

WEATHERFORD INTERNATIONAL, LLC, et al.

EXHIBIT 1012

WEATHERFORD INTERNATIONAL, LLC, et al.

v.

PACKERS PLUS ENERGY SERVICES, INC.

Expert Report

Re: Halliburton Energy Services, Inc. and Halliburton Group Canada
v. Packers Plus Energy Services, Inc., et al.

No. CV-44,964

In the 238th Judicial District Court of Midland County, Texas

Prepared for

Packers Plus Energy Services, Inc. et al.

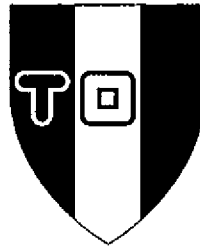
&

Counsel

By

Kevin Trahan

Trahan Oilfield Consulting, LLC



April 27, 2007

Table of Contents

A. Qualifications to Serve as Expert

- 1. Professional Background pg. 5**
- 2. Baker Hughes v. Weatherford, Trahan, et al. pg. 9**

B. Opinion

- 1. Information Reviewed pg. 11**
- 2. Packer Development & Design pg. 12**
 - 2.1 New Product Development pg. 12**
 - 2.2 Reverse Engineering pg. 14**
- 3. Claimed Trade Secrets pg. 20**
 - 3.1 Shear Screws pg. 20**
 - 3.2 O-rings & Seal Surfaces pg. 22**
 - 3.3 Materials Used in Packers..... pg. 24**
 - 3.4 Stub Acme Threads..... pg. 29**
 - 3.5 API Tubing Threads..... pg. 32**
 - 3.6 API Nominal Tubing ID..... pg. 34**
 - 3.7 Chamfer Callouts..... pg. 35**
 - 3.8 Lock Ring Design..... pg. 37**
 - 3.9 Glass Bead Peening..... pg. 40**
 - 3.10 Pump Out Plug and Other Packers Plus Products..... pg. 41**

4. Rockseal v. Wizard II Design Comparison pg. 43

4.1 Mandrelpg. 45

4.2 Shear Screws pg. 45

4.3 Top Connection pg. 46

4.4 Lock Ring..... pg. 47

4.5 Packing Element.....pg. 49

4.6 Shear Ring..... pg. 49

5. Patentability of Rockseal Design Features pg. 51

6. Conclusion pg. 53

EXHIBITS

I have been retained by the defendants in the above-referenced lawsuit to serve as an expert witness. This report and my opinions and testimony concern and address the design, manufacture, and marketing of packers used in the oil and gas services industry. As my resume indicates, I have had considerable experience and expertise in the area of designing downhole tools including many types of packers. Based on that expertise, as further elaborated in my resume and in the body of this opinion, I consider myself qualified to provide detailed responses to each of the opinions reached by Berryman in his report, as well as other allegations made by Halliburton in this lawsuit. Those areas include, but are not limited to:

1. The question whether any of the alleged "trade secrets" relied on by Halliburton are in fact trade secrets;
2. The question whether there is any evidence that Packers Plus actually used any of those alleged trade secrets in any of its products;
3. The ability of any downhole tool manufacturer to obtain from publicly available source the information that Halliburton claims to be trade secrets;
4. The question whether the Rockseal packer was a novel, patentable invention;
5. Practices and procedures concerning reverse engineering, in particular as they relate to products at issue in this lawsuit.

My knowledge, experience and expertise provide me with a strong foundation and qualification to address each of these issues. However, I have also relied to some degree on the opinions expressed by Ron Britton whose vast operational experience in the field provides yet another valuable perspective on many of these issues.

A. Qualifications to Serve as Expert

1. Professional Background¹

My career began in 1992 following graduation from Texas A&M University. I was immediately employed by Baker Service Tools, a division of Baker Hughes, Inc., as design engineer trainee. In this capacity I was involved in design reviews, drafting, and testing of many types of down-hole tools, including many types of packers. During my first year with Baker Hughes, Inc. the divisional operating structure was reorganized by merging Baker Service Tools with Baker Oil Tools. The newly merged division retained the name of Baker Oil Tools. The new division included all of the production packers and all of the service packers.² During this time I was able to design and test both production and service type packers.

¹ My professional biography is attached as Exhibit T01

² A service packer is a packer utilized in the remediation or stimulation of a well, while a production packer is a packer utilized during the production of a well. Many types of packers can be used both as service packers and as production packers.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.