

MR. ROGERS, EXAM. BY MR. MERRICK

1 that it was based on using some novel technology?

2 A. Yes. The technologies had -- were all known, but
3 they possibly -- there were not many, if any,
4 demonstration cases of most or all of them being
5 undertaken and used at the same time.

6 Q. Yes.

7 A. So that that would be one definition of novelty that
8 would come from my memory of reading the documents.
9 Particularly the Kilborn assessment.

10 Q. Are you able to give an expression or an opinion as
11 to what you took those studies to be? We've heard a lot
12 of terms about them being feasibility studies.

13 A. Yeah.

14 Q. Sort of a initial idea of how you could do it so
15 that you could make a decision whether you really wanted
16 to commit to the project.

17 A. Project assessment documents. It says the geology
18 is appropriate or not. The resources that you're looking
19 for are there, we think. Here's the engineering that
20 would probably be appropriate to apply. And so you had
21 surrounded most of the topics a reasonable person would
22 expect to see canvassed in those documents.

23 But they really are, what I describe as "project
24 level support." They would say this is appropriate to
25 satisfy yourself that you can proceed.