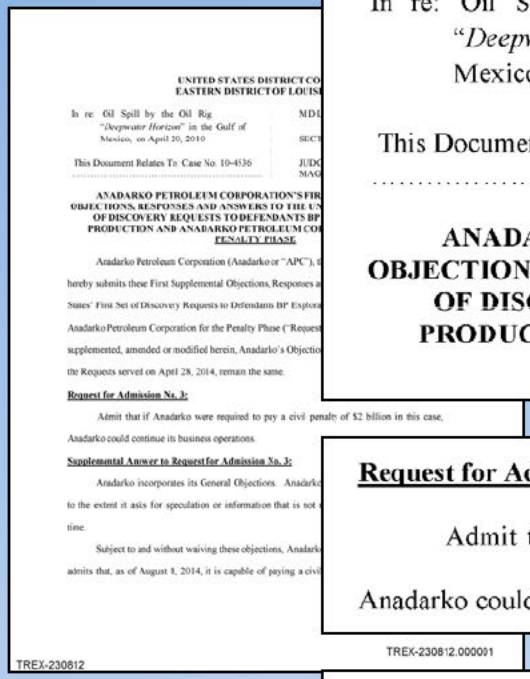
Statement by Anadarko on August 14, 2014



TREX-230812

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
	:	SECTION : J
This Document Relates To: Case No. 10-4536	:	JUDGE BARBIER
	:	MAG. JUDGE SHUSHAN

ANADARKO PETROLEUM CORPORATION'S FIRST SUPPLEMENTAL OBJECTIONS, RESPONSES AND ANSWERS TO THE UNITED STATES' FIRST SET OF DISCOVERY REQUESTS TO DEFENDANTS BP EXPLORATION AND PRODUCTION AND ANADARKO PETROLEUM CORPORATION FOR THE PENALTY PHASE

Request for Admission No. 3:

Admit that if Anadarko were required to pay a civil penalty of $2 billion in this case, Anadarko could continue its business operations.

TREX-230812.000001

Supplemental Answer to Request for Admission No. 3:

Subject to and without waiving these objections, Anadarko answers as follows: Anadarko admits that, as of August 8, 2014, it is capable of paying a civil penalty of between $0.00 and $4.6 billion using available cash, new or existing credit facilities or loan arrangements, equity or debt offerings, and/or through the sale of assets. Anadarko also admits that, as of August 8, 2014.