

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF LOUISIANA

IN RE: THE MACONDO WELL NO. 1 INCIDENT IN THE
GULF OF MEXICO, ON APRIL 20, 2010

EXPERT REPORT OF
DAVID G. CALVERT

SUBMITTED ON BEHALF OF
WEATHERFORD U.S., L.P.

DATED:

October 14, 2011

David G. Calvert

Signature: David G. Calvert

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Introduction

I have been asked to offer my opinions regarding the following in connection with the blowout of the Macondo Well on April 20, 2010:

- 1) What purposes did the Weatherford M45AP float collar serve in the cementing of the 9 7/8" x 7" production casing on the Macondo Well on April 19 and 20, 2010?
- 2) Did the Weatherford M45AP float collar serve the purposes for which it was (a) designed by Weatherford; (b) intended and utilized by BP; and (c) intended and utilized in the oil and gas industry in the cementing of production casing?
- 3) Did the 9 7/8" x 7" production casing cement fail to achieve zonal isolation of the hydrocarbon zones and pay sands in the production interval of the Macondo Well?
- 4) Was the Weatherford M45AP float collar a cause or contributing cause of any failure of the 9 7/8" x 7" production casing cement to achieve zonal isolation of the hydrocarbon zones and pay sands in the production interval of the Macondo Well?
- 5) Could hydrocarbons from the pay sands in the production interval of the Macondo Well have flowed through the shoe track cement and have done so without forcing cement out of the shoe track?

Opinions and Conclusions

The documents, reports, and references that I have reviewed address a number of factors pertaining to the production casing cement job that may have caused or contributed to the Macondo Well blowout on April 20, 2010. The loss of life, the loss of the Deepwater Horizon Rig, and the effects on the environment likely make this blowout the worst in U.S. history. On April 19, 2010, BP's well plan called for a Weatherford M45AP Flow-Activated Mid-Bore Auto-Fill Float Collar to be run in the Macondo Well in the cementing of the 9 7/8" x 7" production casing. Based on my review of the facts, circumstances, reports and other data and information, I have reached the following conclusions regarding the cement job in the well, the condition of the cement in the well and the Weatherford float collar: