

ENERGY VENTURES, INC.

5 Post Oak Park
Suite 1760
Houston, TX 77027
Fax: 713/297-8488
713/297-8400



CERTIFIED MAIL NO. P 454 705 366
RETURN RECEIPT REQUESTED

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Ave., N.W.
Washington, D.C. 20210

Re: Energy Ventures, Inc. Foreign Executive Deferred Compensation Plan

Dear Sir or Madam:

In accordance with the Department of Labor Regulation §2520.104-23, this letter will serve as the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for a pension plan for a select group of management or highly compensated employees.

1. The name and address of the employer is Energy Ventures, Inc., 5 Post Oak Park, Suite 1760, Houston, TX 77027

2. The employer identification number assigned by the Internal Revenue Service to the employer is 04-2515019.

3. The employer declares that it maintains two plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

4. The number of employees in each plan is as follows:

- (a) Energy Ventures, Inc. Executive Deferred Compensation Stock Ownership Plan (38 employees in plan).
- (b) Energy Ventures, Inc. Foreign Deferred Compensation Stock Plan (3 employees in plan).

Sincerely yours,

A handwritten signature in cursive script that reads "Teresa LeFlore".

Teresa LeFlore

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