



STEVEN W. LASKEY, P.E.



Mr. Laskey is a Principal with Long International and has more than 40 years of project experience in the U.S. and Australia. Mr. Laskey has served as the lead technical expert on more than 10 arbitration/litigation matters related to the duty of the engineer and design professional, construction contractor standard of care, construction claims, and oil and gas equipment failures. His project experience includes refineries, oil and gas facilities, natural gas processing and conditioning plants, chemical plants, coal seam gas gathering and facilities, and commercial and residential buildings. He has testified in federal and state district courts. Before joining Long International, Mr. Laskey was a Process Engineer, Field Construction Engineer, Project Engineer, and Project Manager for both a large domestic architectural and engineering firm and a major international engineering and construction company. As a Project Manager,

he was responsible for all aspects of facility estimating, budget and schedule preparation and control, engineering, design, procurement, and construction. Early in his career, he was an Operations Engineer and Measurement Engineer for the upstream subsidiary of a major U.S. oil company. Mr. Laskey relies on his experience in operations and the management of engineering, procurement, and construction (EPC) projects to perform financial analysis, delay analysis, causation and damages analysis, prepare expert reports, and testify for parties in litigation.

EDUCATION

B.S., Chemical Engineering, Texas A&M University, 1977

PROFESSIONAL REGISTRATIONS

Registered Professional Engineer, Texas (No. 53346)

PROFESSIONAL AFFILIATIONS

Gas Processors Association, Rocky Mountain Chapter

LECTURES AND SEMINARS

Session Chair: Construction SuperConference, December 2007, *Commercial and Industrial Change Orders*

TECHNICAL EXPERIENCE

Representative U.S. and international technical experience includes:

- Development of project management and project controls plans and procedures
- Analysis of construction contract terms and conditions
- Assessment of project management performance
- Construction claims preparation, analysis, and defense
- Deposition and expert witness testimony
- Management of upstream oil and gas, gas gathering and processing, gas transportation, petroleum refining, and chemicals projects, including program and project management and the management of engineering and construction contractors



- Assessment and quantification of direct and indirect damages associated with construction claims
- Analysis of CPM schedules to determine the impacts of delays, disruption, acceleration, and loss of labor productivity and the entitlement to time extensions
- Identification and systematic evaluation of major engineering and construction problems and their cause/effect relationship on cost and schedule overruns
- Evaluation and quantification of cumulative impact claims resulting from multiple change orders and other impacts
- Process Engineering: the development of process flow diagrams and piping and instrumentation diagrams (P&IDs), and preparation of equipment and instrument specifications
- Process Hazard Analysis: preparation of and leading HAZOP, What-If, and Guide-Word process hazard analysis sessions

PROJECT EXPERIENCE

As a recognized expert in the analysis and resolution of complex construction disputes, Mr. Laskey has evaluated claims and assessed the performance of owners, engineers, and contractors on numerous types of projects. Representative projects include the following:

Oil Refinery, Oil and Gas Production Facilities, Chemical Plants, and Industrial Facilities

- On behalf of the owner, assessed arbitration claims on a multibillion-dollar refinery project in Vietnam. The project experienced significant cost and schedule overruns. Provided technical guidance to the owner as to the viability of its claims against the EPC contractor by analyzing the underlying causes and effects of a wide range of issues that affected refinery operations.
- On behalf of the owner, performed an assessment of the prime EPCm contractor's schedule and technical performance on a multibillion-dollar LNG project in Australia. The project experienced significant cost and schedule overruns. Provided technical guidance to the owner as to the viability of its potential claims against the EPC contractor by analyzing the underlying causes and effects of a wide range of issues that affected project execution.
- On behalf of the owner, assessed the EPCm contractor's schedule, technical, and project management performance on a multibillion-dollar LNG project in Australia. The project experienced billions of dollars in cost overruns and many years of delay. Provided technical guidance to the owner as to the viability of its potential claims against the contractor for overruns in owner's costs as well as overruns in costs incurred by the implementation contractors.
- Analyzed general contractor project management standard of care. Performed schedule and damages analyses and prepared an expert report for a case involving a dispute that arose from the construction of a natural gas compressor station in Colorado.
- Analyzed contractor project management standard of care. Performed design, schedule, and damages analyses, and prepared an expert report for a case involving a dispute that arose from the construction of three pump stations on an interstate pipeline transporting finished petroleum products in Missouri.
- Analyzed contractor project management standard of care and prepared an expert report for a case involving a dispute that arose from the construction of a large cement plant.
- Project Manager for the Pluto Expansion Integration Scope Concept Development Project executed in Perth, Western Australia. The client was Woodside Energy Limited. Managed a project to provide complete engineering to compile a Class 2 cost estimate (TIC) and Level 2 schedule for the integration



scope, CTRs and Level 3 Schedule for the FEED and Class 2 cost estimate and Level 2 schedule for early tie-in work for the Train 2 Expansion of the Pluto LNG Facility. The integration scope included process and piping design of the Train 2 process and utility tie-ins to Train 1, electrical and control systems integration into Train 1 systems, Train 2 site preparation, modification of access roads and drainage at the Pluto facility, all temporary and construction facilities for the Pluto expansion scope, and upgrade to the Pilbara Ports Authority Port and haul roads to support receipt and transport of Train 2 modules and other equipment.

- Project Manager for DCP Midstream's Permian Emissions Upgrade Program. The \$5 million project installed upgrades at five gas plants and five compressor stations to eliminate shutdowns and the resulting flaring of sour gas or venting of raw hydrocarbon gas. The upgrades included measures to eliminate separator high-level shutdowns, reduce power outages, and prevent fuel gas system freeze-ups.
- Project Manager for the QCLNG Phase II Concept and Pre-FEED Engineering Project executed in Brisbane, Queensland, Australia. The client was QGC Pty Limited (a BG Group company). Managed a project to provide concept development and selection for nine work scopes related to coal seam gas development: well site facilities, gas and water gathering systems, and field compression stations to develop approximately 2000 CSG wells producing gas to feed two 680 MMSCFD LNG trains in Queensland, Australia. The project was executed simultaneously by teams in Jacobs' Brisbane QLD (five of the study scopes) and Denver, Colorado (three of the study scopes) offices, and managed in Brisbane. The estimated total installed cost of the QCLNG Phase II development was more than AU\$3 billion.
- Project Manager for a Narrabri Concept Development Project executed in Brisbane, Queensland, Australia. The client was Energy NSW Pty Limited (a subsidiary of Santos Limited), in Brisbane, Queensland, Australia. Managed a project to provide concept development and selection for more than 100 CSG wells, gas and water gathering systems, field compression stations, a gas conditioning and compression plant, and a high-pressure gas transmission pipeline to deliver 1 TJ/day into the New South Wales domestic market in Brisbane. The estimated total installed cost of the Narrabri Development was more than AU\$1 billion.
- Facilities Engineer for Enerplus Resources (USA) in Denver, Colorado. Provided project management for EPC of well site production facilities and pipelines for crude oil and natural gas in the Bakken and Marcellus Fields. Initiated a standard design for the production facilities in North Dakota (Bakken Field) Enerplus properties.
- Process Engineering Program Manager for Shell Exploration and Production Company projects executed in Denver, Colorado. Provided process engineering and interdisciplinary coordination for the design of two central produced water collection facilities and three standard well site facilities designs.
- Project Manager for the EPC of the Lost Creek Compressor Station, a \$10 million, grassroots, 275 MMSCFD compression and conditioning facility on the Lost Creek Gathering, LLC, pipeline from Lysite to Wamsutter, Wyoming. The compression and conditioning facility consisted of a 500 HP electric-drive compressor controlled by a VFD, a refrigeration type gas proceeding unit, and glycol dehydration system all controlled through a DCS housed in a central control building, which also housed the MCC and VFD.
- Project Manager for electrical design and a control systems upgrade at Amoco Production Company's Florida River facility near Durango, Colorado.
- Project Manager for process engineering and design of a \$10 million unit to compress tail gas from an amine sweetening unit for underground injection at Amoco Production Company's Whitney Canyon Gas Processing Plant in southwestern Wyoming.



- Project Manager/Process Engineer for Amoco Production Company's implementation of 29 CFR 1910.119 Process Safety Management regulations at compressor stations and gas plants in Kansas and Oklahoma. Led teams that developed as-built P&IDs, plot plans, etc. and participated in the HAZOP sessions as either the Process Engineer, Scribe, or Facilitator.
- Project Manager for the conceptual design of a \$25 million crude oil and natural gas gathering system, crude oil pump station, and gas compression system at Amoco Production Company's Anschutz Ranch East Gas Plant. Field blow down precluded continued use of the two-phase gathering system.
- Project Manager for the \$19 million expansion of the Questar Pipeline Company Kastler Compressor Station. The project involved the engineering, design, and installation of three gas turbine engine driven centrifugal compressors and modification of the existing control building for injection of natural gas to the Clay Basin Storage Field in Daggett County, Utah.
- Project Manager for the Katy Gas Storage Measurement Project, which provided control systems engineering and piping design of 14 natural gas measurement stations located in Harris County, Texas.
- Technical Manager for the engineering and design of a grassroots natural gas pipeline compression station for Southern California Gas Company. The compression station consisted of four gas turbine engine driven centrifugal compressors with Selective Catalytic Reduction emissions control equipment, controlled through a DCS housed in a central control/facility office building.
- Project Manager of the Permian Flexibility Project for El Paso Natural Gas Company. The project prepared FEED and scope of work documents for three compressor stations, one in west Texas and two in New Mexico.
- Project Engineer and Lead Process Engineer for the engineering, design, and construction of the addition of a gas turbine engine driven centrifugal compressor and modification of the existing control building at El Paso Natural Gas Company's Bondad Compressor Station in La Plata County, Colorado.
- Project Engineer for the engineering and design of a sulfur removal plant in Wilmington, California, that involved a proprietary process. Responsible for the budget, schedule, and performance of 14 engineers, designers, and project support personnel in the effort to produce the engineering specifications and construction drawings for the process, mechanical, and electrical equipment, control systems and control building, earthworks, and structural features. Also performed the duties of the Project Control Engineer and Process Engineer on the project.
- Senior Process Project Engineer responsible for the development of FEL-1 package upgrades for the Holly-Frontier Refinery in Cheyenne, Wyoming.
- Process Engineering Section Lead at the Suncor Energy Inc. Commerce City Refinery. Supervised and coordinated the work of Jacobs' process engineers assigned to the Refinery's Capital Alliance Team and Process Safety Management Group.
- Lead Process Engineer for the Suncor Energy Inc. Commerce City Refinery efforts to achieve compliance with Title 49 CFR Part 98 Regulation for greenhouse gas emissions reporting. The project included several capital projects to add equipment to monitor and record greenhouse gas emissions for reporting to the U.S. Environmental Protection Agency.
- Project Engineering Manager and Field Engineer for the construction of a new motor fuel debutanizer unit and conversion of the existing debutanizer unit to an LSR/Naphtha Splitter at the Conoco Inc., Denver, Colorado refinery.
- Project Manager for a \$7 million project for the engineering, design, construction, and validation for the modernization of the sodium bicarbonate modernization of a Church & Dwight plant near Green River, Wyoming. The project increased the plant capacity from 160 tons per year to 167 tons per year by



replacing the carbonator column, which included removing the existing carbonator tower from the center of the plant building and replacing it with a tower of greater diameter. All project work was performed with minimal building disassembly. The project also replaced the batch centrifuges with continuous centrifuges and upgraded the entire control system to a distributed control system.

- Project Manager of an EPC project for a \$5 million polylactic acid polymer plant for a subsidiary of Adolph Coors Co. The plant was fit into an existing building while other production operations were occurring in the vicinity of the construction.
- Project Manager for capital budget projects valued up to \$1 million at the Roche Pharmaceuticals Plant in Boulder, Colorado. Responsible for the budget, schedule, and performance of construction projects. Production-plant projects included those associated with the process of making an intermediate step chemical for naproxin sodium (brand name Aleve). These included automation of phase separations, bulk feedstock loading, VOC emission control, and reaction rate enhancement. Non-production projects included facility-wide hazardous waste containment, solvent handling, and utilities distribution.

Commercial, Educational, Residential, and Industrial Buildings, and Airports

- Analyzed responsibility for construction defects alleged by plaintiff and allocated repair costs estimated by plaintiff's experts for a case involving a dispute that arose from the construction of 102 residential townhomes in 42 structures.
- Analyzed general contractor project management standard of care and construction delay allegations. Performed schedule and damages analyses and prepared an expert report for a case involving a dispute that arose from the construction of a student recreation center at a Colorado public college.
- Analyzed contractors' project management standard of care. Performed design and schedule analysis and prepared an expert report for a case involving a dispute that arose from the design and construction of steel framework for a terminal and gate facilities at an international airport in Maryland.
- Analyzed general contractor project management standard of care and construction defect allegations. Performed schedule and damages analyses and prepared portions of an expert report for a case involving a dispute that arose from the construction of a high-rise condominium project in Colorado.
- Analyzed general contractor project management standard of care. Performed schedule and damages analyses and prepared an expert report for a case involving a dispute that arose from the renovation of a building designated as a historic landmark in Kentucky.
- Performed schedule analysis and weather impact analysis for a case involving a dispute that arose from the construction of housing units at a U.S. Air Force Base.
- Analyzed contractor project management standard of care. Performed schedule and damages analyses and prepared an expert report for a case involving a dispute that arose from the reconstruction of a collapsed roof at a Colorado athletic facility.
- Analyzed contractor project management standard of care. Performed schedule and damages analyses and prepared an expert report for a case involving a dispute that arose from the construction of a hotel complex in California.
- Analyzed contractor project management standard of care and performed damages analysis for a case involving a dispute that arose from the cleanup of schools in Louisiana damaged by Hurricanes Katrina and Rita.

Highways, Wastewater Treatment Plants, Lock and Dam Projects

- Analyzed general contractor project management standard of care and prime contractor standard of care. Analyzed construction delay allegations and performed schedule analysis. Prepared portions of an expert



report for a case involving a dispute that arose from the construction of a wastewater treatment plant in Colorado.

- Analyzed contractor project management standard of care. Performed schedule and damages analyses and wrote position papers. Prepared presentations for a DRB dispute hearing that arose from the construction of a flood-control dam in California.
- Analyzed contractor project management standard of care. Performed schedule and damages analysis and prepared an expert report for a case involving a dispute that arose from the reconstruction of a state highway in Minnesota.
- Analyzed contractor project management standard of care. Performed schedule and damages analyses and prepared an expert report to rebut the plaintiff's expert report for a case involving a dispute that arose from the reconstruction of a roadway, bridge, and storm water sewer system.

PROFESSIONAL EXPERIENCE

Long International, Inc.

Littleton, Colorado (June 2016 to Present)

As a Principal with Long International, Mr. Laskey provides expert services in all facets of contract dispute analysis and resolution, litigation/arbitration/mediation support, and expert testimony. He is skilled in the assessment of technical issues and evaluations of project management performance of owners and construction contractors on EPC contracts for process plant, infrastructure, and industrial projects. He has analyzed EPC costs and project documentation to identify responsibility for issues causing delays and cost overruns.

Halker Consulting

Englewood, Colorado (August 2014 to March 2016)

As Consulting Project Manager, Mr. Laskey was seconded to DCP Midstream to manage emissions reduction projects in DCP's Permian Basin Region. He created a system to catalog, categorize, and analyze data from DCP's emissions events database to identify the best economical candidate facilities for the emissions reductions upgrades.

Jacobs

Denver, Colorado, and Brisbane, Queensland (May 2009 to August 2014)

Mr. Laskey served as Project Manager in Jacobs' Brisbane QLD Office and Senior Process Engineer in Jacobs' Denver Office. His expertise in natural gas production and procession was a significant contribution to Jacobs being awarded the coal seam gas projects in Australia. Prior to working in Australia, Mr. Laskey was the Process Section Lead tasked with supervising and directing the work of Jacobs' process engineers seconded to the Suncor Refinery in Commerce City, Colorado, and the Shell Process Engineering Program Manager, coordinating process engineers working on projects for Shell Exploration and Production Company.

Holloway Consulting Group

Lakewood, Colorado (May 2004 to May 2009)

As Principal Consultant, Mr. Laskey acted as the lead expert in the analysis and resolution of construction claims projects and frequently represented his clients along with counsel in settlement negotiations.



Mr. Laskey performed delay and damages analysis for more than 15 construction arbitration and litigation cases. He provided trial and deposition testimony for five cases.

Merrick and Company

Aurora, Colorado (June 1998 to May 2004)

As Project Manager, Mr. Laskey was responsible for management, project execution planning, engineering contractor supervision, permitting, cost estimating, economic analyses, cost and schedule control, risk analysis, and management reporting. Mr. Laskey managed significant projects such as Carbon Brake, which was a Boeing 747 aircraft manufacturing facility in Spokane, Washington, a gas conditioning plant near Wamsutter, Wyoming, a gas gathering project near Gillette, Wyoming, and the addition of a new motor fuel debutanizer unit and conversion of an existing debutanizer unit to an LSR/Naphtha Splitter at the Conoco Refinery in Commerce City, Colorado.

Jacobs

Denver, Colorado (January 1988 to June 1998)

Mr. Laskey joined Jacobs as a Process Engineer/Project Engineer. In this role, he was responsible for the process design, flow sheet preparation, equipment specification, bid evaluation, and overall engineering and design coordination for a gas conditioning facility in Long Beach, California, a gas compressor station expansion near Durango, Colorado, and grass-roots gas compressor stations in Colorado, New Mexico, Texas, Utah, and Wyoming. Mr. Laskey soon advanced to Project Manager and had overall responsibility for management, project execution planning, construction contractor supervision, permitting, cost estimating, economic analyses, cost and schedule control, risk analysis, and management reporting for EPC of oil and gas, chemicals, and pharmaceutical facilities. The largest of these projects included the expansion of a natural gas storage facility near Dutch John, Utah, construction of a polylactic acid extrusion facility in Golden, Colorado, and the expansion of a sodium bicarbonate plant near Green River, Wyoming.

Christie Energy Corporation

Brownwood, Texas (January 1988 to January 1991)

As Chief Engineer, Mr. Laskey was responsible for expanding the company's gas gathering system in Eastland County, Texas, and for the design, equipment selection, construction, and start-up of its gas processing plant and NGL fractionators near Desdemona, Texas. After the successful start-up of the Desdemona plant, he prepared technical, environmental, and financial reviews of assets considered for acquisition, such as the Jal (New Mexico) NGL Terminal purchased from El Paso Natural Gas.

Sun Gas Company/Sun Exploration & Production Company

Oklahoma City, Oklahoma; Dallas, Texas; and Abilene, Texas (December 1977 to January 1988)

Mr. Laskey began his career as a Gas Process Engineer. He was responsible for operations engineering at natural gas processing plants utilizing refrigeration, refrigerated lean oil absorption, and cryogenic turboexpander processes. While working in the Oklahoma City District Office, he developed and managed projects to increase gas throughput and optimize NGL recovery at gas plants near Carney, Tonkawa, Wakita, and Lavern, Oklahoma, and near Bennett, Colorado. He also participated in safety audits at other OKC District Gas Plants in Colorado and Wyoming. Mr. Laskey was appointed as Gas Measurement Engineer and relocated to the Sun Gas Headquarters Office in Dallas. In this role, he was responsible for gas and NGL



measurement at all Sun-operated facilities in the U.S. He supported the Gas Measurement Department in its effort to prepare accurate monthly gas and NGL allocations to gas suppliers and plant co-owners.

EXPERT REPORT PREPARATION AND TESTIMONY

- 2007 Provided oral testimony in the Jefferson County, KY Circuit Court in the case of *A&A Mechanical, Inc. v. Wehr Constructors, Inc.*, Case No. 05-CI-04311. Provided testimony in a case involving breach of contract by the general contractor.
- 2004 Provided oral testimony in the U.S District Court, District of Wyoming, in the case of *Ross Rae, Inc. v. Merrick & Company*, Case No. 03-CV-234J. Provided testimony in a case involving breach of contract by the general contractor.
- 2004 Provided oral testimony in the District Court of Adams County, Colorado, in the case of *Bateman-Merrick Group, LLC v. Conoco, Inc. and Elkhorn Construction, Inc.*, Case No. 02CV2619. Provided testimony in a case involving breach of contract by the owner.
- 2004 Provided oral testimony in the District Court of Adams County, Colorado, in the case of *Heritage Townhomes at Legacy Ridge Owners Association v. Cessna Associates, Ltd., et al.*, Case No. 2006CV522. Provided testimony in a case involving construction defects by the subcontractors.
- 2003 Provided oral testimony in the District Court of Campbell County, Wyoming, in the case *Interline Resources, Inc. v. Basin Western, Inc.* Provided testimony about the estimated costs to replace a gas processing facility that had been destroyed by a fire, in a case in which the owner alleged Basin Western, Inc. was liable for the damage.