

Third, Dr. Wilson's report suggests that BP had "high-quality estimates" concerning the "engineered infrastructure" of the Well useful in hydraulic modeling after the blowout. Such a view is incorrect, if the relevant timeframe is April and May 2010. Until the original Well was intercepted by a relief well in August 2010, important features of the wellbore, including the flow path of oil from the reservoir to the BOP and out the riser on top of the BOP, were unknown.

Dr. Wilson's report states that the accident on the *Deepwater Horizon* "could have damaged [the] architecture" of the Well;²⁰ but there is no legitimate dispute that the explosion and later collapse of the rig did in fact damage what Dr. Wilson's report calls the "engineered infrastructure" of the Well. Dr. Wilson's report concedes "some uncertainty" about the relevant condition of the Well.²¹ ■■■

analysis and PVT information to MMS); LNL083-000351 (May 6, 2010 e-mail transmitting fluid properties information to National Labs); IMT911-014001 (May 7, 2010 e-mail discussion of MMS analysis of reservoir properties from analog wells in the Gulf of Mexico); LAL013-021351 (May 10, 2010 e-mail sending GOR and bubble point information to National Labs); SNL008-018879 (May 11, 2010 e-mail discussion among government scientists regarding plume temperature measurement); LAL019-000583 (May 12, 2010 e-mail transmitting temperature estimate of 150-200F to government scientists); BP-HZN-2179MDL01951916 (C. Cecil notes summarizing transmission of data, including PVT properties, to scientists from National Labs between May 13 and May 18, 2010); LAL013-012807 (May 14, 2010 e-mail acknowledging National Lab scientists received PVT data); LAL013-013023 (May 16, 2010 e-mail among National Labs scientists discussing black oil tables); IMT911-014188 (May 18, 2010 e-mail transmitting Pencor PVT data to MMS); LAL013-020344 (May 24, 2010 e-mail transmitting fluid properties data and EOS to National Labs); ORL001-000271 (May 24, 2010 e-mail transmitting Pencor PVT data and a sidewall core report to MMS and National Labs scientists); NOA016-001452 (May 25, 2010 e-mail transmitting Pencor PVT data to NOAA); PNL001-032329 (May 27, 2010 circulation of Pencor PVT data among National Labs scientists); IMW028-020971 (May 28, 2010 e-mail noting MMS access to Pencor and Schlumberger PVT data); ORL003-006587 (May 28, 2010 e-mail distributing reservoir data to government scientists); PNL001-032991 (May 28, 2010 e-mail noting National Labs scientists use of Schlumberger PVT data).

²⁰ Wilson Report, p. 6 (emphasis added).

²¹ Wilson Report, p. 6.