

# Deposition Transcript of Lars Herbst

ORAL AND VIDEOTAPED DEPOSITION OF:



**Lars Herbst**  
VOLUME 2

OCTOBER 11, 2012

18 Q. (BY MR. DAVIS-DENNY) And the  
19 reason why it would be important to -- to  
20 understand that the flow path was up the  
21 inside of the casing was that that would mean  
22 that the mud from the top kill could not have  
23 gone out the burst disks; is that right?

24 A. If -- if it was stated that that  
25 was the only flow path, in other words, there  
1 wasn't a combined flow path, then, yes, that  
2 would be correct.

25 Q. (BY MR. DAVIS-DENNY) Okay. If  
1 you'll look at the line at the top of the  
2 page that's near your right hand there, it  
3 reads, "Based on the simulations, evidence,  
4 and evaluations performed it is believed that  
5 the initial flow path was through a leaking  
6 casing shoe and up inside the casing." Did  
7 BP inform you in late May or early June of  
8 2010 that one of its contractors had  
9 concluded that the flow path with -- was up  
10 the inside of the casing?

11 MR. DIAZ: Object; form.

12 A. I'm not re- -- sure which casing  
13 they're referring to in this sentence, but I  
14 don't re- -- I don't recall that statement  
15 being made.