

Foam Job with D-Air Failed in January 2010

Haiburton's Experience With Foam Cement Using D-AIR 3000 In The Slurry In The GOM, 2005 - April 20, 2010

Well Name	Date	Customer Name	Water Depth	JOB DEPTH TRUE VERTICAL DEPTCH	Primary BOM Name	Production Interval	Used D-AIR and SCR100L
OCS-G-23782 T88R	Mar-2005	BP AMERICA PRODUCTION COMPANY	4135	10873	CMT DRILLING LINER BOM	No	No
OCS-G-18607	Jan-2008	BP AMERICA PRODUCTION COMPANY	4836	8164*	CMT CONDUCTOR CASING BOM	No	No
OCS-G-18607	Jan-2008						
OCS-G-18607	Jan-2008						
OCS-G-32301	Jan-2010	LLOG EXPLORATION COMPANY L L C	2460	4289	CMT SURFACE CASING BOM	No	No

defenses of any party to the extent that it requests information from the past ten (10) years and is not limited by well type or location. FUD, R, CIV, P, 24(9)(1). HESI further objects to the unidentified terms "identify and describe" as overly broad and vague. HESI further objects to the definition of "CEMENT FAILURE" as "the inability of CEMENT to achieve zonal isolation and prevent the flow of

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

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OCS-G-32301	Jan-2010	LLOG EXPLORATION COMPANY L L C	2460	4289	CMT SURFACE CASING BOM	No	No

Date	Water Depth	Total Depth	Job Type
5/20/2008	6078	7184	Conductor Casing
1/31/2010	2460	4289	Surface Casing

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.

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