



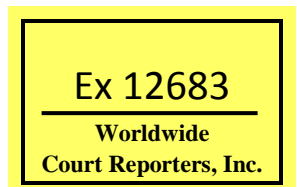
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

In re: Oil Spill by the Oil Rig “ <i>Deepwater</i>	:	MDL No. 2179
<i>Horizon</i> ” in the Gulf of Mexico, on	:	
April 20, 2010	:	SECTION: J
	:	
This Document Relates To: 10-4536	:	Honorable CARL J. BARBIER
.....	:	Magistrate Judge SHUSHAN

**DEFENDANT BP EXPLORATION & PRODUCTION INC.’S
AMENDED INITIAL DISCLOSURES RELATING TO THE
CLEAN WATER ACT PENALTY PHASE**

Defendant BP Exploration & Production Inc. (“BPXP”) hereby provides its initial disclosures in accordance with Federal Rule of Civil Procedure 26(a)(1) and the Court’s February 21, 2014 Order (Rec. Doc. 12392). BPXP’s investigation relating to certain of the Clean Water Act penalty factors continues, and BPXP’s initial disclosures are based on knowledge developed to date. Given the very large number of individuals likely to have discoverable information that BPXP may use to support its defenses, BPXP is disclosing individuals likely to have a broad base of information concerning any environmental, human health, and economic effects of the *Deepwater Horizon* spill and BPXP’s efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. BPXP has not named in these disclosures every individual with knowledge of its defenses, as such a disclosure would be voluminous and burdensome for both the Court and the parties.

BPXP reserves the right to amend or supplement these disclosures, including, but not limited to, the right to amend or supplement in response to the United States’ and Anadarko Petroleum Corporation’s (“APC”) initial disclosures to be received on April 4, 2014; the right to amend or supplement pending resolution of proposed stipulations and issues pertaining to the



scope of both discovery and trial; and the right to amend or supplement as a result of information learned through discovery or as otherwise necessary to present evidence at trial.

BPXP's disclosures are made without waiving any claim of privilege or work product; the right to object on the grounds of competency, relevancy and materiality, hearsay, or any other proper ground; to use any such information, for any purpose, in any subsequent proceeding in this action or in any other action; and the right to object on any and all grounds, at any time, to any other discovery request involving or relating to the subject matters of these disclosures.

A. Individuals Likely To Have Discoverable Information On Whom BPXP May Rely In Supporting Its Claims And/Or Defenses.

Subject to the taking of discovery, BPXP currently believes that the following persons do, or may, have knowledge of discoverable information upon which BPXP may rely to support its claims and/or defenses:

1. Admiral Thad Allen (U.S. Coast Guard, former National Incident Commander): Admiral Allen may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
2. Captain Meredith Austin (U.S. Coast Guard, former Incident Commander (Houma, LA)): Captain Austin may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Captain Austin may also have information concerning any environmental, human health, and other effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities.
3. Nick Bamfield (BP p.l.c., Deputy Group Treasurer): Mr. Bamfield may have information concerning the economic impact of a Clean Water Act penalty on BPXP. Mr. Bamfield may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
4. David Bucknall (BP p.l.c., Group Treasurer): Mr. Bucknall may have information concerning the economic impact of a Clean Water Act penalty on BPXP. Mr. Bucknall may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
5. Iris Cross (BP America Inc., General Manager of National Programs and Houston Community Affairs): Ms. Cross may have information concerning community

outreach programs associated with the *Deepwater Horizon* spill response and other efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Ms. Cross may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.

6. Gabe Cuadra (BP America Production Company, Vice President of Compliance, Gulf of Mexico): Mr. Cuadra may have information concerning compliance with the Remedial Order in place following acceptance of the Plea Agreement. Mr. Cuadra may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
7. Dave Dutton (Unified Area Command, Industrial Hygiene Lead): Dr. Dutton may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Dr. Dutton may also have information concerning any environmental, human health, and other effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities. Dr. Dutton may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
8. Laura Folse (GCRO Executive Vice President, Response and Environmental Restoration; BPXP Vice President): Ms. Folse may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, including through shoreline protection, monitoring, and cleanup, as well as other mitigation and environmental restoration initiatives. Ms. Folse may also have information concerning any environmental, human health, and other effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities. Ms. Folse may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
9. Heidi Grether (BP Corporation North America Inc., General Manager, State and Local External Affairs): Ms. Grether may have information concerning community outreach programs associated with the *Deepwater Horizon* spill response and other efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Ms. Grether may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
10. Robert Haddad (National Oceanic and Atmospheric Administration, Office of Response and Restoration, Chief of Assessment and Restoration Division; Joint Analysis Group for Surface and Sub-Surface Oceanography, JAG Lead): Dr. Haddad may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, and the environmental effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities.

11. Captain James Hanzalik (U.S. Coast Guard, former Federal On Scene Coordinator): Captain Hanzalik may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
12. Captain Julia Hein (U.S. Coast Guard, former Federal On Scene Coordinator): Captain Hein may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
13. Richard Heron (BP p.l.c., Vice President of Safety and Operational Risk, Health, and Industrial Hygiene): Dr. Heron may have information concerning efforts to respond to the *Deepwater Horizon* spill as well as any human health effects related to the *Deepwater Horizon* spill and/or response activities. Dr. Heron may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
14. Captain Larry Hewett (U.S. Coast Guard, former Incident Commander (Houma, LA)): Captain Hewett may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
15. Jared Houge (BP Corporation North America Inc., Manager Group Funding): Mr. Houge may have information concerning BPXP's liabilities relating to the *Deepwater Horizon* spill, the financial position of BPXP, and/or the economic impact of a Clean Water Act penalty on BPXP. Mr. Houge may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
16. John Howard (National Institute for Occupational Safety and Health, Director): Dr. Howard may have information concerning efforts to respond to the *Deepwater Horizon* spill as well as any human health effects related to the *Deepwater Horizon* spill and/or response activities.
17. Captain Roger Laferriere (U.S. Coast Guard, former Incident Commander (Houma, LA)): Captain Laferriere may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
18. Ken Lindemann (GCRO Director, External Gulf Coast Scientific Programs): Dr. Lindemann may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill as well as any human health effects related to the *Deepwater Horizon* spill and/or response activities. Dr. Lindemann may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
19. Jane Lubchenco (National Oceanic and Atmospheric Administration, former Administrator): Dr. Lubchenco may have information concerning efforts to

respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, and the environmental effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities.

20. Jaqueline Michel (Research Planning, Inc., SCAT Technical Advisor): Dr. Michel may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, including through shoreline protection, monitoring, and cleanup and other efforts. Dr. Michel may also have information concerning the environmental and other effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities.
21. Richard Morrison (BPXP Chairman and President; former Deputy Incident Commander): Mr. Morrison may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Mr. Morrison may also have information concerning any environmental, human health, and other effects, and subsequent recovery, related to the *Deepwater Horizon* spill and/or response activities as well as the positive impact of BPXP on the economy and community. Mr. Morrison may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
22. Captain Scott Paradis (U.S. Coast Guard, former Incident Commander (Houma, LA)): Captain Paradis may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
23. Captain Raymond Perry (U.S. Coast Guard, former Incident Commander (Houma, LA)): Captain Perry may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
24. Captain Steven Poulin (U.S. Coast Guard, former Incident Commander (Mobile, AL)): Captain Poulin may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
25. Mike Robertson (GCRO Director of Finance and Performance Management): Mr. Robertson may have information concerning BPXP's liabilities relating to the *Deepwater Horizon* spill (including BPXP's payment of costs associated with response activities and mitigation efforts), the financial position of BPXP, and/or the economic impact of a Clean Water Act penalty on BPXP. Mr. Robertson may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
26. Brian Smith (BP Corporation North America Inc., Chief Financial Officer BP America and Vice President Structured Finance Western Hemisphere): Mr. Smith

may have information concerning BPXP's liabilities relating to the *Deepwater Horizon* spill, the financial position of BPXP, and/or the economic impact of a Clean Water Act penalty on BPXP. Mr. Smith may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.

27. Captain Thomas Sparks (U.S. Coast Guard, Federal On Scene Coordinator): Captain Sparks may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
28. Captain Edwin Stanton (U.S. Coast Guard, former Incident Commander (Houma, LA)): Captain Stanton may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
29. Bea Stong (GCRO Director, Natural Resource Damages & Regulatory Affairs): Ms. Stong may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, including through shoreline protection, monitoring, and cleanup, as well as other mitigation and environmental restoration initiatives. Ms. Stong may also have information concerning any environmental, human health, and other effects of, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities. Ms. Stong may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
30. Captain Lincoln Stroh (U.S. Coast Guard, former Federal On Scene Coordinator): Captain Stroh may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
31. Elliott Taylor (Polaris Applied Sciences, Inc., SCAT Technical Advisor): Dr. Taylor may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, including through shoreline protection, monitoring, and cleanup and other efforts. Dr. Taylor may also have information concerning any environmental and other effects of, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities. Dr. Taylor may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
32. Maria Travis (GCRO Director, Economic Restoration; BPXP Vice President): Ms. Travis may have information concerning the economic effects of the *Deepwater Horizon* spill and/or response activities and BPXP's efforts to minimize, mitigate, or prevent economic and other effects of the *Deepwater Horizon* spill, including grants, payments, and other financial support that were made to individuals, businesses, and governmental entities, as well as other

contributions and initiatives. Ms. Travis may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.

33. Fred Tremmel (Unified Area Command, Industrial Hygiene Lead): Mr. Tremmel may have information concerning efforts to respond to the *Deepwater Horizon* spill as well as any human health effects related to the *Deepwater Horizon* spill and/or response activities. Mr. Tremmel may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
34. Mike Utsler (GCRO former President; BPXP former Incident Commander): Mr. Utsler may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Mr. Utsler may also have information concerning any environmental, human health, and other effects of, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities. Mr. Utsler may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
35. Captain Duke Walker (U.S. Coast Guard, former Federal On Scene Coordinator): Captain Walker may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
36. Danny Wallace (BPXP former Incident Commander): Mr. Wallace may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Mr. Wallace may also have information concerning any environmental, human health, and other effects of, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities. Mr. Wallace may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
37. Rear Admiral James A. Watson (U.S. Coast Guard, former Federal On Scene Coordinator): Rear Admiral Watson may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
38. Duane Wilson (retired Vice President of Refining, Marketing, Supply & Transportation and Fuels Technology for Conoco-Philips; member of BP p.l.c.'s U.S. Refineries Independent Safety Review Panel; Independent Expert to Board of Directors of BP p.l.c.): Mr. Wilson may have information concerning the progress toward implementation of the U.S. Refineries Independent Safety Review Panel's recommendations following the incident that occurred at the Texas City refinery in 2005, and reports that he provided to the Board of Directors on that subject. Mr. Wilson may be contacted through counsel for

BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.

39. Tom Zimmer (BPXP former Incident Commander): Mr. Zimmer may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill. Mr. Zimmer may also have information concerning any environmental, human health, and other effects of, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities. Mr. Zimmer may be contacted through counsel for BPXP: Kirkland & Ellis LLP, 300 N. LaSalle Street, Chicago, IL 60654; telephone: (312) 862-2000.
40. Rear Admiral Paul Zukunft (U.S. Coast Guard, former Federal On Scene Coordinator): Rear Admiral Zukunft may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill.
41. Representatives of BPXP, third parties, and federal, state, and local government at the Unified Area Command (in Robert, Louisiana and New Orleans, Louisiana) and at each Incident Command Post (Houma, Mobile, Houston, Galveston, and St. Petersburg/Miami) — including all incident commanders; deputy incident commanders; on-scene coordinators; unit leads branch directors; section chiefs; deputy section chiefs; and state, parish and local on-scene coordinators for Louisiana, Mississippi, Alabama, Florida, and Texas; and other response personnel (as identified in organization charts prepared during the response) — may have information concerning efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, as well as any environmental, human health, and economic effects, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities.
42. Representatives of BPXP; federal, state, and local government; and third parties with knowledge concerning the nature, extent, or degree of effectiveness of efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill, and any environmental, human health, and economic effects, and subsequent recovery related to, the *Deepwater Horizon* spill and/or response activities.
43. Federal, state, and local government employees and third parties with knowledge concerning the work of the Operational Science Advisory Team, including the preparation and publication of the OSAT I, OSAT II, and OSAT III reports, their appendices, and any forthcoming OSAT reports.
44. Federal, state, and local government employees and third parties with knowledge concerning the preparation and publication of the document entitled “Oil Budget Calculator, Deepwater Horizon, Technical Documentation,” and its appendices, dated November 2010.

45. Federal, state, and local government employees and third parties with knowledge concerning the amount of oil that was contained, collected, dispersed, burned, or cleaned up during the response to the *Deepwater Horizon* spill.
46. Federal, state, and local government employees and third parties with knowledge concerning the preparation and publication of the documents entitled “BP Deepwater Horizon Oil Spill: Incident Specific Preparedness Review (ISPR)” and its appendices, dated January 2011, and the “On Scene Coordinator Report *Deepwater Horizon* Oil Spill,” and its appendices, dated September 2011.
47. Representatives of BPXP, third parties, and federal, state, and local governments involved in the environmental investigation related to the *Deepwater Horizon* spill, including the natural resource damages assessment, emergency restoration, and early restoration, with knowledge concerning any environmental impact, including environmental recovery and rehabilitation, related to the *Deepwater Horizon* spill and/or response activities.
48. Federal, state, and local government employees and third parties with knowledge concerning the preparation and publication of the documents entitled “*Deepwater Horizon* Draft Phase I Early Restoration Plan & Environmental Assessment” (DERP/EA) and its appendices, dated December 2011; “*Deepwater Horizon* Draft Phase II Early Restoration Plan & Environmental Review” (DERP/ER) and its appendices, dated November 2012; and “Draft Programmatic and Phase III Early Restoration Plan & and Draft Early Restoration Programmatic Environmental Impact Statement” (Draft Phase III ERP/PEIS) and its appendices, dated December 2013.

BPXP also incorporates by reference any individuals identified by the United States and/or APC in their initial disclosures and reserves the right to call any witness necessary to authenticate, or lay the foundation for, any document that BPXP might rely upon in this litigation. Additional individuals may also be identified in the documents that are exchanged between the parties, including, but not limited to, current or previous employees of the United States as well as third parties. BPXP reserves the right to amend and supplement these disclosures as it conducts further investigation and discovery. Pursuant to the Federal Rules of Civil Procedure, BPXP will disclose the names of experts upon which BPXP may rely at the required time.

B. Listing Of Relevant Documents And Tangible Things.

BPXP may support its claims and/or defenses with the following categories of documents, electronically stored information, and tangible things (collectively “documents”), to the extent they are admissible and are not protected from disclosure due to attorney-client or other privilege:

1. Documents relating to any analysis, assessment, evaluation, or study of the amount, composition, distribution, concentration, location, fate, transformation, transport, or weathering of oil from the *Deepwater Horizon* spill.
2. Documents relating to the environmental, human health, or other effects of the *Deepwater Horizon* spill and/or response activities, and subsequent recovery from the *Deepwater Horizon* spill and/or response activities.
3. Documents relating to BPXP’s efforts to respond to, or otherwise, mitigate, minimize, or prevent, environmental, human health, or economic effects of the *Deepwater Horizon* spill and/or response activities.
4. Documents sufficient to show BPXP’s community outreach activities, expenditures to support and promote the Gulf Coast economy, and the existence and amount of grants, donations, contributions, or payments by BPXP to individuals, businesses, governments, or non-profit entities related to the *Deepwater Horizon* spill and/or response activities.
5. Documents relating to the preparation and publication of reports, studies, or assessments prepared by or at the direction of the United States Coast Guard, the Unified Command, the Environmental Protection Agency, National Oceanic and Atmospheric Administration, and any other federal, state, or other governmental department, agency, entity, or body, or any representative or employee thereof, regarding the nature, extent, or degree of effectiveness of BPXP’s efforts to respond to, or otherwise mitigate, minimize, or prevent the effects of, the *Deepwater Horizon* spill and/or response activities.
6. Documents sufficient to show BPXP’s payment for costs associated with the response to the *Deepwater Horizon* spill.
7. Documents relating to the economic impact of a Clean Water Act penalty on BPXP.
8. Documents sufficient to show the liabilities incurred by BPXP and the BP Group as a result of the *Deepwater Horizon* incident and spill.
9. Documents sufficient to show the financial position of BPXP.

10. Documents sufficient to show the corporate structure of the BP Group with respect to BPXP.
11. Documents sufficient to summarize loans and other material transactions between BPXP and other BP Group entities from 2009 to the present.
12. Documents relating to BPXP's positive impact on the local economy and community.
13. Documents sufficient to show the number of employees, contractors, and vendors employed on BPXP projects and expenditures on BPXP projects.

BPXP also incorporates by reference any documents identified by the United States and APC in their Rule 26 disclosures. BPXP is in the process of locating additional documents relevant to this case. BPXP reserves the right to rely on all documents produced by the United States, APC, and any third parties during the course of this litigation and to amend or supplement these disclosures as it conducts further investigation or discovery.

C. Information Related to Calculation of Damages.

BPXP is not seeking damages.

D. Applicable Insurance Agreements or Policies.

BPXP is unaware of any relevant or applicable policies at this time.

E. Expert Witnesses.

BPXP is working to identify experts to testify in the Penalty Phase. No deadline for the disclosure of experts has been established by the Court. BPXP will timely supplement these disclosures on or before the established deadline for Defendants to serve expert reports.

Date: April 4, 2014

Respectfully submitted,

/s/ J. Andrew Langan
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*Attorneys for BP Exploration & Production
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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing has been served on All Counsel by electronically uploading the same to Lexis Nexis File & Serve in accordance with Pretrial Order No. 12 on this 4th day of April, 2014.

/s/ Don K. Haycraft
Don K. Haycraft