence, notes, articles, data sheets, corporate documents, court papers and filings, administrative agency documents or materials, news articles, academic literature, memoranda, invoices, financial data, and other types of materials.</i></p>	<p>YPF Holdings, Inc. 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380</p> <p>CLH Holdings, Inc. 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380</p> <p><i>Previously Produced:</i> YPFH290-413, 442-470, 522-529, 530-533; CLHH001-064, 96, 132-161, 162-168</p>
<p>Financial Statements of YPFH and affiliated companies</p> <p><i>This category of documents may include, but is not limited, to analytical data, reports, correspondence, notes, articles, data sheets, corporate documents, court papers and filings, administrative agency documents or materials, news articles, academic literature, memoranda, invoices, financial data, and other types of materials.</i></p>	<p>YPF Holdings, Inc. 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380</p> <p><i>Previously Produced:</i> YPFH011-033, 034-057, 058-081, 111-131, 132-152, 153-169, 170-186, 187-204, 205-223, 224-240, 241-255, 256-272, 273-289, 542-567, 1496-1511, 1512-1526</p>
<p>The August 14, 1996 Contribution Agreement and related documents</p> <p><i>This category of documents may include, but is not limited, to analytical data, reports, correspondence, notes, articles, data sheets, corporate documents, court papers and filings, administrative agency documents or materials, news articles, academic literature, memoranda, invoices, financial data, and other types of materials.</i></p>	<p>YPF Holdings, Inc. 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380</p> <p>CLH Holdings, Inc. 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380</p>
<p>August 1, 2005 Credit Facility between YPF and YPFH related documents</p> <p><i>This category of documents may include, but is not limited, to analytical data, reports, correspondence, notes, articles, data sheets, corporate documents, court papers and filings, administrative agency documents or materials, news articles, academic literature, memoranda, invoices, financial data, and other types of materials.</i></p>	<p>YPF Holdings, Inc. 1330 Lake Robbins Drive, Suite 300 The Woodlands, Texas 77380</p> <p><i>Previously Produced:</i> YPFH575-576, 582-583, 589-591, 592, 596-597, 598-604, 609, 610, 611, 630, 631-632, 641</p>

Rule 26(a)(1)(C)

A computation of any category of damages claimed by the disclosing party, who must also make available for inspection and copying as under R. 4:18-1 the documents or other evidentiary material unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

Not applicable.

Rule 26(a)(1)(D)

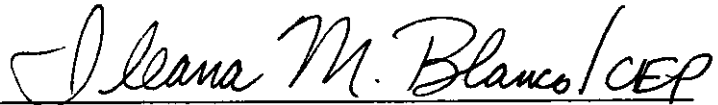
For inspection and copying as under R. 4:10-2(b) any insurance agreement under which an insurance business may be liable to satisfy:

Not applicable.

GREENBAUM, ROWE, SMITH & DAVIS LLP

DLA PIPER US LLP

Attorneys for Defendant
YPF Holdings, Inc. and CLH Holdings, Inc.

Handwritten signature of Ileana M. Blanco in cursive script, followed by a horizontal line.

By:

DATED: February 17, 2009

CERTIFICATE OF SERVICE

Christina E. Ponig, in lieu of oath of affidavit, certifies and says:

1. I am an attorney-at-law and am associated with DLA Piper LLP (US), counsel for Foreign Defendants Repsol YPF, S.A., YPF, S.A., YPF Holdings, Inc. ("YPFH") and CLH Holdings, Inc. ("CLHH") in connection with the above-referenced matter.

2. I hereby certify that, on this date, copies of the Supplemental Disclosures of Defendants YPFH and CLHH were served upon the following counsel of record via e-mail and Federal Express:

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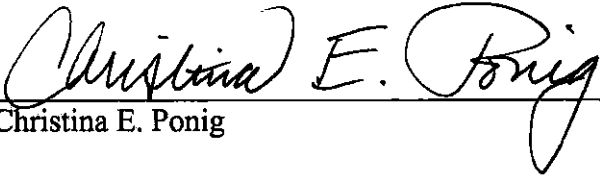
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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Christina E. Ponig

DATED: February 17, 2009