



Jul 11 2012
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

In Re: Oil Spill by the Oil Rig
"Deepwater Horizon" in the Gulf
of Mexico, on April 20, 2010

* MDL NO. 2179
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* SECTION J
*
* JUDGE BARBIER
*
* MAG. JUDGE SHUSHAN

THIS DOCUMENT RELATES TO:
ALL CASES

**AGREED 30(b)(6) DEPOSITION NOTICE OF STATOIL (WITH 30(b)(2)
DOCUMENT REQUESTS)**

By agreement of Plaintiffs' Liaison Counsel, Defense Liaison Counsel, Coordinating Counsel for the States, Coordinating Counsel for the U.S., and Counsel for Statoil, Statoil shall—pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Pre-Trial Order No. 17 (as supplemented and amended by Pre-Trial Order 27)—designate and produce a representative of Statoil to discuss the Areas of Inquiry identified below on October 4, 2012 in New Orleans, Louisiana, unless otherwise scheduled with Judge Shushan and the parties.

DEFINITIONS

As used in the list of topics contained in this notice, the following terms are defined as set forth below:

1. "You," "your," and "yours" shall mean Statoil, including without limitation all of Statoil's present or former agents or representatives, or anyone acting or purporting to act for or on Statoil's behalf for any purpose whatsoever.

2. "Communication" shall mean and include any transmission or exchange of any information, whether oral or written, including, without limitation, any conversation or discussion by means of letter, note, memorandum, interoffice correspondence, telephone, electronic mail, telegraph, telex, telecopies, cable communicating data processors, or some other electronic or other medium.

3. "Document" shall mean any printed, type-written or handwritten matter of whatever character, including, without limitation, the original and each non-identical copy of each and any writing, memorandum, letter, e-mail, correspondence, telegram, note, minutes, contract,



agreement, interoffice and intraoffice communications, procedure, pamphlet, diary, record or note of telephone conversation, chart, schedule, entry, print, representation, record, report, photograph and any tangible item or thing of written, readable, graphic, audible, or visual material.

4. The "DOE-NNSA Flow Team" shall mean the group of scientists and engineers affiliated with the Lawrence Livermore National Laboratory, the Los Alamos National Laboratory, and the Sandia National Laboratories who were tasked by the Secretary of Energy with estimating the rate at which hydrocarbons were flowing through the Macondo well between April 20, 2010, and July 15, 2010.

5. The "Capping Stack" shall mean the mechanical device installed on July 10, 2010 onto the *Deepwater Horizon* blowout preventer, and subsequently used to shut in the Macondo well on July 15, 2010.

6. "Macondo well" shall mean the exploratory well drilled in Block 252 of the Mississippi Canyon.

7. "HYDRO" shall mean Statoil's multiphase flow model.

AREAS OF INQUIRY

1. Your knowledge of and participation in any efforts to estimate, quantify, or measure the flow rate of hydrocarbons ("flow rate") through the Macondo well between April 20, 2010, and July 15, 2010.

2. Your knowledge of the methods that you used in your work for the DOE-NNSA Flow Team to analyze multiphase flow in piping systems through orifices, bends, elbows, restrictions, contractions or expansions, including but not limited to choke valves, and how such methods were applied.

3. Your work for the DOE-NNSA Flow Team to model multiphase flow through the Capping Stack, including but not limited to flow through the choke valve and any other work you were asked to perform in connection with the flow of hydrocarbons through the Macondo well.

4. Your knowledge of the HYDRO model, including the manner in which it models the local phase effects on a multiphase fluid in piping systems as it passes through orifices, bends, elbows, restrictions, contractions or expansions, including choke valves, and any scientific, empirical, or other support for its use.

5. Any inputs, measurements, or assumptions upon which your efforts relied, or which you considered and rejected, including but not limited to (1) any pressure data, (2) any temperature data, (3) any physical, fluid, or chemical properties of the hydrocarbon fluid, (4) the flow path of the fluid, and (5) the geometry and plumbing of the Capping Stack and the choke valve.

6. The results of your application of HYDRO to model the flow of fluid through the Capping Stack choke valve, including HYDRO's prediction that flow rate would increase as the Capping Stack choke valve was closed and your views regarding the basis for this prediction.

7. Any other work that you were asked to perform relating to the quantity or volume of hydrocarbons discharged through the Macondo well and the results of that work.

8. Your knowledge of the DOE-NNSA Flow Team's views, observations, comments, statements or conclusions regarding your work modeling multiphase flow in piping systems through orifices, bends, elbows, restrictions, contractions or expansions, and whether and/or how, to your knowledge, your modeling work impacted the DOE-NNSA Flow Team's efforts to estimate or calculate the flow of hydrocarbons through the Macondo well.

9. Any communications you received from anyone working for or on behalf of the United States regarding the results of your modeling work, including your prediction that flow rate would increase as the Capping Stack choke valve was closed.

10. Any efforts by you to quantify or estimate uncertainty in the work you performed in connection with the Macondo well.

11. Any relevant information, data, or additional work that could have reduced uncertainty in the work that you performed in connection with the Macondo well, and whether you requested it.

12. Your knowledge of any uncertainty with the models that you used to model the flow of the multiphase fluid through the Macondo well.

13. Your knowledge of any uncertainty with the models that you used to estimate flow rates for the Macondo well.

14. The basis for each assumption underlying your work.

15. Whether, in order to simplify the work you performed in connection with the Macondo well and/or to address limitations inherent in the models you used in your work, there was information or data made available to you that you did not utilize, and if so, which information or data was not utilized and an explanation of why it was not utilized.

16. All individuals who participated or assisted in the work you performed in connection with the Macondo well, and their professional, educational, and other qualifications.

17. With regard to the work that you performed in connection with the Macondo well, your knowledge of whether your views, observations, opinions or conclusions regarding your work, including the results of your work, differed from those of any member of the DOE-NNSA Flow Team or any person working for or on behalf of the United States.

18. The amount and structure of your compensation for your work with the DOE-NNSA Flow Team.

DOCUMENTS REQUESTED

1. All communications between you and the DOE-NNSA Flow Team or any person working for or on behalf of the United States regarding your work in connection with the Macondo well.
2. Any reports, presentations, or other documents or materials that are in your possession (whether draft or final) that you prepared regarding your work in connection with the Macondo well.
3. All documents concerning your use of HYDRO to model flow through the Capping Stack, including but not limited to notes, logbooks, inputs, outputs, algorithms, and formulas.

Dated: July 11, 2012

Respectfully submitted,

By: /s/ J. Andrew Langan, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing deposition notice has been served on All Counsel by electronically uploading the same to Lexis Nexis File & Serve in accordance with Pretrial Order No. 12, which will send a notice in accordance with the procedures established in MDL 2179, on this 11th day of July, 2012.

/s/ J. Andrew Langan, P.C.