

From: Lucari, James L
Sent: Mon Jul 26 15:13:33 2010
To: kelley.green@halliburton.com
Cc: Bly, Mark R
Subject: BP Incident Investigation Team
Importance: Normal
Attachments: Halliburton ltr (Green) 072610.ZIP

Kelley:

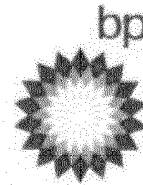
Attached is a follow-up letter to BP's letter to Halliburton dated July 7, 2010 which you forwarded to Mr. Swan at my request. As noted herein, to date we have received no response from Halliburton to our letter, despite assurances that a prompt response would be forthcoming. BP's Incident Investigation team would appreciate Halliburton's prompt cooperation with our renewed request for access to information and materials important to our investigation.

Best regards,

James L. Lucari
Managing Attorney
BP America Inc.
(630) 815-8973

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July 26, 2010

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VIA ELECTRONIC MAIL

(Kelley.Green@Halliburton.com)

C. Kelley Green, Esq.
Senior Counsel - Litigation
Halliburton
Houston, Texas

Re: Contract for Gulf of Mexico Strategic Performance Unit Offshore Well Services
Between BP Exploration & Production Inc. and Halliburton Energy Services, Inc.
BPM-09-00255 effective April 15, 2009 (the "Contract")

Dear Mr. Green,

I am writing to follow-up on BP's letter of July 7, 2010 to Merv Swan (which was transmitted to you by email of the same date for delivery to Mr. Swan) demanding immediate production to BP's Deepwater Horizon (DWH) Incident Investigation team of certain laboratory testing results. The letter also requested access to samples of Halliburton cement products and additives used in the Macondo well 9-7/8 x 7" casing string cement job. As set forth in our letter, BP is contractually entitled to all consulting information and lab testing data generated as part of Halliburton's services in support of the Macondo well project. Your email of July 8, 2010 acknowledges receipt of BP's demand letter, indicates that you forwarded the letter to Mr. Swan and promises that "Halliburton shall respond promptly." To date, we have received no further communication from you or anyone else at Halliburton in response to our letter. BP is contractually entitled to all Macondo project cement design and testing data and information and we hereby renew our demand for its immediate production.

Halliburton's lack of responsiveness to our repeated requests for information and access to representative samples of the Macondo well cement program continues to impede the BP DWH Incident Investigation team's efforts to investigate the causes of this tragic incident. As such, we renew our demand for access to cement and additive samples from the same lot/batch used in the Macondo well project so that we can conduct independent testing of the cement program slurry designed by Halliburton. If Halliburton believes that it cannot provide immediate access to the requested samples due to government agency protective order(s) or US DOJ notice, we ask that you identify to us in writing which orders in your view prevent compliance so that we may address the issue directly with the relevant government agencies.

We remain concerned that further delay in providing access to the Macondo well cement and additives increases the risk that these materials may degrade, become contaminated or their integrity will be otherwise compromised. Accordingly, we hereby serve notice that we expect Halliburton will take all steps necessary to maintain the integrity of all Macondo well cement program samples in your possession, custody or control until such time as BP's request for access to the materials is fulfilled.

Very truly yours,

A handwritten signature in black ink that reads "James L. Lucari". The signature is written in a cursive, flowing style.

James L. Lucari

cc: Mark Bly, BP DWH Incident Investigation Team Leader