

Thomas Roth – Cross-Examination

July 26, 2011



Thomas Roth

From: Thomas Roth
Sent: Mon, Jun 14, 2010 11:23:34 AM
To: Ron Shuman
Subject: FW: cement white paper
Response: None

Re:
As discussed this afternoon. Tammy

From: Thomas Roth
Sent: Monday, June 14, 2010 8:24 AM
To: Bill Dean; Anthony Badalamenti; Simon Turton
Subject: RE: cement white paper

Good points below.

I think that we need to continue to market foam cement. We need to use caution though in promoting foam cement in the public domain such as in a booth before multiple customers and potentially the press. In such settings, once we open topic of foam cement, the speaker could be attacked by questions concerning the DW horizon that we are unable to defend ourselves against due to confidentiality issues with BP as customer.

Internally and before individual customers, we need to move forward in promoting solutions at every opportunity. Wall security is a topic an increasing number of customers will want to review for improved methods following possibility of DW horizon, PA blow out, ground water issues, etc. Tammy

From: Bill Dean
Sent: Monday, June 14, 2010 8:15 AM
To: Anthony Badalamenti; Simon Turton; Thomas Roth
Subject: cement white paper

Do you really think now is the time to write a white paper, given the >200 lawsuits over the puff incident and various people "representing themselves as customers to find info on ourselves"? Why don't we ask Kelley Green's advice first?

Regards,
Bill Dean
Office: 281 375 6545
Cell: 281 536 6046

From: Anthony Badalamenti
To: Simon Turton
Cc: Ron Shuman
Sent: Sat Jun 12 10:34:58 2010
Subject: cement white paper

Simon - Yesterday I bumped into Ron Shuman (VP - US South), during our conversation Ron mentioned that he has noticed that our operations, engineers and BD teams are reluctant to design and sell solutions to their customers. In the past 3 years we have increased our work force substantially, as such our teams may not have the technical and operations experience in foam cementing that would enable them to be comfortable to design and present to our customers.

Ron suggested that we address the basic engineering and operational information needed that would give our teams the ability to begin designing, selling, and executing jobs.

What would you think about asking David Katakobsky to visit with Ron on this request and develop a simple to understand white paper?

Your comments and recommendations are really appreciated.

HIGHLY CONFIDENTIAL

4356
Exhibit No. _____
Workslide Court
Bakersfield, Tex. HAL_1125448

TREX-04356

Simon, yesterday I bumped into Ron Shuman, vice president US South. During our conversation, Ron mentioned that he has noticed that our operations, engineers and BD teams are reluctant to design and sell solutions to their customers. **In the past three years, we've increased our workforces substantially; as such, our teams may not have the technical and operations experience in foam cementing that would enable them to be comfortable to design and present to our customers.**

Ron suggested that we address the basic engineering and operation – operational information needed that would give our teams the ability to begin designing, selling, and executing jobs.