

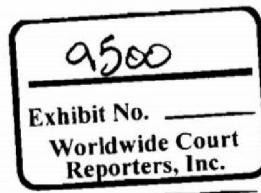
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September 27, 2012

By Electronic Mail

The Honorable Sally Shushan
United States District Court
500 Poydras Street
New Orleans, LA 70130

Re: MDL No. 2179 — Phase 2 Rule 30(b)(6) Deposition Scheduling

Dear Judge Shushan:

BP is providing an update to its proposed designees for providing testimony pursuant to the Rule 30(b)(6) notice to BP for Phase 2. Attached are the 24 topics and corresponding designees and deposition dates.

The following updates are set forth in the attached: John Hughes is replacing Adam Ballard as the designee for one part of each of topics 8, 18 and 19. Mr. Ballard remains the designee for the remaining topics and parts of topics for which he previously has been designated.

(As you know, Mr. Hughes currently is scheduled for a one-day deposition on November 7, 2012. If other parties are convinced Mr. Hughes's designation for parts of additional topics merits lengthening his deposition, BP would consider making Mr. Hughes available for a second day on November 6 or 8, 2012.)

BP reserves the right to supplement and/or change these designees, their topics, and/or their deposition dates.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert R. Gasaway'.

Robert R. Gasaway

Attachment

cc (via electronic mail):

United States' MDL Counsel
Plaintiffs' Liaison Counsel

Defense Liaison Counsel
Joel M. Gross

Allison B. Rumsey

Chicago Hong Kong London Los Angeles Munich New York Palo Alto San Francisco Shanghai

TREX 009500.0001

TREX-009500.0001

ATTACHMENT

BP Phase 2 30(b)(6) Designees¹

Areas of Inquiry and Responses to Topics

1. For any and all attempts after April 20, 2010, to cap, control, contain, shut in, limit flow from, and/or kill the Macondo Well by each of the following methods (unless otherwise specified): Actuation of the Deepwater Horizon BOP; Riser Insertion Tube Tool ("RITT"), Top Hat, Top Kill, Junk Shot, Cofferdam, Capping Stack, BOP on BOP strategies, Macondo Relief Well No. 1, and Macondo Relief Well No. 2 (hereinafter, collectively referred to as "Methods"):
 - a. The process of approval to fund and/or implement Top Kill, Capping Stack, and BOP-on-BOP strategy, including the responsibility and identity of each person involved;
 - b. A description of the manner and methodology, including computer models, used to assess each attempt and/or Method;
 - c. A description of the rationale and factors considered by BP for each attempt and/or Method made by BP to the UAC;
 - d. Dates when planning began for each attempt and/or Method, including the length of time used to plan and budget;
 - e. An explanation of and timeline for the steps involved in planning and/or implementing each attempt and/or Method, including both the design of any equipment and the steps involved in the Method;
 - f. The identity of BP employees and contractors who planned, managed, and/or supervised the implementation of each attempt and/or Method.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

John Hughes: BOP Intervention (Available Date(s): Nov. 7).

Kevin Devers: Cofferdam, RITT, and Top Hat (Available Date(s): Nov. 12-13).

Charlie Holt: BOP-on-BOP, Top Kill, and Junk Shot (Available Date(s): Nov. 28-29).

Trevor Smith: Capping Stack (Available Date(s): Oct. 25-26).

¹ BP reserves the right to supplement and/or change these designees, their topics, and proposed deposition dates.

Robert Sanders: Relief Wells (Available Date(s): Nov. 5).

2. For any and all subsea collection efforts identified in BP's June 9, 2010, June 13, 2010, or June 21, 2010 letters to Rear Admiral James A. Watson that were considered, but not used, to cap, control, contain, shut in, limit flow from, and/or kill the Macondo Well after April 20, 2010:
 - a. The process of approval to fund and/or implement each attempt and/or effort, including the responsibility and identity of each person involved and the reasons why approval was not given and/or the attempt was not funded or implemented;
 - b. A description of the manner and/or methodology, including computer models, used to assess each effort;
 - c. Dates when planning or consideration for each such effort began, including the length of time used to plan and budget;
 - d. An explanation of and timeline for the steps involved in planning and/or implementing each effort, including both the design of any equipment and the steps involved in the effort.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Kevin Devers: Collection to Clear Leader from Kill Line/Capping Stack and Collection to Enterprise from Capping Stack (Available Date(s): Nov. 12-13).

Hugh Banon: Pipeline Tie Back (Available Date(s): Nov. 6)

3. For any and all attempts between January 1, 2001 (for the Deepwater Horizon Rig) or January 1, 2004 (for all other BP contracted rigs) and April 20, 2010, to cap, control, contain, shut in, limit flow from, and/or kill a flowing subsea Gulf of Mexico well (with a release equal to or greater than 50 BBOE or where hydrocarbons reached the rig floor) in which BP has either an operational or other interest by any of the Methods and any other method(s) used but not listed above:
 - a. The process of approval to fund and/or implement each attempt and/or Method, including the responsibility and identity of each person involved;
 - b. A description of the manner and methodology, including computer models, used to assess each attempt and/or Method;

- c. A description of the rationale for each attempt and/or Method made or prepared for approval within BP;
- d. Dates when planning began for each attempt and/or Method, including the length of time used to plan and budget;
- e. An explanation of and timeline for the steps involved in planning and/or implementing each attempt and/or Method, including both the design of any equipment and the steps involved in the Method;
- f. The identity of BP employees and contractors who planned, managed, and/or supervised the implementation of each attempt and/or Method.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Marvin Miller (Available Date(s): Nov. 8)

- 4. The manner and/or methodology that BP, BP's contractors and/or any other entity working under BP's direction, used to predict, estimate, characterize and/or measure the daily amount of hydrocarbons flowing from the Macondo Well from:
 - a. April 20, 2010 through July 15, 2010;
 - b. July 16, 2010 through September 19, 2010; and
 - c. September 20, 2010 through the present,

Including the results of such efforts, the identity of the individuals and groups who undertook such efforts, and a description of the data, observations and assumptions on which such efforts were based.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Adam Ballard: Estimated Discharge (modeling based on subsea temperature and pressure measurements) (Available Date(s): Oct. 16-17).

Ellen Williams: Flow rate (observational) (Available Date(s): Nov. 19-20).

5. The manner and/or methodology that BP, BP's contractors, and/or any other entity working under BP's direction used to analyze results of tests of the physical and chemical properties -- including chemical composition, viscosity, compressibility, formation volume factor, gas/oil ratio, saturation pressure, heat capacity and density -- presented in the reports identified below, including the effects of changes in pressure and/or temperature on those physical and chemical properties, the results of such efforts, the identity of the individuals and groups who undertook such efforts, and a description of the data, observations and assumptions on which such efforts were based: Core Lab Report Nos. 36126-5010048448, 36126-5010068510, 36126-19-5010068508, and 36126-53-5010068379; Intertek Report No. WTC-10-001812; Isotech Report No. 13030; and Schlumberger Report Nos. 201000053, 201000101, and 201000120.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Yun Wang (Available Date(s): Oct. 24-25).

6. The manner and/or methodology that BP, BP's contractors and/or any other entity working under BP's direction used to predict, estimate, characterize and/or measure pressure depletion of the Macondo M56 hydrocarbon reservoir tapped by the Macondo Well from:
 - a. April 20, 2010 through July 15, 2010;
 - b. July 16, 2010 through September 19, 2010; and
 - c. September 20, 2010 through the present,

Including the results of such efforts, the identity of the individuals and groups who undertook such efforts, and a description of the data, observations and assumptions on which such efforts were based.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Simon Bishop (Available Date(s): Sept. 27 - 28).

7. The manner and/or methodology that BP, BP's contractors and/or any other entity working under BP's direction used to predict, estimate, characterize and/or measure the pressure inside the Macondo Well (including but not limited to the reservoir pressure), pressures at the BOP, pressures through the capping stack,

and pressures at whatever points hydrocarbons were being released into the Gulf of Mexico for every day from:

- a. April 20, 2010 through July 15, 2010;
- b. July 16, 2010 through September 19, 2010; and
- c. September 20, 2010 through the present,

Including the results of such efforts, the identity of the individuals and groups who undertook such efforts, and a description of the data, observations and assumptions on which such efforts were based.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Graham "Pinky" Vinson: Measurement of initial reservoir pressure (Available Date(s): Sept. 18-19).

Simon Bishop: Post-incident estimates of reservoir pressure and shut-in well head pressure (Available Date(s): Sept. 27 - 28).

Matt Gochmour: Post-incident pressure measurements from pressure gauges (Available Date(s): Sept. 13-14).

8. The manner and/or methodology that BP, BP's contractors and/or any other entity working under BP's direction used to predict, estimate, characterize and/or measure the temperature of the discharge from the Macondo Well, including but not limited to the reservoir temperature, temperatures inside the wellbore, the temperature at the BOP, and the temperature at the point where hydrocarbons were being released into the Gulf of Mexico for every day from:

- a. April 20, 2010 through July 15, 2010;
- b. July 16, 2010 through September 19, 2010; and
- c. September 20, 2010 through the present,

Including the results of such efforts, the identity of the individuals and groups who undertook such efforts, and a description of the data, observations and assumptions on which such efforts were based.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

John Hughes: Temperature measurements of discharged fluid (Available Date(s): Nov. 7).

Matt Gochmour: Attempts to obtain temperature measurements from gauges (Available Date(s): Sept. 13-14).

9. Your efforts (including all communications, modeling, calculations and analysis) undertaken or used in connection with: the flow rate estimate of 1,000 bopd announced by Admiral Landry on April 24, 2010; the flow rate estimate of 5,000 bopd announced by Admiral Landry on April 28, 2010; the flow rate estimate announced by the Flow Rate Technical Group ("FRTG") on or about May 27, 2010 (according to National Commission Staff Working Paper #3); the flow rate estimate announced by the FRTG on or about June 10, 2010 (according to National Commission Staff Working Paper #3); the flow rate estimate announced by the FRTG on or about June 15, 2010 (according to National Commission Staff Working Paper #3); and the flow rate estimate announced on or about August 2, 2010 (according to National Commission Staff Working Paper #3, at page 17, "The Current Estimate").

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Ellen Williams (Available Date(s): Nov. 19-20).

10. All planning, preparations, discussions, evaluations and/or training with regard to a "Worst Case Discharge scenario" (as defined in BP's Gulf of Mexico Regional Oil Spill Response Plan dated June 30, 2009) well control / hydrocarbon discharge event, or an uncontrolled release of hydrocarbons subsea into the Gulf of Mexico prior to April 20, 2010.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Greg Rohloff (Available Date(s): Oct. 17 - 18).

11. All planning, preparations, discussions, evaluations and/or training for a) a "Worst Case Discharge scenario" (as defined in BP's Gulf of Mexico Regional Oil Spill Response Plan dated June 30, 2009) well control/hydrocarbon discharge

event, or b) an uncontrolled release of hydrocarbons subsea into the Gulf of Mexico after April 20, 2010, excluding the efforts of BP, BP's contractors and/or entities under the direction of BP in the effort to cap, contain, shut-in, limit flow from and/or kill the Macondo Well.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Greg Rohloff (Available Date(s): Oct. 17 - 18).

12. The use of any analysis, calculations, assumptions or modeling of the flow rate of hydrocarbons from the Macondo MC252 well undertaken by or on behalf of BP or the Unified Command in connection with the analysis, consideration or execution of any Method (as that term is defined in Topic 1).

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

John Hughes: BOP Intervention (Available Date(s): Nov. 7).

Kevin Devers: Cofferdam, RITT, and Top Hat (Available Date(s): Nov. 12-13).

Charlie Holt: BOP-on-BOP, Top Kill, and Junk Shot (Available Date(s): Nov. 28-29).

Trevor Smith: Capping Stack (Available Date(s): Oct. 25-26).

Robert Sanders: Relief Wells (Available Date(s): Nov. 5).

13. All source control equipment, products, and/or materials presently identified, reserved, set aside, under construction / development, purchased, and/or developed by, or at the request of, BP for use in a subsea release of hydrocarbons in the Gulf of Mexico.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Greg Rohloff (Available Date(s): Oct. 17 - 18).

14. Calculations, models, programs, data, discussion, analyses, and/or communications made, transmitted, announced, drafted, discussed, sent, received, analyzed, reviewed, considered, and/or exchanged both internally and with third parties regarding BP's determination of what the "Worst Case Discharge scenario" (as defined in BP's Gulf of Mexico Regional Oil Spill Response Plan dated June 30, 2009) was for the Macondo Well.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Tanner Gansert (Available Date(s): Nov. 12-13).

15. Calculations, models, programs, data, discussion, analyses, and/or communications made, transmitted, announced, drafted, discussed, sent, received, analyzed, reviewed, considered, and/or exchanged both internally and with third parties regarding the creation of BP's "Regional Oil Spill Response Plan" dated June 30, 2009 as such document pertains to "Source Control" (as set out in Section 6.C of that Regional Oil Spill Response Plan) and the determination of the "Worst Case Discharge scenario" (as defined in BP's Gulf of Mexico Regional Oil Spill Response Plan dated June 30, 2009) for an exploration well.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Tanner Gansert: OSRP -- Exploratory Well WCD (Available Date(s): Nov. 12-13).

Earnest Bush: 2009 OSRP -- Section 6.C (Available Date(s): Nov. 14).

16. All analyses, calculations, assumptions, and data cited and/or relied upon in "BP's Preliminary Response to the Flow Rate and Volume Estimates Contained in Staff Working Paper No. 3" submitted by BP to the National Oil Spill Commission on or about October 21, 2010.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Ellen Williams (Available Date(s): Nov. 19-20).

17. All calculations and analyses performed by BP, BP's contractors and/or any other entity working under the direction of BP, to quantify the amount of oil flowing

through the capping stack of the Macondo Well at any time between July 12, 2010 and July 15, 2010, and the identity of all individuals or groups who undertook such efforts.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Adam Ballard (Available Date(s): Oct. 16 - 17).

18. The configuration of the capping stack (including ram position at all times) and all pressure measurements (including calibration measurements) and temperature measurements taken from the capping stack from July 12, 2010 and August 3, 2010.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Trevor Smith: Configuration of Capping Stack from 7/12/2010 to 8/3/2010 (Available Date(s): Oct. 25-26).

Matt Gochnour: Capping stack pressure measurements from pressure gauges (including calibration) 7/12/2010 to 8/3/2010 (Available Date(s): Sept. 13-14).

John Hughes: Capping stack temperature measurements from 7/12/2010 to 8/3/2010 (Available Date(s): Nov. 7).

19. All attempts by BP, BP's contractors and/or any other entity working under the direction of BP, made to measure the pressure and/or temperature of any portion of the Macondo Well or its discharge—either above or below the BOP—between April 20, 2010 and August 3, 2010.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Matt Gochnour: Post incident pressure measurements from pressure gauges and attempts to obtain temperature measurements from gauges (Available Date(s): Sept. 13-14).

John Hughes: Attempted temperature measurements of discharged fluid (Available Date(s): Nov. 7).

20. All attempts by BP, BP's contractors and/or any other entity working under the direction of BP, made to measure the size of the apertures through which hydrocarbons were being released into the environment at the Macondo Well between April 20, 2010 and August 3, 2010.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Tom Knox: (Available Date(s): Oct. 11-12).

21. All efforts by BP, BP's contractors and/or any entity under the direction of BP to predict, calculate, analyze, determine, estimate, model, simulate, and/or interpret (after January 1, 2009) the geophysical or geological characteristics, and (after April 1, 2010) the petrophysical characteristics, of the Macondo M56 reservoir.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Bryan Ritchie: Geological and geophysical reservoir properties (after 1/1/09) (Available Date(s): Oct. 4-5).

Graham "Pinky" Vinson: Petrophysical reservoir properties (after 4/1/10) (Available Date(s): Sept. 18-19).

22. All efforts by BP, BP's contractors and/or any other entity working on BP's behalf to calculate, estimate, predict, and/or model the shut-in wellhead pressure of the Macondo Well after April 20, 2010.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Simon Bishop (Available Date(s): Sept. 27 - 28).

23. All analysis, calculations, modeling, or estimates by BP, BP's contractors and/or any other entity working under the direction of BP relating to obstructions in the wellbore, the BOP, and/or the riser.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

Simon Bishop: Obstructions in wellbore (Available Date(s): Sept. 27 - 28).

Tom Knox: Obstructions in BOP and obstructions in riser (Available Date(s): Oct. 11-12).

24. All analysis, calculations, modeling, or estimates by BP, BP's contractors, and/or any entity working under the direction of BP, relating to the effect of erosion on the rate of flow from the Macondo well.

RESPONSE:

BP Parties designate the following individuals to testify on the indicated aspects of this topic:

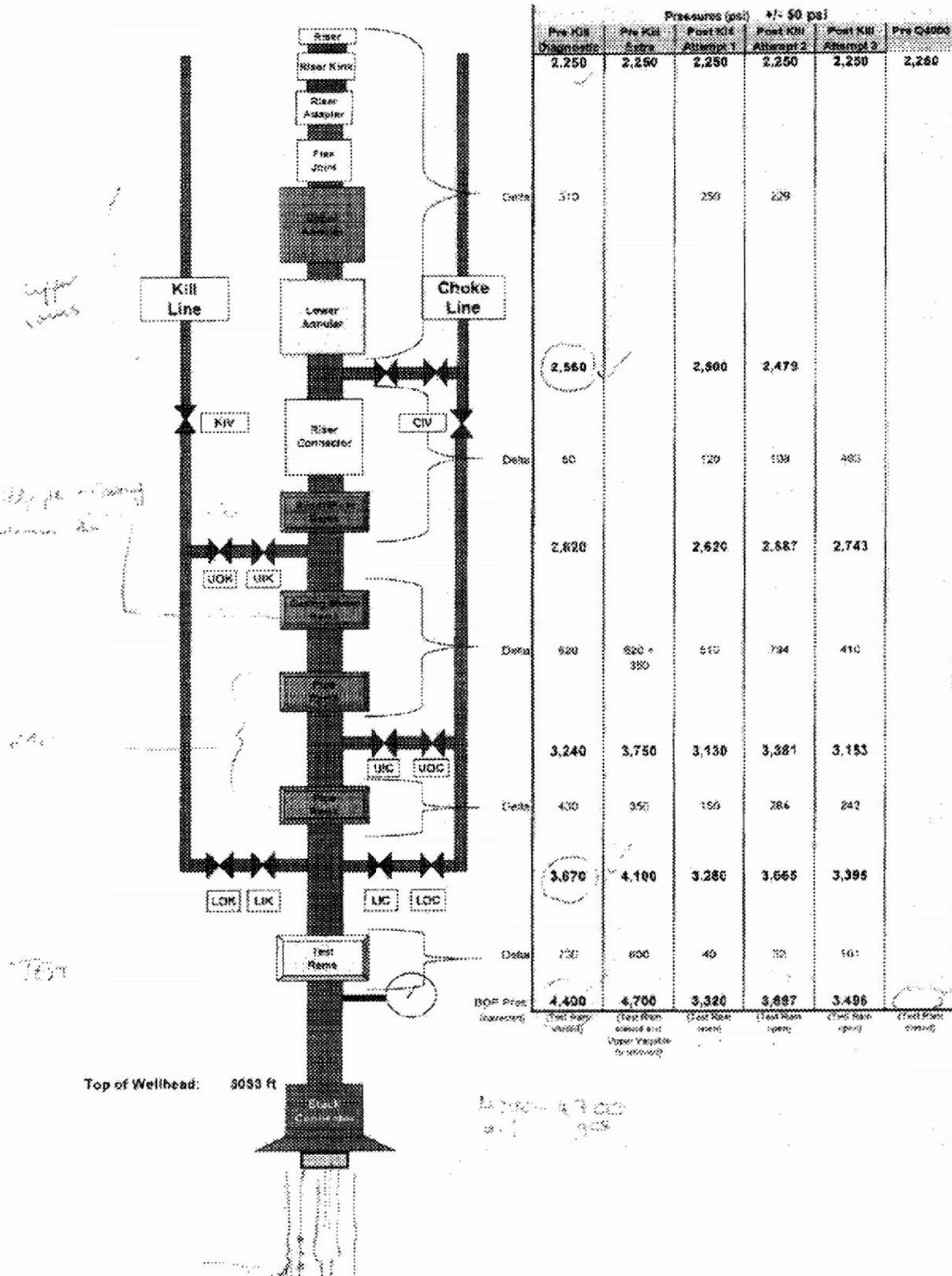
Tom Knox: (Available Date(s): Oct. 11-12).

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**Horizon BOP Intervention
Diagnostic Pumping
28 May 2010**



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