



**Trans-Asia Oil  
and Energy Development  
Corporation**

21 April 2010

**THE PHILIPPINE STOCK EXCHANGE, INC.**  
Phil. Stock Exchange Centre, Exchange Road  
Ortigas Center, Pasig City


Attention: **MS. JANET A. ENCARNACION**  
Head, Disclosure Department

Sir:

In compliance with the Continuing Listing Requirements of the Exchange, we are submitting the computation of public ownership level of Trans-Asia Oil and Energy Development Corporation as of March 31, 2010.

Please acknowledge receipt hereof.

Very truly yours,

  
**PONCIANO L. DIMAYUGA**  
SVP – Finance



TRANS-ASIA OIL & ENERGY DEVELOPMENT CORP.  
Computation of Public Ownership as of March 31, 2010

		Number of Shares		
		A	B	Total
Number of Issued Shares		1,664,625,604		1,664,625,604
Less: Number of Treasury Shares (if any)		-		-
Number of Issued and Outstanding Shares		1,664,625,604		1,664,625,604
Less:				
	% to total I/O Shares	A	B	Total
<b>Directors*</b>				
Oscar J. Hilado				
Direct	0.0360 %	600,000	-	600,000
Indirect (thru _____)	- %	-	-	-
Ramon R. del Rosario, Jr.				
Direct	0.2837 %	4,722,035	-	4,722,035
Indirect (thru Emar Corp.)	0.3734 %	6,215,232	-	6,215,232
Francisco L. Viray				
Direct	0.2663 %	4,432,334	-	4,432,334
Indirect (thru _____)	- %	-	-	-
Roberto M. Lavina				
Direct	0.0263 %	437,493	-	437,493
Indirect (thru _____)	- %	-	-	-
Antonio V. del Rosario				
Direct	0.0047 %	79,005	-	79,005
Indirect (thru _____)	- %	-	-	-
Magdaleno B. Albarracin, Jr.				
Direct	0.0603 %	1,003,891	-	1,003,891
Indirect (thru _____)	- %	-	-	-
Raymundo O. Feliciano, Sr.				
Direct	0.0252 %	419,220	-	419,220
Indirect (thru _____)	- %	-	-	-
Alfredo M. Velayo				
Direct	0.0000 %	468	-	468
Indirect (thru _____)	- %	-	-	-
Ricardo V. Camua				
Direct	0.0283 %	470,841	-	470,841
Indirect (thru _____)	- %	-	-	-
Victor J. del Rosario				
Direct	0.0398 %	662,141	-	662,141
Indirect (thru _____)	- %	-	-	-
David L. Balangue				
Direct	0.0006 %	10,001	-	10,001
Indirect (thru _____)	- %	-	-	-
<b>Sub-total</b>	<b>1.1446 %</b>	<b>19,052,661</b>	<b>-</b>	<b>19,052,661</b>
<b>Officers*</b>				
Rosario B. Venturina				
Direct	0.0539 %	897,792	-	897,792
Indirect (thru _____)	- %	-	-	-
Ponciano L. Dimayuga				
Direct	0.0441 %	734,491	-	734,491
Indirect (thru _____)	- %	-	-	-
Juan J. Diaz				
Direct	0.0020 %	33,657	-	33,657
Indirect (thru _____)	- %	-	-	-
Raymundo A. Reyes, Jr.				
Direct	0.0434 %	721,967	-	721,967
Indirect (thru _____)	- %	-	-	-

TRANS-ASIA OIL & ENERGY DEVELOPMENT CORP.  
Computation of Public Ownership as of March 31, 2010

		Number of Shares		
		A	B	Total
Rizalino G. Santos				
Direct	0.0719 %	1,196,243	-	1,196,243
Indirect (thru _____)	- %	-	-	-
Frederick C. Lopez				
Direct	0.0080 %	133,153	-	133,153
Indirect (thru _____)	- %	-	-	-
Danilo L. Panes				
Direct	0.0209 %	347,471	-	347,471
Indirect (thru _____)	- %	-	-	-
Benjamin S. Austria				
Direct	0.0851 %	1,415,942	-	1,415,942
Indirect (thru _____)	- %	-	-	-
Virgilio R. Francisco, Jr.				
Direct	0.0034 %	57,413	-	57,413
Indirect (thru _____)	- %	-	-	-
<b>Sub-total</b>	<b>0.3327 %</b>	<b>5,538,129</b>	<b>-</b>	<b>5,538,129</b>
<b>Principal/Substantial Stockholders*</b>				
Phil. Investment Management Consultants, Inc.				
Direct	25.6460 %	426,909,684	-	426,909,684
Indirect (thru Bacnotan Consolidated)	9.6787 %	161,113,759	-	161,113,759
Bacnotan Consolidated Industries, Inc.				
Direct	27.0128 %	449,661,621	-	449,661,621
Indirect (thru _____)	- %	-	-	-
<b>Sub-total</b>	<b>62.3374 %</b>	<b>1,037,685,064</b>	<b>-</b>	<b>1,037,685,064</b>
<b>Affiliate*</b>				
Trans-Asia Power Generation Corp.				
Direct	0.5847 %	9,733,832	-	9,733,832
Indirect (thru _____)	- %	-	-	-
<b>Sub-total</b>	<b>0.5847 %</b>	<b>9,733,832</b>	<b>-</b>	<b>9,733,832</b>
<b>Others</b>				
<b>Government*</b>	- %	-	-	-
<b>Banks*</b>	- %	-	-	-
<b>Employees*</b>	- %	-	-	-
Philip M. Rimando				
Direct	0.0041 %	67,990	-	67,990
Indirect (thru _____)	- %	-	-	-
Alan T. Ascalon				
Direct	0.0029 %	48,509	-	48,509
Indirect (thru _____)	- %	-	-	-
Yolanda D. Añonuevo				
Direct	0.0075 %	124,909	-	124,909
Indirect (thru _____)	- %	-	-	-
Rico W. Ermino				
Direct	0.0139 %	230,980	-	230,980
Indirect (thru _____)	- %	-	-	-
Arthur R. Villacorte				
Direct	0.0020 %	33,670	-	33,670
Indirect (thru _____)	- %	-	-	-
<b>Lock-Up Shares*</b>	- %	-	-	-
<b>Sub-total</b>	<b>0.0304 %</b>	<b>506,058.00</b>	<b>-</b>	<b>506,058.00</b>
<b>TOTAL</b>	<b>64.4298 %</b>	<b>1,072,515,744</b>	<b>-</b>	<b>1,072,515,744</b>
<b>Total Number of Shares Owned by the Public</b>		<b>592,109,860</b>	<b>-</b>	<b>592,109,860</b>

## ANNEX B

### Minimum Percentage of Public Ownership

To check if Company, Inc. is in compliance with the Minimum Percentage of Public Ownership, the following steps must be observed:

**Step 1    Compute for Company's Market Capitalization**

( Please observe the same cut-off date as that of the Computation of Public Ownership Percentage)

Market Capitalization = Total Issued and Outstanding shares x Closing Market Price on cut-off date

=                    1,664,625,604 shares   P                    1.30

=    2,164,013,285.20

**Step 2    Refer to the Table below.**

(Based on the Market Capitalization computed, identify the corresponding minimum public ownership requirement.)

MARKET CAPITALIZATION	PUBLIC OWNERSHIP
Not exceeding P 400 M	33%
>P400M to P1B	25%
>P1B to P5B	20%
>5B to P10B	15%
>P10B	10%

**Step 3    Compare computed Actual Public Ownership with the Minimum Requirement**

Actual Public Ownership (per computation)                    **35.57%**

Minimum Required Public Ownership (per table)                    **20%**