WEATHERFORD INTERNATIONAL, LLC, et al. EXHIBIT 1014

WEATHERFORD INTERNATIONAL, LLC, et al. v. PACKERS PLUS ENERGY SERVICES, INC.



SUPPLEMENTAL ENGINEERING REPORT Prepared by: RONALD A. BRITTON, P.E.

Halliburton Energy Services, Inc. and Halliburton Group Canada

vs

Packers Plus Energy Services, Inc., et al

for

Mr. Rick Fletcher

Cause No. CV-44964

Midland County,

Texas

August 20, 2008

The Rohill Building, Suite E-200 3100 North "A" Midland, TX 79705-5367 (432)686-0022 (432)686-2034 Fax





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for

Cause No. CV-44964 In The 238th Judicial District of Midland County, Texas

Halliburton Energy Services, Inc. and Halliburton Group Canada 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

Established safety management procedures and industry practices and standards have been followed to form the following opinions. In forming those opinions, the basic methodology of a systematic approach utilizing the scientific method was used. First, the need was recognized for an investigation. Second, the problem was defined. The next step was to collect data. The empirical data reviewed was the discovery in this case. Also reviewed were pleadings, depositions and exhibits. The fourth step was to analyze the data by inductive reasoning. After a careful review of all the factual information, proven technologies were then employed to look at the procedures and equipment used at the time; management techniques and other skills such as human factors to review the job assignment, experience and performance of the individuals who may have been involved; how the subject operation, equipment and procedures fit with industry practice and standards at the time; how the procedures and operations fit with applicable regulations; and how design, industry standards and equipment placement relate to this case. The fifth step was to develop a hypothesis, which was based on the data analysis. Lastly, the hypothesis was tested using deductive reasoning; that is, comparing the hypothesis to all known facts.





Halliburton vs Packers Plus * Supplemental Report * August 20, 2008

This report is meant to supplement my original report dated April 27, 2007. My opinions and conclusions in my previous report have not changed. My additional opinions are based on the review of additional materials I have now received and reviewed in this case.

Mr. Berryman's comments in his supplemental report provided to us on August 8, 2008, page 40 quotes paragraph 27 of my April 27, 2007 report. The liberties Mr. Berryman, and those who have retained him, take with my report underscores the difficulty Halliburton has in developing factual evidence to support its case. Mr. Berryman's quote as referenced above, is taken completely out of context. One intent of my April 27 report was to expand on the six areas shown on page 4. Paragraph 4 states:

"Based on years of direct field experience in the operational side of the oil and gas industry, I have a unique perspective to address many of the allegations that Halliburton has made against the Defendants in this case. I have direct knowledge and experience of many of the practices and procedures that Halliburton claims as the basis for its allegations in the referenced lawsuit, including, but not limited to, the following:

- The ability to reverse engineer products that have entered the stream of commerce;
- The perception in the field that a product, its characteristics, components and dimension, once they enter the stream of commerce, are no longer confidential or subject to trade secret protection;
- 3. The general understanding of companies that they cannot expect to protect trade secrets on a product that has entered



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- the stream of commerce;
- The general and specific standards that a company needs to apply to ensure that its employees, contractors and customers protect company secrets, and whether Halliburton has followed those standards;
- 5. The nature of the RockSeal packer and whether it was perceived in the field as a new invention that radically departed from prior art; and
- 6. Whether any of the items relied on by Mr. Berryman in his report can be said to be trade secrets and how easily that information can be accessed by persons in the field.

My report addresses each of the foregoing items and others from an operational and industry perspective; addressing how members of the industry, similarly situated to myself, would respond to each of the substantive allegations of Halliburton in this case based on our experience of actual field practice by Halliburton and other major companies."

My use of the term "innovative ideas" was again taken out of context. It is also important to note that the "Themig Contract" on which Halliburton relies was first produced a month after my April 2007 report was tendered. Based on the testimony as represented by Halliburton, they could not find most of Mr. Themig's employment records for well over two years. This further supports Halliburton's lack of control and procedures for confidential and proprietary information.

The tools referenced in Mr. Berryman's report are not as narrowly focused as Mr. Berryman would have one believe. Many tools that were originally designed as cased hole tools can and have been used in open hole situations. It is clear that Mr. Berryman is not familiar with actual oilfield operations as he would be aware of this fact. In many deep hole





situations, a deep open hole acts in the same manner as a cased hole. Consequently, many of the tools designed for cased hole applications would be used in open hole applications. From an operational standpoint Mr. Berryman's distinctions regarding applications is unfounded in fact.

Any opinions expressed in this report are subject to change and revision pending my receipt and review of additional materials, as discovery is still ongoing. I do retain the right to alter, modify, change, or add to these opinions and conclusions as further evidence becomes available on this case. I will, of course, reserve the unilateral right to amend my report at such time as that happens and I deem it necessary. I reserve the right to further supplement my report or expand on these concepts at trial.



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