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WITNESS

PAGE

RAYMOND SIMS

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1 of this benefit in my calculation. If I did, the
2 quantification -- the benefits would have been even
3 higher.

08:44:33

4 **Q.** So you looked at the 12 items that were specifically
5 listed?

6 **A.** Correct.

7 **Q.** -- in that document on Slide 72?

8 **A.** Right.

08:44:39

9 **Q.** And did you decide there were some that you thought
10 you could put a dollar value on?

08:44:57

11 **A.** Yes. Based on all the information in the record, the
12 documents that were produced by Fugro and ION, there were
13 a lot of documents that indicated benefits of infill
14 reduction, line change efficiency and faster and safer
15 deployment and recovery.

16 So those are the ones that I focused on to
17 quantify, in terms of the benefits.

08:45:12

18 **Q.** I mean, it's pretty hard to figure out how much money
19 somebody saved by having more safety; right? Maybe they
20 put a dollar number on it somewhere, but you haven't tried
21 to ascribe one?

08:45:24

22 **A.** I haven't seen anything in their documents that
23 indicate that they put a dollar amount on it. Clearly
24 it's a benefit, and certainly it does have a cost, a
25 dollar value to it, but I don't know what that dollar

1 value is, so I didn't include it.

2 **Q.** And if there were fewer cable tangles, it's probably
3 unlikely that somebody wrote in the ship's log because we
4 steerable streaming this week, we didn't have a tangle?

08:45:36 5 **A.** Correct.

6 **Q.** So you didn't put a dollar value on that either?

7 **A.** No.

8 **Q.** All right. Well, let's look at three out of the 12
9 items that you tried to put a value on. And how did you
10 go about doing that?

11 **A.** Again, I looked at the documents, all the documents
12 that were produced, and I tried to get as much information
13 as I could about the amount of savings or value
14 contributed by lateral steering in those three areas, and
15 I did a calculation.

16 And this is a summary of my calculation.
17 And it indicates that in total, the quantifiable benefits
18 from those three items was somewhere between 19.9 and 21.8
19 percent of the value of the surveys, survey revenue on
20 average.

08:46:19 21 **Q.** All right. So let's look at the three items you did
22 talk about and that you put a value on. And the first one
23 we're going to talk about is infill?

24 **A.** Right.

08:46:30 25 **Q.** And what does Slide 76 show?

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