

1 IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF COLORADO

2

Civil Action No. 1:10-cv-00047-MSK-MEH

3

CHEVRON CORPORATION, a Delaware corporation,

4

Petitioner,

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v.

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STRATUS CONSULTING, INC., DAVID J. CHAPMAN, an

7 individual, DOUGLAS BELTMAN, an individual, JENNIFER

M.H. PEERS, an individual, DAVID M. MILLS, an

8 individual, PETER N. JONES, an individual, LAURA

BELANGER, an individual, and ANN S. MAEST, an

9 individual,

10 Respondents.

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VIDEOTAPE DEPOSITION OF: ANN S. MAEST - Volume II

12 January 20, 2011

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PURSUANT TO SUBPOENA, the videotape deposition

14 of ANN S. MAEST was taken on behalf of the Petitioner at

1801 California Street, Suite 4200, Denver, Colorado 80202,

15 on January 20, 2011, at 9:24 a.m., before Barbara Birger,

Registered Merit Reporter, Certified Realtime Reporter and

16 Notary Public within Colorado.

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1 evaluate the mobility of whether hydrocarbons in soil?

2 A. You mean just -- do you mean -- what do

3 you mean?

4 Q. What are the methods that are used to

5 evaluate whether hydrocarbons move in soil?

6 A. Well, in general you would collect soil

7 and groundwater samples down gradient of the source,

8 and look at the extent of contamination.

9 Q. And to your knowledge, have such methods

10 been followed in the sampling of groundwater by the

11 plaintiffs in the Lago Agrio case?

12 A. There has been some sampling of

13 groundwater that's down gradient of pits, and they did

14 find quite high concentrations of TPH in groundwater.

15 Q. How far down gradient from the nearest

16 pit?

17 A. We talked about this a little bit

18 yesterday. It's probably tens of feet at the most.

19 It's not very far.

20 Q. And the pits that you just referred to,

21 or the sample you just referred to which, in your

22 words, the plaintiffs found quite high concentrations

23 of TPH in groundwater, were any of those pits, pits

24 that were remediated by TexPet in the RAP?

25 A. I don't recall.

1 APPEARANCES

2 For the Petitioner: T. MICHAEL CRIMMINS, ESQ.

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For the Respondent MARTIN D. BEIER, ESQ.

8 Stratus Consulting, Silver & DeBoskey, P.C.

Inc., and the 1801 York Street

9 Deponent: Denver, Colorado 80206

10 For the Ecuadorian WILLIAM H NARWOLD, ESQ.

Plaintiffs: Motley Rice LLC

11 20 Church Street

17th Floor

12 Hartford, Connecticut 06103

13 Also Present: Sara McMillen

14 Jerry DeBoer, Videographer

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