



DOUGLAS J. NUTTER



Mr. Nutter is Long International's Graphics Design Manager. He has over 45 years of experience in design, illustration, cartography, and graphic production for technical support, arbitration, and litigation. He is skilled in developing complex technical issues and data into concise presentations for use by counsel, juries, and arbitration panels. Prior to his consulting career, Mr. Nutter gained 12 years of engineering drafting and graphics experience on petroleum refining, oil shale, synfuels, mining, and power generation projects with Tosco Corporation.

EDUCATION

Cartography, Illustration, and Graphic Design, California State University, Northridge, 1978
Graphic Design, Illustration and Typography, University of California, Los Angeles, 1977
Undergraduate Studies in Environmental Biology, University of Colorado, 1971–1975
A.S., Environmental Biology, Mesa College, 1971

PROJECT EXPERIENCE

Mr. Nutter has provided graphic design, illustration and technical support for construction claim preparation, analysis, defense, and negotiation of settlements and includes owners, contractors, transit agencies, universities, sureties, financial institutions, law firms, and architectural firms. Representative project experience includes the following:

- Developed graphics for numerous Long International expert reports involving CPM delay analyses, measured mile loss of productivity analyses, P & ID and process flow diagram changes, allocation of cost overruns to support damages opinions, and various technical illustrations to support mediation presentations and expert testimony. Representative projects include graphics for claims analyses and expert reports involving chemical plants, power plants, oil refineries, fiber optic cable telecommunications systems, hospitals, libraries, offshore oil & gas production facilities, prisons, and pipelines.
- Formatted and finalized the expert report with photos of unsatisfactory quality of concrete and delay issues for a refinery project in Saudi Arabia.
- Formatted and finalized the expert report for a scaffolding claim on a major chemical plant in Louisiana.
- Prepared quantum and cost graphics for use in an expert report on a major LNG project in Australia.
- Formatted the expert and rebuttal reports for a dry sorbent injection system at an electrical power plant in Kentucky.
- Prepared tables, planned vs. actual progress graphs, and charts for the initial list of key performance problems and issues on a multi-billion-dollar LNG project in Australia.
- Coordinated the compilation of the Executive Summary, Detailed Analysis of Construction Work Packages, and Design Documents reviewed on a major LNG project in Australia. Prepared the final Word documents and assembly of the PDF file for the expert report to be submitted to the Supreme Court of Queensland, Australia. The report was three volumes and comprised nearly 2,200 pages.



- Prepared the organization charts, tables, and existing equipment photos for the expert report on the preservation and maintenance activities on a refinery expansion in Peru.
- Prepared the tables and graphics for the Affirmative Claim Expert Report, Counter-Memorial Claim and Reply Report on the delay assessment on an oil sands expansion project in Canada.
- Prepared project timelines, planned vs. actual manpower curves, planned vs. actual forecast cost increases, and planned vs. actual change requests vs. change orders regarding a major refinery expansion project in South America.
- Prepared various charts and graphics used in a standard of care expert report on a billion dollar mining project in Canada.
- Prepared table and charts for an expert report and presentation of findings on a dam project in northern Quebec, Canada.
- Prepared materials flow diagram, delivery time diagrams, tower assembly as-built sequences, project management turnover, mature vs. immature contractor diagrams, and snow and frost diagrams used in an expert and rebuttal report on a 500-mile power transmission line claim in Manitoba, Canada.
- Prepared flow diagrams, weekly craft man-hour charts, time impact analysis schedules, schedules of forecasted dates for achieving mechanical completion, and timelines of events affecting performance used in the expert report on a multi-billion dollar mining project in Canada. Developed additional graphics for report author's to be used during testimony during trial.
- Developed schedule graphics and various manpower charts for a pipeline project in Canada.
- Developed as-planned vs. as-built critical path schedules, delays by window, installation by gathering lines, and piping alignments for a pipeline installation project in Pennsylvania. Prepared topographic maps showing pipeline routes and segments and areas of delay of pipe installation. Prepared trial graphics and materials for direct and cross-examination testimony.
- Prepared as-planned vs. as-built schedules, location of Request for Information impacts, manpower and increased cost graphics for a major building projects for an expert report for a contractor's work in Sacramento, California.
- Developed the various schedules, graphics, training materials, and the claim seminar presentation for a major U.S. chemical company.
- Prepared and developed slide presentation materials for claims management regarding the construction of a dam in Newfoundland.
- Developed tables, planned vs. actual schedules showing delays, planned vs. actual man-power, cost curves and other accounting flow diagrams used in the Expert Report, Rebuttal Report, Reply Report, and Counter Claims filed by the owner on a 450-billion Euro claim on a nuclear power plant in Europe.
- Prepared tables, planned vs. actual schedules showing delays, and various window schedules and project timeline graphics by area for an expert report on a multi-billion-dollar project in Africa.
- Developed tables, as-planned vs. actual manpower, and forecast vs. incurred costs to date charts for underground cable and materials. Formatted expert report for submittal to tribunal.
- Prepared as-planned vs. as-built schedule shut-down generator periods and non-work periods in support of an Independent Analysis Report for a step-up generator replacement failure on a power plant project in Canada.



- Prepared forecast vs. deliverables, actual vs. simulated engineering progress, as-planned design vs. recovery plan, management changes, and issues timelines for a multi-billion-dollar gas-to-liquids facility in Africa. Prepared additional graphics and tables for an expert report and presentation to a major oil company.
- Developed as-planned vs. as-built schedules and manpower charts for a major bridge replacement claim in Wyoming.
- Developed schedule and damages analysis graphics in support of expert reports regarding the defense against an EPC contractor's \$138 million claim on a gas plant project in Saudi Arabia.
- Developed damages analysis graphics in support of an expert report regarding the defense against an EPC contractor's \$130 million delay and changed conditions claim involving the relocation of a \$700 million natural gas processing plant project site in Algeria.
- Developed schedule analysis graphics in support of expert reports regarding the defense against an EPC contractor's and an owner's claim against a paint supplier for the remediation of paint containing lead chromates from an offshore oil production facility being built in Texas.
- Provided RFI analysis and schedule development for electrical subcontractor work on the Alaska Native Medical Center in Anchorage, Alaska.
- Provided arbitration and litigation support graphics for the John Wayne Airport expansion project in Orange County, California. Worked with project executives in the development of an as-built CPM schedule to analyze project delays and acceleration issues and cause-effect relationships of schedule impacts and damages.
- Provided technical support and report graphics on a multimillion dollar dispute engagement for a major U.S. oil company. The claims were brought by a large engineering and construction firm for cost overruns and delays associated with the lump sum construction of hydrocarbon production and process modules for the Kuparuk project on the north slope of Alaska.
- Provided trial graphics including schedules, pipeline cross sections, and maps showing crew movements demonstrating the contractor's inefficiencies in litigation support for a major U.S. oil company on the La Barge gas pipeline project in Wyoming.
- Graphics specialist retained by a consultant working for the Denver Regional Transportation Department to defend against claims brought by the contractor on the 19th and 20th Streets HOV Project. Prepared numerous schedule graphics to assist in discovery and with deposition preparation, and provided graphic support during arbitration proceedings.
- Provided technical report graphics, developed schedules and floor plans for the investigation and analysis of the rebuild construction schedule and costs after a major fire at the MGM Grand Hotel in Las Vegas, Nevada.
- Provided technical report graphics, presentation boards and 35 mm slides for the investigation and analysis of the A-130 tunnel fire for the Los Angeles County Transportation Commission. Also provided graphics and technical support for project management oversight of light rail development in southern California, including the Long Beach – Los Angeles Light Rail Transit Project.
- Prepared schedules, timelines, and graphics for a South African contractor's delay and disruption claim against a major U.S. oil company constructing two offshore oil production facilities in Angola.
- Worked with the project manager and project executives to develop and produce graphics for the interim and final report and presentation before Congress on the Independent Management and Financial Review of the Yucca Mountain Project, a nuclear waste storage facility in Nevada.



- Developed project milestone schedules and timeline charts from document databases for use in retrospective schedule analysis and litigation support on the Zimmer and Perry Nuclear Power Plant projects in Ohio.
- Provided graphic design, layout, production and coordination of corporate brochures, advertising and newsletters. Quarterly publications for Kellogg Corporation included *KC News*, *Environmental Perspectives* and *Schedule and Damages Analysis in Construction Contract Disputes*.
- Assisted project managers and executives to develop seminar materials on schedule analysis, cause/effect relationships, issue analysis, and cost allocation for environmental cleanup projects.

PROFESSIONAL EXPERIENCE

Long International, Inc.

Denver, Colorado Area (November 1996 to Present)

As Graphics Design Manager for Long International, Mr. Nutter provides illustration and graphic design for contract dispute analysis and resolution, expert testimony, and claims prevention through the application of integrated estimating, cost and schedule control systems for owners, engineering and construction firms, and contractors in the petroleum refining, petrochemical, power/cogeneration, industrial and other process industries worldwide.

ProGraphics

Arvada, Colorado (October 1995 to November 1996)

Independent Consultant responsible for providing design, production and coordination of graphics for technical reports and for use in support of arbitration and litigation for a variety of clients.

Kellogg Corporation / Peterson Consulting LLC

Littleton, Colorado (June 1984 to October 1995)

As Manager of Graphic Services, responsible for planning, design, layout and coordination of graphics for arbitration and litigation support, technical reports, proposals and marketing materials. Worked with project executives and project managers to develop numerous spreadsheets, databases and graphics for use in desktop publishing and presentations. Additional responsibilities included department administration, budgeting, staffing, supervision of five graphic specialists, researching new software and equipment for improving the quality and efficiency of presentations, and providing quality control on final work products.

Freelance Illustrator and Graphics Consultant

Denver, Colorado (October 1982 to June 1984)

Responsible for design, layout and production of illustrations and maps for business plans, annual reports and prospectus offerings. Acted as a liaison between client and printers, prepared artwork, typesetting, budgets, cost estimates and schedules.

Tosco Corporation

Denver, Colorado and Los Angeles, California (June 1971 to August 1982)

As a Senior Engineering Technician, had overall responsibility for the coordination and preparation of illustrations for technical reports, permit applications, environmental assessments and environmental impact



statements of foreign and domestic oil shale projects. Also developed and maintained a computer database of foreign and domestic oil shale data and produced computer drawn histograms from this data for geologic and mining evaluations. Prepared illustrations and maps for the \$1.2 billion Colony Shale Oil Project Loan Guarantee application, which was submitted to the U.S. Synthetic Fuels Corporation and for the Sand Wash Shale Oil Project. In addition, served as staff assistant to mining engineers and geologists in evaluating and preparing feasibility studies of eastern U.S. coal projects. Involved in the assembly of a Functional Cost Report used to evaluate the mining operations of two operating coal strip mines in western Pennsylvania and prepared geologic maps and cross sections for permit applications and produced surveys of coal stockpiles and pit operations.