

WILLIAM J. PIEL

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E X A M I N A T I O N  
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BY MR. MILLER:

Q. Mr. Piel, please give us your name and your business address.

A. My name's William Joseph Piel. That's P-I-E-L. My business address is Teir Associates, and that's T-E-I-R; and the address is 160 Hidden Hills Road, that's H-I-D-D-E-N, and that's located in Media, M-E-D-I-A, Pennsylvania.

Q. Mr. Piel, when did you go to work for one of the ARCO companies?

A. I started working for Atlantic Richfield in June, 1975.

**PLAINTIFF'S EXHIBIT**  
12

Q. And what was your position with them at that time?

A. I started as a Process Engineer at their Philadelphia refinery.

Q. And how long did you stay with one of the ARCO companies?

A. At the refinery, I stayed

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1 there for approximately three and a half  
2 years as I remember.

3 Q. And after you finished your  
4 assignment at the refinery, did you go to  
5 work for a different ARCO company?

6 A. Yes, I went to work for ARCO  
7 Chemical Division.

8 Q. And when did you start  
9 working for the ARCO Chemical Division of  
10 the company?

11 A. Some -- I think it was in  
12 1979.

13 Q. Could you briefly describe  
14 for us your educational background  
15 starting with college?

16 A. I have a BS in Chemical  
17 Engineering from Lehigh University. And  
18 I have an MBA from Widener, Widener,  
19 W-I-D-E-N-E-R, University.

20 (Exhibits 1 and 2 are marked  
21 for identification.)

22 BY MR. MILLER:

23 Q. I've marked as Exhibit 1 the  
24 notice of this deposition. Let me show

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1 you Exhibit 2. Is this a statement of  
2 your professional qualifications, sir?

3 A. Yes, this represents my  
4 general experience, right.

5 Q. Under the heading ARCO  
6 Chemical Company Manager Business  
7 Development, you list a number of major  
8 activities that you engaged in with the  
9 company; is that correct?

10 A. Yes.

11 Q. And you held that position  
12 from 1987 to the date of this particular  
13 CV; is that correct?

14 A. I'm not sure there's a date  
15 on the CV. The --

16 Q. When did you leave Lyondell,  
17 the successor to ARCO Chemical Company?

18 A. In April of '98.

19 Q. Between 1987 and April of  
20 1998, were you the Manager of Business  
21 Development for ARCO Chemical Company?

22 A. Yes.

23 Q. Were you assigned to their  
24 corporate headquarters?

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1 A. Yes.

2 Q. And can you tell us  
3 approximately how many people worked  
4 under your direction?

5 A. Anywhere from zero to three  
6 people. It varied over time.

7 Q. Okay. Prior to that you're  
8 listed as being ARCO Chemical Company's  
9 Manager of Technical Service and Business  
10 Management between 1983 and 1987. Is  
11 that the position you held during that  
12 period?

13 A. Yes.

14 Q. And how many people did you  
15 supervise during that assignment?

16 A. None.

17 Q. In your statement of  
18 professional qualifications you indicated  
19 that you assisted the states of Colorado,  
20 Nevada and Arizona in the development of  
21 an oxygenated fuels program to reduce  
22 carbon monoxide levels in non-attainment  
23 areas.

24 Is that one of the things