

EXHIBIT 2532

From: William Langewiesche [WLang@vf.com]
Sent: Tuesday, February 13, 2007 7:52 AM
To: Steven Donziger
Subject: Email
Attachments: Chevron-Texaco.doc

Dear Steve, attached is a draft of the email, still a little rough language-wise. I'm obviously eager for your input, and the addition of whatever precision we can manage. Any additions and corrections will be much appreciated. You'll see a few places in upper case, where I'm asking directly for your help.

I hope things are going well at the hearing today.

William

February 11, 2007

Dear XXX,

It was a pleasure meeting you and Sarah McMillan in Quito last week, and I have carefully read the document you provided me, rebutting the plaintiff's claims. As I said to you then, I am traveling extensively in the area of Texaco's former concession, and am closely studying some of the technical and legal documentation associated with this case. I have also spoken at some length to the plaintiff's lead Ecuadorian lawyer, Pablo Fajardo. At this point I would like to ask Chevron-Texaco a series of narrow questions, to which I would appreciate narrow and tangible answers, keeping in mind that I have visited a large number well sites and separation stations, of U.S. and Ecuadorian laws and standards, present and past, and of the historical distinctions between Texaco and Petroecuador operations. You will notice that some of the questions overlap.

1. Who was the author (the "I") of the document "Addressing Plaintiffs' Attorneys' Big Lies?" Why is he not identified? When was the document written, and to whom is it distributed?
2. Given that the plaintiffs' claims are currently being litigated in the courts of Ecuador and the United States, what is the purpose of the above-mentioned document?
3. Why does the document not include footnotes to provide sources?
4. At any point during the two decades preceding 1992 did Texaco disseminate a global environmental practices policy. If so, would it be possible for Vanity Fair to obtain a copy of the document? If such policy/documents evolved over the course of the Ecuadorian operations, would it be possible for Vanity Fair to obtain an early version (1970s) as well as a later one (1980s.)
5. Does Chevron-Texaco have such a policy/document today? Can Vanity Fair obtain a copy of it?
6. What was the policy of Texaco toward the indigenous people who traditionally inhabited the Ecuadorian concession in the early 1970s? What tangible attempts were made to mitigate the displacement or disruption of such peoples?
7. What was the policy of Texaco toward the settlers who arrived in the concession area as the roads were being cut through the forest in the 1970s and 1980s? Did Texaco disseminate a document clarifying such a policy, and if so would it be possible for Vanity Fair to obtain a copy?
8. At a mid-point in the 1970s (1973? 1974? 1975?) what was the approximate size of the Texaco workforce in the area, including workers for subcontractors? Approximately how many of the workers were Ecuadorian nationals? Approximately how many were U.S. nationals?
9. At that time (1970s) on what technical and regulatory basis was the decision made to contain the drilling "muds" in unlined earthen pits (*piscinas*) at the well sites?
10. Were such unlined earthen pits in use by Texaco or Chevron at that time in Texas or California. If so, specifically at which well sites, where? At that time were

such unlined earthen pits in use by Texaco or Chevron elsewhere in the world? If so, specifically where?

11. I know that for historical reasons the regulations of the Texas Railroad Commission are generally considered to set oil-industry operating standards within the United States, and that in 1939 the Commission effectively banned the storage of crude oil and waste products in unlined pits throughout the state of Texas, regardless of soil type, density of human population, or proximity to surface and subsurface waters. For what reason were unlined pits later used by Texaco in the Amazon?
12. What typically, or in any known instance, would have been the additional cost to Texaco of lining a pit?
13. I am aware of the clause in the contract with Ecuador which obligated Texaco to respect the environment during operations, using technology and procedures according to best practices at the time. (CITE) In what ways specifically was the technology in use in Ecuador different from that in use by Chevron or Texaco at that time in California or Texas?
14. What were Texaco's plans and methods in the 1970s and 1980s to dispose of the materials (drilling muds, and waste products) contained in the pits at the Amazon well sites? Were those disposal plans and methods the same as those in use at that time in California or Texas? Can you provide me with relevant disposal documentation both from the US and Ecuador?
15. In the 1970s and 1980s what was the nature of the oil-like material that was sprayed on the dirt roads for purposes of dust suppression? What was the origin of that material?
16. During Texaco's two decades of operations in the concession area, what were the specific methods and techniques used to treat the "produced water" at the separation stations before the water was released into the environment.
17. What was the range of salinity levels in the produced waters before and after such treatment? Can you provide me with documentation?
18. What was the range of heavy metals and other toxins in such water, before and after treatment? Can you provide me with documentation?
19. In your document referenced in questions #1 and #2, (page 4, section 5, paragraph 4) you seem to be saying that the separation of crude in the separation stations was 100 percent efficient. Is this correct? If not, what approximately was the efficiency of the separation process, and what was done with the residual crude.
20. In your document referenced in questions #1 and #2, (page 4, section 5, paragraph 5) you state that the average annual volume of produced water discharged by Texaco in Ecuador was 1.7 percent of the volume of such waters discharged onshore in the United States in 1985. What is your source for the calculation? What was the nature of that discharge in the United States? Was the treatment of the produced waters the same as in Ecuador? Was the water discharged directly into the watersheds? Can you provide me with specific locations in California and Texas where this was being done by Chevron or Texaco in 1985?
21. Your document states (page 4, section 5, paragraph 4) that the discharge of produced waters directly into the environment is currently in use in many parts of

the world today. Can you tell me specifically where, and whether this continues to be the practice of Chevron-Texaco.

22. What is the reason, as your document states, that the re-injection of produced waters is the preferred method of disposal in Ecuador today?
23. What percentage of Chevron and Texaco's produced waters onshore in the United States were re-injected in 1985?
24. Your document states (page 5, paragraph 2) that the health studies and writings of Dr. Miguel San Sebastian are funded by the plaintiffs. Can you provide Vanity Fair with evidence, documentary or other, to back up this assertion. Have you attempted to contact Dr. San Sebastian to verify his financial connection to the plaintiffs?
25. Your document cites the critiques of Dr. San Sebastian's work by three epidemiologists (Dr. Michael Kelsh, Dr. Felix Arellano, and Ken Rothman) whom it describes as independent. Does this mean that they were not funded or otherwise subsidized by Chevron-Texaco or its agents? Would you inquire on our behalf to see if Vanity Fair might email or briefly speak to these men?
26. Has Chevron or Texaco funded health studies in the concession area of Ecuador? If so, have the results been published in peer-reviewed journals?
27. To the best of your knowledge, have any health studies published in peer-reviewed journals supported your document's claim that the health conditions in the Oriente region cannot be linked to oil-industry pollutants?
28. Conversely, are you aware of any studies published in peer-reviewed journals that support your document's statement that the health problems in the Oriente are likely the result of poverty, malnutrition, and poor sanitation? If not, on what basis does your document make such statements?
29. Who are the "many physicians and epidemiologists" referred in your document who support your position on medical conditions in the Oriente? How many are "many?" How are you aware of them? Can you provide Vanity Fair with their names? Similarly, which health organizations is your document referring to?
30. During the Texaco operations prior to 1992 were any pits at the well sites or separation stations remediated and/or covered over with dirt? If they were remediated, what specific methods and standards were applied?
31. It is our understanding that Chevron-Texaco objects to the retroactive application of remediation standards in Ecuador. Is this true? Does Chevron-Texaco reject such retroactive "cleanup" standards and laws in the United States?
32. For the purposes of Texaco's remediation effort in 1995-1998, on what scientific or regulatory basis did the contract negotiated with the Ecuadorian government settle upon a Total Petroleum Hydrocarbon (TPH) standard of 5000 ppm?
33. At that time what was the TPH standard in California? In Texas?
34. Precisely what procedures were applied to the remediation of the pits during the cleanup effort of 1995-1998. Who did the work, and how was it monitored? Would it be possible to provide Vanity Fair with documentation?
35. Can you explain the precise quality control and auditing procedures associated with the release from further liability? Was the Woodward Clyde work monitored by qualified independent technicians? If so, who were they?

36. Is it true that water samples taken by Texaco after the remediation at the well site Sacha 10 showed nickel, cadmium, and phenols existing at levels several times higher than those permitted by the Ecuadorian clean-water regulation 2144 of 1989?
37. Is it true that Texaco tested the remediated sites by using the Toxic Characteristic Leaching Procedure (TCLP)? If other procedures were used, what were they, specifically? Can you provide Vanity Fair with documentation?
38. Has Chevron-Texaco ever tested for Chromium 6 in the concession area? If such tests have been performed, can you provide Vanity Fair with documentation? If such tests were not performed, what is the reason?
39. In its submissions resulting from field testing during the ongoing Lago Agrio trial, why has Chevron-Texaco raised the allowable standard for TPH to 10,000 pph?
40. What is the basis for the “international standards” repeatedly referred to in Chevron-Texaco submissions at the trial? (CAN YOU HELP MAKE THIS MORE SPECIFIC?) Can you provide Vanity Fair with documentation to support those international standards?
41. I'D LIKE A QUESTION REFERRING TO THE BOILERPLATE ASSERTION IN THE CHEVRON SUBMISSIONS THAT NO HEALTH OR NEGATIVE ENVIROMENTAL IMPACT IS SHOWN, YET POINTING TO VALUES PREFERABLY FOR PPH EXCEEDING 5000 AND ECUADORIAN LAW. HOW WOULD YOU WORD THIS?
42. I am aware that for the purposes of the Lago Trial, in March 2004 Chevron-Texaco entered into an agreement with local Ecuadorian military authorities to house Chevron personnel on the Lago military base. What was the reason for this? Given the history of the Ecuadorian military's role in national affairs, and the known weaknesses of the Ecuadorian political and judicial structures, was there no concern that the relationship between military authorities and Chevron-Texaco might be prejudicial to the judicial process? If there was no such concern, can you explain the reason for the lack of concern?
43. In your document referenced in questions #1 and #2, (page 1, section 1, paragraph 1) you state that 95 percent of the profits generated by consortium during Texpet's operations went to the Ecuadorian government, and that about \$490 million went to Texpet. Can you provide Vanity Fair with similar financial calculations not for Texpet, but for the Texaco Corporation? (WORDING??)