HALLIBURTON ENERGY SERVICES, INC. and HALLIBURTON GROUP CANADA, Plaintiffs	§	IN THE DISTRICT COURT OF
VS.	§	
PACKERS PLUS ENERGY SERVICES, INC.; PACKERS PLUS ENERGY SERVICES, INC. USA; PACKERS PLUS ENERGY SERVICES (U.S.A.) LIMITED PARTNERSHIP; DANIEL THEMIG; PETER KRABBEN; and KENNETH PALTZAT, Defendants	§	MIDLAND COUNTY, TEXAS
	§	238TH JUDICIAL DISTRICT

FIRST SUPPLEMENTAL EXPERT REPORT OF KEVIN TRAHAN

August 21, 2008

Attachments

1. Brown Oil Tools HS-16-1 catalog pages (2 pages)
2. U.S. Patent 4,716,967 (9 pages)
3. U.S. Patent 4,791,992 (12 pages)
4. U.S. Patent 5,197,547 (18 pages)
5. U.S. Patent 5,775,429 (14 pages)
6. U.S. Patent 6,543,545 (9 pages)

I hereby incorporate by reference my prior Affidavit filed in support of Packers Plus' Response to Halliburton's Partial Motion for Summary Judgement and all opinions expressed in it, as well as all exhibits and attachments to my Affidavit. This supplemental report is being submitted in addition to my original report dated April 27, 2007 and my Affidavit dated May 19, 2008. The purpose of this supplemental report is to correct errors and misrepresentations, shed light and provide clarity on many issues that Mr. William Berryman, plaintiff's expert witness, writes about in his original report dated March 18, 2007 and his supplemental report submitted in August of 2008. Mr. Berryman has taken great liberties in his reports that could be misleading to a person that is not skilled in the art of oil and gas well completion and the tools that are applied for this purpose.

It is critical to the integrity of this case that those that present themselves as experts must put forth facts, evidence, experience and opinions in an objective, forthright, and transparent manner. Due to this it is important that I clarify and correct some things that have been inaccurately documented by others. As a point of clarity I must refute a lie that has been put forth by Mr. Berryman in his supplemental report. On page 40 of his supplemental report Mr. Berryman states that he and I agree "that the Rockseal invention is an invention, development, and innovation under Themig's contract." His statement is a lie. I have not, in any report, affidavit, or by any other means, whether verbal or written, characterized the Rockseal II hydraulic set packer as an invention, development, or innovation, and therefore do not agree with his opinion.

Halliburton should have been supplying through the discovery process in this case.

II. Open hole versus Cased hole

Mr. Berryman has expended significant effort in attempting to show that tools that were initially designed for cased hole would not be applicable for use in open hole. This point could be construed as intentionally misleading.

It is important to have an understanding of what constitutes cased hole as well as open hole in order to provide clarity to the situation at hand. Open hole is a borehole that is drilled through the formations of earth. The open hole remains as open hole until some sort of pipe, whether made of steel or other material, is inserted into the open hole in order to provide stability to the borehole. Once the pipe, typically referred to as casing in the industry, is installed inside of the open hole then the portion of the open hole that contains the supporting casing is referred to as cased hole.

Open hole and cased hole are both substantially circular in cross section. The only substantial difference is that the inner wall of cased hole is typically made of steel and the inner wall of the open hole is made from formations of earth, or rock. Tools that are initially designed for cased hole are manufactured to perform in substantially circular cross section holes that are hard enough and strong enough to provide necessary support for sealing (typically created by some sort of packing element) and anchoring (typically

designed for sealing requires an anchoring device on the tool. If anchoring is required for a specific application, then anchoring may be provided by a separate tool in the same string of tools or in combination with the single element on a single tool. And, not every tool that is designed to be an anchor requires a sealing mechanism.

The stability of the open hole is largely dependent upon the formations in which open hole exists. Rock formations in many cases are extremely hard and stable. In these cases the rock is highly compressed due to pressure exerted on the rock over millions of years of formation. There are also sand formations that can be less consolidated and less stable. These less stable formations are more susceptible to having "wash outs" or areas that are substantially non circular in cross section after being drilled.

The hard rock formations, once drilled, typically provide a circular cross section conduit, just as a cased hole does. In these types of hard formations a tool that was designed for use in cased hole may be used in open hole. The fact is that many tools, including anchoring mechanisms and packing elements, that were initially designed for cased hole, with no contemplation of being used in open hole, have been used in open hole successfully. It is a fact that many tools which utilized compression set elastomeric solid packing elements have been used in open hole. Mr. Berryman, in his original report, indicated that these types of packing element arrangements were initially designed for cased hole and that they are now being used in open hole. In fact this is exactly what Guiberson / Halliburton has done successfully for many years by use of its original

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