

19 October 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 September 30, 2010.

Please acknowledge receipt hereof.

Very truly yours,

BENNETTE DAPLAS-BACHOCO

SVP - Finance

TRANS-ASIA OIL & ENERGY DEVELOPMENT CORP. Computation of Public Ownership as of September 30, 2010

			Α	Number of Shares B	Total
Number of Issued Shares			1,664,625,604		1,664,625,604
Directors*					
Oscar J. Hilado					
Direct	0.0360	%	600,000	_	600,000
Indirect (thru)	0.0000	%	-	_	-
Ramon R. del Rosario, Jr.	1 200	70		-	
Direct	0.2837	0/2	4,722,035	_	4,722,035
Indirect (thru Emar Corp.)	0.2837			-	
	0.3734	%	6,215,232	· .	6,215,232
Francisco L. Viray	0.2672	0/	4 440 004		4 440 224
Direct	0.2672		4,448,334	-	4,448,334
Indirect (thru)	1 -	%	-	-	-
Roberto M. Lavina	/				:== 400
Direct	0.0263		437,493	-	437,493
Indirect (thru)	5 5 <u>-</u> 2	%	<u>~</u> 22	<u>-</u>	-
Antonio V. del Rosario					
Direct	0.0047	%	79,005	-	79,005
Indirect (thru)	•	%	-	-	-
Magdaleno B. Albarracin, Jr.					
Direct	0.0672	%	1,117,891		1,117,891
Indirect (thru)	5 9 E	%			
Raymundo O. Feliciano, Sr.					
Direct	0.0252	%	419,220	_	419,220
Indirect (thru)	-	%	-	_	,
Alfredo M. Velayo	70	70	9270	11 50 1801	-37
Direct	0.0000	0/2	468	- Table 1	468
	0.0000		400		400
Indirect (thru)		%	-		•
Ricardo V. Camua	2 0000	21	170 044		170 044
Direct	0.0283		470,841	2	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)	= STAROPORTOR	%			
Sub-total	1.1524		19,182,661	-	19,182,661
Officers*					
Rosario B. Venturina					
Direct	0.0539	0/2	897,792		897,792
	0.0000		091,102		001,102
Indirect (thru)	7	%	-		
Juan J. Diaz	2 0000	~/	22.057		20.057
Direct	0.0020		33,657		33,657
Indirect (thru)		%	-	-	-
Secretary In A. Device In	ъ				
Raymundo A. Reyes, Jr.	20404				701.007
Direct	0.0434		721,967	-	721,967
Indirect (thru)		%			

TRANS-ASIA OIL & ENERGY DEVELOPMENT CORP. Computation of Public Ownership as of September 30, 2010

			Α	Number of Shares B	Total
Number of Issued Shares			1,664,625,604		1,664,625,604
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	1 2	347,471
Indirect (thru)	-	%			-
Benjamin S. Austria	000	,,,	\$700.		2000 1
Direct	0.0851	0/0	1,415,942	_	1,415,942
Indirect (thru)	, 0.000.	%	1,710,072		1,710,072
Virgilio R. Francisco, Jr.		70		-	
Direct	0.0034	0/0	57,413	_	57,413
Indirect (thru)	0.000-	%	-,10	-	J1,710
mullect (tillu)	-	70	-	-	-
Sub-total	0.2886	%	4,803,638	-	4,803,638
Principal/Substantial Stockholders*					
Phil. Investment Management Consultants, Inc.					
Direct	25.6460	%	426,909,684		426,909,684
Indirect (thru Bacnotan Consolidated)	9.6787		161,113,759	<u>.</u>	161,113,759
Bacnotan Consolidated Industries, Inc.	3.0101	70	101,113,133	•	101,110,700
Direct	27 0129	0/	440 661 621		440 661 621
	27.0128		449,661,621	•	449,661,621
Indirect (thru)		-%-	1 007 005 064	-	4 007 005 004
Sub-total	62.3374	%	1,037,685,064	•	1,037,685,064
Affiliate*					
Trans-Asia Power Generation Corp.	0.5847	%	9,733,832	-	9,733,832
	-	%	-	-	
Sub-total	0.5847	%	9,733,832	•	9,733,832
TOTAL	64.3631	%	1,071,405,195		1,071,405,195
			.,,		.,,
Total Number of Shares Owned by the Public			593,220,409		593,220,409

PUBLIC OWNERSHIP PERCENTAGE Total Number of Shares Owned by the Public

1,664,625,604 shares			
er of Issued and Outstanding Shares	=	1,664,625,604	
er of Outstanding Shares	=	1,664,625,604	
er of Treasury Shares	=	-	
er of Listed Shares	=	1,664,625,604	
per of Foreign-Owned Shares	=	26.819.663	
•	=	1.6112%	
gn Ownership Limit (%)	=	40.0000%	
	er of Outstanding Shares er of Treasury Shares er of Listed Shares er of Foreign-Owned Shares in Ownership Level (%)	er of Outstanding Shares = er of Treasury Shares = er of Listed Shares = er of Foreign-Owned Shares = gn Ownership Level (%) =	er of Outstanding Shares = 1,664,625,604 er of Treasury Shares = - er of Listed Shares = 1,664,625,604 er of Foreign-Owned Shares = 26,819,663 gn Ownership Level (%) = 1.6112%

^{*} See Annex A for Guidelines and Definitions

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 x P 1.15

= 1,914,319,444.60

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%	3
>	>P1B to P5B	20%	<
	>5B to P10B	15%	
	>P10B	10%	le:

Step 3 Compare computed Actual Public Ownership with the Minimum Requirement

Actual Public Ownership (per computation) 35.64%

Minimum Required Public Ownership (per table) 20%