

# International Construction Consulting, LLC

(Independent Consultant to the Oil & Gas Industry)



*18" Pipe Gang in Bolivia*

## KNOWLEDGE

35 years industry experience; a BSc and an MBA with a focus on international business.

## EXPERIENCE

Routinely perform feasibility studies; conceptual to detail cost models and estimates; write execution plans; provide planning expertise and documents, etc.

## INNOVATIVE SOLUTIONS

Skill sets to put together a variety of project packages, including project finance (funding, justification of investment, estimate confidence packages, etc.), contracting and business strategies, field development (programs and planning), and various management systems.

## RELIABLE EXECUTION

Experienced in both mega/large international projects as well as smaller gas field development work for small to midsize independents.

[www.oil-gas-consulting.com](http://www.oil-gas-consulting.com)



Feasibility Studies



Conceptual to Detailed Cost Estimates



Quality Surveillance Programs



Project Execution Plans



Specialized Studies & Investment Analysis



Independent Project Reviews



Project & Construction Management

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Greg Lamberson

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## ***Expert Witness Services Provided***

The following are details regarding Expert Witness Services I have provided and are not included on my CV:

### **Spie-Capag vs TC Energy (formerly TransCanada)**

**Client:** Spie-Capag / McLean & Armstrong LLP  
**Location:** Canada  
**Scope:** Expert Testimony Regarding Impact of Construction Delays  
**Magnitude:** \$350,000,000 (approximate)  
**Year:** 2024

Provision of consulting services and expert advice for the Plaintiff in a construction delay dispute with a major international energy infrastructure company, TC Energy (defendant).

The work included assessing the cause and impacts of each instance of delay caused by the defendant, including the nature, duration, and context of each delay; evaluate the financial repercussions of these delays on the Plaintiff, including direct costs (labor, materials, equipment) and indirect costs (extended overhead, lost opportunities); review the contractual terms to determine the liability and potential remedies for the delays caused by the client, and: offer an expert opinion on the extent of the delays and cost impacts, supported by detailed analysis and evidence. *Results are pending.*

### **CNOOC Petroleum North America ULC v. ITP SA, Sunstone Projects, Ltd., and Wood Group Canada, Inc / Round Table Group**

**Client:** CNOOC Petroleum North America ULC / Burnet, Duckworth & Palmer LLP  
**Location:** Canada  
**Scope:** Expert Testimony Regarding the Quality of Engineering, Design, and Construction Services on behalf of the Plaintiff  
**Magnitude:** Pending  
**Year:** 2024

Provision of consulting services and expert advice for the Plaintiff in a dispute with a consortium who provided engineering, design, procurement, construction management, and construction services on dual buried pipelines in Northern Alberta. Both pipelines were to operate at high temperatures and pressures. The pipelines were to have an operational life of 40 years, yet one of the two failed and ruptured only ten months into service. A large spill of produced emulsion containing bitumen occurred, which required shut down of the pipelines, related facilities, and associated environmental cleanup and remediation.

Expert advice and input focused on the roles and responsibilities of the Plaintiff and the Defendants failure to properly provide the engineering, design, and other work and materials they were contracted to provide and failure to ensure the pipelines met the intended design specifications; could be safely operated for their intended operational life; and the leak detection system for the pipelines was designed and installed to function properly. *Results are pending.*

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## Anthony Zamora; Gilbert Viator; Gary Simon v. Magnolia River Services, Inc. / Round Table Group

**Client:** Magnolia River Services, Inc. / Bradley Arant Boult Cummings, LLP  
**Location:** US  
**Scope:** Expert Testimony Regarding Contractor / 3<sup>rd</sup> Party Inspection Services Roles & Responsibilities on behalf of the Defendant  
**Magnitude:** Pending  
**Year:** 2024

Provision of consulting services and expert advice for the Defendant in a dispute with local firefighters who were injured due to a gas leak caused by a gas pipeline ruptured during a horizontal directional drill (HDD) operation. The work included delineating the roles and responsibilities between the Owner, the contractor, and the 3<sup>rd</sup> party inspection company hired to inspect the HDD activities. *Results are pending.*

## MC Tubular Products Inc. vs. US Customs and Border/US Department of Justice

**Client:** MC Tubular Products, Inc. / Steptoe, LLP  
**Location:** USA  
**Scope:** Expert Testimony Regarding API 5L Specification for Line Pipe, on behalf of the Plaintiff  
**Magnitude:** \$10,000,000 (approximate)  
**Year:** 2024

Provision of consulting services and expert advice for the Plaintiff in a dispute with U.S. Customs and Border Protection and the U.S. Department of Justice. The work included assessing the requirements and applicability of API 5L, Specification for Line Pipe regarding its pertinence to pipe imported; and in determining whether the current anti-dumping statutes in place at the time of import applied to the pipe order. *Results are pending.*

## Tex-Isle Supply, Inc. vs Tecnotubi S.p.A. and Alessio Tubi S.p.A.

**Client:** Tex-Isle Supply, Inc. / Kelley Drye & Warren LLP  
**Location:** USA  
**Scope:** Expert Testimony as End User for Plaintiff  
**Magnitude:** Confidential  
**Year:** 2022

Provide expert testimony as the purchaser and end user of line pipe provided by Tex-Isle Supply, Inc. (Plaintiff/Claimant) from Tecnotubi S.p.A. and Alessio Tubi S.p.A. (Defendant/Respondent), an Italian pipe mill. The pipe in question failed during hydrostatic testing.

Testimony in support of Tex-Isle Supply, Inc. included the technical and regulatory aspects of hydrostatic testing line pipe; purchase order terms & conditions; API 5L specifications of line pipe; the replacement method and related activities of the failed pipe and re-hydrotest of replacement pipe; and associated costs.

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Expert Witness Statement was prepared and submitted. Testimony was proffered at arbitration. Case was being heard by the International Centre for Dispute Resolution department of the American Arbitration Association. The case was settled successfully for the Plaintiff.

### **O-089950: Lucinda Avery and Roy Avery Case**

**Client:** Lucinda and Roy Avery / Carlile Law Firm, LLP / Expert Institute  
**Location:** USA  
**Scope:** Expert Services, Testimony and Witness for Plaintiff / Findings Report for Litigation  
**Magnitude:** \$1,000,000 (approximate)  
**Year:** 2020

Provided services as an independent expert in the areas of construction and site construction management, including safety processes and controls for litigation regarding an individual injured at a place of employment while that place of employment was undergoing repair & construction activities. Case was settled successfully for the Plaintiff.

### **Confidential Project**

**Client:** Robbins Geller Rudman & Dowd LLP / The Michel-Shaked Group /  
**Location:** USA  
**Scope:** Expert Services, Testimony and Witness for Plaintiff / Findings Report for Litigation  
**Magnitude:** \$100,000,000 (approximate)  
**Year:** 2017

Provided services as an independent expert in the areas of project and construction management, including project controls, cost engineering, progress tracking, schedule control, and project reporting for litigation concerning the corporate reporting of a major domestic EPC services contractor. The case was related to alleged SEC reporting violations.

Developed a preliminary Findings assessment to provide an overall understanding of what processes and procedures a prudent EPC services company would take in order to properly manage its major capital projects, including schedule, cost control, cost engineering, and reporting activities for management to be fully apprised at all times of the status and profitability of its' projects.

My work was in support of the Plaintiff in the case. The case was successfully settled for the Plaintiff.

### **Alpha Crude Connector Project**

**Client:** Frontier Energy Services, LLC / Alpha Crude Connector, LLC (ACC)  
**Location:** USA  
**Scope:** Expert Services / 3<sup>rd</sup> Party Failure Analysis Report Assessment and Rebuttal  
**Magnitude:** \$500,000 (approximate)  
**Year:** 2016

ACC (Plaintiff) suffered failure of three pipe segments that failed during hydrostatic testing of several lengths of pipe after welding and having the completed welds inspected. Three separate pipe segments

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failed, including a segment of pipe API 5L X-52, 8 5/8-in diameter, .188-in thickness; a second segment of API 5L X-52, 8 5/8-in diameter, 0.188-in thickness; and a smaller diameter API 5L X-52, 4 1/2-in diameter, 0.188-in thickness also failed.

The pipe was manufactured by SEAH Steel and were coated with 14-6 mils of green 3M 6233P protective coating. The three pipe segments were manufactured employing an Electric Resistance Welding (ERW) process.

The 3<sup>rd</sup> party expert Failure Analysis Report concluded the failures were due to transit fatigue imparted on the pipe after coating (transportation was provided by ACC). The rebuttal report produced a convincing case that transit fatigue did in fact lead to the failure, however, the transit fatigue occurred during ocean transport rather than the short over land transportation provided by ACC. The case was successfully settled for the Plaintiff.

### **Confidential Project**

**Client:** Germer Gertz, LLP

**Location:** USA

**Scope:** Expert Services, Testimony and Witness for Defendant / Findings Report for Litigation

**Magnitude:** \$35,000,000 (approximate)

**Year:** 2010-2011

Provided services as an independent expert in the areas of project and construction management for litigation regarding a domestic pipeline project.

Developed a Findings Report to provide an overall understanding of what steps an Owner Company would typically be expected to take in order to manage its major capital projects taking into consideration the contracting strategies selected.

A management analysis was provided based on contracting strategies selected for the pipeline engineering and construction work with a focus on what should have happened after the contract type was made, both from a Construction and Project Management standpoint. The litigation was successfully defended against.

My work was in support of the Defendant in the case. I participated in two (2) depositions for the defendant; the case went to trial, but prior to my testimony, the case was successfully settled for the Defendant.