

NO. 2000-757

IGNACIO SERAFIN, ET AL	§	IN THE COUNTY COURT
	§	
VS.	§	AT LAW NO. 3
	§	
CHEVRON U.S.A. INC.	§	EL PASO COUNTY, TEXAS

**CHEVRON U.S.A. INC.'S SUPPLEMENTAL RESPONSES
TO PLAINTIFF'S REQUEST FOR PRODUCTION**

TO: IGNACIO SERAFIN, by and through his attorney of record, Stephanie Finch,
BARON & BUDD, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281.

NOW COMES CHEVRON U.S.A. INC., Defendant herein, and makes and files this its
Supplemental Response to Plaintiff's Request for Production.

Respectfully submitted,

STRONG, PIPKIN, NELSON,
BISSELL & LEDYARD, L.L.P.

David W. Ledyard
State Bar No. 12109400

Michael T. Bridwell
State Bar No. 02979600
14th Floor, San Jacinto Building
Beaumont, Texas 77701-3255
(409)981-1000
FAX(409)981-1010

ATTORNEYS FOR DEFENDANT,
CHEVRON U.S.A. INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Chevron U.S.A. Inc.'s Supplemental Response to Plaintiff's Request for Production is being furnished to Plaintiffs' counsel by certified mail, return receipt requested, on the 15 day of August, 2000.


Michael T. Bridwell

REQUEST FOR PRODUCTION NO. 31:

Produce all contracts pertaining to work done by contractors at Defendant's facility.

RESPONSE:

See documents attached. Bates numbers BB 007309 to BB 007335

20002, El Paso, TX 79998

AND MATERIAL DAILY REPORT

FOR BROWN OLO's

DAY Tue ZONE

MO.		DAY		YEAR	
1	2	-	2	2	- 81 (3-6)
					(7-10)
C	A				(11-16)

Waddle, d.

SHEET ____ OF ____

[illegible]

SOCAL CRAFT CODES

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPV.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

TRACTOR'S REPRESENTATIVE W Addle

CHEV BB 007309

button: White - Contractor Green - Keypunch Yellow - Contractor Pink - Field Office
(Submit with Invoice)

MFG 1638-8 (4-81)

E AND MATERIAL DAILY REPORT

TRACTOR BROWN OLOS2 DAY Wed ZONE _____MO. DAY YEAR
12-23-81 (3-6)UNIT
NO. C A (7-10)

NO. (11-16)

NO. Waddell

SHEET 1 OF 8

NAME	Class	Craft Codes (76-77)	Job Descp.						TOTALS				
			REQN. (17-21)	S/O (22-25)	ITEM (26-30)	S/O	Job Descp.	S/O	Job Descp.	S/O	Job Descp.	HRS	RATE
Waddell, J.	FF		1	2	2	1	8	1848	147	84			
NKINS, O.	FF		8				8	1848	147	84			
ROOVA, M.	W					8	8	1717	137	36			
ST, R.						8	8				137	36	
NA, D.			8				8				137	36	
IPES, J.			5		3		8				137	36	
TO, O.				8			8				137	36	
RCIA, G.	F					8	8				137	36	
MMEL, A.			8				8				137	36	
LACIOS, A.				8			8				137	36	
TINKO, D.				4 1/2			4 1/2				77	27	
STRAIGHT TIME			15	16	22 1/2	13	17	844			1471	83	
OVERTIME													
Waddell, J.	FF				1 1/2		1 1/2	2597	38	96			
ST, R.	W				1 1/2		1 1/2	2409	36	14			
RCIA, G.	F				1 1/2		1 1/2	2409	36	14			
STRAIGHT TIME					4 1/2		4 1/2				111	24	
OVERTIME													
STRAIGHT TIME													
EQUIPMENT/MATERIALS													
EQUIPMENT/MATERIALS													
GRAND TOTAL													

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
 04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

TRACTOR'S REPRESENTATIVE Waddell

button: White - Contractor

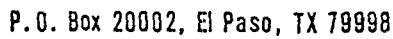
Green - Keypunch

Yellow - Contractor

(Submit with Invoice)

Pink - Field Office

CHEV BB 007310



AUTH. NO. Waddell, J.

[illegible]

SOCAL CRAFT CODES

PF	03	MACH.	05	MAS/INSL	07	INST.	09	PAINT	12	TOOL	18	STC	20	SUPV.
B/W	04	CARP.	06	LABOR	08	ELECT.	10	TIN.	14	LLM, LLA	19	OTHER	-	

CONTRACTOR'S REPRESENTATIVE W. A. D. L. S.

CHEV BB 007311

Distribution: White - Contractor Green - Key punch Yellow - Contractor Pink - Field Office

Box 20002, El Paso, TX 79998

ACTOR BROWN OLD'S

T 2 DAY Tue ZONE _____

MO.		DAY		YEAR	
1	-	5	-	8	1 (3-6)

UNIT					(7-10)
NO.	C	A			(11-16)

NO. GADDV, CM.

SHEET 7 OF 10

[illegible]

SOCAL CRAFT CODES

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPY.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

CTOR'S REPRESENTATIVE Gaddy, C.M.

White - Contractor Green - Key punch Yellow - Contractor
(Submit with invoice) Pink - Field Office

CHEV BB 007312

TIME AND MATERIAL DAILY REPORT

CONTRACTOR BROWN OLDS

LIFT 2 DAY MON ZONE _____

DATE

MO.	DAY	YEAR
12	28	81

 (3-6)

REG. UNIT

		(7-10)
--	--	--------

CONT. NO.

C	A				
---	---	--	--	--	--

 (11-16)

UTH. NO. Waddell

NAME			Class	Craft Codes (76-77)	S/O										TOTALS		
STRAIGHT TIME					S/O	Job Descp	S/O	Job Descp	S/O	Job Descp	S/O	Job Descp	S/O	Job Descp	HRS	RATE	AMOUNT
PACHECO, C.			LF		8									8	10.04	80.32	
LEFARO, M.			CL		8									8	9.19	73.52	
CONTERAS, J.			T		8									8		73.52	
PACHECO, A.					8									8		73.52	
MUTIERREZ, R.					8									8		73.52	
SIVAREZ, M.					8									8		73.52	
ALDANA, A.					8									8		73.52	
ERABAIN, I					8									8		73.52	

REQN. (17-21)

S/O (22-25)

ITEM (26-30)

HIDC 21141111260

RENTAL FORMER

MP6120011670

150M PLT



Chevron U.S.A. Inc.

P. O. Box 20002, El Paso, TX 79898

TIME AND MATERIAL DAILY REPORT

CONTRACTOR BROWN OLDS

SHIFT 2 DAY MON ZONE _____

DATE MO. DAY YEAR
12 - 28 - 81 (3-6)

ORG. UNIT (7-10)

CONT. NO. C A (11-16)

UTH. NO. Waddell, J.

NAME	Class	Craft Codes (76-77)	Job Descp.						HRS	RATE	AMOUNT
			REQN. (17-21)	S/O (22-25)	ITEM (26-30)	S/O	S/O	S/O			
TICKETT, E.	CF								13.66	109.28	
HERNANDEZ, E.	C								13.01	104.08	
PEDROZA, M.	T									104.08	
TERRERA, M.	I									104.08	
WOSLEY, E.										104.08	
TOTAL STRAIGHT TIME			32	8					40	525.60	
OVERTIME											
L OVERTIME											
L TIME											
EQUIPMENT/MATERIALS											
EQUIPMENT/MATERIALS											
GRAND TOTAL											

SHEET 3 OF 8

CHEV BB 007314

SOCAL CRAFT CODES

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPY.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.			

Box 20002, El Paso, TX 78988

TRACTOR BROWN OLD'S

LIFT 2 DAY Mon ZONE

DATE

MO.		DAY		YEAR	
1	2	-	28	-	81

 (3-6)

G. UNIT				(7-10)
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NT. NO.	C	A				(11-16)
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TH. NO. Wadde. I.

SHEET 2 OF 8

SOCAL CRAFT CODES

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPY.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

CTOR'S REPRESENTATIVE W. Addie L. L.

CHEV BB 007315

on: White - Contractor Green - Key punch Yellow - Contractor
(Submit with Invoice)

Pink - Field Office



Chevron U.S.A. Inc.

P.O. Box 20002, El Paso, TX 79998

E AND MATERIAL DAILY REPORT

ACTOR BROWN OLOS

T 2 DAY MON ZONE _____

MO. DAY YEAR
1 2 - 28 - 81 (3-6)

UNIT _____ (7-10)
 . NO. C A (11-16)

. NO. Waddle, J.

NAME	Class	Craft Codes (76-77)	TOTALS									
			STRAIGHT TIME							HRS	RATE	AMOUNT
<u>Addle, J.</u>	<u>FF</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>5</u>	<u>18 48</u>	<u>92 40</u>
<u>NHINS. O.</u>	<u>FF</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>18 48</u>	<u>147 84</u>
<u>RDOVA. M.</u>	<u>W</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>17 17</u>	<u>137 36</u>
<u>IST. R.</u>	<u>1</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>		<u>137 36</u>
<u>NA. D.</u>	<u>1</u>	<u>1</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>8</u>		<u>137 36</u>
<u>IPES. J.</u>	<u>1</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>		<u>137 36</u>
<u>RCIA. G.</u>	<u>F</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>		<u>137 36</u>
<u>NMEL. A.</u>	<u>1</u>	<u>1</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>8</u>		<u>137 36</u>
<u>LACIOS. A.</u>	<u>1</u>	<u>1</u>	<u>4 1/2</u>	<u>4 1/2</u>	<u>4 1/2</u>	<u>4 1/2</u>	<u>4 1/2</u>	<u>4 1/2</u>	<u>4 1/2</u>	<u>4 1/2</u>		<u>77 27</u>
<u>RTILLO. D.</u>	<u>1</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>		<u>137 36</u>
<u>BID. M.</u>	<u>1</u>	<u>1</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>		<u>137 36</u>
<u>STRAIGHT TIME</u>			<u>21 1/2</u>	<u>25</u>	<u>7</u>	<u>11</u>	<u>17</u>	<u>4 1/2</u>	<u>4 1/2</u>			<u>1416 39</u>
OVERTIME										<u>8 1/2</u>		
OVERTIME												
TIME												
MENT/MATERIALS												
EQUIPMENT/MATERIALS												
GRAND TOTAL												

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
 04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

ACTOR'S REPRESENTATIVE Waddle, J.

ation: White - Contractor Green - Keypunch Yellow - Contractor Pink - Field Office
 (Submit with Invoice)

CHEV BB 007316

ME AND MATERIAL DAILY REPORT

TRACTOR BROWN 0605

DATE 2 DAY Tue ZONE

E MO. DAY YEAR
1 2 - 2 9 - 8 1 (3-6)

. UNIT				(7-10)
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T. NO.	C	A					(11-16)
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H. NO. Waddell

SHEET 3 OF 8

[illegible]

SOCAL CRAFT CODES

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPV.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

OR'S REPRESENTATIVE Waddell

on: White - Contractor Green - Keypunch Yellow - Contractor Pink - Field Office
(Submit with Invoice)

CHEV BB 007317



Chevron U.S.A. Inc.

P.O. Box 20002, El Paso, TX 79998

MAN AND MATERIAL DAILY REPORT

FACTOR BROWN OLOS

2 DAY Tue ZONE _____

MO. DAY YEAR
12 - 29 - 81 (3-6)

UNIT _____ (7-10)
NO. CA _____ (11-16)

NO. Waddle, J.

NAME	Class	Craft Codes (76-77)	Job Descp.						TOTALS		
			S/O	S/O	S/O	S/O	S/O	S/O	HRS	RATE	AMOUNT
STRAIGHT TIME											
Waddle, J.	FF		1	2	1	1			5	1848	9240
SKINS, O.	FF		8						8	1848	14784
RODOVA, M.	W			5		3			8	1717	13736
ST. R.	I				8				8		13736
VA. D.	I			8					8		13736
IPES, J.	I		8						8		13736
ACIA, G.	F			5		3			8		13736
MMEL, A.	I			8					8		13736
MIRAZ, E.	I				8				8		13736
BLOY, M.	I		8						8		13736
W. Carpenter									8		
STRAIGHT TIME			25	28	17	7			77		133912
OVERTIME											
Waddle, J.	FF			4					4	2597	10388
RODOVA, M.	W			4					4	2409	9636
IPES, J.	W			4					4		9636
ACIA, G.	F			4					4		9636
MMEL, A.	F			4					4		9636
OVERTIME				20					20		
TIME											48932
MENT/MATERIALS											
EQUIPMENT/MATERIALS											
GRAND TOTAL											

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

FACTOR'S REPRESENTATIVE Waddle, J.

tion: White - Contractor Green - Keypunch Yellow - Contractor Pink - Field Office
(Submit with Invoice)

CHEV BB 007318



Chevron U.S.A. Inc.

P.O. Box 20002, El Paso, TX 79908

MAN AND MATERIAL DAILY REPORT

TRACTOR BROWN OLDS

2 DAY WED ZONE _____

MO. DAY YEAR

1	2	-	3	0	-	8	1
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(3-6)

UNIT _____ (7-10)

NO. C A _____ (11-16)

NO. Waddell, J.

NAME	Class	Craft Codes (76-77)	TOTALS					
			STRAIGHT TIME	OVERTIME	TIME	EQUIPMENT/MATERIALS	GRAND TOTAL	AMOUNT
Waddell, J.	FF		1					18 48
NHINS, O.	FF		8					147 84
RODA, M.	W		8					137 36
ST, R.	I			8				137 36
NA, D.	I		8					137 36
IPES, J.	I		8					137 36
ACIA, G.	F		8					137 36
MUEL, A.	I		8					137 36
WIREZ, E.	I			8				137 36
BIO, M.	I		8					137 36
RODRIGUEZ, C.	FT		8					14 04
STRAIGHT TIME			33	33	17			1414 48
OVERTIME								
TIME								
EQUIPMENT/MATERIALS								
GRAND TOTAL								

SOCIAL CRAFT CODES

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPV.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

TRACTOR'S REPRESENTATIVE Waddell, J.

ation: White - Contractor Green - Key punch Yellow - Contractor (Submit with Invoice)

Pink - Field Office

CHEV BB 007319

E AND MATERIAL DAILY REPORT

TRACTOR BROWN OLDS

2 DAY THUR ZONE _____

MO. DAY YEAR
1 2 - 3 1 - 8 1 (3-6)

UNIT (7-10)

F. NO. C A (11-16)

I. NO. Waddell, J.

SHEET 1 OF 2

NAME	Class	Craft Codes (76-77)	Job Desc.							TOTALS		
			S/O	S/O	S/O	S/O	S/O	S/O	S/O	HRS	RATE	AMOUNT
Waddell, J.	FF		1	1	1					3	18 48	55 44
AKINS, O.	FF		8							8	18 48	147 84
ARDOVA, M.	W			8						8	17 17	137 36
AST, J.					8					8		137 36
VA, D.				8						8		137 36
IPES, J.			8							8		137 36
ACIA, G.	F			8						8		137 36
MMEH, A.	F			8						8		137 36
MIREZ, E.	I				8					8		137 36
BIO, M.	I		8							8		137 36
ENANDEZ, C.	F7		8							8	14 04	112 32
AL STRAIGHT TIME			33	33	17					83		1414 48
OVERTIME												
Waddell, J.	FF		5							5	25 97	129 85
AKINS, O.	FF		3							3	25 97	77 91
ACIA, G.	F		5							5	24 09	120 45
ACIA, G.	F		5							5	24 09	120 45
AL OVERTIME			18							18		448 66
AL TIME												
PHMENT/MATERIALS												
AL EQUIPMENT/MATERIALS												
GRAND TOTAL												

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

TRACTOR'S REPRESENTATIVE Waddell, J.

tribution: White - Contractor Green - Keypunch Yellow - Contractor Pink - Field Office
(Submit with Invoice)

CHEV BB 007320

MFG 1638-8 (4-91)

MATERIAL DAILY REPORT

TRACTOR BROWN OLD'S
 IIFT 2 DAY TUE ZONE _____

MO. DAY YEAR
1 - 5 - 82 (3-6)
 S. UNIT (7-10)
 IT. NO. C A (11-16)

H. NO. Gaddy, C.M.

REQN. (17-21) S/O (22-25) ITEM (26-30)
HDC 61120011570
ISO M
HDC 01118
FCC
HDC 01110
STAB 211411136
STAB 2113806760
 SHEET 5 OF 10

NAME	Class	Craft Codes (76-77)	S/O						TOTALS		
			Job Descp.	Job Descp.	Job Descp.	Job Descp.	Job Descp.	Job Descp.	HRS	RATE	AMOUNT
FORD, J.	CF		3	2	1	1	8	1366	10928		
ARNANDEZ, E.	C			8			8	1301	10408		
OROZA, M.	C			8			8		10408		
OS, E.	C		2		3	3	8		10408		
ROTT, E.	C		4				8		10408		
STRAIGHT TIME			5	9	18	4	4	40		52560	
OVERTIME											
FORD, J.	CF			5			5	19365	9653		
ARNANDEZ, E.	C			5			5	18365	9183		
OROZA, M.	C			5			5	18365	9182		
VERTIME				15			15		28018		
WE											
T/MATERIALS											
IPMENT/MATERIALS											
GRAND TOTAL											

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
 04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

'S REPRESENTATIVE Gaddy, C.M.

White - Contractor Green - Key punch Yellow - Contractor Pink - Field Office
 (Submit with Invoice)

CHEV BB 007324

TRACTOR BROWN OLDS

2 DAY Wed ZONE

MO. DAY YEAR
1 2 - 23 - 81 (3-6)

UNIT					(7-10)
NO.	C	A			(11-16)

NO. Waddell

SHEET 2 OF _____[illegible]

03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPV.
04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

ution: White - Contractor

Green - Keypunch

Yellow - Contractor

(Submit with Invoice)

Pink - Field Office

CHEV BB 007327

Box 20002, El Paso, TX 79998

CONTRACTOR BROWN OLO'S

SHIFT 2 DAY Tue ZONE

DATE

MO.		DAY		YEAR	
1	2	-	22	-	81

 (3-6)

ORG. UNIT					(7-10)
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CONT. NO.	C	A					(11-16)
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AUTH. NO. Waddell

SHEET 8 OF 8

[illegible]

SOCAL CRAFT CODES

F	03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPV.
	04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER	

RACTOR'S REPRESENTATIVE Waddell

ution: White - Contractor

Green - Keypunch

Yellow - Contractor

(Submit with invoice)

Pink - Field Office

CHEV BB 007328

USA, INC.

20002, El Paso, TX 79998

AND MATERIAL DAILY REPORT

CTOR BROWN OLD'S

2 DAY Tue ZONE _____

MO. DAY YEAR
12 - 22 - 81 (3-6)

NIT _____ (7-10)
 NO. C A (11-16)

NO. Waddell, J.

REQ. (17-21)	S/O (22-25)	ITEM (26-30)
WDCO1113	TANA FICLD	440
WDCO1110	ZCO1110	250
WDCO1110	150M PLT	250
WDCO1110	GEN PLT	570
WDCO1110	FRG14	440

SHEET 3 OF 8

NAME	Class	Craft Codes (76-77)	S/O	Job Desc.	S/O	Job Desc.	S/O	Job Desc.	S/O	Job Desc.	HRS	RATE	AMOUNT
CHETT, E.	CF	1	2	1	4	1					00	1366	10928
ARNANDEZ, E.	C	1			5						00	1301	6505
OROZA, M.	C	1			5	3					00		10408
ZZ, E.	C	1	3		5						00		10408
<u>J. O. R.</u>													
STRAIGHT TIME			5	1	19	4					29		38249
OVERTIME													
OVERTIME													
TIME													
MENT/MATERIALS													
EQUIPMENT/MATERIALS													
GRAND TOTAL													

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
 04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

ACTOR'S REPRESENTATIVE Waddell, J.

Color: White - Contractor Green - Keypunch Yellow - Contractor Pink - Field Office
 (Submit with Invoice)

CHEV BB 007329

- AND MATERIAL DAILY REPORT

TRACTOR BROWN OLDS

T 2 DAY Tue ZONE _____

MO. DAY YEAR
1 2 - 2 2 - 8 1 (3-6)

UNIT					(7-10)
NO.	C	A			(11-16)

. NO. Waddle, J.

SHEET / OF

[illegible]

SOCAL CRAFT CODES

03 MACH.

05 MAS/INSL

07 INST.

09 PAINT

12 TOOL

18 STC

20 SUPV.

04 CARP.

06 LABOR

08 ELECT.

10 TIN.

14 LLM, LLA

19 OTHER

ACTOR'S REPRESENTATIVE Waddell, J.

CHEV BB 007330

on: White - Contractor

Green - Keyrunch

Yellow - Contractor

Pink -- Field Office

Chevron U.S.A. Inc.

P.O. Box 20002, El Paso, TX 79998

ND MATERIAL DAILY REPORT

ACTOR BROWN OLOS2 DAY FRI ZONE _____

MO. DAY YEAR
12 - 18 - 81 (3-6)
 HIT _____ (7-10)
 NO. C A _____ (11-16)

NO. Waddell, J.

REQN. (17-21) S/O (22-25) ITEM (26-30)
 S/O Job Desc. H21 MP 6112001570
 S/O Job Desc. 150M PFT
 S/O Job Desc. H00001118
 S/O Job Desc. H00001118
 S/O Job Desc. No 6 CA 200
 S/O Job Desc. H00001110
 S/O Job Desc. H00001106
 S/O Job Desc. BLK PFT

SHEET 1 OF 2

NAME	Class	Craft Codes (76-77)	Job Descp								TOTALS		
			S/O	S/O	S/O	S/O	S/O	S/O	S/O	HRS	RATE	AMOUNT	
STRAIGHT TIME													
Waddell, J.	FF		1	1	1	2	3	8	18 48		147 84		
KINS, O.	FF		8					8	18 48		147 84		
DOVA, M.	W			8				8	17 17		137 36		
ST, R.	T					8		8			137 36		
HA, D.	I				8			8			137 36		
PS, J.	I							0					
O, O.	I						8	8			137 36		
ACIA, G.	F			8				8			137 36		
AMEL, A.	I				8			8			137 36		
MIREZ, E.	I					8		8			137 36		
ANG, S. M.	F3						8	8	10 91		87 28		
STRAIGHT TIME			9	17	17	18	19	80			1344 48		
OVERTIME													
Waddell, J.	FF					1	4	5	25 97		129 85		
ST, R.	W						5	5	24 09		120 45		
ACIA, G.	F						5	5	24 09		120 45		
MIREZ, E.	I					1 1/2		1 1/2	24 09		36 14		
STRAIGHT TIME						2 1/2		16 1/2			406 89		
OVERTIME													
L TIME													
MENT/MATERIALS													
L EQUIPMENT/MATERIALS													
GRAND TOTAL													

SOCAL CRAFT CODES

03 MACH.

05 MAS/INSL

07 INST.

09 PAINT

12 TOOL

18 STC

20 SUPV.

04 CARP.

06 LABOR

08 ELECT.

10 TIN.

14 LLM, LLA

19 OTHER

TRACTOR'S REPRESENTATIVE Waddell, J.

CHEV BB 007331

button: White - Contractor

Green - Keypunch

Yellow - Contractor

Pink - Field Office

(Submit with Invoice)

ND MATERIAL DAILY REPORT

ACTOR BROWN OLDS2 DAY THUR ZONE _____

MO. DAY YEAR
 1 2 - 1 7 - 8 1 (3-6)
 NIT
 NO. C A (7-10)
 (11-16)

NO. Waddell, J.

NAME		Class	Craft Codes (76-77)	S/O	Job Descp.	S/O	Job Descp.	S/O	Job Descp.	S/O	Job Descp.	S/O	Job Descp.	S/O	Job Descp.	TOTALS
STRAIGHT TIME																HRS RATE AMOUNT
Waddell, J.		FF		1		1		1		1		1		5	18 48	92
LINS, O.		FF						7						7	18 48	129
ADOVA, M.		W				7								7	17 17	120
ST, R.		I		3										3		51
NA, D.		I			4									4		68
O, O.		I						8		8				8		137
GLA, G.		F				8								8		137
MEL, A.		I			4									4		68
MIREZ, E.		I		4		3								7		120
NCIS, M.		F3								8				8	10 91	87
ANANDAZ, C.		F7						7						7	14 04	98
STRAIGHT TIME				8	9	19	15	17	68							111
OVERTIME																
TIME																
MENT/MATERIALS																
EQUIPMENT/MATERIALS																
GRAND TOTAL																

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
 W 04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

ACTOR'S REPRESENTATIVE Waddell, J.

Colors: White - Contractor Green - Key punch Yellow - Contractor Pink - Field Office
 (Submit with Invoice)

CHEV BB 007332

CONTRACTOR BROWN OLOS

HEIGHT 2 DAY Wed ZONE

ORG. UNIT					(7-10)
CONT. NO.	C	A			(11-16)

AUTH. NO. Waddell

RECN. (17-21)				S/O (22-25)				ITEM (26-30)					
S/O				WOC	8	1	1	3	2	8	3	6	0
Job Desc.	TANK FILL												
S/O				WOC	6	1	2	0	0	1	5	7	0
Job Desc.	ISOM PLT												
S/O				WOC	2	1	4	1	1	1	3	6	0
Job Desc.	PHEM/FORMER												
S/O				WOC	9	1	3	6	0	2	1	5	0
Job Desc.	ASPHALT PLT												
S/O				WOC	2	1	1	6	1	6	3	6	
Job Desc.	NO 6 CRUDE												
SHEET 1 OF 7													
TOTALS													
HRS				RATE				AMOUNT					

SHEET 1 OF 1

SOCAL CRAFT CODES														
PF	03	MACH.	05	MAS/INSL	07	INST.	09	PAINT	12	TOOL	18	STC	20	SUPV.
3/W	04	CARP.	06	LABOR	08	ELECT.	10	TIN.	14	LLM, LLA	19	OTHER		

DIRECTOR'S REPRESENTATIVE

button: White - Contractor Green - Key punch Yellow - Contractor Pink - Field Office
(Submit with invoice)

CHEV BB 007333

TRACTOR BROWN OLDS
3 DAY MON ZONE _____

UNIT					(7-10)
T. NO.	C	A			(11-16)

H. NO. Gaddy, Cm.

SHEET OF

		<u>SOCAL CRAFT CODES</u>							
PF	03 MACH.	05 MAS/INSL	07 INST.	09 PAINT	12 TOOL	18 STC	20 SUPV.		
B/W	04 CARP.	06 LABOR	08 ELECT.	10 TIN.	14 LLM, LLA	19 OTHER			

TRACTOR'S REPRESENTATIVE

tribution; White - Contractor Green - Key punch Yellow - Contractor Pink - Field Office
(Submit with Invoice)

CHEV BB 007334

MATERIAL DAILY REPORT

NAME BROWN OLO'S

DAY MON ZONE _____

MO. DAY YEAR

1 - 4 - 82 (3-6)

JNIT

NO.

C A (11-16)

NO. Gaddy, C.M.

NAME	Class	Craft Codes (76-77)	REQ. (17-21)	S/O (22-23)	ITEM	Job Desc.	S/O	Job Desc.	S/O	Job Desc.	S/O	Job Desc.	S/O	Job Desc.	S/O	Job Desc.	HRS	RATE	AMOL
STRAIGHT TIME																			
STRAIGHT TIME																			
STRAIGHT TIME																			
OVERTIME																			
FORD, J.	CF	1	1	1													2	19.365	38
MERTT, E.	C	1	1														1	18.365	18
OS, E.	C	1		1													1	18.365	18
ANNOE2, E	C	1		1													1	18.365	18
STRAIGHT TIME																			
OVERTIME			2	3													5		93
TIME																			
MENT/MATERIALS																			
EQUIPMENT/MATERIALS																			
GRAND TOTAL																			

SOCAL CRAFT CODES

03 MACH. 05 MAS/INSL 07 INST. 09 PAINT 12 TOOL 18 STC 20 SUPV.
 04 CARP. 06 LABOR 08 ELECT. 10 TIN. 14 LLM, LLA 19 OTHER

FACTOR'S REPRESENTATIVE Gaddy, C.M.

on: White - Contractor

Green - Keypunch

Yellow - Contractor

(Submit with Invoice)

Pink - Field Office

CHEV BB 007335

STRONG, PIPKIN, NELSON, BISSELL & LEDYARD, L.L.P.

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SUITE 2300

HOUSTON, TEXAS 77002-2546

TELEPHONE (713) 651-1900

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EWELL STRONG (1905-1974)
CHARLES S. PIPKIN (1896-1989)

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DAVID W. LEDYARD
MICHAEL L. BAKER
DANIEL C. DUCOTE
PHILIP BABIN III
MICHAEL T. BRIDWELL
JOHN W. BRIDGER
MARK D. RAYBURN
GREG M. DYKEMAN
THEODORE P. RAY

August 14, 2000

Edie Rubalcaba, District Clerk
Room 103, County Courthouse
500 E. San Antonio
El Paso, Texas 79901

*Re: Cause No. 2000-757; Serafin vs. Chevron, U.S.A., Inc.; In the County Court of Law
No. 3; El Paso County, Texas*

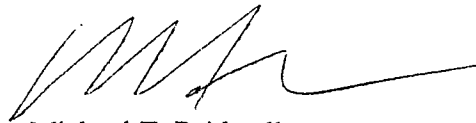
Dear Mr. Rubalcaba:

Enclosed for filing in the above cause of action is an original and one copy Chevron U.S.A. Inc.'s Supplemental Response to Plaintiff's Request for Production.

Please acknowledge receipt and date of filing by stamping the extra copy and returning it to our office in the enclosed self addressed stamped envelope.

Very truly yours,

STRONG, PIPKIN, NELSON,
BISSELL & LEDYARD, L.L.P.



Michael T. Bridwell

Enclosures
MTB/lsa/23526/176984

cc: Ms. Stephanie Finch

(CM RRR 7000 0520 0024 1846 2614)