

Deposition Transcript of Lars Herbst

ORAL AND VIDEOTAPED DEPOSITION OF:



Lars Herbst
VOLUME 2

OCTOBER 11, 2012

18 Q. (BY MR. DAVIS-DENNY) And the
19 reason why it would be important to -- to
20 understand that the flow path was up the
21 inside of the casing was that that would mean
22 that the mud from the top kill could not have
23 gone out the burst disks; is that right?

24 A. If -- if it was stated that that
25 was the only flow path, in other words, there
1 wasn't a combined flow path, then, yes, that
2 would be correct.

25 Q. (BY MR. DAVIS-DENNY) Okay. If
1 you'll look at the line at the top of the
2 page that's near your right hand there, it
3 reads, "Based on the simulations, evidence,
4 and evaluations performed it is believed that
5 the initial flow path was through a leaking
6 casing shoe and up inside the casing." Did
7 BP inform you in late May or early June of
8 2010 that one of its contractors had
9 concluded that the flow path with -- was up
10 the inside of the casing?

11 MR. DIAZ: Object; form.

12 A. I'm not re- -- sure which casing
13 they're referring to in this sentence, but I
14 don't re- -- I don't recall that statement
15 being made.