



Dr. Ole Rygg
Add Energy

- Q. If you were asked what your best estimation of the flow rate was on May 18th, 2010 during that meeting, what would you have said?
- A. I would have said the same thing I just said, that, "I believe I don't have enough information on the flow configuration and -- and input to estimate from the modeling the flow rate."



Dr. Tom Hunter
Director, Sandia National Lab

- Q. Based on the data that existed in May of 2010, excluding data that came to exist after the fact, do you think you could calculate a credible flow rate for any particular day of May of 2010, just using the data that existed in May of 2010?
- A. [I]n terms of data from the well, there was not sufficient data from the well to make a Flow Rate Estimate.



Dr. Art Ratzel
Sandia National Lab

- Q. So you need both appropriate and -- a model and accurate data to get an accurate result; is that correct?
- A. That would be my position.
- Q. Okay, And you did not have the accurate data necessary to get an accurate result prior to the capping stack; is that correct?
- A. The team believed it lacked the data and the confidence in that data.