EXAMINATION

By DUANE C. MILLER, Esq., counsel on behalf of the plaintiff:

Q Can we have your name and business address, please?
A Sure. My name is Curtis Stanley. My business address is the Equilon Westhollow Technology Center in Houston, Texas. Is that enough?
Q That's sufficient.

THE VIDEOGRAPHER: Excuse me. We need to swear in the witness.

MR. MILLER: Correct.
(Witness sworn.)

MS. DOYLE: So now really tell him your true address.

THE WITNESS: The same.

MR. MILLER: Q Mr. Stanley, I'd like you to briefly relate your educational background starting with college for us, please.

A I have a bachelor of science in geology from North Carolina State University with a specialization in engineering. That is my formal education and then other education that I've received was on-the-job training while at Shell and now Equilon.

Q And basically you were employed by the Shell Oil Company since you graduated from North Carolina State
University?

A That's correct.

Q And you are currently responsible for hydrogeological evaluation of Shell's facilities nationwide and on the West Coast immediately prior to Equilon becoming involved; is that correct?

A In my career I've had responsibility for evaluating facilities. Currently my primary responsibility is in regard to development and implementation of risk-based corrective action.

Q When you were employed by Shell you had responsibility to evaluate retail gasoline stations; is that correct?

A Yes.

Q And you had that responsibility for the West Coast for a period of time for manufacturing facilities; is that correct?

A That's correct.

Q And you also had that responsibility nationwide for Shell for gasoline stations at one time; is that correct?

A That's correct.

Q And what period of time are we talking about when you had that responsibility?

A For retail?

Q Yes.

A As I recall probably starting in 1980 extending into
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the mid-eighties.

2 Q And when you had those responsibilities, were you

3 responsible among other things for investigating leaks of

4 gasoline?

5 A Yes.

6 Q And in that respect did you go to Rockaway, New Jersey

7 in approximately 1980?

8 A Yes.

9 Q What was the problem in Rockaway, New Jersey?

10:08:00 am 10 A MTBE and diisopropyl ether had been found in the

11 municipal water supply for Rockaway, New Jersey.

12 Q And why as a Shell Oil Company employee were you

13 interested in that?

14 A There was an indication that that, the concentrations

10:08:30 am 15 of those oxygenates, those oxygenates in the water supply,

16 were potentially from one of our service stations located

17 upgradient of the site.

18 Q Didn't you confirm that Shell was the source of that

19 problem?

20 A We confirmed that we were part of that problem.

21 Q In 1980?


23 Q Okay. And during that investigation were you in charge

10:09:00 am 24 of that investigation on behalf of Shell?

25 A Yes.
Q And did you determine during that investigation that there were complaints about the taste and odor of water from that well that was operated by the municipality involved?

A Yes.

Q Who were the taste, who was making the taste and odor complaints?

A I was told that some people which were served by that utility had made those complaints.

Q And did you determine what concentration of MTBE was present in their drinking water in some way?

A I believe we did. I don't recall specifically what those concentrations were in their drinking water.

Q Are we talking about parts per billion?

A Yes.

Q So is it fair to say that by 1981 Shell Oil Company knew that MTBE and its gasoline could contaminate public drinking water supplies?

A Yes.

Q And is it also fair to say that they knew by that time that it created taste and odor problems in public drinking water supplies?

A Yes.

Q And did you report those facts to Shell management?

A Yes.

Q How did you do that?
We had, I believe as part of our investigation, the results of that investigation were reported to both retail and environmental affairs management.

Q What is retail?

A By "retail" I mean the management that was responsible for the engineering for service station sites.

Q Okay. And what is the environmental part of the business that you referred to at the time?

A The environmental affairs group at the time was the corporate environmental affairs group which is responsible for corporate environmental activities.

Q Did you publish a paper in the professional literature concerning your findings at Rockaway, New Jersey?

A I don't recall specifically publishing a paper on Rockaway.

Q Do you recall preparing an MTBE White Paper?

A I recall participating in development of a draft MTBE White Paper.

(Thereupon a document was marked by the reporter as Exhibit 1 for identification.)

MR. MILLER: Q I'm going to show you a document I'll mark as Exhibit 1. It's entitled, "Impact of MTBE on groundwater" under the heading, "MTBE White Paper," and you're listed as the first author. And it has attached to it a depiction of plumes and a list of seven references.