

EXHIBIT 2538

From: Steven Donziger [sdonziger@gmail.com]
Sent: Thursday, February 22, 2007 9:35 AM
To: Juan Pablo Sáenz; OLGA LUCIA GOMEZ
Subject: Fwd: Some numbers

Read below and let's talk on the phone. Thanks, SRD

----- Forwarded message -----

From: William Langewiesche <WLang@vf.com >
Date: Feb 22, 2007 12:51 AM
Subject: Some numbers
To: Steven Donziger <sdonziger@gmail.com>

Steve--I'm just off the phone with you, which was a pleasure, as usual.

Here's a summary of the approach we decided on for the "numbers," for which I'd like your help.

What I need:

#1. At a few specific Texaco "remediation sites," by name. a) The sampling numbers by Woodward at the end of the "remediation," preferably which show high numbers, and preferably for TPH. If not that, then an associated explanation of the manipulation of data. b) For those same "remediated" sites, the Chevron numbers from the judicial inspections, preferably for numbers exceeding 5000. c) For those same sites, from Chevron judicial inspections, high numbers for high concentrations of heavy metals or other toxins.

#2. At a few specific sites, by name, that are Texaco's legacy, but for which they have refused to take responsibility, and that therefore have not been "remediated": high TPH or other toxin-numbers from Chevron's own judicial inspections. Ideally for the purposes of the article, these would be places into which no toxins were dumped after 1992. (I understand and accept your argument that even if toxins were dumped there after '92 it is Chevron's responsibility, but the presentation will be stronger if we can avoid this issue, as it pertains to the numbers at specific sites.)

For your reference, the Chevron court submissions and associated lab reports which you gave me in Quito are: Lago Ario Norte; Shushufindi 48; Estacion Sacha Sur; Shushufindi 08; Estacion Shushufindi Suroeste; and Sacha 57. I do not know how these sites relate to # 1 and #2 categories above.

Also, can you give me the background of the May 1997 Petroecuador document, "Analysis By The Environmental Protection Unit of Petroecuador Concerning Texaco Operation And The Environmental Remedial Plan in Ecuador." Who were these guys, and why did they issue this document? What was going on? What was the purpose? How did they derive the numbers, for instance for salinity of the produced waters?

Thanks, Steve.

As you know, I am determined within my limited capabilities, to do justice to your work and to Pablo's.

In other words, I know you have a tendency to worry, but as for this VF article trust me, and rest easy.

William

PS: just a reminder about talking to Anne Maest

--

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Certificate of Accuracy Certificado de Exactitud

This is to certify that the attached translation is, to the best of our knowledge and belief, a true and accurate translation from Spanish into English of the attached document.

Por el presente certifico que la traducción adjunta es, según mi leal saber y entender, traducción fiel y completa del idioma español al idioma inglés del documento adjunto.

Dated: August 6, 2012
Fecha: 6 de agosto de 2012

Violeta Lejtman
Team Lead – Legal Translations
Merrill Brink International/Merrill Corporation

[firmado]

Violeta Lejtman
Líder del equipo – Traducciones Legales
Merrill Brink International/Merrill Corporation

Sworn to and signed before
Jurado y firmado ante
Me, this 6th day of
mí, a los 6 días del
August 2012
mes de agosto de 2012

Notary Public
Notario Público

Gina Marie St-Laurent
GINA MARIE STLAURENT
Notary Public, State of New York [firmado]
No. 01876146442 [sello]
Commission Expires May 15, 2014

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Lee lo abajo y hablamos por telefono. Gracias, SRD

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