

Critical Considerations for the Court

- **APC is a global public oil and gas exploration and production company**
 - \$58.4b total assets (June 30, 2014)
 - \$14.6b revenues (2013)
 - \$10.3b revenues (June 30, 2014)
 - \$5.4b cash (June 30, 2014)
 - \$1.2b dividends (2009 – June 30, 2014)
- **APC admits that it can pay a civil penalty of \$4.6b**
- **APC offers no expert opinion on economic impact of a penalty**