



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

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

			A	Number of Shares		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 _____)	- %	-	-			-
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	0.2672 %	4,448,334	-			4,448,334
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	0.0672 %	1,117,891	-			1,117,891
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 _____)	- %	-	-			-
Sub-total	1.1524 %	19,182,661	-			19,182,661
Officers*						
Rosario B. Venturina						
Direct	0.0539 %	897,792	-			897,792
Indirect (thru _____)	- %	-	-			-
Juan J. Diaz						
Direct	0.0020 %	33,657	-			33,657
Indirect (thru _____)	- %	-	-			-
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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 September 30, 2010

			Number of Shares		
			A	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	-	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 _____)	- %	-	-	-	
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	-	161,113,759	
Bacnotan Consolidated Industries, Inc.					
Direct	27.0128 %	449,661,621	-	449,661,621	
Indirect (thru _____)	- %	-	-	-	
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

593,220,409 shares	<u>35.64%</u>
1,664,625,604 shares	

Number of Issued and Outstanding Shares	=	1,664,625,604
Number of Outstanding Shares	=	1,664,625,604
Number of Treasury Shares	=	-
Number of Listed Shares	=	1,664,625,604
Number of Foreign-Owned Shares	=	26,819,663
Foreign Ownership Level (%)	=	1.6112%
Foreign Ownership Limit (%)	=	40.0000%

Note: Please observe the same cut-off date.

* See Annex A for Guidelines and Definitions

Minimum Percentage of Public Ownership

Step 1 **Compute for Company's Market Capitalization**
(Please observe the same cut-off date as that of the Computation of Public Ownership Percentage)

$$= 1,664,625,604 \text{ shares} \times \text{P} \quad 1.15$$

= 1,914,319,444.60

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

Actual Public Ownership (per computation) **35.64%**

Minimum Required Public Ownership (per table)	20%
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