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October 13, 1992

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Re: Tutu Water Wells Contamination Litigation

Dear Mr. Knoepfel:

In attention to your September 28, 1992 letter to Francis Torres, Esq. regarding the inspection of certain installations and connections at the ESSO Tutu Service Station ("ETSS") as well as a purported "anomaly" in the North-East quadrant of ETSS, please be advised of the following:

ESSOVI reiterates that it will undertake the testing and/or excavations necessary for accomplishing the stated purposes of Four Winds' Request for Inspection, i.e.:

- 1) The locating and tracing [of] piping to and from the holding containment area and/or the oil water separator; and
- 2) The exploration of an anomaly detected within a square area, measuring 40 feet per side, more specifically identified in Exhibit "A".

A specific work plan is being developed and will be made available to plaintiffs in the course of the next few days.

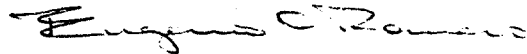
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Addressing your other queries, please be advised that the proposed investigation will cover the scope of all aspects described in Four Winds' Request for Inspection. Moreover, the work will be directed by ESSO's consultants, Blass, Bouck & Maguire, the same consultants who conducted the site inspections in August, 1992, the information as to whom has been provided to you. Furthermore, we anticipate that, insofar as feasible, plaintiffs' experts, as well as other parties' experts, will be allowed to observe the work as it is conducted. Lastly, ESSO defendants represent that the plaintiffs will be provided with copy of the final report prepared on the above-described work to be performed at ETSS by the above-named consultants.

I believe this letter fully addresses all of the concerns raised in your September 28, 1992 letter. The actual work plan will be provided to you in the next few days.

If you should have any additional questions or comments regarding this matter, please contact the undersigned.

Sincerely yours,



Eugenio C. Romero

ECR/za

cc: Caroline Kwan, Esq.
Andrew Prashak, Esq.
All Counsel of Record