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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. L9868-05

: **DEFENDANTS REPSOL YPF, S.A.,
YPF, S.A., YPF HOLDINGS, INC.,
AND CLH HOLDINGS, INC.'S
RESPONSES TO PLAINTIFFS' FIRST
SET OF INTERROGATORIES TO
REPSOL YPF, S.A. AND SECOND SET
OF INTERROGATORIES TO YPF,
S.A., YPF HOLDINGS, INC., AND CLH
HOLDINGS, INC.**

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PLEASE TAKE NOTICE that pursuant to New Jersey Rule 4:17, Defendants Repsol YPF, S.A. (“Repsol”), YPF S.A. (“YPF”), YPF Holdings, Inc. (“YPFH”), and CLH Holdings, Inc. (“CLHH”) (collectively “Defendants”), by and through their undersigned counsel hereby respond to Plaintiffs’ First Set of Interrogatories to Repsol YPF, S.A. and Second Set of Interrogatories to YPF, S.A., YPF Holdings, Inc., and CLH Holdings, Inc. (“Plaintiffs’ Interrogatories”).

Defendants state that because Plaintiffs' Interrogatories seek detailed answers covering a fifteen-year time period, and especially given that merits discovery has only recently commenced, Defendants expect to and will supplement their responses to Plaintiffs' Interrogatories as facts are learned and discovery continues. Thus, Defendants expressly reserve the right to supplement, modify, or amend the following responses throughout the course of discovery.

INTERROGATORY NO. 1:

Please Identify each and every Person assisting in answering these interrogatories and for each such Person Identify the interrogatory for which such Person provided assistance.

RESPONSE TO INTERROGATORY NO 1:

Defendants object to this interrogatory because it seeks information that is protected by the attorney work product doctrine. Subject to that objection and their General Objections below, Defendants state that undersigned counsel worked with in-house lawyers at Repsol and at YPF in answering these interrogatories, and the answers are verified by Javier Sanz Cedron for information provided by Repsol; Gabriel Leiva for information provided by YPF; Teodoro Marco for information provided by YPFH; and Teodoro Marco for information provided by CLHH.

INTERROGATORY NO. 2:

Identify and explain the business purpose, rationale, and justification behind the creation and implementation of the Contribution Agreement.

RESPONSE TO INTERROGATORY NO 2:

Defendants object that the terms "business purpose, rationale, and justification" are vague, ambiguous, and subject to varying interpretations. Defendants will respond to this interrogatory using their understanding of those terms. Defendants also object to the use of the defined term "Identify," which Plaintiffs have defined to refer to persons or documents, as being

vague and ambiguous when applied to terms such as “business purpose, rationale, and justification.”

Subject to those objections and their General Objections below, Defendants state that the Contribution Agreement was created to facilitate certain aspects of a corporate restructuring implemented in 1996. Under that restructuring, Chemical Land Holdings, Inc. (“CLH”), later known as Tierra Solutions, Inc. (“Tierra”), assumed certain potential obligations of Maxus. On that same date, Maxus sold the stock of CLH, a Maxus subsidiary at the time, to CLHH, an indirect subsidiary of YPF. On August 14, 1996, YPF, YPFH, CLHH, and YPF International, Ltd. (“YPF Int’l”) entered into the Contribution Agreement, under which they agreed to make cash contributions to the equity capital of CLH, as and when requested by CLH, up to a specified amount.

The implementation of the Contribution Agreement allowed for improved operating efficiency at Maxus by transferring frontline responsibility for performing certain of Maxus’ potential obligations to a separate company—CLH—where they could receive specialized attention and management. This allowed Maxus to focus its energies on its core oil and gas business while, at the same time, highlighting Maxus’ improved balance sheet, thereby making Maxus’ post-acquisition financial recovery more easily apparent to third parties, capital markets, and others in the financial community.

Nothing in the Contribution Agreement, or any other aspect of the restructuring, eliminated, reduced, limited or impaired the fulfillment of any alleged liabilities or potential obligations. Rather, the Contribution Agreement simply specified an amount of contributions equal to the best estimate of the reserve for such potential obligations at the time, along with payment of certain additional expenses requested periodically by CLH (later Tierra). Nor did

anything limit the ability of YPF, YPFH, CLHH or YPF Int'l to make additional payments or financial contributions to Maxus or CLH (later Tierra). In fact, since entering into the Contribution Agreement, Defendants collectively have provided Maxus and Tierra with contributions, financial support and assistance well in excess of any particular amounts specified in the Contribution Agreement.

Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 3:

Identify any and all consideration each of You received in exchange for agreeing to be a party to the Contribution Agreement.

RESPONSE TO INTERROGATORY NO 3:

Defendants object to the use of the defined term "Identify," which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as "consideration." Defendants further object to this interrogatory as assuming incorrect facts, as Repsol was not a party to the Contribution Agreement. Subject to those objections and their General Objections below, Defendants state that the Contribution Agreement provided financial support to CLH (later Tierra) in connection with satisfying certain potential obligations. The agreement also allowed Maxus to focus its energies on its core oil and gas business while, at the same time, highlighting Maxus' improved balance sheet. As a result, Maxus' post-acquisition financial recovery was more easily perceived by third parties, capital markets, and others in the financial community. Improved financial health and increased access to the capital markets for its subsidiary company (Maxus), and the continued satisfaction by a different subsidiary

company (CLH) of Maxus' potential obligations, benefited all of YPF, YPFH, CLHH and YPF Int'l. In addition, in exchange for the agreement by YPF, YPFH, CLHH and YPF Int'l to fund alleged or potential obligations under the Assumption Agreement, Maxus agreed that all payments made under that agreement would be credited against YPF's obligations under the "keepwell covenant" in the Maxus Merger Agreement.

Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 4:

Identify each and every Person who participated in creating or drafting the Contribution Agreement and each Person's role Concerning same.

RESPONSE TO INTERROGATORY NO 4:

Subject to their General Objections below, Defendants state that Carlos Olivieri for YPF, Linda Engelbrecht for YPF Int'l, David Wadsworth for YPFH, Mel Skaggs for CLH and CLHH, and W. Mark Miller for Maxus signed the Contribution Agreement. The law firm, Andrews Kurth, LLP, advised YPF and Maxus in connection with certain aspects of the Contribution Agreement. The identity of individuals at YPF and/or officers at YPFH or CLHH involved in "creating or drafting" the Contribution Agreement can be derived by reference to documents that have been, or will be, produced and identified pursuant to Rule 4:17-4(d) and the initial disclosures served by YPF, YPFH and CLHH, which are incorporated herein by reference. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 5:

Identify the basis for the \$108,400,000 figure contained in the Contribution Agreement (YPF 521-YPF 527) and the portion of that figure attributable to the Lister Plant and/or the Lister Site, and to each site listed in Exhibit A of the Assumption Agreement (YPF 543-546).

RESPONSE TO INTERROGATORY NO 5:

Defendants object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as “basis.” Defendants also object that the phrase “basis for” is vague, ambiguous, and subject to varying interpretations. Defendants will respond to this interrogatory using their understanding of that term. Defendants further object that the request for information concerning any estimated reserve for, and estimate of alleged potential liabilities or obligations attributable to, the Lister Site and/or the Lister Plant seeks privileged information that is protected from disclosure under the attorney work product doctrine and the attorney-client privilege in that it seeks information on reserve analyses and estimates beyond that disclosed in SEC filings.

Subject to those objections and their General Objections below, Defendants state that the \$108,400,000 figure represents the amount of the aggregate commitment at the time by YPF, YPF Int'l, YPFH and CLHH to contribute capital to Tierra (f/k/a CLH) pursuant to the terms of the Contribution Agreement (the “Assumed Liability Accrued Amount,” as defined in the Contribution Agreement). The \$108,400,000 Assumed Liability Accrued Amount was based on Maxus’ estimated environmental reserve as of June 30, 1996. On February 5, 1997, the Contribution Agreement was amended to increase the amount of the Assumed Liability Accrued Amount by \$3.1 million based on an increased estimate of the reserve. YPF received advice on the estimated reserve at the time from Andrews Kurth, LLP. Before YPF’s acquisition of Maxus, Maxus’ reserves for environmental liabilities were considerably smaller — \$84,700,000 as of December 31, 1995 and \$87,100,000 as of December 31, 1994.

Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 6:

Identify (including the name, title, business, address, telephone number and time period for each position) each of Your employees, officers, directors, or Agents whose job responsibilities Include or have in the past Included or were related to supervising, overseeing, coordinating, planning, approving or conducting any activities Concerning the Assumption Agreement or Contribution Agreement as those agreements pertain to the Lister Plant, the Lister Site, the Passaic River, and/or for each site listed in Exhibit A of the Assumption Agreement (YPF 543546).

RESPONSE TO INTERROGATORY NO 6:

Defendants object that this interrogatory is overly broad and unduly burdensome insofar as it asks Defendants to identify, for each specified individual, that individual's title, business address, telephone number and time period for each position held. Defendants also object to providing the address and telephone number of any current or former employees on the grounds that such individuals must be contacted through counsel and cannot be contacted directly by Plaintiffs. Defendants also object to providing information for sites listed in Exhibit A of the Assumption Agreement that are not at issue in this suit because such sites are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object to the term "Agent" as vague and ambiguous as well as overly broad to the extent that it purports to include persons under "indirect control or influence" of another person.

Subject to those objections and their General Objections below, Defendants state that, with respect to the Assumption Agreement, Repsol, YPF, YPFH and CLHH were not parties to that agreement. With respect to the Contribution Agreement, Defendants state that Repsol was not a party to that agreement either. The identity of individuals at YPF, YPFH, or CLHH

involved in contributions to CLH / Tierra and Maxus under the Assumption Agreement and the Contribution Agreement can be derived by reference to documents that have been, or will be, produced and identified pursuant to Rule 4:17-4(d) and the initial disclosures served by YPF, YPFH and CLHH, which are incorporated herein by reference. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 7:

Do any of You contend that cash contributions were made to the equity capital of Tierra sufficient to fully satisfy each of Your contractual obligations pursuant to Paragraph 2, titled *Limited Capital Contribution Obligation for CLH*, of the Contribution Agreement? If Your answer is anything other than an unequivocal “No,” Explain Your position in detail, Including Identifying all contributions of any kind and relevant Persons and Documents.

RESPONSE TO INTERROGATORY NO 7:

Defendants object to the use of the defined term “Identifying,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as “contributions.” Subject to that objection and their General Objections below, Defendants state that Repsol is not a party to the Contribution Agreement and, therefore, had no contractual obligations under the Contribution Agreement. Defendants further state that YPF, YPFH, CLHH and YPF Int’l have satisfied their contractual obligations under the Contribution Agreement. According to the terms of the Contribution Agreement, the obligation of YPF, YPFH, CLHH and YPF Int’l to make capital contributions to Tierra ceased once the aggregate capital contributions, plus the amount of any advances or loans, to Tierra (excluding all contributions for administrative expenses) totaled \$108,400,000, plus certain expenses budgeted from CLH from time to time. On February 5, 1997, the Contribution Agreement was amended to increase the amount of the Assumed Liability Accrued Amount by \$3.1 million.

On October 8, 2007, the parties to the Contribution Agreement entered into a settlement agreement resulting in the satisfaction and termination of all obligations under the Contribution

Agreement. Under the settlement, Maxus and Tierra collectively received consideration totaling \$378,202,422, which consisted of the release, in its entirety, of an account receivable and loans equal to \$363,772,421 owed to YPFH by Maxus (upon various reimbursements) and a \$14,430,000 pre-settlement payment by YPFH to Tierra, which was converted into a capital contribution to Tierra by YPFH.

YPF, YPFH and YPF Int'l, collectively, have provided Maxus and CLH (later Tierra) with financial support and assistance well in excess of any amounts specified in the Contribution Agreement. Since entering into the Contribution Agreement, YPF, YPFH and YPF Int'l collectively have provided hundreds of millions in contributions and other financial assistance to Maxus and CLH / Tierra.

Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 8:

What amount of cash has each of You contributed to or for Tierra' s benefit pursuant to the Contribution Agreement for costs or expenses related to the Lister Site or the Lister Plant?

RESPONSE TO INTERROGATORY NO 8:

Subject to their General Objections below, Defendants incorporate their response to Interrogatory Number 7 as if fully set forth herein.

INTERROGATORY NO. 9:

Have any of you made Transfers of Value to Maxus or Tierra or for their benefit beyond the contributions contemplated by the Contribution Agreement? If Your answer is anything other than an unequivocal "No," Identify all such Transfers of Value, including relevant Persons and Documents.

RESPONSE TO INTERROGATORY NO 9:

Defendants object to the phrase “Transfers of Value” as overly broad, vague and ambiguous. Subject to that objection and their General Objections below, Defendants incorporate their response to Interrogatory Number 7 as if fully set forth herein. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 10:

For the time period 1995 to the present, which of You or Your Affiliates has used The Woodlands, Texas 77380 (including any suite at 1330 Lake Robbins Drive) as a business address in any capacity (including in marketing and/or financial information)? In your answer, Identify the business entity, the address used, and the applicable time period.

RESPONSE TO INTERROGATORY NO 10:

Defendants object to the term “Affiliates” as defined by Plaintiffs on the grounds that the term is overly broad, unduly burdensome and calls for information not relevant or likely to lead to the discovery of admissible evidence because the defined term would include literally hundreds of different companies that are not named as the parties to this litigation and that have nothing to do with any of the claims in dispute.

Subject to those objections and the General Objections below, Defendants state that in 2005, Repsol USA Holdings Corporation, Repsol Services Company (f/k/a Repsol GoM, Inc.), Repsol E&P USA Inc. (f/k/a Repsol Oil USA Inc. and Hispanoil USA, Inc.) and Repsol Energy North America Corporation registered business addresses in the United States at 1330 Lake Robbins Drive, Suite 400, The Woodlands, Texas 77380. In 2007, each of the above mentioned entities moved its business address in the United States to 2001 Timberloch Place, Suite 3000,

The Woodlands, Texas 77380. In November 2006 Repsol Offshore E&P USA Inc. registered an address of 1330 Lake Robbins Drive, Suite 400, The Woodlands, Texas 77380. In 2007 Repsol Offshore E&P USA Inc. registered business addresses at 2001 Timberloch Place, Suite 3000, The Woodlands, Texas 77380. Between 2002-2005, RYTTSA USA, Inc. (f/k/a YPF Distribution Company) registered a business address at 1330 Lake Robbins Drive, Suite 400, The Woodlands, Texas 77380. In 2009, YPF Services USA Corporation registered a business address in the United States at 1330 Lake Robbins Drive, Box 10, The Woodlands, Texas, 77380. Defendants further state that Repsol and YPF have hundreds of affiliates, the vast majority of which have business addresses in locations other than The Woodlands, Texas 77380.

At various times between 1995-Present, Maxus Energy Corporation, Maxus International Energy Company, and Midguard Energy Company (f/k/a Maxus Exploration Company) have registered business addresses at 1330 Lake Robbins Drive, Suite 300, The Woodlands, Texas, 77380. Additional information responsive to this interrogatory may be produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 11:

For all times during the time period 1995 through 2006, Identify the following Persons, Including their respective employer(s), position(s) (including any and all officer and/or director positions), and dates of employment and/or service in such position(s), and for each parenthetically noted Document Identify in which capacity each such Person was acting at the time of such Document:

Adolfo Carmelo Moreira Meoniz (MAXUS-E-0000180; 0000189; 0000275; and YPFE-0000037; 0001047; 0001061)

Adrian Ramon Marino Ponce (MAXUS-E-0009822)

Agustin Garcia Moratilla (MAXUS-E-0001772; 0002200; 0005509)

Alfonso De Las Cuevas (MAXUS-E-0005229)

Alfredo Bruno Curcio (MAXUS-E-0000103; 0001314; 0001488; and YPF-E-0000049; 00000263; 0000525)

Allen Gulledge (YPF 615-616)

Alvaro Felipe Negrao (MAXUS-E-0005229)

Alvaro Racero Baena (MAXUS-E-0000036; 0004770)

Ana Oliva Garcia (MAXUS-E-0005165)

Annette Womack Graves (MAXUS-E-0000023)

Arantxa Calvo Guerrero (YPF-E-0001011)

Carlos Alberto Arango Gallego (MAXUS-E-0005073)

Carlos Alberto Oliviera Fernandez (MAXUS-E-0000336; 0001567; 0009813; and YPF-E-0000481; 0000576)

Carlos Folgado Delgado (MAXUS-E-0009821)

Carolyn Kalterman Singman (MAXUS-E-0000024; 0000030; 0000103; 00000145; 0000222; and YPF-E-0000001; 0000010; 00000028)

Connie Hawkins Monnett (MAXUS-E-0000033; 0001374)

Cristina Llorente Perez (MAXUS-E-0009810)

Cristina Calleja Perez (MAXUS-E-0009813; and REP-E-0000001)

David Caceres Nunez (REP-E-0000001)

David O. Smith (YPF 615-616)

David Rabbe (YPF-E-0000361; YPF-E-0000896)

Diego De Vivo (MAXUS-E-0000056)

Diego Diaz Baldasso (MAXUS-E-0005121; 0005566)

Dora Batao Wecjman (YPF-E-0001011)

Dora Elsa Acosta Vasquez (MAXUS-E-0000017; 0001326; 0001417; 0001574; 0005131; and YPF-E-0000003; 0000228; 0000253; 0000595; 0000662)

Emma Kosfelder Bonaldo (MAXUS-E-0000310; 0004315; and YPF-E-0001011; 0001016)

Enrique Castro (MAXUS-E-0001773)

Enrique Waterhouse Boneo (MAXUS-E-0000017; 00001309; 0001409; 0009813; and YPF-E-0000700; 0000712; 0000717)

Evelin Lopez Elezcano (MAXUS-E-0009822)

Fernando Marin Flores (MAXUS-E-MAXUS-E-0006854; 0006988)

Fernando Nardini Fernandez (YPF-E-0000047; 0000229; 0000687; 0005202)

Fernando Quadros Enriquez (MAXUS-E-0006854)

Francisco Javier Sanz Cedron (MAXUS-E-0001278; 0001374; 0005147; and YPF-E0000840)

Frederico Martin Anton (MAXUS-E-0004390)

German Cabrera Marin (MAXUS-E-0000024; 0000343)

Gerry Coscia (MAXUS-E-0001773)

Greg Robert Castelan (MAXUS-E-0002253; 0003287)

Greg Smith (YPFH 630)

Guillermo Rispoli Prieto (MAXUS-E-0000275; 00005174 and YPF-E-0001061)

Hector Gandini Frechou or **Hector C. Frechou** (MAXUS-E-0000145; 0000162; 0000194; 0000268; and YPF-E-0000001; 0000011; 0000015)

Ignacio Segovia San Juan (MAXUS-E-0009822)

Ignacio Ullate Jimenez (MAXUS-E-0009810)

Javier Alberto Marino Ponce (MAXUS-E-0000338; 0000182; 0009820; and YPF-E0000034; 0000243; 0001043)

Javier Garcia-Rubio Jaquotot (MAXUS-E-000121; 0002139; 0002200)

Javier Jose Ares Ascariz (MAXUS-E-0000026; 0001581; 0009818; and YPF-E0000047; 0000059; 0001043)

Javier Nogales Aranguéz (MAXUS-E-0001277; 0001755; and REP-E-0000001)

Javier Vega Lera (MAXUS-E-0006854)

Jesus Chillon Fernandez (MAXUS-E-0005073)

Jesus Herranz San Frutos (MAXUS-E-0006854)

John Girgis Joseph (MAXUS-E-0000033)

Jose Goncalves De Abreu (MAXUS-E-0006854)

Jose Manuel Revuelta (YPFHWF000060)

Jose Maria Borreguero Seron (MAXUS-E-0005165)

Leo Ozuna (MAXUS-E-0006854)

Liliana Urquiza Catalano (MAXUS-E-0000103; 0000150; 0000202; 0000275; and YPF-E-0000001; 0000012; 000020; 000047)

Lonnie Organ Jones (MAXUS-E-0000338; 0001734; 0005073)

Luis Ramon Luiza Mendoza (MAXUS-E-0009573; and YPF-E-0000060)

Marcelo Delfino (MAXUS-E-00000033)

Marcelo Delfino Santa Cruz (MAXUS-E-0001369; 0001372)

Maria Belen Roman Guindo (MAXUS-E-0005566; 0008084)

Maria Christina Espana Sebastian (REP-E-0000001)

Maria Cristina Franco Ferreira (MAXUS-E-0000001; 0000089; 0001333; 0005323; and YPF-E-0001007)

Maria Luz Molinero Calvo (MAXUS-E-0009822)

Maria Salamanca Iniesta (MAXUS-E-0009813; YPF-E-0000575; and REP-E-0000001)

Mariano Benito Zamarriego (REP-E-0000001)

Mariano Rodrigo De Bony Prati (MAXUS-E-0000336; 0009813; and YPF-E-0000034; 0000041)

Marta Marcos Ayuso (MAXUS-E-0009813; and REP-E-0000001)

Marva Tarver (MAXUS0002253; 0005571)

Melissa Quintanilla (MAXUS-E-0005571)

Miguel Luque Herran (MAXUS-E-0005155)

Miguel Torres Lopez (MAXUS-E-0009813; and REP-E-0000001)

Mitch Brouman (MAXUS-E-0001773)

Myriam Narvaez Hidalgo (MAXUS-E-0005073)

Nancy Dembny (YPF 615-616)

Nestor Sosa Canosa (MAXUS-E-0005137; 0005229)

Nicolas Bernatine Oillataguerra (MAXUS-E-0000030; 0000103; 0000145; 0000189; 0000242; and YPF-E-0000001; 0000010)

Nora Marti Hansson (MAXUS-E-0001567)

Nurys Maleki (MAXUS-E-0009739)

Paloma Gomayo Carbonell (MAXUS-E-0009813; YPF-E-0000059; 0000575; and REP-E-0000001)

Peg Kelly (MAXUS-E-0001773)

Pete Sawchuck (MAXUS-E-0001773)

Ramon Lauder / Juan Ramon Lauder Ruiz (MAXUS-E-0004802)

Raquel Clabiorne Soria (MAXUS-E-0000033)

Rene Manceda (MAXUS-E-0009862)

Reyes Clemente Lavanda (MAXUS-E-9821)

Ricardo Anibal Diaz Oliva (MAXUS-E-0000336; and YPF-E-0000033; 0000047)

Ricardo Chercoles Blazquez (MAXUS-E-0001277; 0001374; 0001755; 0005557; and YPF-E-0000685; 0000836)

Rich Ricci (MAXUS-E-0001773)

Richard Sanchez (MAXUS-E-0000023; 0000155; 0001795; and YPF-E-0000568; 0000981)

Rick J. Hartline (MAXUS-E-0009821; MAXUS-E-0009980; YPF-E-0000361)

Rosario Duque Sanchez (MAXUS-E-0009813; and REP-E-0000001)

Sandra Rodriguez Necchi (MAXUS-E-0000002; 0000061; 0001285; 0001921; and YPF-E-0000003)

Sergio O. Paredes (or Sergio Glaria Paredes) (MAXUS-E-0001810; 0009860)

Susana Beatriz Borla Sosa (MAXUS-E-0000180; 0000189; 0000275; and YPF-E0000033; 0000396)

Tim Carr (YPF 615-616)

Wendy Francis (or Wendy Francis Weber) (MAXUS-E-0000027; 0001788; 0004762; and YPF-E-001003)

Wieke Kodri Ireawate (MAXUS-E-0000033; 0005156; 0005325; 0006987)

Wladimir Salto Mosquera (MAXUS-E-0006854; 0009285)

Yoseph Rudiricus (MAXUS-E-0005970)

RESPONSE TO INTERROGATORY NO 11:

Defendants object that this interrogatory is excessively overly broad, unduly burdensome and oppressive. The interrogatory asks for detailed employment histories for **99** different individuals for “all times” between 1995 through 2006, an 11-year period. The interrogatory further asks Defendants to identify the “capacity [in which] each such Person was acting” at the time of the creation of dozens of different documents. Defendants further object that this interrogatory constitutes at least 99 separate interrogatories, and thus violates the limit on interrogatories in Case Management Order VII. Subject to those objections and their General Objections below, Defendants preliminarily respond to this interrogatory as follows:

Carlos Alberto Arango Gallego held the position of Contable in Repsol’s Delegación Colombia group from January 1, 1997 through November 30, 1998; the position of Contable in Repsol’s E&P Delegación Perú/Gerencia Económico-Financiera group from December 1, 1998 through January 15, 1999; the position of Jefe Contable in Repsol’s E&P Delegación Perú group from January 16, 1999 through August 31, 2001; and the positions of Gerente Económico Administrativo/Gerente Administración y Finanzas in Repsol’s C&A Ecuador group from July 1, 2002 through 2006. At the time MAXUS-E-0005073 was created, Carlos Alberto Arango

Gallego held the positions of Gerente Económico Administrativo/Gerente Administración y Finanzas in Repsol's C&A Ecuador group.

José Goncalves De Abreu held the position of Analista de Contabilidad Sr. in Repsol's Contabilidad y Cuentas Por Pagar group from October 1, 2002 through December 31, 2005. At the time MAXUS-E-0006854 was created, José Goncalves De Abreu held the position of Analista de Contabilidad Sr. in Repsol's Contabilidad y Cuentas Por Pagar group.

Marta Marcos Ayuso held the position of Técnico Operaciones Ryttsa in Repsol's D. Planificación y Gestión Financiera group from August 3, 2000 through September 30, 2000; the position of Técnico Financiación in Repsol's D.C. Financiera group from October 1, 2000 through November 5, 2000; the position of Técnico Financiación Internacional in Repsol's D.C. Financiera group from November 6, 2000 through May 31, 2000; the position of Técnico Mesa de Tesorería in Repsol's Mesa Tesorería group from June 1, 2001 through April 7, 2005; and the position of Jefe Mesa de Tesorería in Repsol's Mesa Tesorería group from April 8, 2005 through 2006. At the time MAXUS-E-0009813 and REP-E-0000001 were created, Marta Marcos Ayuso held the position of Técnico Mesa de Tesorería and Jefe Mesa de Tesorería in Repsol's Mesa Tesorería group.

Mariano Benito Zamarrigo held the position of Técnico Mercado de Capitales in Repsol's D.C. Financiera group from September 17, 2001 through May 31, 2002 and the position of Técnico Renta Fija in Repsol's Mercados Renta Fija group from June 1, 2002 through 2006. At the time REP-E-0000001 was created, Mariano Benito Zamarrigo held the position of Técnico Renta Fija in Repsol's Mercados Renta Fija group.

María Luz Molinero Calvo held the position of Técnico De Central de Riesgo in Repsol's R. Comercial y Filiales (Histórico) group until November 30, 1995; the position of Técnico

Cuentas a Pagar y Sistema Tesorero in Repsol's Cuentas con Terceros group from March 1, 1996 through July 31, 1997; the position of Técnico Cuentas Financiaras in Repsol's Cuentas Financieras group from August 1, 1997 through April 30, 2000; the position of Técnico Pagos Manuales/Técnico Cuentas a Pagar in Repsol's Pagos Manuales/Cuentas a Pagar group from May 1, 2000 through May 31, 2001; the position of Técnico Proyectos Tesorería in Repsol's Planificación y Gestión Financiera group from June 1, 2001 through November 30, 2002; the position of Jefe Recursos Financieros in Repsol's Recursos Financieros group from December 1, 2002 through April 7, 2005; the position of Jefe Tesorería España in Repsol's Gestión Tesorería España group from April 8, 2005 through July 11, 2005; and the position of Jefe Gestión Tesorería España in Repsol's Gestión Tesorería España group from July 12, 2005 through 2006. At the time MAXUS-E-0009822 was created, Maria Luz Molinero Calvo held the position of Jefe Recursos Financieros in Repsol's Recursos Financieros group.

Maria Cristina Franco held the position of Técnico YPF Internacional in Repsol's Consolidation Argentina/Consolidación & Reporting group from March 1, 2001 through August 31, 2005. At the time MAXUS-E-0000089, MAXUS-E-0001333 and MAXUS-E-0005323 were created, Maria Cristina Franco held the position of Técnico YPF Internacional in Repsol's Consolidation Argentina/Consolidación & Reporting group.

María Cristina España Sebastián held the position of Técnico Superior Tesorería at Repsol in 1995; the position of Técnico Contratos in Repsol's Relaciones Bancarias/Recursos Financieros group from January 1, 1996 through May 31, 2001; the position of Jefe Recursos Financieros in Repsol's Recursos Financieros group from June 1, 2001 through August 31, 2002; the position of Subdirectora. Control Financiero in Repsol's Control Financiero group from September 1, 2002 through December 31, 2002; and the positions of Subdirectora. Control

Financiero/Jefe Control Financiero/Responsible Control Financiero in Repsol's Control Financiero group from January 1, 2003 through 2006. At the time REP-E-0000001 was created, Maria Cristina España Sebastian held the position of Jefe Recursos Financieros in Repsol's Recursos Financieros group.

Marcelo Emilio Delfino held the position of Jefe Gestión Fiscal in Repsol's Asuntos Fiscales Latam group from March 1, 2001 through March 31, 2006 and the position of Gerente Asuntos Fiscales Latam in Repsol's Asuntos Fiscales Latam group for the remainder of 2006. At the time MAXUS-E-00000033, MAXUS-E-0001369 and MAXUS-E-0001372 were created, Marcelo Emilio Delfino held the position of Jefe Gestión Fiscal in Repsol's Asuntos Fiscales Latam group.

Francisco Javier Nogales Aranguez held the position of Jefe Departamento Control at Repsol in 1995; the position of Jefe Consolidación in Repsol's Consolidación Financiera group from January 1, 1996 through June 30, 1997; the position Gerente Económico Financiero in Repsol's Delegación Argentina group from July 1, 1997 through December 31, 1997; the position of Subdirector Financiación in Repsol's D.C. Financiera group from March 1, 2001 through May 31, 2002; and the position of Subdirector Estructura Financiera y Control/Responsible Estructura Financiera in Repsol's Seguimiento Estructura Financiera group from June 1, 2002 through 2006. At the time MAXUS-E-0001277, MAXUS-E-0001755 and REP-E-0000001 were created, Francisco Javier Nogales Aranguez held the position of Subdirector Estructura Financiera y Control/Responsible Estructura Fin. in Repsol's Seguimiento Estructura Financiera group.

Javier García-Rubio Jaquotot held the position of lawyer in Repsol's Servicios Jurídicos group from October 26, 1998 through September 30, 1999 and the position of lawyer for

Repsol's D. Asuntos Corporativos/D.C. Asesoría Jurídica group from October 1, 1999 through July 31, 2005. At the time MAXUS-E-000121, MAXUS-E-0002139 and MAXUS-E-0002200 were created, Javier Garcia-Rubio Jaquotot held the position of lawyer for Repsol's D. Asuntos Corporativos/D.C. Asesoría Jurídica group.

Federico Martin Anton held the position of Administrativo. Consolidación in Repsol's R. Química y Filiales group from 1995 through March 31, 1996; the position of Admvo. Consolidación in Repsol's Económico group from April 1, 1996 through April 30, 2000; the position of Admvo. Contabilidad in Repsol's Contabilidad group from May 1, 2000 through October 10, 2000; the position of Administrativo Operaciones Complementarias in Repsol's Operaciones Complementarias group from October 11, 2000 through November 30, 2000; the position of Gestor Facturas Deudoras in Repsol's Facturación a Deudores group from May 1, 2001 through November 30, 2003; and the positions of Gestor Lubr. Química, Upstream/Gestor Rylesa RQ. Rexp. y Corp./Gestor Efectos y Pagos a Clientes in Repsol's Cobros Domiciliados/Efect. y Cli. Espec./Cuentas a Cobrar VVDD Aviación, EESS/PAGOS group from December 1, 2003 through 2006. At the time MAXUS-E-004390 was created, Federico Martin Anton held the positions of Gestor Lubr. Química, Upstream/Gestor Rylesa RQ. Rexp. y Corp./Gestor Efectos y Pagos a Clientes in Repsol's Cobros Domiciliados/Efect. y Cli. Espec./Cuentas a Cobrar VVDD Aviación, EESS/PAGOS groups.

Francisco Javier Sanz Cedron held the position of Financiación Internacional in Repsol's R. Petróleo y Filiales group in 1995; the position of Jefe Financiación Internacional in Repsol's D.C. Financiera group from January 1, 1996 through April 2, 1998; the position of Director Financiación in Repsol's D.C. Financiera group from April 3, 1998 through April 30 1998; and the positions of Director Financiero/Director Financiera/Director de Financiación in Repsol's

D.C. Financiera group from May 1, 1998 through 2006. At the time MAXUS-E-0001278, MAXUS-E-0001374, MAXUS-E-0005147 and YPF-E-0000840 were created, Francisco Javier Sanz Cedron held the position of Director Financiero/Dirección Financiera/Director de Financiación in Repsol's D.C. Financiera group.

Miguel Jesús Luque Herran held the position of Jefe Exploración y Producción y Cautivas in Repsol's Exploración y Produccion y Cautivas group from January 1, 2001 through January 31, 2001 and the position of Subdirector Seguros Upstream y Cautivas in Repsol's Seguros Upstream group from January 4, 2001 through 2006. At the time MAXUS-E-0005155 was created, Miguel Jesús Luque Herran held the position of Subdirector Seguros Upstream y Cautivas in Repsol's Seguros Upstream group.

Paloma Golmayo Carbonell held the position of Técnico Marketing Corporativo F-1 in Repsol's Marketing Corporativo group from March 17, 1999 through February 28, 2001; the position of Técnico Publicidad in Repsol's Publicidad group from March 1, 1999 through June 30, 2001; the position of Técnico Publicidad in Repsol's Servicios Marketing group from July 1, 2001 through November 30, 2001; the position of Técnico Mesa de Tesorería in Repsol's Mesa Tesorería group from December 1, 2001 through April 7, 2005; the position of Gestor Coordinación Global Tesorería in Repsol's Tesorería group from April 8, 2005 through September 3, 2006; the position of Reporting Cordinación Global in Repsol's Reporting Global group from April 8, 2005 through 2006; and the position of Tesorería in Repsol's Tesorería group from March 10, 2006 through 2006. At the time MAXUS-E-0009813, YPF-E-0000575 and REP-E-0000001 were created, Paloma Golmayo Carbonell held the position of Técnico Mesa de Tesorería in Repsol's Mesa Tesorería group. At the time YPF-E-0000059 was created,

she held the positions of Gestor Coordinación Global Tesorería in Repsol's Tesorería group and Reporting Cordinación Global in Repsol's Reporting Global group.

Reyes A. Clemente Lavanda held the position of Cedido Tesorería in Repsol's R. Exploración y Filiales group from January 1, 1995 through December 31, 1996; the position of Técnico Finanzas Exploración in Repsol's Recursos Financieros group from January 1, 1997 through September 30, 1998; the position of Técnico Contratos in Repsol's Operaciones Bancarias group from October 1, 1998 through May 31, 2001; the position of Técnico Back Office Mesa Tesorería in Repsol's Back Office Mesa Tesorería group from July 1, 2002 through April 7, 2005; the position of Gestor Riesgos y Apoyo Gestión Tesorería in Repsol's Control Riesgos y Apoyo Gestión Tesorería group from April 8, 2005 through April 30, 2005; and the position of Gestor Cuentas. Bancarias en Divisas in Repsol's Cuentas Bancarias en Divisas group from May 1, 2005 through 2006. At the time MAXUS-E-9821 was created, Reyes A. Clemente Lavanda held the position of Técnico Back Office Mesa Tesorería in Repsol's Back Office Mesa Tesorería group.

Rosario Duque Sanchez held the position of Jefe Sección Normas y Procedimientos in Repsol's Sección Normas y Procedimientos group from October 1, 1996 through January 31, 1997; the position of Jefe Sección Finanzas in Repsol's Sección Finanzas group from February 1, 1997 through May 31, 1998; the position of Jefe Sección Inmovilizado in Repsol's Sección Inmovilizado GLP group from June 1, 1998 through September 30, 2000; the position of Resp. Operaciones R. Francia in Repsol's D. Planif. Y Gestión Financiera group from October 1, 2000 through May 31, 2001; the position of Jefe Back Office Mesa Tesorería in Repsol's Back Office Mesa Tesorería group from June 1, 2001 through April 7, 2005; the position of Gestor Cuentas- Bancarias en Divisas in Repsol's Cuentas Bancarias en Divisas group from April 8, 2005

through April 30, 2005; the position of Coordinador Equipo Proyecto Control Interno in Repsol's Control Interno group from May 1, 2005 through March 9, 2006; and the positions of Jefe Control Interno Reporting Financiero/Jefe Oficina Técnica in Repsol's Control Interno Reporting Financiero Oficina Técnica group from March 10, 2006 through 2006. At the time MAXUS-E-0009813 and REP-E-0000001 were created, Rosario Duque Sanchez held the position of Jefe Back Office Mesa Tesorería in Repsol's Back Office Mesa Tesorería group.

Wladimir Saltos Mosquera held the position of Técnico Económico Financiero in Repsol's R. Exploración y Filiales group from January 1, 1995 through December 31, 1996; the position of Técnico Económico Financiero in Repsol's Departamento. Control Asociaciones group from January 1, 1997 through May 31, 1997; the position of Técnico Económico Financiero in Repsol's Contabilidad y Consolidación group from June 1, 1997 through December 31, 2000; the position of Técnico Contabilidad in Repsol's Contabilidad group from May 1, 2000 through October 10, 2000; the positions of Jefe Administrativo/Control Participadas/Control Operaciones Financieras/Existencias/Costes in Repsol's Administración Participadas/Operaciones Financieras/Existencias/Costes group from October 11, 2000 through August 31, 2001; the position of Jefe Administrativo/Control de Participadas in Repsol's Administración de Participadas group from September 1, 2001 through June 23, 2002; the positions of Jefe Administrativo/Control de Participadas/Responsable Administración Control Participadas/Jefe Administrativo/Control Participadas in Repsol's Administración y Control de Participadas group from June 24, 2002 through November 30, 2003; and the position of Subdirector Económico Administrativa Europa, Asia, Africa/Subdirector Contabilidad y Administración EAA in Repsol's Control Países y Participadas EAA y Norteamérica group from December 1, 2003 through 2006. At the time MAXUS-E-0006854 was created, Wladimir Saltos

Mosquera held the positions of Jefe Administrativo./Control de Participadas/Responsable Administración Control Participadas/Jefe Administrativo/Control Participadas in Repsol's Administración y Control de Participadas group. At the time MAXUS-E-0009285 was created, he held the position of Subdirector Económico Administrativa Europa, Asia, Africa/Subdirector Contabilidad y Administración EAA in Repsol's Control Países y Participadas EAA y Norteamérica group.

Juan Ramon Lauder Ruiz held the position of Jefe Departamento. Económico Financiero in Repsol's R. Exploración y Filiales group from 1995 through December 31, 1996; the position of Jefe Departamento. Económico Financiero in Repsol's Finance and Administration Libia group from January 1, 1997 through October 31, 1999; the position of Jefe Departamento Control de Gestión in Repsol's Subdirección Control de Gestión group from November 1, 1999 through December 31, 1999; the position of Cedidos a Planificación/Control R.S.A. in Repsol's Cedido a Administración Contable Unica Rps group from January 1, 2000 through January 31, 2000; the position of Jefe Control de Gestión Enarm in Repsol's Control de Gestión Enarm group from February 1, 2000 through February 28, 2001; the position of Jefe Departamento. Control de Gestión in Repsol's Control de Gestión group from March 1, 2001 through March 31, 2002; the position of Jefe Consol, Control Gestión y Coordinación Acu in Repsol's Control de Gestión E&P group from April 1, 2002 through April 30, 2004; and the position of Subdirector Consolidación y Control Gestión E&P in Repsol's Control de Gestión E&P group from May 1, 2004 through July 24, 2006. At the time MAXUS-E-0004802 was created, Juan Ramon Lauder Ruiz held the position of Jefe Consolidación, C. Gestión y Coordinación Acu in Repsol's Control de Gestión E&P group.

Fernando J. Marin Flores held the position of Técnico Análisis Negocios y Procedimiento Contables in Repsol's Análisis y Control group from May 7, 2003 through November 30, 2003; the position of Técnico Contabilidad Administración Europa, Asia, Africa/Técnico Filiales Enarm in Repsol's Control Países y Participadas EAA y Norte Am. group from December 1, 2003 through March 9, 2006; and the position of Técnico Económico Administrativo Europa, Asia, Africa in Repsol's Control Países y Participadas EAA y Norteamérica from March 10, 2006 through 2006. At the time MAXUS-E-0006854 and MAXUS-E-0006988 were created, Fernando J. Marin Flores held the position of Técnico Análisis Negocios y Procedimientos Contables in Repsol's Análisis y Control group.

Emma Alejandra Kosfelder held the position of Jefe Consolidación/Responsable Consolidación y Reporte in Repsol's Consolidación group from January 1, 2003 through 2006. At the time MAXUS-E-0000310, MAXUS-E-004315 and YPF-E-0001011 were created, Emma Alejandra Kosfelder held the position of Jefe Consolidación/Responsable Consolidación y Reporte in Repsol's Consolidación group.

Fernando Jose Quadros Enriquez held the position of Jefe Equipo Auditoria at Repsol from January 1, 1995 through December 31, 1995; the position of Jefe Equipo Auditoria Corporativa in Repsol's D. Auditoria y Control group from January 1, 1996 through September 15, 1997; the position of Gerente Económico Financiero Relapasa in Repsol's Refinería Pampilla group from September 16, 1997 through March 31, 1998; the position of Gerente Económico Financiero Relapasa in Repsol's Delegación Perú group from April 1, 1998 through February 28, 2001; the position of Gerente Económico Financiero Relapasa in Repsol's Estructura No Op. Expatr. Enarm group from March 1, 2001 through September 30, 2002; the position of Gerente Económico Financiero in Repsol's C&A Perú group from March 1, 2002 through September 30,

2002; the position of Subdirector Análisis y Control Contable in Repsol's Análisis y Control Contable group from October 1, 2002 through November 30, 2003; the position of Subdirector Económico Administrativo Upstream in Repsol's D. Económico Administrativa Upstream y GNL group from December 1, 2003 through August 31, 2005; and the position of Subdirector Consolidación Financiera in Repsol's D. Consolidación group from September 1, 2005 through 2006. At the time MAXUS-E-0006854 was created, Fernando José Quadros Enriquez held the position of Subdirector Análisis y Control Contable in Repsol's Análisis y Control Contable group.

José María Borreguero Seron worked at Repsol from 1995 through February 4, 1996 without an assigned position; the position of Técnico Económico Financiero in Repsol's R. Exploración y Filiales group from February 5, 1996 through December 31, 1996; the position of Técnico Económico Financiero in Repsol's Sección Contabilidad group from January 1, 1997 through May 31, 1997; the position of Técnico Cuentas a Pagar y Cobrar in Repsol's Subdirección Administración group from June 1, 1997 through June 30, 1998; the position of Técnico Económico Financiero in Repsol's Departamento. Económico Financiero group from July 1, 1998 through October 31, 1998; the position of Técnico Administración Operaciones in Repsol's Servicios Compartidos group from November 1, 1998 through February 28, 1999; the position of Técnico Administración. Operaciones in Repsol's Administración Operaciones group from March 1, 1999 through December 31, 1999; the position Técnico Administración Publicas/Cuentas de Personal/Técnico Contabilidad in Repsol's Cuentas Publicas/Cuentas de Personal y Contabilidad group from May 1, 2000 through March 31, 2002; the position of Gestor Administración. Publicas/Cuentas. Personal in Repsol's Administración Públicas/Cuentas de Personal group from April 1, 2002 through November 30, 2003; the position of Gestor R.

Exploración y Filiales LAM in Repsol's Administración España group from December 1, 2003 through May 16, 2004; and the positions of Jefe Conciliación Bancaria/Coordinador Administrativo/Coordinador Contabilidad General in Repsol's Conciliación Bancaria group from May 17, 2004 through 2006. At the time MAXUS-E-0005165 was created, Jose Maria Borreguero Seron held the position of Jefe Conciliación Bancaria/Coordinador Administrativo/Coordinador Contabilidad General in Repsol's Conciliación Bancaria group.

David Cáceres Nuñez held the position of Técnico Operaciones Exportación e Importación in Repsol's R. Petróleo y Filiales group in 1995; the position of Jefe Gestión Riesgos in Repsol's D.C. Financiera group from January 1, 1996 through December 21, 2000; and the position Director Tesorería in Repsol's D. Planificación y Gestión Financiera group from December 22, 2000 through 2006. At the time REP-E-0000001 was created, David Cáceres Nuñez held the position of Director Tesorería in Repsol's D. Planificación y Gestión Financiera group.

Christina Calleja Perez held the position of Técnico de Internacional at Repsol in 1995; the position of Técnico Financiación Internacional in Repsol's Financiación Internacional/Central Riesgos group from January 1, 1996 through June 30, 1998; the position of Técnico Financiación Internacional in Repsol's D.C. Financiera group from July 1, 1998 through September 30, 1998; the position of Jefe Back Office in Repsol's D.C. Financiera group from October 1, 2000 through May 31, 2001; the position of Jefe Mesa de Tesorería in Repsol's Mesa Testoreria group from June 1, 2001 through April 7, 2005; the position of Subdirectora Tesorería Corporativa Coordinación Países Jefe Tesorería Corporativa y Coordinación Países in Repsol's Cash Management y Coordinación Financiera Internancional group from April 8, 2005 through March 9, 2006; and the position of Subdirectora Gestión Corporativa de Tesorería in Repsol's

Cash Management y Coordinación Financiera Internacional group from March 10, 2006 through 2006. At the time MAXUS-E-0009813 and REP-E-0000001 were created, Christina Calleja Perez held the position of Jefe Mesa de Tesorería in Repsol's Mesa Tesorería group.

Ignacio F. Ullate Jimenez held the position of Jefe Contabilidad in Repsol's R. Comercial y Filiales group from April 1, 1992 through March 31, 1995; the position of Jefe Contabilidad in Repsol's Contabilidad group from March 1, 1996 through April 30, 1999; the position of Subdirector Contabilidad y Consolidación in Repsol's Contabilidad y Consolidación group from May 1, 1999 through April 30, 2000; the position of Subdirector Reporting Interno in Repsol's Reporting Interno group from May 1, 2000 through June 23, 2002; the position of Subdirector Reporting/Responsable Reporting in Repsol's Reporting group from June 24, 2002 through November 30, 2003; the position of Subdirector Apoyo a la Gestión USEA in Repsol's Oficina Proyec. Controles en Procesos E&A group from December 1, 2003 through December 31, 2004; the position of Subdirector Apoyo a la Gestión Contable in Repsol's Oficina Proyec. Controles en Procesos E&A group from January 1, 2005 through March 9, 2006; and the position of Subdirector Apoyo a la Gestión in Repsol's Oficina Proyec. Controles en Procesos E&A group from March 10, 2005 through 2006. At the time MAXUS-E-0009810 was created, Ignacio F. Ullate Jimenez held the position of Subdirector Apoyo a la Gestión USEA in Repsol's Oficina Proyec. Controles en Procesos E&A group.

Carlos Folgado Delgado held the position of Técnico Control de Operaciones y Reporting in Repsol's Control Operaciones y Reporting group from February 11, 2003 through June 15, 2005 and the position of Analista de Riesgos Financieros in Repsol's Control Operaciones y Reporting group from June 16, 2005 through 2006. At the time MAXUS-E-0009821 was

created, Carlos Folgado Delgado held the position of Técnico Control de Operaciones y Reporting in Repsol's Control Operaciones y Reporting group.

María Aranzazu (Arantxa) Calvo Guerrero held the position of Técnico Superior D. Financiera at Repsol in 1995; the position of Técnico Análisis Consolidación in Repsol's Consolidación Financiera group from January 1, 1996 through June 30, 1997; the position of Subdirectora Consolidación Financiera/Jefe Consolidación Financiera in Repsol's Consolidación Financiera group from July 1, 1997 through November 17, 2005; the position of Subdirectora Reporting y Normativa Contable in Repsol's Reporting Corporativo group from November 18, 2005 through March 9, 2006; and the position of Subdirectora Normativa Contable in Repsol's Reporting Corporativo group from March 10, 2006 through 2006. At the time YPF-E-0001011 was created, Maria Aranzazu (Arantxa) Calvo Guerrero held the position of Subdirectora Consolidación Financiera/Jefe Consolidación Financiera in Repsol's Consolidación Financiera group.

Jesús Herranz San Frutos held the position of Técnico Riesgos in Repsol's R. Comercial y Filiales group from 1995 through December 31, 1997; the position of Jefe Riesgos y Recobros in Repsol's Riesgos y Recobros group from January 1, 1998 through June 30, 1998; the position of Responsable Garantías y Recobros in Repsol's Garantías y Recobros group from July 1, 1998 through April 13, 2003; the position of Gestor Análisis Negocios Proc. Contab. in Repsol's Análisis Negocios y Procesos Contables group from April 14, 2003 through April 30, 2003; the position of Gestor Control Presupuesto/Gestor USEA in Repsol's Análisis Negocios y Procesos Contables group from May 1, 2003 through November 30, 2003; and the position of Gestor Control Seguimiento Presupuestario in Repsol's Control group from December 1, 2003 through 2006. At the time MAXUS-E-0006854 was created, Jesus Herranz San Frutos held the position

of Gestor Control Presupuesto/Gestor USEA for the Análisis Negocios y Procesos Contables group.

Cristina Llorente Perez held the position of Técnico Sup. Area Fiscal at Repsol in 1995; the position of Técnico Control Interno/Gestor Recobro y Avales in Repsol's D. Control Interno/Central Riesgos group from January 1, 1996 through September 30, 1999; the position of Técnico Control Interno in Repsol's Control Interno Sobre Reporting Financiero group from October 1, 1999 through April 30, 2000; the position of Gestor Control Participadas in Repsol's Administración Participadas/Control de Participadas Corp. y E&P group from May 1, 2000 through June 23, 2002; the position of Gestor Control Participadas in Repsol's Control Participadas/Administración Participadas group from June 24, 2002 through November 31, 2003; the position of Gestor Analista Transacciones Intergrupo in Repsol's Análisis Transacciones Intergrupo group from December 1, 2003 through March 19, 2006; and the position Coordinador Contab. de Terceros in Repsol's Intervencion y Pagos group from March 20, 2006 through 2006. At the time MAXUS-E-0009810 was created, Cristina Llorente Perez held the position of Gestor Análisis Transacciones Intergrupo in Repsol's Análisis Transacciones Intergrupo group.

Agustín García Moratilla held the position of Director Jurídico in Repsol's I.N.H. group until December 31, 1995; the position of Director Jurídico at Repsol from June 8, 1995 through December 31, 1995; and the position of Director Jurídico in Repsol's D.C. Servicios Jurídicos group from January 1, 1996 through September 30, 1999.

Ana Oliva García held the position of Jefe Intervención in Repsol's R. Comercial y Filiales group until March 31, 1995; the position of Jefe Intervención in Repsol's Intervención group from March 1, 1996 through June 30, 1999; the position of Jefe Contabilidad in Repsol's Contabilidad group from July 1, 1999 through April 30, 2000; the position of Coordinador

Contabilidad in Repsol's Contabilidad group from May 1, 2000 through October 10, 2000; the position of Jefe Activos Fijos/Proyectos in Repsol's Activos Fijos/Proyectos group from October 11, 2000 through June 30, 2002; the position of Coordinador Reporting R&M in Repsol's Reporting Refino Marketing group from July 1, 2002 through May 31, 2003; the position of Jefe Reporting R&M in Repsol's Reporting Refino Marketing group from June 1, 2003 through November 30, 2003; the position of Subdirectora Contabilidad y Administración Repsol YPF/Subdirectora Económico Administrativo in Repsol's Administración Corporación group from December 1, 2003 through March 9, 2006; and the position of Subdirectora Económico Administración. Repsol in Repsol's Administración Corporación group from March 10, 2006 through 2006. At the time MAXUS-E-0005165 was created, Ana Oliva Garcia held the position of Subdirectora Contabilidad y Administración Repsol YPF/Subdirectora Económico Administrativo in Repsol's Administración Corporación group.

Miguel Clemente Torres López held the position of Técnico Económico Financiero Prácticas in Repsol's Departamento. Gestión Economica group from June 1, 1998 through February 28, 1999; the position of Técnico Económico Financiero Prácticas in Repsol's Contabilidad y Consolidación group from March 1, 1999 through October 31, 1999; the position of Técnico Económico Financiero Oficina Holanda in Repsol's Oficina de Holanda group from November 1, 1999 through December 31, 2001; the position of Responsable Soporte Documental in Repsol's Soporte Documental Informacion Agentes Financieros group from January 1, 2002 through May 31, 2002; the position of Jefe Control Operaciones y Reporting/Responsable Control Operaciones y Reporting in Repsol's Control Operaciones y Reporting group from June 1, 2002 through May 31, 2005; the position of Coordinador Equipo Proyecto Control Interno in Repsol's Control Interno group from June 1, 2005 through March 9,

2006; and the position of Jefe Control Interno sobre Reporting Financiero/Jefe Oficina Tecnica in Repsol's Control Interno sobre Reporting Financiero group from March 10, 2006 through 2006. At the time MAXUS-E-0009813 and REP-E-0000001 were created, Miguel Clemente Torres López held the position of Jefe Control Operaciones y Reporting/Responsable Control Operaciones y Reporting in Repsol's Control Operaciones y Reporting group.

María Salamanca Iniesta held the position of Técnico Precios in Repsol's Precios/Gestión de Precios group from November 3, 1997 through November 30, 2001; the position of Técnico Operativa Divisas in Repsol's Cuentas Bancarias en Divisas group from December 1, 2001 through September 30, 2002; the position of Técnico Operativa Divisas in Repsol's Mesa Tesorería group from October 1, 2002 through April 7, 2005; the position of Gestor Tesorería Internacional/Gestor Tesorería Zona Euro in Repsol's Gestión Tesorería Internacional group from April 8, 2005 through October 31, 2006; and the position of Jefe Operaciones Bancarias in Repsol's Operaciones Bancarias group from November 1, 2006 through 2006. At the time MAXUS-E-0009813 and YPF-E-0000575 were created, María Salamanca Iniesta held the position of Técnico Operativa Divisas in Repsol's Mesa Tesorería group. At the time REP-E-0000001 was created, she held the position of Técnico Operativa Divisas in Repsol's Cuentas Bancarias en Divisas group.

José Manuel Revuelta LaPique held the position of Director General Adjunto al Presidente in Repsol's Presidencia Ejecutiva Repsol YPF group from June 20, 1996 through February 28, 1999; the position of Director General Adjunto al Presidente in Repsol's D.C. Asuntos Institucionales Adjunta al Presidente group from March 1, 1999 through September 30, 1999; and the position of Director Corporativo Asuntos Institucionales. Adjunta Al President/Director Corporativo Adjunto al Presidente in Repsol's D.C. Asuntos Institucionales

Adjunta al Presidente group from October 1, 1999 through November 11, 2004. At the time YPFHWF000060 was created, José Manuel Revuelta LaPique held the position of Director Corporativo Asuntos Institucionales Adjuntos Al President/Director Corporativo Adjunto al Presidente in Repsol's D.C. Asuntos Institucionales Adjunta al Presidente group.

Alvaro Negroao held the position of Jefe Producción in Repsol's Produção group from August 1, 2003 to May 31, 2005. At the time MAXUS-E-0005229 was created, Alvaro Negroao held this same position.

Alvaro Racero Baena held the position of Responsable de Coordinación in Repsol's Coordinación group from September 3, 2001 to March 31, 2003; the position of Director U.N. USA/Méjico in Repsol's E&P D. UR Norteamericana group from February 1, 2004 to September 30, 2006; the position of Director Desarrollo de Negocios América in Repsol's D. Desarrollo Negocios América (Houston) from January 1, 2006 to September 30, 2006; the position of Director Europa, Asia y Africa in Repsol's E&P D.E. UR Europa, Asia y Africa group from October 1, 2006 to November 30, 2006; and the position of Director Europa, Asia y Africa in Repsol's E&P D.E. UR Europa, Asia y Africa group as of December 1, 2006. At the time MAXUS-E-0000036 was created, Alvaro Racero Baena held the position of Responsable de Coordinacion in Repsol's Coordinacion group. At the time that MAXUS-E-0004770 was created, Alvaro Racero Baena held the position of Director U.N. USA/Méjico in Repsol's E&P D. UR Norteamericana group.

Ricardo Chercoles Blazquez held the position of Gestión Clientes Contabilidad in Repsol's Repsol S.A. (Histórico) group from June 1, 1991 to April 30, 1992; the position of Jefe Departamento Desarrollo in Repsol's Repsol S.A. (Historico) group from May 1, 1992 to December 31, 1995; the position of Jefe Desarrollo Contable in Repsol's Direcc. Control Interno

group from January 1, 1996 to April 30, 1996; the position of Jefe Back-Office Financiero Internacional/Técnico Financiación Interancional in Repsol's D.C. Financiera group from May 1, 1996 to April 2, 1998; the position of Jefe Back-Office Financiero Internacional in Repsol's D.C. Financiera group from April 3, 1998 to September 30, 2000; the position of Jefe Análisis y Control Financiero in Repsol's D.C. Financiera group from October 1, 2000 to May 31, 2002; the position of Jefe Reasignación Recursos Intra Grupo/Resp. Reasignación Recursos Intra Grupo in Repsol's Reasignación Recursos Intra Grupo group from June 1, 2002 to May 31, 2006. At the time MAXUS-E-0001374 and YPF-E-0000836 were created, Ricardo Chercoles Blazquez held the position of Jefe Análisis y Control Financiero in Repsol's D.C. Financiera group.

Adolfo Carmelo Moreira held the position of Analista de Recaudacion in YPF's Pagos Finanzas Corporativas (Depto.) as of 1995; the position of Analista de Gastos Bancarios in YPF's Finanzas Corporativas (Departamento) group as of May 1, 1999; the position of Técnico de Pagos in YPF's Cop. Bancarias y Gestión T group as of on July 31, 2001; the position of Técnico Control de Proces in YPF's Pagos group as of March 1, 2003; and the position of Técnico de Pagos in YPF's Pagos group from May 1, 2003 through 2006. At the time MAXUS-E-00000180, MAXUS-E-0000189, MAXUS-E-0000275, YPFE-0000037, YPF-E-0001047 and YPF-E 0001061 were created, Adolfo Carmelo Moreira held the position of Técnico de Pagos in YPF's Pagos group.

Adrian Ramón Marino held the position of Emp. Pagos Proveed. Por Tesoreria as of 1995; the position of Empleado Prog. Pagos y Pago a Prove in YPF's Finanzas Corporativas (Departamento) group as of May 1, 1999; the position of Técnico de Pagos in YPF's Coordinación Pagos group as of July 31, 2001; and the position of Técnico de Recaudaciones in YPF's Recaudaciones group from January 1, 2003 through 2006. At the time MAXUS-E-

00009822 was created, Adrian Ramón Marino held the position of Técnico de Recaudaciones in YPF's Recaudaciones group.

Alfredo Bruno held the position of Analista Jr. Gestion y Control Finan in YPF's Finanzas y Desarrollo Corporativo (Depto.) as of 1995; the position of Analista Pagos y Transf. al Exterio in YPF's Finanzas Corporativas (Departamento) group as of May 1, 1999; the position of Técnico de Pagos in YPF's Coordinación Pagos group as of September 1, 2002; and the position of Técnico Normas y Control in YPF's Normas y Control de Cambios group from July 1, 2003 through 2006. At the time MAXUS-E-0000103, MAXUS-E-0001314 and YPF-E-00000263 were created, Alfredo Bruno held the position of Analista de Pagos y Tranf. al Exterio in YPF's Finanzas Corporativas (Departamento) group. At the time MAXUS-E-0001488 and YPF-E-0000525 were created, Alfredo Bruno held the position of Tecnico de Pagos in YPF's Pagos group. At the time YPF-E-0000049 was created, Alfredo Bruno held the position of Técnico Normas y Control in YPF's Normas y Control de Cambios group.

Dora Rosa Batao held the position of Analista Sr. Consolidación in YPF's Espec. Senior Consolidación group as of November 1, 1995; the position of Espec. Analisis de Balance in YPF's Area Consolidación group as of April 3, 1997; the position of Analista de Balance in YPF's Contaduría General (Depto.) group as of April 1, 1998; the position of Analista Consolidación Corporación in YPF's Contaduría General (Depto.) group as of March 1, 1999; the position of Analista Consolidación in YPF's Consolidación group as of September 1, 2002; the position of Analista Reporte de Gest. in YPF's Reporte de Gestión Consol group as of May 1, 2003; and the position of Técnico Consolidación in YPF's Consolidación Argentina group from November 1, 2005 through 2006. At the time YPF-E-0001011 was created, Dora Rosa Batao held the position of Analista Consolidacion in the YPF's Consolidacion group.

Dora Elsa Acosta held the position of Coordinador de Créditos in YPF's Cambio Estructura Salarial Finanzas Corporativas (Depto.) group from 1995 through 2006. At the time that MAXUS-E-0000017, MAXUS-E-0001326, MAXUS-E-0001417, MAXUS-E-0001574, MAXUS-E-0005131, YPF-E-0000003, YPF-E-0000228, YPF-E-0000253, YPF-E-0000595 and YPF-E-0000662 were created, Dora Elsa Acosta held the position of Coordinator de Créditos in YPF's Cambio Estructura Salarial Finanzas Corporativas (Depto.) group.

Emma Alejandra Kosfelder held a position in YPF's Depto. Contaduría (Downstream) as of 1995; the position of Especialista Analisis Económicos in YPF's Area Consolidación group as of April 3, 1997; the position of Consolidación y Contabilidad Corp. in YPF's Contaduría General (Depto.) group as of March 1, 1999; the position of Jefe de Consolidación in YPF's Consolidación group as of September 1, 2002; and the position of Responsable Consolidación in YPF's Camconsolidación y Reporting group from January 1, 2003 through 2006. At the time MAXUS-E-0000310, MAXUS-E-0004315, YPF-E-0001011 and YPF-E-0001016 were created, Emma Alejandra Kosfelder held the position of Responsable Consolidación in YPF's Camconsolidación y Reporting group.

Enrique Fernando Waterhouse Boneo held the position of Jefe de Area Financiamiento in YPF's Ingreso Finanzas Corporativas (Departamento) group as of November 11, 1996; the position of Area Financiamiento in YPF's Finanzas Corporativas (Departamento) group as of September 1, 1998; the position of Responsable Financiamiento in YPF's Financiamiento group as of September 1, 2002; and the position of Gerente Financiamiento in YPF's Cambio de Estructura - Revision Retribut Financiación Abb group from December 1, 2005 through 2006. At the time MAXUS-E-0000017, MAXUS-E-0009813, YPF-E-0000700, YPF-E-0000712, and YPF-E-0000717 were created, Enrique Fernando Waterhouse Boneo held the position of

Responsible Financiamient in YPF's Financiamiento group. At the time MAXUS-E-00001309 and MAXUS-E-0001409 were created, Enrique Fernando Waterhouse Boneo held the position of Area Financiamiento in YPF's Finanzas Corporativas (Departamento).

Evelin López held the position of Técnico de Pagos in YPF's Cesión Cont. Trab. (Ar Pagos) group as of January 1, 2003; the position of Técnico Gestión de Tesore in YPF's Pagos group as of March 1, 2003; and the position of Técnico de Pagos in YPF's Pagos group from March 1, 2004 through 2006. At the time MAXUS-E-0009822 was created, Evelin López held the position of Técnico de Pagos in YPF's Pagos group.

Fernando Nardini held the position of Jefe Area Planeamiento y Analisis F in YPF's Depto. Impuestos as of 1995; the position of Coordinador/Especialista Estrategia in YPF's Cambio Estructura group as of March 17, 1997; the position of Personal Gerencial Transferido a Ma in YPF's Personal Asignado a Maxus group as of March 1, 1998; the position of Personal Gerencial Transferido a Ma in YPF's Personal Asignado a Maxus group as of May 1, 1999; the position of Resp. Planificación in YPF's Pase Finanzas y Control (Vicepresidencia) group as of January 1, 2000; the position of Responsable Gestión Fisca in YPF's YPF U.S. Gestión Fiscal U group as of September 1, 2002; and the position of Gerente Asesoría Fiscal A in YPF's YPF U.S. Asesoría Fiscal group from March 1, 2004 through 2006. At the time YPF-E-0000047 was created, Fernando Nardini held the position of Resp. Planificación in YPF's Pase Finanzas y Control (Vicepresidencia) group. At the time that YPF-E-0000229 and YPF-E-0000687 were created, Fernando Nardini held the position of Gerente Asesoría Fiscal A in and YPF U.S. Asesoría Fiscal group.

Germán Cabrera held the position of Pasante in YPF's Alta Empleado YPF 1RA Fase - Alta Pasante group as of October 12, 2004; the position of Pasante in YPF's Pagos Pasante group

as of May 1, 2005; and the position of Pasante in YPF's Pagos Pasante group from May 1, 2006 through 2006. At the time MAXUS-E-0000024 and MAXUS-E-0000343 were created, Germán Cabrera held the position of Pasante in YPF's Pagos Pasante group.

Carlos Alberto Olivieri held the position of Vicepresidente in YPF's Ingreso Vipe. Contraloria General group as of 1995; the position of Vicepresidente in YPF's Vipe Contraloría General group as of April 1, 1998; resigned from the position of VP Finanzas y Control (CFO) in YPF's Finanzas y Control group as of August 4, 1999; returned to the position of Director Finanzas YPF in YPF's Cobertura de V Finanzas YPF group as of September 16, 2002; held the position of Director Finanzas y Admin in YPF's YPF D. Finanzas y Administ group as of March 1, 2003; the position of Director Finanzas y Admin in YPF's YPF D. Finanzas y Administ group as of May 1, 2003; the position of Director Económico-Financ in YPF's D. Económico-Financiero A group as of May 1, 2005; and the position of Director Finanzas YPF in YPF's D. Adjusta Económico Financiera Abb group from January 1, 2006 through 2006. At the time MAXUS-E-0000336 and YPF-E-0000481 were created, Carlos Alberto Olivieri held the position of Director Económico-Financ in YPF's D. Económico-Financiero A group. At the time MAXUS-E-0001567, MAXUS-E-0009813, and YPF-E-0000576 were created, Carlos Alberto Olivieri held the position of Director Finanzas y Admin in YPF's YPF D. Finanzas y Administ group.

Guillermo Rispoli held the position of Encargado de Caja in YPF's Finanzas Corporativas (Depto.) group as of 1995; the position of Analista Cuenta Corriente in YPF's Finanzas Corporativas (Depto.) group as of May 1, 2000; the position of Analista Conciliaciones Débitos Ban in YPF's Dirección Administración Argentina Pase group as of August 1, 2000; the position of Movimientos Bancarios in YPF's Técnico Solo Clientes Regionales group as of July

31, 2001; the position of Analista Movimientos Banc in YPF's Coordinación de Recaudación group as of December 1, 2002; the position of Técnico de Recaudaciones in YPF's Recaudaciones group as of January 1, 2003; the position of Técnico de Pagos in YPF's Recaudaciones A group as of May 1, 2003, the position of Técnico de Recaudación in YPF's Revisión Retribut. Recaudaciones group as of March 1, 2004, the position of Técnico de Pagos in YPF's Pagos group as of September 1, 2005; and the position of Técnico de Pagos in YPF's Pagos group from May 1, 2006 through 2006. At the time MAXUS-E-0000275, MAXUS-E-0005174 and YPF-E-0001061 were created, Guillermo Rispoli held the position of Tecnico de Recaudacion in YPF's Revisión Retribut. Recaudaciones group.

Hector Cristian Frechou held the position of Técnico de Pagos in YPF's Cambio Razón Social - Cesión Cont. Trab. (AR Coordinación Pagos) group as of May 1, 2001; and the position of Técnico Presupuesto in YPF's Presupuesto group as of January 1, 2003, through 2006. At the time MAXUS-E-0000145, MAXUS-E-0000162, MAXUS-E-0000194, MAXUS-E-0000268, YPF-E-0000001, YPF-E-0000011 and YPF-E-0000015 were created, Hector Cristian Frechou held the position of Técnico Presupuesto in YPF's Presupuesto group.

Javier Alberto Marino held the position of Empleado de Pagos al Exterior in YPF's Finanzas Corporativas (Depto.) group as of 1995; the position of Encargado Asignación de Recursos in YPF's Finanzas Corporativas (Departamento) group as of May 1, 1999; the position of Coord. Asig. Recursos Y P in YPF's C Coord. Asig. Recursos Y P group as of July 31, 2001; the position of Jefe de Pagos in YPF's Pagos group as of January 1, 2003; and the position of Coordinador de Pagos in YPF's Pagos group as of March 1, 2003, through 2006. At the time MAXUS-E-0000338, MAXUS-E-0000182, MAXUS-E-0009820, YPF-E-0000034, YPF-E-

0000243 and YPF-E-0001043 were created, Javier Alberto Marino held the position of Coordinador de Pagos in YPF's Pagos group.

Javier José Ares held the position of Coordinador Tesorería General in YPF's Finanzas Corporativas (Depto) group as of 1995; the position of Coordinador Tesorería General in YPF's Proyecto Sap (Dpto. Finanzas Corporativas) group as of April 1, 1998; the position of Coordinador Tesorería Gral. in YPF's Corporativas (Depto) group as of October 1, 1998; the position of Coordinador Tesorería General in YPF's Finanzas Corporativas (Departamento) group as of April 1, 2000; the position of Jefe Ope. Bancarias y Ges in YPF's Bancarias y Gestión T group as of July 21, 2001; the position of Jefe Oper. Bancarias y Ges in YPF's Op. Bancarias y Gestión Tesorería group as of September 1, 2002; and the position of Jefe Tesorería in YPF's Tesorería group as of January 1, 2003, through 2006. At the time MAXUS-E-0001581, MAXUS-E-0009818, YPF-E-0000059 and YPF-E-0001043 were created Javier José Ares held the position of Jefe Tesorería in YPF's Tesorería group. At the time YPF-E-0000047 was created Javier José Ares held the position Jefe Ope. Bancarias y Ges in YPF's Bancarias y Gestión T group.

Enrique Javier Vega Lera held the position of Analista Consolidación in YPF's Contaduría General (sector Consolidacion) group as of 1995; Analista Consolidación in YPF's Contaduría General (Depto.) group as of October 1, 1997; the position of Consolidación Upstream in YPF's Contaduría General (Depto.) group as of March 1, 1999; the position of Analista Consolidación Corporación in YPF's Contaduría General (Sector Consolidación) group as of March 2, 1999; the position of Analista Consolidación in YPF's C Consolidación group as of July 31, 2001; the position of Jefe Consolidación España in YPF's Consolidación España group as of May 1, 2003, the position of Gerente Cuentas a Cobrar in YPF's Cuentas a Cobrar-

Facrurac group as of September 1, 2005; and the position of Jefe Cuentas a Cobrar-Fac in YPF's Cuentas a Cobrar-Facturación group as of December 1, 2005, through 2006. At the time MAXUS-E-0006854 was created, Enrique Javier Vega Lera held the position of Jefe Consolidación España in YPF's Consolidación España group.

Liliana Urquiza held the position of Coordinador Presupuesto Financiero in YPF's Depto. Finanzas Corp. (Area Control y Anal. Financ.) group as of May 1, 1995; the position of Coordinación Presupuesto in YPF's Cambio Estructura YPF - Cambio Organiz. group as of June 1, 2001; the position of Coordinación Presupuesto in YPF's Tesorería Argent group as of September 1, 2002; the position of Técnico Presupuesto in YPF's Presupuesto group as of January 1, 2003 and the position of Técnico Presupuesto in YPF's Cambio de Estructura - Revisión Retribut. as of May 1, 2006, through 2006. At the time MAXUS-E-00000103 and YPF-E 0000047 were created, Liliana Urquiza held the position of Coordinación Presupuesto in YPF's Cambio Estructura YPF - Cambio Organiz. group. At the time MAXUS-E-0000150, MAXUS-E-0000202, MAXUS-E-0000275 and YPFE-0000001, YPF-E 0000012, YPF-E-000020 and were created, Liliana Urquiza held the position of Técnico Presupuesto in YPF's Presupuesto group.

Luis Ramón Mendoza held the position of Jefe Dpto. Contaduria in YPF's Adm. Com. Riv. Contaduria group as of 1995; the position of Jefe Area Contabilidad General in YPF's Area Contabilidad General Resolucion P. N° 240/97 group as of April 3, 1997; the position of Jefe de Area Contabilidad General in YPF's Proyecto SAP (Area Contabilidad General) group as of February 1, 1998; the position of Jefe de Area Contabilidaad General in YPF's Area Contabilidad General group as of April 2, 1999; the position of Area Contabilidad Gral Down. in YPF's Relationship Manager (Indust. y Comercio) group as of May 1, 1999; the position of

Analista Políticas Normas y Proced in YPF's Contaduría General (Depto.) as of January 1, 2000; the position of Lider Cuentas a Cobrar in YPF's Cambio Estructura group as of May 1, 2000; the position of Responsable Cuentas a Cobr. in YPF's Cuentas a Cobrar-Facturac group as of September 1, 2002; the position of Responsable Cuentas a Cobr. in YPF's Cambio de Estructura-Revisión Retribut. group as of March 1, 2003; the position of Gerente Cuentas a Cobrar in YPF's Cuentas a Cobrar-Facturac group as of January 1, 2005; and the position of Expatriado a Brasil in the YPF's Cambio de Estructura-Expatriados group as of August 1, 2006. At the time MAXUS-E-00009573 was created, Luis Ramón Mendoza held the position of Gerente Cuentas a Cobrar in YPF's Cuentas a Cobrar-Facturac group. At the time YPF-E 0000060 was created, Luis Ramón Mendoza held the position of Responsable Cuentas a Cobrar in YPF's Cambio de Estructura-Revisión Retribut group.

Marcelo Emilio Delfino held the position of Coordinador/Especialista Estrategia Fiscal in YPF's Impuestos Depto. group as of May 4, 1998; the position of Jefe Gestion Fiscal in YPF's YPF U.S. Gestion Fiscal U group as of September 1, 2002; the position of Jefe Asesoría Fiscal in YPF's U.S. Asesoría Fiscal group as of March 1, 2004; and the position of Gerente Asesoría Fiscal A in YPF's Asesoría Fiscal ABB's group as of April 1, 2006. At the time MAXUS-E-00000033 was created, Marcelo Emilio Delfino held the position of Coordinador/Especialista Estrategia Fiscal in YPF's Impuestos Depto. group.

Maria Cristina Franco held the position of Empleado "D" Cuentas a Pagar in YPF's Contaduria General (Sector Cuentas a Pagar) group as of 1995; the position of Analista Análisis y Proy. Esp. in YPF's Contaduría General (Depto.) group as of April 1, 1998; the position of YPF Internacional in YPF's Dirección Administración Argentina group as of April 1, 2000; the position of Técnico YPF Internacional in YPF's Consolidación y Reporting group as of July 31,

2001; the position of Técnico YPF Internacional in YPF's Cambio de Estructura-Revisión Retribut. group as of September 1, 2002; the position of Técnico YPF Internacional in YPF's Consolidación y Reporting group as if March 1, 2003; the position of Técnico Consolidación in YPF's Consolidación España group as of May 1, 2003, and the position of Tecnico Consolidación in YPF's Consolidación España as of May 1, 2006. At the time MAXUS-E-00000001, MAXUS-E-0000089, MAXUS-E-0000202, and YPFE-0001007 were created, Maria Cristina Franco held the position of Tecnico Consolidación in YPF's Consolidación España group. At the time MAXUS-E-0001333 was created, Maria Cristina Franco held the position of Tecnico YPF Internacional in YPF's Cambio de Estructura -Revisión Retribut. group. At the time MAXUS-E-0005323 was created, Maria Cristina Franco held the position of Técnico YPF Internacional in YPF's Consolidación y Reporting group.

Mariano Rodrigo De Bony held the position of Técnico Gastos Bancaria in YPF's Coord. Asig. Recursos Y P group as of September 1, 2002; the position of Técnico Mesa de Dinero in YPF's Mesa de Dinero group as of January 1, 2003; and the position of Técnico Mesa de Dinero in YPF's Mesa de Dinero group as of May 1, 2006. At the time MAXUS-E-00000336, MAXUS-E-0009813, and YPFE-0000034, YPF-E 0000041 were created, Mariano Rodrigo De Bony held the position of Técnico Mesa de Dinero in YPF's Mesa de Dinero group.

Marva Jean Tarver held the position of Personal de Maxus in YPF's Ingreso group as of September 1, 1999 and held a position in YPF's Contaduría General group as of April 1, 2000 through February 10, 2001. At the time MAXUS0002253, MAXUS-0005571 were created, Marva Jean Tarver did not hold a position at YPF.

Nicolas Ambrosio Bernatene held the position of Jefe Area Operaciones Financieras in YPF's Finanzas Corporativas group as of 1995; the position of Tesorero in YPF's Finanzas

Corp. group as of September 16, 1999; the position of Coordinación Presupuesto in YPF's Cambio Estructura YPF - Cambio Organiz. group on June 1, 2001; the position of Responsable Tesorería in YPF's U.S. Tesorería Argentina group as of July 31, 2001; the position of Gerente Tesorería Argentina in YPF's U.S. Tesorería Argentina group as of March 1, 2003 and the position of Gerente Tesorería Argentina in YPF's Tesorería Argentina group as of May 1, 2006 through 2006. At the time MAXUS-E-00000030 was created, he held the position of Tesorero in YPF's Depto. Finanzas Corp. group. At the time MAXUS-E-0000103 was created, he held the position of Responsable Tesoreria in YPF's U.S. Teroreria Argentina group. At the time MAXUS-E-0000145, MAXUS-E-0000189, MAXUS-E-0000242, YPF-E-0000001, and YPF-E-0000010 were created, he held the position of Gerente Tesoreria Argentina in YPF's U.S. Tesoreria Argentina group.

Melissa Deanna Quintanilla held the position of Personal de Maxus in YPF's Contaduría General group as of September 1, 1999; the a position in YPF's Dirección Administrativa Argentina group from April 1, 2000 to February 10, 2001. At the time MAXUS-E-00005571 was created Melissa Deanna Quintanilla did not hold a position with YPF.

Nora Telma Marti held the position of Secretaria Vipe. Bilingue in YPF's Contraloría General group as of 1995; the position of Secretaria Vicepresidencia Bilingue in YPF's Dirección Administración y Finanzas Argentina group as of April 1, 2000; the position of Asistente in YPF's Finanzas YPF group as of July 31, 2001; the position of Secretaria in YPF's D. Finanzas y Administ. group as of May 1, 2003; the position of Secretaria in YPF's D. Económico -Financiero AB group as of May 1, 2005; the position of Secretaria in YPF's D. Adjunta Económico Financiera ABB group from May 1, 2006 through 2006. At the time

MAXUS-E-00001567 was created, Nora Telma Marti held the position of Secretaria in YPF's D. Finanzas y Administración group.

René Enrique Manceda held the position of Proyectista Interprete in YPF's Area Neuquen Explor. Group as of 1995; the position of Proyectista Intérprete in YPF's División Exploración Regional Oeste group as of February 1, 1997; the position of Personal Transferido a Maxus in YPF's Personal Asignado a Maxus group as of January 12, 1998; the position of Personal Expatriado Upstream in YPF's Personal Expatriado a Upstream group as of July 1, 1999; the position of Expatriado a España in YPF's Reingreso 1ra. Fase-Para Continuidad Pre group as of June 1, 2004; the position of Expatriado a España in YPF's Expatriados de E&P group from January 1, 2005 through 2006. At the time MAXUS-E-00009862 was created, René Enrique Manceda held the position of Expatriado a España in YPF's Expatriados de E & P group.

Ricardo Aníbal Diaz Oliva held the position of Jefe Mesa Dinero y Cambio in YPF's Finanzas Corporativas group as of 1995; Jefe Mesa de Tesorería in YPF's Mesa de Tesorería group as of September 1, 2002; the position of Jefe Mesa de Dinero in YPF's Mesa de Dinero group as of May 1, 2006 through 2006. At the time MAXUS-E-00000336 and YPF-E-0000033 were created, he held the position of Jefe Mesa de Tesorería in YPF's Mesa de Tesorería group.

Sandra Edith Rodríguez held the position of Jefe Sctor Utes y Contratos in YPF's Contaduria General group as of 1995; the position of Sector Consolidación in YPF's Depto. Contaduría General group as of April 1, 1998; the position of Utes in YPF's Depto. de Contaduría General group as of March 1, 1999; the position in YPF's Dirección Administración Argentina group as of April 1, 2000; the position of Técnico YPF Internacional in YPF's Consolidacion y Reporting group as of July 31, 2001; the position of Jefe Consolidacion

Argentina in YPF's Consolidacion Argentina group as of March 1, 2004; the position of Jefe Consolidación España in YPF's Consolidación España group as of September 1, 2005 and the position of Jefe Consolidación España in YPF's Consolidación España group as of May 1, 2006 through 2006. At the time MAXUS-E-00000002 and MAXUS-E-0001921 were created, she held the position of Jefe Consolidación España in YPF's Consolidación España group. At the time MAXUS-E-0000061 and MAXUS-E-0001285 were created, she held the position of Jefe Consolidacion Argentina in YPF's Consolidacion Argentina group. At the time YPF-E-0000003 was created, she held the position of Jefe Consolidación España in YPF's Consolidación España group.

Sergio Omar Paredes held the position of Ingeniero de Reservorios PPAL in YPF's Denver EEUU - Operaciones Internacionales group as of 1995; the position of Coordinador Etmas in YPF's Etma Dirección group as of January 1, 1999; the position of Exploración y Desarrollo Norte in YPF's DG E& P Latino América group as of October 1, 1999; the position of Exploración y Desarrollo Sur in YPF's Exploración y Desarrollo Sur group as of September 1, 2000; the position of Director Exploración y Desarrollo in YPF's Exploración y Desarrollo group as of January 1, 2002; the position of Expatriado a EEUU in YPF's Expatriados de E &P YPF group as of May 1, 2002; the position of Expatriado a España in YPF's Expatriados de E&P a España group as of January 1, 2005; and the position of Expatriado a España in YPF's Expatriados de E&P a España group as of January 1, 2006 through 2006. At the time MAXUS-E-00001810 was created, he held the position of Expatriado a EEUU in YPF's Expatriados de E&P YPF group. At the time MAXUS-E-0009860 was created, he held the position of Expatriado a España in YPF's and Expatriados de E&P group.

Susana Beatriz Borla Sosa held the position of Empleado de Programación de Pagos in YPF's Finanzas Corporativas (Depto.) group as of 1995; the position of Técnico de Pagos in YPF's Coordinación Pagos group as of July 31, 2001; the position of Técnico de Recaudación in YPF's Recaudaciones group as of September 1, 2005; the position of Técnico de Recaudación in YPF's Recaudaciones group on May 1, 2006 through 2006. At the time MAXUS-E-00000180, MAXUS-E-0000189, and YPF-E-0000033, were created, she held the position of Tecnico de Pagos in YPF's Coordinacion Pagos group. At the time MAXUS-E-0000275 was created, she held the position of Tecnico de Recaudacion in YPF's Recaudacion group.

Diego Román Díaz held the position of ASTRA in YPF's Ingreso Personal Expatriado Upstream group as of January 1, 2001; the position of Personal Expatriado Upstream in YPF's Personal Expatriado Upstream group as of January 2, 2001 the position of Personal Expatriado Upstream in YPF's Baja- Cambio Sociedad en el Grupo group as of June 1, 2002; the position of Expatriado a USA in YPF's Reingreso 1ra. Fase -Para Continuidad Pre group as of June 1, 2004; the position of Expatriado a España in YPF's Expatriados de E&P a España group as of January 1, 2005 and the position of Expatriado a España in YPF's Expatriados de E&P a España group from January 1, 2006 through 2006. At the time MAXUS-E-0005121 was created, Diego Román Díaz held the position of Expatriado a USA in YPF's Expatriados de E&P a Estados Unidos group. At the time MAXUS-E-0005566 was created, he held the position of Expatriado a Espana in YPF's Expatriados de E&P a Espana group.

Néstor José Sosa Canosa held the position of Sector Compras in YPF's Dept. Prod. Com. Rivadavia (Chubut) group as of January 20, 1997; the position of Sector Compras in YPF's Proyecto SAP (Dto. Prod. Reg. Com. Rivadavia (Chubut)) group as of March 1, 1998; the position of Sector Compras in YPF's Depto. Prod. Regional Comod. Rivadavia (Chubut) group

as of June 1, 1998; the position of Compras in YPF's Planeamiento y Administración Regional Sur (Depto.) group as of September 1, 1998; the position of Compras in YPF's Administración y Servicios Regional Sur group as of April 1, 2000; the position of Responsable de Abastecimiento (Pers) in YPF's Santa Cruz de la Sierra- Bolivia group as of August 1, 2000; the position of Expatriado E&P a Bolivia in YPF's Expatriados de E&P group as of June 1, 2001; the position of Jefe de Administración Y in YPF's Cambio de Estructura-Traslado C/S sin CA group as of January 1, 2002; the position of Jefe de Administración Y in YPF's Administración y Servicio group as of September 1, 2002; the position of Gerente Compras y Contratos in YPF's Compras y Contratos Una S. group as of January 1, 2003; the position of Expatriado a EEUU in YPF's Expatriados de E&P group from August 1, 2004 through 2006. At the time MAXUS-E-00005137, MAXUS-E-0005229 were created, Néstor José Sosa Canosa held the position of Expatriado a EEUU in YPF Expatriados de E&P group.

Defendants further state that, as discovery and their investigation continues, they may supplement this response.

INTERROGATORY NO. 12:

For the time period 1995 through the present, Identify each Person that is or was primarily responsible for accounting Concerning YPFH, CLHH, Maxus and/or Tierra, and each of their Subsidiaries.

RESPONSE TO INTERROGATORY NO 12:

Defendants object that this interrogatory is improper in that it seeks information from Repsol, YPF, YPFH and CLHH about persons "primarily responsible for accounting" concerning specifically identified companies, only two of which are YPFH and CLHH. In addition, the undefined term "accounting" is vague, ambiguous and subject to multiple meanings. Defendants will respond to this interrogatory using their understanding of that term. Defendants further object to a request for information about "Subsidiaries" that are not identified

nor named as parties to this lawsuit as being irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and their General Objections below, Defendants state that employees of Maxus and Tierra, respectively, are “primarily responsible” for accounting at each separate company, and officers at YPFH and CLHH are “primarily responsible” for accounting at each holding company. With respect to the accounting of financial transactions between Repsol and YPF, on the one hand, and YPFH, CLHH, Maxus and Tierra on the other, additional information responsive to this interrogatory has been or will be produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by plaintiffs on Repsol, YPF, YPFH and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 13:

For the time period 1995 through the present, Identify the procedures, Including relevant Persons and Documents, Concerning the billing, invoicing, paying, writing off, reimbursing and accounting treatment for any task or work performed by Maxus, including accounting and legal work, on behalf of any Affiliate Including YPFH, CLHH, YPF, and Repsol.

RESPONSE TO INTERROGATORY NO 13:

Defendants object that this interrogatory is unduly burdensome, overly broad and not likely to lead to the discovery of admissible evidence to the extent it is requesting information concerning any and all “persons and documents” involved in “billing, invoicing, paying, writing off, reimbursing and accounting treatment” for any work at all performed by Maxus over a fifteen year period. Defendants also object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as “procedures.” Defendant further object to other terms within the interrogatory as vague and ambiguous, including “procedures,” “accounting and legal work” and

“accounting treatment.” Moreover, Defendants object that the interrogatory is vague and ambiguous insofar as it asks about work performed by Maxus “on behalf of” other corporate affiliates.

Subject to those objections and their General Objections below, Defendants state that from 1995 through the present, Repsol entities entered into various service agreements with Maxus. Under each such agreement, Maxus agreed to provide services to, and receive service from, the individual Repsol entity. Pursuant to these agreements, Maxus and Repsol entities followed appropriate accounting procedures in the billing and subsequent payment process for all rendered services. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH and CLHH. Defendants further state that, as discovery and their investigation continues, they may supplement this response.

INTERROGATORY NO. 14:

For the time 1995 to the present, Identify and explain in detail any and all procedures for any funding for Maxus and/or Tierra, including pursuant to any obligations provided in the Assumption Agreement and the Contribution Agreement. This interrogatory contemplates monthly forecasts, 6-month forecasts, annual cash flow forecasts, and any funding associated with any Environmental Liabilities, including those Persons that receive the request at any stage, the position and name of each Person with each Defendant and/or Affiliate, and the bank and brokerage accounts used for same.

RESPONSE TO INTERROGATORY NO 14:

Defendants object that this interrogatory is overly broad and unduly burdensome insofar as it asks each of Repsol, YPF, YPFH and CLHH to “identify and explain” “any and all procedures” over a fifteen year period. Defendants also object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as “procedures.” Defendants further object that the interrogatory is vague and ambiguous in that “procedures” is not defined, and the interrogatory is

entirely unclear as to what it is requesting with respect to the various types of “forecasts” it “contemplates.” Specifically, the interrogatory asks about procedures for funding in the first sentence, and then the second sentence references concepts and documents that are not connected to any funding procedures. Defendants also object to the request for “bank and brokerage accounts” as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, Defendants object to the phrase “Environmental Liabilities” as misleading and improper. Defendants deny that Maxus or Tierra have any environmental liabilities as that term is commonly understood. Moreover, nothing in Defendants’ responses shall be interpreted to admit or imply that they have any environmental liabilities. Defendants also object to the phrase “Environmental Liabilities” as overly broad to the extent that it seeks information about sites or issues other than the ones at issue in this suit.

Subject to those objections and their General Objections below, Defendants state that any funding for Maxus and/or Tierra by Repsol, YPF, YPFH or CLHH requires the consideration, evaluation, assessment, deliberation and approval of specific employees or officers of any company providing such funding, including for funding provided under the Contribution Agreement. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 15:

Identify any policies, procedures and/or agreements, Including relevant Persons and Documents, Concerning Your use of, control of, and/or access to Maxus financial accounts, Including Maxus Controlled Disbursement Account # XXX100300 and Maxus account Chase CMA # XX0277 (as referenced in Maxus 001028-001245), Maxus account Chase # XXXX775641 (as referenced in YPF-E-0001060-0001062), and Maxus account XXXXX263605 (as referenced in Maxus-E0000335).

RESPONSE TO INTERROGATORY NO 15:

Defendants object that this interrogatory assumes incorrect facts. None of the Defendants have “control of” any Maxus financial accounts. Subject to this objection and the General Objections below, Defendants state that information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 16:

Identify the policies and procedures, including relevant Persons and Documents, concerning guarantees, counter-guarantees, letters of credit, and bonds concerning any of the Environmental Liabilities, whether direct or assumed, of Maxus and/or Tierra.

RESPONSE TO INTERROGATORY NO 16:

Defendants incorporate their objection to the phrase “Environmental Liabilities” as indicated above in response to Interrogatory Number 14 (an objection which Defendants incorporate as if set forth fully herein). Defendants further object that this interrogatory is vague and ambiguous. Subject to those objections and their General Objections below, Defendant state that, in general, any guarantee, counter-guarantee, letter of credit, or bond by Repsol, YPF, YPFH, or CLHH requires formal approvals by employees, officers and/or directors of each separate company involved in such guarantee, counter-guarantee, letter of credit, or bond. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 17:

Identify and explain in detail the business reason, rationale and justification for the creation of YPF International (Including the reason, rationale and justification for changing YPF International Ltd. to YPF International S.A.), YPFH, CLHH, and Tierra.

RESPONSE TO INTERROGATORY NO 17:

Defendants object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to phrases such as “business reason, rationale and justification.” Defendants also object that the term “justification” is vague, ambiguous and argumentative. Subject to those objections and their General Objections below, Defendants state that the creation, and subsequent transfer, of YPF International Ltd. (“YPF Int’l”) was part of a restructuring plan intended to provide greater tax efficiency at Maxus. Prior to the implementation of this restructuring, Maxus was inefficiently organized from a tax perspective because, among other things, Maxus was forced to pay foreign taxes on income earned by its international subsidiaries (e.g. the Indonesian subsidiaries paid taxes in Indonesia) and then was forced to pay additional U.S. income tax on its foreign-source income in the event Maxus paid dividends to YPF. To reduce these additional tax expenses, under the restructuring plan, Maxus sold its international operations to a non-U.S. subsidiary of YPF.

On June 19, 1996, as part of the implementation of this restructuring, Maxus International Energy Company (“Maxus Int’l”) formed YPF International Ltd. (“YPF Int’l”), a Cayman Island corporation. Maxus Int’l then contributed the stock of Maxus Bolivia, Inc. (“Maxus Bolivia”), Maxus Venezuela, Ltd. (“Maxus Venezuela”), and Maxus Venezuela, S.A. (collectively the “Bolivian and Venezuelan Assets”) to YPF Int’l. On July 1, 1996, Maxus Int’l sold the outstanding shares of YPF Int’l to YPF (see response to Interrogatory Number 18). In addition to the Bolivian and Venezuelan Assets, other international assets of Maxus were sold to YPF

Int'l at a later date (see response to Interrogatory Number 18). Having YPF Int'l hold these assets eliminated Maxus' double taxation problem, eliminated alternative minimum tax on foreign source income, and facilitated tax savings for Maxus. In addition, YPFH, CLHH and CLH (later known as Tierra) were created to facilitate certain additional aspects of the corporate restructuring implemented in 1996, described more fully above in response to Interrogatory Number 2, which Defendants incorporate as if fully set forth herein.

In connection with this and other aspects of the restructuring, YPF received advice from Andrews Kurth, LLP, Arthur Anderson LLP, and Credit Suisse First Boston. In addition, the Bolivian law firm, Bufete Aguirre Soc. Civ., advised Maxus with regard to the sale of the Bolivian assets, and the Venezuelan law firm, Travieso Evans Hughes Arria Rengel & Paz, advised Maxus with regard to the sale of the Venezuelan assets.

Additional aspects of the restructuring are described in response to Interrogatory Number 18 below, which Defendants also incorporate as if fully set forth herein. Moreover, additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 18:

For You and each of Your Affiliates involved in each Asset Transfer, Identify the details of each such transaction, including all officers and directors at the time of the approval and at the time of completion of each Asset Transfer (for each such officer and director, also Identify each Affiliate for which such officer or director also served as a director or officer and the applicable time period for each such position and each Affiliate such officer or director was employed by (in any capacity other than as an officer or director) and the applicable time period for each such position), the specific bank and brokerage accounts involved in each Asset Transfer and which entities or Affiliates owned such accounts, the accounting treatment of each Asset Transfer including the amount of the recorded gain or loss, and the use of the funds or capital obtained through the transfer including whether the funds were transferred to an Affiliate via a dividend, loan, distribution, or any other method.

RESPONSE TO INTERROGATORY NO 18:

Defendants object that the phrase “Asset Transfer” is overly broad and unduly burdensome and, among other problems, lists companies and assets that have never been “transferred” at all and for which there is no allegation of impropriety in Plaintiffs’ complaint. Defendants also object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as the “details of each such transaction.” Defendants also object to the request for “specific bank and brokerage accounts” as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object to the term “accounting treatment” as vague and ambiguous. Defendants also object to the request regarding “the use of the funds or capital obtained through the transfer,” as funds and capital are fungible.

Subject to those objections and their General Objections below, Defendants state that the Bolivian, Venezuelan, Ecuadorian, and Indonesian asset sales (discussed in detail below) were part of a post-acquisition reorganization, the objective of which was to bring the recently acquired Maxus—laden with \$1 billion in debt and operational inefficiencies—back to profitability. Specifically, the Bolivian, Venezuelan, Ecuadorian, and Indonesian asset sales were intended, among other things, to eliminate the double taxation of Maxus’ international subsidiaries, and facilitate the repayment of Maxus’ outstanding debt.

These asset sales were first proposed by tax and accounting consultants at Arthur Andersen & Co. SC (“Arthur Andersen”) in April of 1995. In addition, other professional experts were consulted regarding the strategy behind these asset sales, including financial consultants at Credit Suisse First Boston, legal advisors at Andrews Kurth, L.L.P. (“Andrews Kurth”), oil and gas consultants at Gaffney, Cline & Associates, Inc., and foreign legal counsel, including: Bolivian law firm, Bufete Aguirre Soc. Civ.; Ecuadorian law firm, Perez, Bustamante

& Ponce; Venezuelan law firm, Travieso Evans Hughes Arria Rengel & Paz; and the Dutch law firm of Stibbe Simont Monahan Duhot.

On July 1, 1996, Maxus International Energy Company (“Maxus Int’l”) sold the outstanding shares of YPF Int’l to YPF. The sole assets of YPF Int’l were all of the issued and outstanding stock of Maxus Bolivia, Inc. (“Maxus Bolivia”), Maxus Venezuela, (C.I.) Ltd. (“Maxus Venezuela”), and Maxus Venezuela, S.A. (collectively the “Bolivian and Venezuelan Assets”). The assets of Maxus Bolivia consisted, at that time, of all of the assets and operations of Maxus in Bolivia, including the interests of Maxus in the Surubi Field and Secure and Caipipendi Blocks. The assets of Maxus Venezuela and Maxus Venezuela S.A. consisted, at that time, of all of the assets and operations of Maxus in Venezuela, except those held through Maxus Guarapiche Ltd. (“Maxus Guarapiche”).

The purchase price for YPF Int’l (the Bolivian and Venezuelan Assets) was \$263,100,000, which was based, in part, on an independent appraisal performed by Credit Suisse First Boston. Credit Suisse First Boston placed the fair market value of YPF Int’l within a range of \$149 to \$214 million as of June 30, 1996. At a meeting of the Maxus Board on July 18, 1996, the Maxus Board determined that the consideration for the transfer of YPF Int’l should equal the higher of the fair market value for the Bolivian and Venezuelan subsidiaries and the carrying value of the assets held by such subsidiaries on the consolidated books and accounts of Maxus as of the time of transfer. Maxus management believed that the purchase price for YPF Int’l substantially exceeded its fair market value. The sale was recorded as a \$266,366,663 “intercompany receivable/payable.” The \$266,366,663 consisted of a \$165,366,663 promissory note and \$101,000,000 in cash.

On September 1, 1996, Maxus Int'l sold the stock of Maxus Guarapiche to YPF Int'l for \$26,353,740. Because Maxus Guarapiche's interest in the Guarapiche Block was a recent acquisition, and was the sole material asset of Maxus Guarapiche, no valuation was necessary to determine the fair market value of Maxus Guarapiche. This sale was recorded as an "intercompany receivable/payable" between Maxus Int'l and YPF Int'l.

The sale of YPF Int'l (the Bolivian and Venezuelan Assets) to YPF, and the sale of Maxus Guarapiche to YPF Int'l, were unanimously approved by Maxus' Board of Directors during the Board meeting held on June 18, 1996. The directors present at the meeting were Charles Blackburn, George L. Jackson, James R. Lesch, Roberto Monti, Dexter Peacock, Cedric Bridger, Nells Leon, and R. A. Walker. Also present, at the invitation of the Board, were Linda Engelbrecht, Mark Miller, David O. Smith, H. R. Smith, Jeff Ventura, and David Wadsworth, all of Maxus. In addition, Carlos Olivieri of YPF, Mike O'Donnell of Arthur Andersen, James M. Prince of Andrews Kurth, and William M. Wicker and Alex Sundich of Credit Suisse First Boston were present. After considering a presentation by Credit Suisse First Boston regarding the fair market value of the assets, and after a full discussion, the Board determined that the sale of YPF Int'l (the Bolivian and Venezuelan Assets) to YPF, and the sale of Maxus Guarapiche to YPF Int'l, was in the best interests of the corporation and unanimously resolved to approve the transfers. Maxus' independent directors, Charles Blackburn, George L. Jackson, and R. A. Walker were in full agreement.

On December 31, 1997, Maxus Int'l sold the outstanding shares of YPF Ecuador, Inc. (the "Ecuadorian Assets") to YPF Int'l. The assets of YPF Ecuador, Inc. consisted, at that time, of an undivided thirty-five percent (35%) interest in the Block 16 Production Sharing Contract,

the Bógi-Capiron Operating Agreement, and the Contract for Specific Services for the Tivacuno Area, each lying within the Orient Region of the Republic of Ecuador.

The purchase price for the Ecuadorian Assets was \$183,966,089.52, and was based on an independent appraisal performed by Gaffney, Cline & Associates of the fair market value of the assets as of December 3, 1997. Gaffney, Cline & Associates appraised the fair market value of the Ecuadorian Assets at \$165,000,000 as of December 1, 1997. In addition, Credit Suisse First Boston placed the value of the Ecuadorian Assets in the range of \$86 million to \$101 million as of September 30, 1996. For accounting purposes, the sale of the Ecuadorian Assets was recorded at a market value of \$185,246,734.85.

The Boards of Directors of Maxus, Maxus Int'l, and YPF Int'l each separately approved the sale of the Ecuadorian Assets. On December 19, 1997, Maxus' Board of Directors held a special meeting to consider the sale. The directors present at the meeting were George L. Jackson, James R. Lesch, Roberto Monti, Dexter Peacock, Mario B. Rosso, and R. A. Walker. Also present, at the invitation of the Board, were Linda E. Englebrecht, David O. Smith, H.R. Smith, and David Wadsworth, all of Maxus. In addition, Fernando Nardini and Francie Fernie of YPF and William B. Cline of Gaffney, Cline & Associates were present. After considering Gaffney, Cline & Associates' independent written advice regarding the fair value of the Ecuadorian Assets, and after a full discussion, the Board determined that it was in the best interest of the company to sell the Ecuadorian Assets and unanimously resolved to approve the sale.

On December 23, 1997, YPF Int'l's Board of Directors held a meeting to consider the purchase of the Ecuadorian Assets. The directors present at the meeting were Carlos Olivieri, Carlos Felices, and James R. Lesch. YPF Int'l's secretary, H.R. Smith, was present as well.

Also present, at the invitation of the Board, were David O. Smith and David A. Wadsworth of Maxus and Francis Fernie and Fernando Nardini of YPF. After considering Gaffney, Cline & Associates' independent written advice regarding the fair value of the Ecuadorian Assets, and after a full discussion, the Board determined that it was in the best interest of the company to purchase the Ecuadorian Assets and unanimously resolved to approve the purchase.

On December 29, 1997, Maxus Int'l's Board of Directors held a meeting to consider the sale of the Ecuadorian Assets. The directors present at the meeting were K. Delmar Rumph and H. L. Todd. Maxus Int'l's secretary, H.R. Smith, was present as well. After considering Gaffney, Cline & Associates' independent written advice regarding the fair value of the Ecuadorian Assets, and after a full discussion, the Board determined that it was in the best interest of the company to sell the Ecuadorian Assets and unanimously resolved to approve the sale.

On December 31, 1997, Maxus Indonesia, Inc. ("Maxus Indonesia") sold the issued and outstanding shares of YPF Java Baratlaut, B.V. ("Java") and all of the limited liability interest in Maxus Southeast Sumatra LLC ("Sumatra") (collectively, the "Indonesian Assets") to YPF Int'l. The Java assets consisted, at that time, of an undivided 24.2705% interest in the Northwest Java Production Sharing Contract ("NWJ-PSC"). The Sumatra assets consisted, at that time, of an undivided 45.6752% interest in the Southeast Sumatra Production Sharing Contract ("SES-PSC") and all shares of YPF Sumatera Tenggara B.V. (which owned an undivided 10% interest in the SES-PSC).

To determine the purchase price for the Indonesian Assets, YPF Int'l conducted a comparison between the Indonesian Assets and the value being offered in a contemporaneous

third-party transaction for the purchase of certain companies owning interests in the NWJ-PSC and the SES-PSC.

Valuations of the Indonesian Assets were also performed by Credit Suisse First Boston and Gaffney, Cline & Associates. Credit Suisse First Boston valued the Java assets in the range of \$232 million to \$282 million, as of September 30, 1996, and valued the Sumatra assets in the range of \$413 million to \$513 million, as of September 30, 1996. On December 3, 1997, Gaffney, Cline & Associates valued the Java assets at \$286 million, as of December 1, 1997, and valued the Sumatra assets at \$278 million, as of December 1, 1997.

Under the Purchase and Sale Agreement, the purchase price for the Java assets (plus a promissory note between Java and Maxus Int'l) was \$263,975,809.71. The purchase price for the Sumatra assets was \$241,336,869.41. For accounting purposes, the sales proceeds from the transfer of the Indonesian Assets were recorded at a market value of \$224,001,378.37 for the Java Assets, \$41,154,266.29 for the promissory note, and \$246,504,946 for the Sumatra Assets.

The Boards of Directors of Maxus, Maxus Indonesia, and YPF Int'l each separately approved the sale of the Indonesian Assets. On December 19, 1997, Maxus' Board of Directors held a special meeting to consider the sale. The directors present at the meeting were George L. Jackson, James R. Lesch, Roberto Monti, Dexter Peacock, Mario B. Rosso, and R. A. Walker. Also present, at the invitation of the Board, were Linda E. Englebrecht, David O. Smith, H.R. Smith, and David Wadsworth, all of Maxus. In addition, Fernando Nardini and Francie Fernie of YPF and William B. Cline of Gaffney, Cline & Associates were present. After a full discussion, the Board determined that it was in the best interest of the company to sell the Indonesian Assets and unanimously resolved to approve the sale.

On December 29, 1997, Maxus Indonesia's Board of Directors held a meeting to consider the sale of the Indonesian Assets. The directors present at the meeting were K. Delmar Rumph and H. L. Todd. Maxus Int'l's secretary, H.R. Smith, was also present. After a full discussion, the Board determined that it was in the best interest of the company to sell the Indonesian Assets and unanimously resolved to approve the sale.

On December 23, 1997, YPF Int'l's Board of Directors likewise held a meeting to consider the purchase of the Indonesian Assets. The directors present at the meeting were Carlos Olivieri, Carlos Felices and James R. Lesch. YPF Int'l's secretary, H.R. Smith, was present as well. Also present, at the invitation of the Board, were David O. Smith and David A. Wadsworth of Maxus and Francis Fernie and Fernando Nardini of YPF. After a full discussion, the Board determined that it was in the best interest of the company to purchase the Indonesian Assets and unanimously resolved to approve the purchase.

On June 30, 1998, the Stock Purchase Agreement relating to the Indonesian Assets was amended to increase the purchase price for the Java assets to \$282,800,569.03 to reflect the fair market value of the Java assets based on a subsequent valuation performed by Gaffney, Cline & Associates. The purchase price for the Sumatra assets was also upwardly adjusted, pursuant to the automatic adjustment provisions of the Stock Purchase Agreement because, subsequent to the execution of the Stock Purchase Agreement, there had been an arms-length sale of an interest in the SES-PSC, indicating an increase of the fair market value of the Sumatra assets. The Maxus Board of Directors unanimously approved the amendment to the Stock Purchase Agreement, in a meeting held on August 4, 1998, after a full review of the independent advice provided by Gaffney, Cline & Associates and other appropriate information.

Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 19:

Identify each instance of a Person objecting to, submitting a counter-offer for, attempting or requesting to obtain an independent valuation of, or negotiating to increase or decrease the Transfer of Value amount for the YPF purchase of Maxus in 1995, the 1996 Restructuring, and/or any Asset Transfer to an Affiliate or any third party between 1995 and 2006.

RESPONSE TO INTERROGATORY NO 19:

Defendants object to the phrase “Transfer of Value” as overly broad, unduly burdensome, vague and ambiguous and further object to the phrase “Asset Transfer,” as indicated above in response to Interrogatory Number 18 (an objection which Defendants incorporate as if set forth fully herein). Defendants also object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as the “details of each such transaction.”

Subject to those objections and their General Objections below, Defendants state that each of the asset sales and transactions described above in response to Interrogatory Number 18 were considered, evaluated and decided by employees, officers and the Board of Directors of each and every company involved in the sales and transactions. Pursuant to N.J Rule 4:17-4(d), Defendants refer, for example, to the Board of Director meeting minutes previously produced or that will be produced in this case. Many of the transactions also involved independent analyses or valuations by consultants, such as Arthur Andersen, Andrews Kurth, Gaffney, Cline & Associates, and Credit Suisse First Boston, as described above in response to Interrogatory Number 18. Finally, market conditions dictated a later increase to the sale price for certain of the

assets, again as described above in response to Interrogatory Number 18. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 20:

As to each Asset Transferred to an Affiliate between 1995 and the present, Identify and explain in detail each effort to sell or transfer the same Asset to any third party, Including details Concerning unsolicited offers.

RESPONSE TO INTERROGATORY NO 20:

Defendants incorporate their objection to the phrase “Asset Transferred” as indicated above in response to Interrogatory Number 18 (an objection which Defendants incorporate as if set forth fully herein). Defendants further object to the time period specified by this interrogatory. The transactions and asset sales at issue occurred over ten years ago, and subsequent offers or bids many years after the fact, if any, under different financial circumstances or involving different asset development or production have no relevance to any issue in the case and are in no way likely to lead to the discovery of admissible evidence. Subject to those objections and their General Objections below, Defendants incorporate their response to Interrogatory Number 18 above, and further state that, while their investigation continues, they are currently unaware of any bids or offers around the time of the transactions identified in these interrogatories responsive to this request. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 21:

For the time period 1995 through the present, Identify each dividend, loan (Including interest rate), and/or disbursement made to You or an Affiliate using, at least in part, the proceeds from any Asset Transfer. Include the name of each officer and executive involved, the

bank and brokerage account(s) used, the business purpose and rationale for each dividend, loan, or disbursement, and Include the same details for the \$825,669,486 referenced in YPFH 393-YPFH 403 and the approximately \$619,000,000 referenced in YPFH 476-YPFH 490.

RESPONSE TO INTERROGATORY NO 21:

Defendants object to this interrogatory as a whole as vague and ambiguous. Cash and other “proceeds” are fungible, and therefore whether a “dividend, loan ... and/or disbursement” was made with proceeds from one source as opposed to another generally cannot be readily determined. This is especially true given that the interrogatory inappropriately seeks information through “the present” even though the asset sales and transactions identified in these interrogatories occurred over ten years ago. Moreover, Defendants incorporate their objection to the phrase “Asset Transferred” as indicated above in response to Interrogatory Number 18 (an objection which Defendants incorporate as if set forth fully herein). Defendants further object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as “dividend, loan ..., and/or disbursement.” Defendants also object to the request for “bank and brokerage account(s)” as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object to the terms “business purpose and rationale” as vague, ambiguous, and subject to varying interpretations. Defendants will respond to this interrogatory using their understanding of those terms.

Subject to those objections and the General Objections below, Defendants state that the proceeds from the Bolivian and Venezuelan asset sales were used, in part, to redeem 100% of its \$4 Cumulative Convertible Preferred Stock; the proceeds from the sale of the Ecuadorian assets were used to pay down a \$200 million intercompany note between YPF Int’l and Maxus Int’l; and the proceeds from the sale of the Java and Sumatra assets were used to pay down intercompany notes between Maxus Indonesia Inc. and YPF Int’l.

Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 22:

For the time period 1995 through the present, did You or anyone on Your behalf perform Due Diligence, an appraisal, a valuation, or a fairness opinion Concerning any Asset? If Your answer is anything other than an unequivocal “No,” Identify the Asset, the project, the dates the project began and ended, the parties as stated in the applicable contract and each Person that performed any of the Due Diligence, appraisal, valuation, or fairness opinion.

RESPONSE TO INTERROGATORY NO 22:

Defendants object that the term “Asset” is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence because, among other problems, it lists companies and assets that have never been “transferred” at all and for which there is no allegation of impropriety in Plaintiffs’ complaint. Defendants further object to the use of the defined term “Identify,” which Plaintiffs have defined to refer to persons or documents, as being vague and ambiguous when applied to terms such as “Asset.” Defendants also object to the time period specified in this interrogatory. The transactions and asset sales at issue occurred over ten years ago, and subsequent appraisals or valuations many years after the fact, if any, under different financial circumstances or involving different asset development or production have no relevance to any issue in the case and are in no way likely to lead to the discovery of admissible evidence. Subject to those objections and their General Objections below, Defendants state that, in addition to representatives of the various companies involved in the transaction (as described and identified at least in part in response to Interrogatory Number 18), outside advisors and consultants were retained to assess and value various of the assets that were later sold, including Arthur Andersen, Andrews Kurth, Gaffney, Cline & Associates, and Credit Suisse First Boston.

Defendants further incorporate their response to Interrogatory Number 18 as if fully set forth herein, and further refer Plaintiffs to the various documents produced on these issues in YPF's most recent document productions. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 23:

For the time period 1995 to the present, Identify each of Your employees, officers, directors, or Agents, Including any third party entity and its employees, having a role in the evaluation or estimation of Environmental Liabilities, and/or environmental reserves, for the Passaic River, the Newark Bay Complex, and for each site covered by Exhibit A of the Assumption Agreement.

RESPONSE TO INTERROGATORY NO 23:

Defendants incorporate their objection to the phrase "Environmental Liabilities" as indicated above in response to Interrogatory Number 14 (an objection which Defendants incorporate as if set forth fully herein). Subject to that objection and their General Objections below, YPF states that it received legal advice from Andrews Kurth concerning the estimate of potential or alleged environmental obligations or liabilities of Maxus. Defendants object to providing information specific to any reserve estimates and analyses "for the Passaic River, the Newark Bay Complex, and for each site covered by Exhibit A of the Assumption Agreement" based on the attorney work product doctrine and attorney-client communication grounds.

INTERROGATORY NO. 24:

Describe in detail the \$325 million dollar purported loan between Maxus and Repsol International Finance, B.V., Including naming each Person involved in the transaction, the bank and brokerage account(s) used, the business purpose, rational or justification, and the applicable interest rates.

RESPONSE TO INTERROGATORY NO 24:

Defendants object to the phrase “purported loan” as vague, ambiguous, and argumentative. Defendants state that an actual \$325 million loan was made between Maxus and Repsol International Finance, B.V., as set forth below. Defendants further object to the terms “business purpose, rational or justification” as vague, ambiguous, and subject to varying interpretations. Defendants will respond to this interrogatory using their understanding of those terms. Defendants also object to the request for “bank and brokerage accounts” as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and their General Objections below, Defendants state that, on January 2, 2001, Maxus and Repsol International Finance, B.V. (“RIF”) entered into a credit facility agreement whereby Maxus loaned RIF \$325 million (the “Credit Facility Agreement”). The loan allowed RIF to obtain better financial returns on such amounts—for the benefit of all companies within the corporate structure—based on economies of scale, and also eliminated inefficiencies between fund positions, among other benefits. According to the Credit Facility Agreement, Maxus was to calculate the interest rate for the loan “on the basis of the alternative yield of funds in market conditions.” This loan is consistent with other similar transactions between RIF and other Repsol subsidiaries and is in accordance with the cash management system used for Repsol affiliates. The average interest rate used was LIBOR minus 0.11%. RIF repaid the loan in full with interest paid on the principal at market rates. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

INTERROGATORY NO. 25:

Identify each Agent, the date each Agent was hired, and the contracted client of each Agent, involved in the 1996 Restructuring, and in any subsequent restructuring analysis involving YPF International, YPFH, or any of YPFH's Subsidiaries, Including those involved in the restructuring analysis in 2005 and documented in YPFH 338.

RESPONSE TO INTERROGATORY NO 25:

Defendants object to the term "Agent" as vague and ambiguous as well as overly broad to the extent that it purports to include persons under the "indirect control or influence" of another person. Defendants further object to the term "restructuring analysis" as vague and ambiguous.

Subject to those objections and their General Objections below, Defendants refer to the consultants and advisors identified in response to Interrogatory Number 18, including Arthur Andersen, Andrews Kurth, Gaffney, Cline & Associates, and Credit Suisse First Boston. In addition, the Dutch law firm of Loyens & Volkmaars advised Maxus on the transfer of the Indonesian assets, the Argentine law firm of Marval, O'Farrell, & Mairal advised YPF regarding the restructuring process, and King & Spalding L.L.P. performed a legal restructuring assessment for Repsol in 2005. Additional information responsive to this interrogatory has been, or will be, produced and identified pursuant to Rule 4:17-4(d) in response to the document requests served by Plaintiffs on Repsol, YPF, YPFH, and CLHH. Defendants further state that, as their investigation continues, they may supplement this response.

GENERAL OBJECTIONS

Defendants expressly assert the following objections to each and every of Plaintiffs' Interrogatories as though fully set forth in response to each individual interrogatory:

1. Defendants object to Plaintiffs' Definitions in that the Definitions list many terms and phrases not used in any specific interrogatory. Defendants expressly reserve the right to object to any such phrase or term in the context of any specific request.

2. Defendants object to the definitions and instructions set forth in the discovery request being answered. Defendants object to such definitions and instructions to the extent that they (a) purport to impose obligations beyond those required under the New Jersey Rules, case law and/or the Orders entered by the Court in this case, (b) are duplicative or request information already in the possession of Plaintiffs or their counsel, or (c) expressly or impliedly ask for information protected from disclosure by the attorney-client privilege, the common interest privilege, the attorney work product doctrine, privilege from disclosure of communications with litigation consultants, accountants, and insurers to the extent recognized by applicable law, or any other applicable privilege, protection, or immunity. Defendants do not intend to disclose or produce any such privileged information in response to this request being answered, and the responses should be read accordingly. Any disclosure of information which is privileged or otherwise protected from disclosure is inadvertent, and all rights to demand return and/or destruction of any such information are reserved.

3. Defendants object to Plaintiffs' Interrogatories in that they far exceed the maximum number of requests allowed by applicable rules, laws, orders or agreements of the parties, and to the extent they are duplicative and overlapping. Defendants have responded herein to far more than twenty-five interrogatories, which is the maximum number permitted the propounding parties under ¶ 3.4 of Case Management Order VII, and Defendants object to any and all additional interrogatories by these propounding parties.

4. Defendants object to Plaintiffs' Interrogatories to the extent that certain interrogatories are in conflict with the privacy laws, or other foreign laws, of Spain or Argentina.

5. In responding to Plaintiffs' Interrogatories, Defendants do not admit or imply that any of the information sought by Plaintiffs is relevant or admissible. Defendants reserve all of

their objections to any information provided in their interrogatory responses, including but not limited to objections regarding relevance and admissibility.

Dated: December 23, 2009

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and CLH Holdings, Inc.

CERTIFICATE OF SERVICE

This is to certify that on December 23, 2009, a true and correct copy of Defendants Repsol YPF, S.A., YPF, S.A., YPF Holdings, Inc., and CLH Holdings, Inc.'s Responses to Plaintiffs' First Set of Interrogatories to Repsol YPF, S.A. and Second Set of Interrogatories to YPF, S.A., YPF Holdings, Inc., and CLH Holdings, Inc. was served electronically on all parties which have consented to service by posting on www.sfile.com/njdepvocc on December 23, 2009. In addition, the following counsel of record were served on December 23, 2009 via first class, regular mail:

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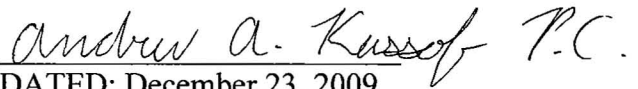
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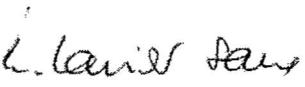
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Attorneys for Township of Cranford


DATED: December 23, 2009

CERTIFICATION

I, Francisco Javier Sanz Cedrón , hereby certify that I am Director de Gestión y Calidad Financiera for Repsol YPF, S.A., and verify the foregoing Interrogatory Responses. The Responses have been assembled with the assistance of counsel for Repsol YPF, S.A., as well as input from other Repsol YPF, S.A. personnel. To the best of my knowledge, the information regarding the issues presented in the Responses is true and correct. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

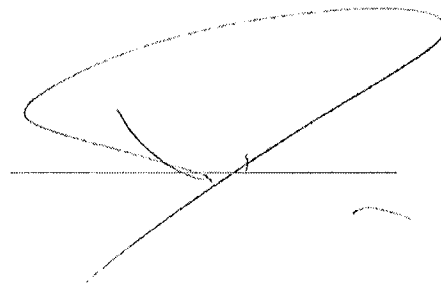


Date: December 23, 2009

CERTIFICATION

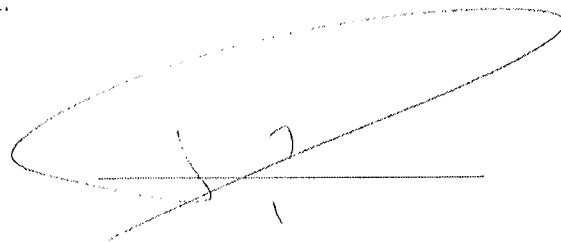
I, Teodoro Marcó, hereby certify that I am a Director for YPF Holdings, Inc., and verify the foregoing Interrogatory Responses. The Responses have been assembled with the assistance of counsel for YPF Holdings, Inc. To the best of my knowledge, the information regarding the issues presented in the Responses is true and correct. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Date: January 5, 2010

A handwritten signature in black ink, appearing to be 'Teodoro Marcó', is written over a horizontal line. The signature is stylized and somewhat cursive.

CERTIFICATION

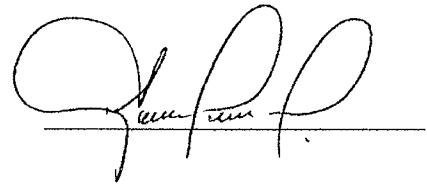
I, Teodoro Marcó, hereby certify that I am a Director for CLH Holdings, Inc., and verify the foregoing Interrogatory Responses. The Responses have been assembled with the assistance of counsel for CLH Holdings, Inc. To the best of my knowledge, the information regarding the issues presented in the Responses is true and correct. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

A handwritten signature in black ink, consisting of a large, sweeping loop followed by a horizontal line and a small vertical tick mark.

Date: January 5, 2010

CERTIFICATION

I, GABRIEL LEIVA, hereby certify that I am Administrative Manager for YPF, S.A., and verify the foregoing Interrogatory Responses. The Responses have been assembled with the assistance of counsel for YPF, S.A., as well as input from other YPF, S.A. personnel. To the best of my knowledge, the information regarding the issues presented in the Responses is true and correct. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

A handwritten signature in black ink, appearing to read 'Gabriel Leiva', is written over a horizontal line.

Date: December 22, 2009