

## Halliburton Failed Foam Jobs in Gulf

other proceeding. HESI reserves all rights to object to the use of such information as evidence in this or any other proceeding.

16. HESI's responses to Anadarko's Discovery Requests are based on information understood by it as of February 14, 2011. HESI reserves its right to amend, modify, or supplement its responses.

of Anadarko's Discovery Requests. HESI objects to the production of any such information.

within the Gulf of Mexico. HESI objects to the production of any such information.

**INTERROGATORY 2:** Please identify and describe each instance of cement failure, where nitrogen based foam cement slurry designed by you was used to seal or cap a deepwater well, within the past ten (10) years.

**Objection:** HESI objects to this Interrogatory as overly broad and unduly burdensome to the extent that HESI's Objections and Responses to Anadarko Petroleum Corporation's Interrogatories and Requests for Production.

Response: HESI has reviewed the Gulf of Mexico jobs it performs and tailored its responses to the Interrogatory.

**INTERROGATORY 3:** Please identify all persons employed by you who visited the DEEPWATER HORIZON between January 1, 2010 and April 20, 2010, and describe the purpose of each such visit.

**Objection:** HESI objects to this Interrogatory as overly broad and unduly burdensome to the extent that HESI's Objections and Responses to Anadarko Petroleum Corporation's Interrogatories and Requests for Production.

**INTERROGATORY 3:** Please identify all persons employed by you who visited the DEEPWATER HORIZON between January 1, 2010 and April 20, 2010, and describe the purpose of each such visit.

**Objection:** HESI objects to this Interrogatory as overly broad in that it requests all employees who merely visited the Deepwater Horizon and the purpose of each such visit, whether or not that employee has any knowledge of relevant facts. HESI further objects to this Interrogatory as overly broad and unduly burdensome to the extent that HESI's Objections and Responses to Anadarko Petroleum Corporation's Interrogatories and Requests for Production.

HESI's Objections and Responses to Anadarko Petroleum Corporation's Interrogatories and Requests for Production. - 6 -

**INTERROGATORY 2:** Please identify and describe each instance of cement failure, where nitrogen based foam cement slurry designed by you was used to seal or cap a deepwater well, within the past ten (10) years.

Job Date	Water Depth Ft.	Total Depth Ft.	Job Type
1/31/2010	2460	4289	Surface Casing

5/12/2001	5421	8011	Conductor Casing
5/26/2001	5421	8000	Surface Casing
5/3/2007	5631	10025	Surface Casing
8/1/2007	2900	4091	Conductor Casing
1/16/2008	8945	12340	Surface Casing
2/10/2008	2696	5776	Surface Casing
5/20/2008	6078	7184	Conductor Casing
1/31/2010	2460	4289	Surface Casing