

2/1/09



**CONTRACT FOR  
GULF OF MEXICO  
STRATEGIC PERFORMANCE UNIT  
OFFSHORE WELL SERVICES**

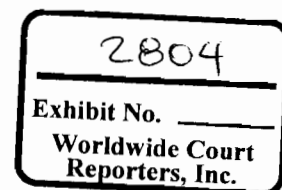
**BETWEEN**

**BP EXPLORATION AND PRODUCTION, INC.**

**AND**

**M-I L.L.C.**

**BPM-09-00209**





May 9 2011  
3:01PM

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 \*

Applies to: *All Cases.* \*

\* \* \* \* \*

MDL No. 2179

SECTION: J

JUDGE BARBIER

MAGISTRATE SHUSHAN

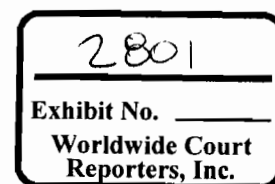
**AGREED 30(b)(6) DEPOSITION NOTICE OF M-1 LLC**  
**(WITH 30(b)(2) DOCUMENT REQUESTS)**

By agreement of Plaintiffs Liaison Counsel, Defense Liaison Counsel, Coordinating Counsel for the States, Coordinating Counsel for the U.S., and Counsel for Defendant, M-1 LLC ("M1"), M1 shall, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and PRE-TRIAL ORDER No. 17, as supplemented and amended by PRE-TRIAL ORDER 27, designate and produce one or more officers, managers, agents, employees, or other representatives of Cameron to discuss the Areas of Inquiry identified below. The times and locations of the depositions will be scheduled in conjunction with the fact depositions of the designees in their individual capacities, or otherwise as may be scheduled with Judge Shushan and the parties.

**Areas of Inquiry**

1. The existence, nature, scope, meaning and intent of drilling contracts, service agreements, mineral lease and/or mineral rights and/or royalty agreements, joint operation and/or exploration and/or production and/or joint-venture agreements, indemnity agreements, and/or charter agreements, relating or pertaining to the Macondo Prospect, the Deepwater Horizon,

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and/or the Macondo Well, including, but not limited to, contracts and/or agreements with: (a) Minerals Management Services ("MMS"); (b) Anadarko; (c) MOEX; (d) BP; (e) Halliburton (and/or Sperry); (f) Transocean; (g) Weatherford; and/or (h) Schlumberger.

2. The existence, nature, scope, coverages, exclusions, defenses, applications, renewals, binders, endorsements, underwriting submissions and/or audits and/or investigations, claims, primary contacts, reservation of rights letters, relating and/or in any way pertaining to policies or contracts of insurance and/or indemnity, which may provide primary, excess, umbrella liability, professional services, errors and omissions, professional services, environmental, and/or any other type of coverage and/or indemnity to M1-Swaco and/or the Plaintiffs and/or any other Defendants with respect to the Deepwater Horizon and/or Macondo Well blow-out, explosion, fire and/or oil spill.
3. The existence, nature, scope and contents of any and all Failure Modes Effects and Critical Analysis, Quantified Risk Assessment ("QRA") and/or Major Accident Risk ("MAR") analysis or evaluation relating to (i) the Deepwater Horizon, and/or (ii) the exploration, development, production and/or drilling of (a) the Macondo Well, and/or (b) deepwater drilling in the Gulf of Mexico.
4. [5] The existence, nature and substance of economic, financial, accounting, or other evaluations, projections or analyses of (and/or communications regarding) the anticipated, projected or potential income, revenue and/or profit anticipated or expected to be realized from the Macondo Prospect (Mississippi Canyon Block 252).
5. [6] The existence, nature and substance of mud log communications and/or analyses, and/or post-mud log communications and/or analyses, regarding the commercial viability of the Macondo Prospect (Mississippi Canyon Block 252).
6. [7] The existence, nature, scope, and response to any and all requests for documents (and/or ESI), and/or any documents (and/or ESI) exchanged, at any time from April 20, 2010 to September 30, 2010, between and/or among M1-Swaco and any other one or more Defendants.
7. [8] The existence, nature, scope, access and/or use of any and all real-time data feeds, data dumps, or other electronic communications to, from and/or regarding the navigational, drilling, completion, temporary abandonment or other operations of the Deepwater Horizon and/or the Macondo Well, including, but not limited to, the "Hitec" system, and/or the "INSITE" (or "Sperry Sun") real-time feed data that was transmitted from the Deepwater Horizon.
8. [9] The existence, nature and contents of any discussions with BP, MOEX, Anadarko, Transocean, Halliburton (and/or Sperry) and/or Cameron regarding the potential costs, risks,

benefits and other analyses or evaluations of potential methods to cap, control, contain, shut-in and/or kill the Macondo Well after April 20, 2010.

9. [10] The existence, nature, scope, contents and results of any and all geological, technical, engineering, professional, management, economic and/or other testing, evaluation, study and/or analysis of any potential method or technique to cap, control, contain, shut-in and/or kill the Macondo Well after April 20, 2010, including the possible risks, benefits or other consequences thereof.
10. [11] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision to mix batches (or "pills") of lost-circulation materials, including but not limited to mixed lost-circulation material pills, to be used as spacer materials, as well as the suitability of the LCM material being used as a spacing material or space pill.
11. [12] The analysis MI Swaco did regarding the effects of the LCM material on the effective operation of the Deepwater Horizon BOP.
12. [13] The requirements of the Resource and Conservation Recovery Act regarding the use and/or disposal of drilling fluids.
13. [14] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision to use the "long string" as opposed to the "liner" casing, between approximately April 10 and April 20, 2010, at the Macondo Well.
14. [15] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision to comply with and/or deviate from the BP standard, guideline, recommendation, requirement and/or protocol that the top of the annular cement be 1,000 feet above the uppermost hydrocarbon zone, between approximately April 10 and April 20, 2010, at the Macondo Well.
15. [16] The existence, nature, scope, results (and/or any reporting, communication, discussion, analysis or evaluation of) any and all actual and/or contemplated foam stability tests and/or cement testing, performed by anyone, relating or in any way pertaining to the drilling, exploration, development and/or production project at the Macondo Well, either before the April 20 blow-out, or after.
16. [17] The existence, nature, scope, contents, and results of discussions, evaluations and/or analyses regarding the decision not to conduct or prepare cement bond logs, on or around April 20, 2010, at the Macondo Well.
17. [18] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision to comply with and/or deviate from MMS Regulations

regarding the placement of the cement plug in relation to the ocean floor (or "mud line"), between approximately April 10 and April 20, 2010, at the Macondo Well.

18. [19] Communications or discussions with BP and/or Transocean and/or Halliburton, and/or other knowledge, input, participation and/or review of BP's Application for Permit to Modify the temporary abandonment procedure on or around April 16, 2010, including the deviations, if any, between that procedure and the procedure(s) described in (a) the April 12, 2010 Drilling Plan, (b) the April 14, 2010 Morel "Forward Ops" E-Mail, or (c) the April 20, 2010 "Ops Note".
19. [20] Communications or discussions with BP and/or Transocean and/or Halliburton, and/or other knowledge, evaluation and/or analyses of a so-called "bladder effect".
20. [21] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision(s) made by BP and/or Halliburton and/or Weatherford regarding the nature and/or number of centralizers used at the Macondo Well, between approximately April 18, 2010 and April 20, 2010.
21. [22] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision(s) made by BP and/or Halliburton and/or Weatherford regarding the nature and/or number of float collars used at the Macondo Well, between approximately April 18, 2010 and April 20, 2010.
22. [23] The existence, nature, scope, contents, and results of discussions, evaluations and/or analysis regarding the decision made by BP and/or the recommendations of Halliburton and/or Weatherford regarding the volume or flow rate of cement pumped down into the well from April 18 to April 20, 2010.
23. [25] Any and all communications or discussions between or among You, BP, Transocean and/or Halliburton, and/or any other knowledge or experience You have regarding the estimated, budgeted, expected and/or actual time and/or cost savings realized by:
  1. Number and Nature of Centralizers Utilized
  2. Foregoing Substantiated Foam Stability Test Results
  3. Not Running Cement Evaluation Log
  4. Using Spacer Made from Combined Lost Circulation Materials to Avoid Disposal Issues
  5. Displacing Mud from Riser Before Setting Surface Cement Plug
  6. Setting Surface Cement Plug 3,000 Feet Below Mud Line in Seawater
  7. Not Installing Additional Barriers During Temporary Abandonment Procedure
  8. Not Performing Further Well Integrity Diagnostics in Light of Troubling and Unexpected Negative Pressure Test Results
  9. Bypassing Pits and Conducting Other Simultaneous Operations During Displacement

24. [26] The presence, participation, supervision or other involvement of officers, directors or other employees of BP plc: (i) in the exploration, development, drilling and/or production of the Macondo Well, from January 1, 2010 thru April 20, 2010; (ii) in the advertising and/or public relations effort directed to and/or conducted within the United States from April 20, 2010, thru the present; (iii) in responding to Federal, State and/or Local executive, legislative and/or regulatory officers, bodies and/or agencies within the United States from April 20, 2010, thru the present; (iv) in the well-control, containment, capping and/or kill efforts regarding the Macondo Well, from April 20, 2010 thru August of 2010; and/or (v) in the establishment, maintenance, staffing, funding and/or administration of the BP Claims Facility and/or Gulf Coast Claims Facility.
25. [27] The presence, participation, supervision or other involvement of officers, directors or other employees of Transocean Ltd: (i) in the exploration, development, drilling and/or production of the Macondo Well, from January 1, 2010 thru April 20, 2010; (ii) in responding to Federal, State and/or Local executive, legislative and/or regulatory officers, bodies and/or agencies within the United States from April 20, 2010, thru the present; (iii) in the well-control, containment, capping and/or kill efforts regarding the Macondo Well, from April 20, 2010 thru August of 2010.
26. [28] The existence, nature and contents of communications relating to the March 8th well control event at the Macondo Well.
27. [29] The use of drilling fluids and related efforts to control the well in response to the March 8th well control event at the Macondo Well.

### **DOCUMENT REQUESTS**

M-1 is further requested, in accordance with Rule 30(b)(2) of the Federal Rules of Civil Procedure, as well as Rule 26, Rule 34, and PRE-TRIAL ORDERS NOS. 16, 17 and 27, to produce, or identify by specific Bates Number(s) (if already produced), the following documents, at least ten (10) days prior to the time of the relevant designee's deposition:

#### **First Set of Requests**

For each Area of Inquiry identified above, please produce all documents provided to, reviewed with, utilized by, and/or relied upon by the deponent to prepare for his or her deposition testimony.

### **Second Set of Requests**

For each Area of Inquiry identified above, please produce all documents which relate, pertain, evidence and/or reflect the issues, topics and/or events described therein or associated therewith.

### **Third Set of Requests**

For each corporate designee, a copy of his or her current resume or CV, as well as a copy of any and all prior testimony, whether provided in an individual or representative capacity, including any and all deposition testimony, trial testimony, sworn statements, affidavits, declarations, expert reports, and/or testimony before a legislative, regulatory or investigative body or agency.

This 9th day of May, 2011.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that the above and foregoing Deposition Notice and Document Requests have been served on All Counsel by electronically uploading the same to Lexis Nexis File & Serve in accordance with Pretrial Order No. 12, this 9th day of May, 2011.

/s/ James Parkerson Roy and Stephen J. Herman