Case 3:04-cv-00374-JAP-JJH Document 344-2 way in terms of the capital expenditure 4 phasing over a number of years as well 5 6 as the operating expenditures over a number of years. 7 So they're different 8 9 concepts that you want to explore. The feeling clearly was that 10 Shell Deepwater Services didn't quite 11 do what they perhaps hoped in Shell 12 Development Angola to really examine 13 all these different development concept 14 avenues, and that we were just using 15 one concept or two concepts, I can't 16 17 recall that, which indeed could have been termed as being more conservative 18 19 than others. That's what I understand, that's what my recollection is of when 20 I wrote that particular paragraph in 21 22 that email. 23 Q. In the first sentence of 24 that first paragraph on the last page 25 you say "I can assure you that I am 0280 1 MATTHIAS BICHSEL 2 personally pushing and cajoling my 3 staff to get the most out of what is possible." What specifically did you 4 5 do to push and cajole your staff to get 6 the most out of what is possible? 7 What we find most often in A. 8 subsurface evaluation that technical 9 staff tend to be a bit blinkered. They 10 instead of really using a divergent 11 methodology to come up with different ideas, you need to basically encourage 12 13 them, push them, cajole them, whatever 14 words you want to use, to basically 15 think out of the box, think wider than 16 normally. That's what I was saying and 17 that's what I was doing and that's what 8 I'm still doing. Q. When you say "get the most 9 0 out of what is possible," what are you

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by SDS which is where you were at the 2 time with SEPTAR and SEPCO? 3 MS. ASHTON: Objection to 4 5 form. We in this particular Α. 6 instance asked SEPTAR to provide a 7 service and SEPCO to provide a service 8 to SDS within the arrangements that we 9 had that with SEPTAR would be done 10 under a CTR arrangement, we would have 11 to pay for these services from them. I 12 cannot recall what the arrangement was 13 for payment for SEPCO for that 14 particular service. 15 O. Were there meetings and 16 interactions between SEPTAR and SDS 17 18 with respect to this? A. I do not recall. 19 Q. Was there communication 20 between SEPTAR and SDS with respect to 21 this project? 22 A. I do not recall that. 23 Q. What did you mean in the 24 last, second to last line where it says 25 0290 MATTHIAS BICHSEL 1 2 "To ensure that we are not missing anything and literally leave no stone 3 4 unturned at our next peer review session" what did you mean by the 5 phrase "leave no stone unturned"? 6 A. This refers back to my 7 8 phraseology which I used before about the 9 divergent thinking. I wanted to make sure that indeed if there are development 10 11 concepts, development opportunities that 12 would allow to optimize the reserves maturation as opposed to optimizing on 13 cap ex, capital expenditure, or 14 15 optimizing on the -- on the production costs during the lifetime, so that we 16 17 really used that, and again using some 18 engineering expertise from SEPCO who has file:///Cl/Documents%20and%20Settings/daustin/Desktop/Deposition%20Transcripts/103106bichsel.txt (176 of 215)9/18/2007 4:00:39 PM