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 KEYWORDS : eduardo;dave;dlr mindspring com;edison;russell  
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DATESENT = 11/01/2004  
 TIMESENT = 11:55:19  
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 TIMERECEIVED = 12:01:12  
 PARENTDATE = 11/01/2004  
 PARENTTIME : 2004/11/01 11:55:19  
 LASTMODDATE = 02/14/2011  
 LASTMODTIME : 11:16:14  
 FILENAME : 000000000ECB62CA08075B46A52CBD8A332728A3C4E42500.MSG  
 TITLE : Re: two important issues  
 SUBJECT : Re: two important issues  
 TEXT :

From: Dave Russell [dlr@mindspring.com]  
 Sent: Monday, November 01, 2004 11:55 AM  
 To: Steven Donziger; limcas2002@yahoo.com; dlr@mindspring.com  
 Cc: awraye1@msn.com; monica\_pareja@hotmail.com  
 Subject: Re: two important issues

Hola Edison:  
 I don't know what happened to the samples you specified when you were the perito. If Eduardo has not included them in his report, fix that because he works for you and should be able to produce the data. With regard to the analyses, there are a couple of things.  
 1) The Selva Viva (SV) lab ran most if not all the samples.  
 2) There are very good correlations between the results from the Crude Check samples and the data from PUCE (DRO Analyses).  
 3) I believe that you can estimate with a high degree of precision, the results you need for DRO from the crude check analyses.  
 I'm incorporating a couple of inserts which should show you the results.  
 First is the comparison between SV DRO and PUCE DRO. The Correlation coefficient is not strong about 0.39  
 Second is the comparison between the SV Crude Check and the PUCE DRO. It is about 0.906 and doesn't get much stronger.  
 I suggest that you interpolate the results where you don't have PUCE data and estimate the information from the SV data.  
 If the crude check analyses are there, the information is reliable and can be counted on.

Here is the SV-DRO vs. PUCE DRO data for Sacha 53 followed by the SV-Crude Check vs. PUCE DRO data for the same site.  
 Call me if you have questions.

I also need to know what the current salaries are so that when I get a check in, I can pay people.

Finally: Based upon a meeting in New York with the Attorneys on Thursday of last week, we need to stop analyzing for BTEX and

GRO.  
 TPH and DRO are fine, but the analysis and reporting of GRO and BTEX data is self defeating except to show that the contamination is much more recent than we would desire, and that would lead to an argument that the contamination is by PetroEcuador rather than TEXACO. This is especially true for BTEX Data.

You also need to instruct the lab to change the reporting of the results and on the invoice. I'll get the information to you later on that, but it may need to change and remove the Selva Viva name if that is in deed the case. I'll get you a new name shortly.

Dave  
Here is the correlation data.

11/1/2004

At 09:30 AM 11/1/2004, Steven Donziger wrote:

Edison and Dave --

You guys need to talk ASAP and deal with two outstanding issues:

- 1) Sacha 53 -- Please provide an update as to the sampling issues that Edison raised. Specifically, if a) there are samples asked for by the judge that were not analyzed; b) what this means in the context of the overall sampling given our Nov. 15 deadline for Edison's report and the Nov. 22 deadline to release it to the court and to the press. Please, do not delay this report under any circumstances. Please give us a short and analysis and propose a plan of action by the end of today if possible.
- 2) Budget -- we need a new budget consistent with the new sampling realities. These realities are taking a limited amt of samples, and running fewer tests per the meeting in New York. Please revise the tech budget consistent with these realities.

Thanks.

Steven

Steven Donziger  
212-561-7456 (land)  
[REDACTED] (cell)

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

[REDACTED]  
Email: sdonziger@yahoo.com

11/1/2004

AUTHOR : Dave Russell [dlr@mindspring.com]  
FROM : Dave Russell [dlr@mindspring.com]  
RECIPIENT : dlr@mindspring.com;limcas2002@yahoo.com;Steven Donziger [sdonziger@yahoo.com]  
CC : awraye1@msn.com;monica\_pareja@hotmail.com  
CUSTODIAN : Donziger, Steven  
UNREAD : Y  
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