

Deposition Testimony of:

Daniel Barron

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Page 7:10 to 7:12

00007:10 DANIEL CLARK BARRON, III,
11 was called as a witness by the Plaintiffs and,
12 being first duly sworn, testified as follows:

Page 8:25 to 9:02

00008:25 Q. Would you go ahead and introduce
00009:01 yourself, please?
02 A. My name is Daniel Clark Barron, III.

Page 9:14 to 11:08

00009:14 Q. Okay. And who do you work for?
15 A. Transocean.
16 Q. You still work for them?
17 A. Yes, sir.
18 Q. How long have you been with Transocean?
19 A. Approximately two years.
20 Q. Two years as of now, or two years as of
21 the blowout?
22 A. As of the blowout.
23 Q. Okay. And sti -- you're still employed
24 by Transocean?
25 A. M-h'm.
00010:01 Q. What do you do for Transocean?
02 A. I'm a Floorhand.
03 Q. And you -- you're a Floorhand now --
04 A. Yes.
05 Q. -- as well as at the time of the blowout?
06 A. Yes.
07 Q. And how long had you been a Floorhand at
08 the time of the blowout?
09 A. Three weeks.
10 Q. Had you been on the DEEPWATER HORIZON the
11 whole time?
12 A. Yes.
13 Q. Was it basically the end of your hitch?
14 A. Yes, sir.
15 Q. Okay. So your hitch began three weeks
16 before, and that was the first time you came on
17 as a Floorhand?
18 A. Yes, sir.
19 Q. Okay. What had you done before that at
20 Transocean?
21 A. I was a Roustabout.
22 Q. Okay. And what did -- when were you a
23 Roustabout?
24 A. Did you want dates, or --
25 Q. Approximately.
00011:01 A. My first day was Christmas, I think it
02 was 2009, up until the three weeks before the
03 accident.

04 Q. And -- and Christmas of 2009 is when you
05 first went to work for Transocean?
06 A. It was my first day on the rig, sir.
07 Q. On the DEEP --
08 A. DEEPWATER HORIZON.

Page 13:10 to 14:20

00013:10 Q. And then Christmas of 2008, you went
11 aboard the DEEPWATER HORIZON?
12 A. Yes, sir.
13 Q. So that was the first vessel and the only
14 vessel that you were on with Transocean from the
15 time of your hire until the time of the blowout?
16 A. Yes, sir.
17 Q. Di -- di -- what did you do before
18 working for Transocean?
19 A. I did construction work.
20 Q. So you -- not in the oil field at all?
21 A. No.
22 Q. When you went to work for Transocean,
23 what kind of training did they give you?
24 A. We went through TOPS. We did --
25 Q. TOFS, T -- T-O-F-S?
00014:01 A. T-O-P-S.
02 Q. T -- and what is that?
03 A. That's their training. I think it was a
04 week-long course, if I'm not mistaken, that you
05 actually stay in a -- a facility, and they --
06 they teach you basically about the rig and what
07 you need to do on the rig, and a Sa -- Safety
08 Programs.
09 Q. Now, was the rig that you were being
10 trained on similar in design to the DEEPWATER
11 HORIZON?
12 A. It wasn't a rig that they trained us on.
13 It was in a facility.
14 Q. Like a simulator?
15 A. It would be a classroom.
16 Q. Okay. How did that relate to the
17 DEEPWATER HORIZON?
18 A. Basically, it was just like teaching us
19 how to, you know, tie knots, and teaching us the
20 safety protocol, that -- that type of stuff.

Page 15:23 to 16:21

00015:23 Q. Okay. What were your responsibilities as
24 a Floorhand on the DEEPWATER HORIZON?
25 A. Drilling the wells, cleaning up, making
00016:01 sure my work area was clean, that sort of stuff.
02 Q. Who did you report to?
03 A. I reported to Dewey Revette.
04 Q. And who was he?

05 A. He was my Driller.
 06 Q. So did you do basically what Mr. Revette
 07 told you to do?
 08 A. Pretty much.
 09 Q. And were you with him a good part of the
 10 time?
 11 A. No, no.
 12 Q. So he would tell you what to do and where
 13 to go, and -- and then you would do it and then
 14 report back to him when it was done?
 15 A. Yes, sir.
 16 Q. Did you get along okay with him?
 17 A. Yes, sir.
 18 (Exhibit No. 7619 marked.)
 19 Q. (By Mr. Lemmon) What kind of a Manager
 20 was he?
 21 A. He was great.

Page 17:03 to 17:22

00017:03 Q. Okay. Who -- who in particular did you
 04 work with during --
 05 A. Shane Roshto.
 06 Q. Okay.
 07 A. He was my mentor.
 08 THE COURT REPORTER: What's his
 09 name?
 10 THE WITNESS: Shane Roshto.
 11 Q. (By Mr. Lemmon) R-o-s-h-t-o, I think.
 12 A. Yeah. Yeah, he was my mentor on the rig,
 13 as a Floorhand.
 14 Q. Okay. He -- was he also a Floorhand?
 15 A. Yes, sir.
 16 Q. And what does it mean to -- was he like
 17 officially assigned to you as a mentor?
 18 A. Yes.
 19 Q. And what does that mean?
 20 A. Basically he teaches me the role of being
 21 a Floorhand, you know, I kind of shadow him, and
 22 he shows me how to do things correctly.

Page 18:01 to 19:02

00018:01 Q. In other words, can you describe the
 02 relationship? Was he a good mentor?
 03 A. Yeah, he was great. He was --
 04 Q. Okay.
 05 A. -- very patient.
 06 Q. Okay. What about co-workers, other
 07 people who had the same job as you did?
 08 A. I worked with Caleb Holloway, you know,
 09 Adam Weise. There's -- there's a whole group of
 10 guys on the floor.
 11 Q. Okay. And on April the 20th, you were

12 actually working with Caleb Holloway?
13 A. Yes, sir.
14 Q. And were you also working with
15 Mr. Roshto?
16 A. Me and Mr. Roshto had actually changed
17 places, and he went to work with Adam, and then I
18 went up and worked with Caleb.
19 Q. So how many Floorhands were on duty at
20 the time of the blowout?
21 A. There's me, Adam, Shane, Caleb, Karl.
22 THE COURT REPORTER: Last name?
23 THE WITNESS: Kleppinger.
24 A. I think that -- think that was all the --
25 Q. (By Mr. Lemmon) So y'all were on that
00019:01 particular shift at the time of the blowout?
02 A. Yes, sir.

Page 19:12 to 19:20

00019:12 Q. So whatever Mr. Revette needed you to do,
13 that's what you did?
14 A. Right.
15 Q. And likewise for the other Floorhands who
16 were assigned to that shift?
17 A. Correct.
18 Q. Did you have in your work as a Floorhand
19 any interaction with people at BP?
20 A. Very little.

Page 19:25 to 20:20

00019:25 Q. So when you say "very little," can you
00020:01 tell me what that means?
02 A. Other than Pre-Tour Meetings and seeing
03 them, when we did our meetings before we started
04 when Dewey delegated our tasks for the day, they
05 sometimes would come in, and if we had a special
06 operation going on, they would come in. But
07 other than that, I rarely, rarely ever talked to
08 him.
09 Q. And was it -- would it be unusual or
10 would it be normal to have BP people at the
11 Pre-Tour Meetings?
12 A. It would be -- it would be typical.
13 Q. Okay. How many people would typically be
14 at Pre-Tour Meetings?
15 A. Typically everybody from each Department
16 should be there.
17 Q. So at least one --
18 A. Person.
19 Q. -- Driller and one Toolpusher and --
20 A. Right.

Page 21:01 to 22:08

00021:01 Q. Okay. Before we leave the training, I'm
02 going to show you 7619.
03 A. Okay.
04 Q. (Tendering.)
05 A. (Reviewing document.)
06 Q. I'll ask you to take a look at that.
07 (Discussion off the record.)
08 A. Okay.
09 Q. (By Mr. Lemmon) These documents were
10 produced by Transocean and appear to be copies of
11 the certifications that you received and may
12 correspond with the previous document.
13 A. Okay.
14 Q. The top one is the OJT Notification or
15 Completion Form for the Floorman. Can you
16 describe what was involved in getting this
17 Certification?
18 A. They -- they had the -- a book, and it
19 has different tasks in the book on things that
20 you need to know before you're a Floorhand. And
21 then they have a question and answer page in the
22 back, it's like a study guide, and at every step
23 along the way, every question or everything that
24 you need to know, you have to have signed off by
25 either a Driller or an Assistant Driller, before
00022:01 you can take your test. It has to be completed
02 in the book.
03 Q. Okay. So you completed each of the steps
04 in the process, and then had a Driller or an
05 Assistant Driller sign off at each of those steps
06 along the way, and then ultimately, you got the
07 Certificate when you finished all of them?
08 A. Right.

Page 22:14 to 23:24

00022:14 Q. Okay. Prior to the blowout, do you
15 remember there being any other problems on the
16 DEEPWATER HORIZON?
17 A. As in what kind of problems? I mean --
18 Q. Well, maybe do you know what a kick is?
19 A. M-h'm.
20 Q. Do you remember that being an issue on
21 the DEEPWATER HORIZON?
22 A. We -- we had lots of little minikicks.
23 We lost a drillstring. We had high gas counts,
24 which was unusual for me. I've never seen that
25 before.
00023:01 Q. Did you have any involvement in
02 responding to those?
03 A. No.
04 Q. You just heard about it basically from
05 other people talking about what had happened?

06 A. With the drillstring, yeah. I was -- I
 07 don't even think I was on the rig when that
 08 happened, when they lost the drillstring. But as
 09 far as the gas goes, I mean, I was there, on the
 10 rig, when that was happening.

11 Q. And did you play any part in responding
 12 to them?

13 A. No, because all -- all you do is --
 14 it's -- this is a warning to let people know that
 15 you can't smoke or do welding or, you know,
 16 anything that could cause a spark.

17 Q. So there would be some kind of an alarm
 18 that went off?

19 A. Yeah. It was a -- it was a flashing
 20 light, and they would call out the gas content
 21 over the intercom.

22 Q. And do you recall there being an alarm or
 23 a flashing light right before the rig exploded?

24 A. No.

Page 24:13 to 24:21

00024:13 Q. (By Mr. Lemmon) Okay. Well, let me --
 14 let -- let's approach it from a different way:
 15 At some point in an interview, you might have --
 16 I believe I'm quoting you, to say, "There was
 17 always like an ominous feeling this well didn't
 18 want to be drilled. It just seemed like we were
 19 messing with Mother Nature."

20 A. Right.

21 Q. What were you referring to there?

Page 24:23 to 26:13

00024:23 A. Just because of the -- the high gas
 24 contents --

25 Q. (By Mr. Lemmon) Oh --

00025:01 A. Oh, I'm sorry.

02 Q. -- excuse me one second.

03 Is that an accurate quote of what -- what
 04 you said?

05 A. Yes, sir.

06 Q. Okay. So now what were you -- what did
 07 you mean by that?

08 A. You know, we had a lot of issues on the
 09 well, such as losing a drillstring, the gas.
 10 Just -- it just -- you know, we heard from, you
 11 know, the Drillers that we were taking it over
 12 from another rig because they couldn't do it, so
 13 they sent in us to do it.

14 Q. Another staff or another --

15 A. Another --

16 Q. -- vessel?

17 A. Another vessel.

18 Q. Okay. And do you know why they
19 couldn't -- that other vessel couldn't do it?
20 A. No, I don't.
21 Q. Okay. It's just something that you
22 heard?
23 A. Yeah.
24 Q. You weren't on that other vessel?
25 A. No, sir.
00026:01 Q. When you said the gas, like how
02 frequently was a kick or gas a problem?
03 A. Well, they -- the -- we constantly
04 monitor the gas content and call it out when it
05 got too high. I mean, I couldn't tell you how
06 often they did it, but, you know, it was unusual
07 for us to hear it. You know, we weren't used to
08 hearing it and then --
09 Q. So it wasn't every day?
10 A. No. No, sir.
11 Q. Okay. And so would it be relatively
12 unusual for it to happen, but it did happen?
13 A. Yes.

Page 26:15 to 27:04

00026:15 Q. (By Mr. Lemmon) Do you have any idea
16 during the three weeks that you were on the
17 vessel how many times the lights flashed or the
18 alarms went off or that there was a kick?
19 A. No, sir.
20 Q. Was it more than five?
21 A. Yes, sir.
22 Q. Was it more than ten?
23 A. Yes, sir.
24 Q. You think it was more than 15?
25 A. No, sir.
00027:01 Q. Okay. So somewhere between 10 and 15
02 times the alarm and lights went off indicating
03 that there was a dangerous level of gas?
04 A. Yes, sir.

Page 27:12 to 28:09

00027:12 Q. (By Mr. Lemmon) Now, can you tell me a
13 little bit about the -- the safety culture of the
14 Transocean people aboard the DEEPWATER HORIZON
15 when you were there?
16 MR. KINCHEN: Object to form.
17 A. What do you want to know? I mean, we --
18 we did -- you know, we had the mandatory START
19 card we had to write every day.
20 Q. (By Mr. Lemmon) What does that mean?
21 A. A START card is a -- is a -- is an
22 observation, where you are supposed to walk
23 around and, you know, do a START observation,

24 just to watch somebody doing their job. Then you
25 write a START card on whether they did a good job
00028:01 or bad job. And if they did a bad job, you're
02 supposed to approach them and say, "Hey, you
03 know, I see you doing this, but you could have
04 been doing this safer."
05 Q. And were you comfortable doing that and
06 talking with other people who had been there
07 longer than you and, perhaps, being critical if
08 you felt you needed to?
09 A. Yes, sir.

Page 28:11 to 28:14

00028:11 Q. (By Mr. Lemmon) Would you -- how would
12 you describe the level of concern with safety
13 aboard the DEEPWATER HORIZON among Transocean
14 people?

Page 28:16 to 28:19

00028:16 A. With Transocean people? You know, I
17 think it was -- I think they wanted to do the
18 right thing, but sometimes you just got to do
19 what you got to do.

Page 29:02 to 30:03

00029:02 Q. (By Mr. Lemmon) Okay. What -- what --
03 are you referring to anything in particular?
04 A. Just, you know, if -- if -- if a job had
05 to be done and it had to get done, sometimes
06 safety was overlooked to get the job done.
07 Q. Okay. You're going to have to help me
08 with that. How -- can you give me an example of
09 how safety might have been overlooked?
10 A. Okay. Sure. We do PMs, which is a
11 pre -- preventive maintenance, on most things on
12 the rig, you know, whether you're a Roustabout,
13 Floorhand. In one instance we were doing a PM on
14 the -- I think it was the port crane -- it was
15 the port crane -- and we were doing the PM. We
16 noticed one of the brackets, one of the support
17 brackets was broken. It was rusted through. So
18 we noted it, wrote a START card, and turned it
19 in, and nothing ever happened with that.
20 Q. Okay. So --
21 A. So the next time, the same PM, same
22 stuff, same START card, nothing ever happened of
23 it.
24 Q. Okay. So that -- what you're referring
25 to when you mention that is that there may have
00030:01 been some maintenance that was deferred, just not

02 done at the time that it was noted?
03 A. M-h'm.

Page 30:05 to 30:11

00030:05 Q. (By Mr. Lemmon) Okay. Did you get the
06 feeling that this well just had to be drilled as
07 quickly as possible no matter what?
08 A. No, sir.
09 Q. Did you get the feeling that there was --
10 were some time considerations with getting the
11 well drilled as soon as possible?

Page 30:13 to 30:19

00030:13 A. Yes.
14 Q. (By Mr. Lemmon) And how -- where did that
15 come from?
16 A. Just from chitter-chatter amongst the
17 guys; you know, "We broke a drillstring. We got
18 stuck, kicks. You know, we've been on that well
19 way too long."

Page 31:13 to 31:17

00031:13 Q. (By Mr. Lemmon) No -- none of them ever
14 said that somebody had told them, in particular,
15 that they needed to hurry up and get the well
16 done?
17 A. No, sir.

Page 33:09 to 35:13

00033:09 Q. Okay. Tell -- tell us about the -- the
10 THINK Plan.
11 A. The THINK Plan is -- it's a -- it's a
12 piece of paper that you fill out in order to
13 start your job. It -- it tells of all the
14 hazards, you know, it -- it -- it just tries to
15 make you aware that -- what can happen. You have
16 to write out basically what you're going to be
17 doing for the job, and then everybody signs it
18 and agrees that that's what's going to happen.
19 Q. So in your particular case, Mr. Revette
20 would give you your assignment, and then you
21 would write out your THINK Plan and then he --
22 show it to him, and then he would sign off on it,
23 and then you would go do whatever it is that he
24 asked you to do?
25 A. Yes, sir.
00034:01 Q. Why don't you tell us about the Pre-Tour
02 Meeting on April the 20th, before you went on
03 your shift.

04 A. Came in, sat down. I sat in the front
 05 row next to Caleb. Dewey was giving the meeting,
 06 and Jimmy Harrell was sitting next to him.
 07 And --
 08 Q. Okay. He's the OIM?
 09 A. He's the OIM, yes, sir.
 10 And they were discussing what was -- they
 11 were telling us what was happening and what we
 12 were going to be doing.
 13 Q. Do you remember what it was they were
 14 telling you?
 15 A. No, I don't really remember.
 16 Q. Okay. Do you remember who else might
 17 have been at that meeting besides Dewey and
 18 Mr. Harrell and Caleb?
 19 A. I -- I mean, all the Floorhands, all the
 20 drill crew was there, all the Roustabouts were
 21 there. Some people from the marine side were
 22 there. BP guys were there, you know. And maybe
 23 the mech -- some of the mechanics and
 24 electricians were there.
 25 Q. Do you remember there being some kind of
 00035:01 a disagreement between the BP people and Dewey?
 02 A. Yes, I do, actually.
 03 Q. Can you tell us about that?
 04 A. They -- they were -- I -- I think Dewey
 05 was -- was explaining what was going on and what
 06 we were going to be doing. And the BP Company
 07 Man, he kind of spoke up and said, "Well, we're
 08 going to be doing it this way." And he --
 09 Q. And that -- that way that the BP Company
 10 Man said was basically overriding what Dewey said
 11 was --
 12 A. Yes.
 13 Q. -- going to be done?

Page 35:15 to 36:04

00035:15 Q. (By Mr. Lemmon) Okay.
 16 A. And then Jimmy came in and said, "Well,
 17 we've never done something like this before.
 18 We've -- I don't remember ever doing this before,
 19 and I don't think it's going to work."
 20 Q. So "Jimmy" is Mr. Harrell?
 21 A. M-h'm --
 22 Q. And --
 23 A. -- yes, sir.
 24 Q. -- and he's the OIM?
 25 A. Yes, sir.
 00036:01 Q. And he was saying to the BP person,
 02 "We've never done it the way that you're
 03 suggesting"?
 04 A. Correct.

Page 36:06 to 36:13

00036:06 Q. (By Mr. Lemmon) Okay. Do you remember
07 what it was in particular that they were talking
08 about?
09 A. It was about displacing the riser with
10 seawater instead of a -- the drilling fluid,
11 which we call "mud."
12 Q. Okay. Can you -- and what was the BP
13 person saying was going to be done?

Page 36:15 to 37:03

00036:15 A. He said we were going to use the -- the
16 seawater, saltwater, instead of the mud.
17 Q. (By Mr. Lemmon) Okay. And do you -- do
18 you understand the mechanics of using seawater
19 instead of mud?
20 A. I have no clue.
21 Q. Okay. But you just remember that there
22 was a discussion between --
23 A. Correct.
24 Q. -- them?
25 A. M-h'm.
00037:01 Q. And would you describe the discussion as
02 an argument, a heated battle? How -- how would
03 you describe it?

Page 37:05 to 37:13

00037:05 A. Yeah. I -- I mean, they were going back
06 and forth pretty -- pretty heavy. I mean, it was
07 more of a -- you know, Jimmy didn't like what was
08 going on, and I really kind of felt bad for him,
09 because it -- he looked like he -- I mean, the BP
10 Man won, basically.
11 Q. (By Mr. Lemmon) He -- did the BP Man say,
12 "I'm in control, and this is the way it's going
13 to be"?

Page 37:15 to 37:22

00037:15 A. No, I don't remember him saying that.
16 But just the way that they were talking, the guy
17 was like, "Well, this is what I got from, you
18 know, the beach, you know, this is what they told
19 me that this is what's going to happen."
20 Q. (By Mr. Lemmon) And "they" meaning the BP
21 higher-ups?
22 A. Yes, sir.

Page 37:24 to 37:25

00037:24 Q. (By Mr. Lemmon) And how -- how did the
25 battle end?

Page 38:02 to 38:15

00038:02 A. Jimmy, you know, basically gave in and
03 said, "Well, you know, I guess that's what those
04 are -- pinchers are for." Meaning --
05 Q. (By Mr. Lemmon) What --
06 A. -- the --
07 Q. -- does that mean?
08 A. He -- we have a -- the BOP, the annulars
09 are supposed to, you know, shear the pipe. He
10 was referring to those.
11 Q. So what does -- what does that mean? I
12 mean, does that -- is he saying, "I don't like
13 it, and if the rig blows up, then we have to use
14 the BOP and the -- the shears"?
15 A. Yes, sir.

Page 38:17 to 38:22

00038:17 Q. (By Mr. Lemmon) And you specifically
18 remember Jimmy saying that?
19 A. Yes, m-h'm.
20 Q. Did -- did Jimmy say that out loud, like
21 to where everybody would hear it, or did he say
22 it to somebody in particular, or do you know?

Page 38:24 to 39:02

00038:24 A. Yeah, I mean, he said it pretty clear. I
25 mean, I was in the front row, so I could hear it
00039:01 pretty well.
02 Q. (By Mr. Lemmon) Where was Jimmy seated?

Page 39:08 to 39:16

00039:08 Q. Okay. So he's pretty close to you?
09 A. Yeah.
10 Q. And did you understand what -- what Jimmy
11 meant when he said that?
12 A. When he said about the pinchers?
13 Q. Correct.
14 A. Yeah, I did, yes, sir.
15 Q. Was that towards the end of the meeting?
16 A. It was the very end.

Page 40:02 to 40:03

00040:02 Q. (By Mr. Lemmon) During that battle, did
03 anyone else agree with the BP Company Man?

Page 40:05 to 40:08

00040:05 A. No, sir.
 06 Q. (By Mr. Lemmon) So it was the BP Company
 07 Man against everyone else who was there, as far
 08 as the way the argument went?

Page 40:10 to 40:13

00040:10 A. Yes, sir.
 11 Q. (By Mr. Lemmon) And did you have the
 12 impression that, ultimately, BP made that final
 13 decision?

Page 40:15 to 40:15

00040:15 A. Yes.

Page 41:09 to 42:14

00041:09 Q. (By Mr. Lemmon) All right. After you
 10 left from the Pre-Tour Meeting, what happened?
 11 What did you do next?
 12 A. I went down, got dressed, went back up,
 13 kind of was talking to the guys, like, asking
 14 them about what happened in the Pre-Tour Meeting,
 15 with work.
 16 Q. What did you ask them about?
 17 A. I was trying to figure out what they were
 18 fighting about in the -- in the Pre-Tour Meeting.
 19 I was trying to see what -- what was the problem,
 20 because you could tell there was tension.
 21 Q. So you were trying to learn about what
 22 the displacement issue was?
 23 A. M-h'm.
 24 Q. Okay. You have to answer "Yes" or "No."
 25 A. Yes, sir.
 00042:01 Q. Okay.
 02 A. Sorry.
 03 Q. And who did you talk to about that?
 04 A. I talked to Caleb and Adam.
 05 Q. And what did they tell you?
 06 A. They really kind of just explained it as
 07 best they could.
 08 Q. But do you remember --
 09 A. I don't remember.
 10 Q. -- what it was that they said?
 11 A. No, sir.
 12 Q. So as you sit here, you don't really
 13 understand what that issue is?
 14 A. No, sir, I don't.

Page 44:09 to 44:21

00044:09 Q. (By Mr. Lemmon) And do you remember,
10 other than cleaning and maintenance, what the
11 tasks were for that particular day?
12 A. I knew I had to do hose watch --
13 Q. Which means what?
14 A. Hose watch is when we were taking the mud
15 off the boat -- off the rig, I'm sorry, and
16 putting it onto the BANKSTON, and anytime mud is
17 transferred from the rig to a vessel, the hose --
18 I mean, literally, you just sit there and stare
19 at the hose, in case any of it goes into the
20 water. And then if it does, you're supposed to
21 make phone calls and -- to the Deckhand.

Page 45:02 to 48:03

00045:02 Q. So you -- what -- do you remember any
03 other tasks besides hose watch?
04 A. Hose watch. You know, we did some
05 cleaning. We cleaned the rig floor.
06 We emptied the -- the -- the catch pans
07 underneath the rotary table.
08 We were spray-painting, color-coding all
09 the lifting equipment.
10 Q. Okay. When did you do the hose watch?
11 A. I believe that was really early in --
12 in -- in my shift. I don't remember the exact,
13 specific time, but I would -- I would say it was
14 towards the beginning of my shift.
15 Q. And, I'm sorry, you might have told me
16 this before, but what time did your shift start
17 that day?
18 A. 11:00.
19 Q. 11:00 a.m.?
20 A. 11:00 a.m. Around 11:00 a.m. is
21 Pre-Tour, and then I usually get up on the floor
22 by 11:30.
23 Q. Okay. And so the hose watch was sometime
24 during the -- during the morning or early --
25 A. Yeah.
00046:01 Q. -- afternoon?
02 A. Yes, sir.
03 Q. Okay. And after you finished on the hose
04 watch, did someone else take over that
05 responsibility?
06 A. No. I -- I was on the hose watch, and
07 they called me -- they stopped the flow of mud,
08 because there was a -- a problem up on the rig
09 floor. And Steve -- I think it was -- I believe
10 it was Steve Curtis came and got me to come help
11 out Caleb on the rig floor.
12 Q. And what was the issue there?

13 A. It was a -- a catch pan underneath the
 14 rotary table was filling up with mud, so we had
 15 to clean it out.
 16 Q. And do you know where that was -- that
 17 mud was coming from?
 18 A. No, sir, I don't.
 19 Q. And what did you do with the -- you
 20 cleaned out the mud from the catch pan?
 21 A. Yes, sir.
 22 Q. What did you do with the mud?
 23 A. We typically would take a vacuum hose
 24 down with us and turn on the vacuum and -- and
 25 just vacuum it out.
 00047:01 Q. And do you know where the vacuum went to?
 02 A. To the -- I mean, the vacuum ha -- it has
 03 a big tank --
 04 Q. Okay.
 05 A. -- on deck.
 06 Q. And was that where you were when the --
 07 the rig blew?
 08 A. At the vacuum?
 09 Q. Right.
 10 A. Yes, sir.
 11 Q. So this was -- the task you were doing at
 12 that time was sucking mud out of the catch pan?
 13 A. No, sir.
 14 Q. Okay.
 15 A. The task I was doing at the time was, we
 16 were transferring the mud from the vacuum tank to
 17 a cutting box, because the vacuum was full.
 18 Q. I see. Was this all one continuous task,
 19 from sucking out the catch pan, to the point to
 20 where it filled up with mud, and then taking that
 21 mud and -- or taking that tank and then emptying
 22 it?
 23 A. No, sir. We -- we -- we did it the first
 24 time in the morning. It was sucked out the catch
 25 pans, and then we got called back up to do it
 00048:01 again, and that's when we realized that there
 02 wasn't enough room in the tank, so we had to
 03 empty it.

Page 48:19 to 48:23

00048:19 Q. So you vacuumed out the mud from the
 20 catch pan, and then you went and did another task
 21 and then you had to go back to vacuum out the
 22 catch pan again; is that what you're saying?
 23 A. Yes, sir.

Page 49:08 to 49:11

00049:08 Q. (By Mr. Lemmon) Did you get the sense
 09 that something was going on that was causing the

10 mud to -- to fill up the catch pan like that?
11 A. Yes, sir.

Page 49:14 to 49:20

00049:14 Q. (By Mr. Lemmon) Did anybody say anything
15 about that?
16 A. Caleb said it was odd. He's never done
17 it before, and he's never seen it happen before.
18 Q. He had never seen the catch pan fill up
19 with mud like that?
20 A. Yes, sir.

Page 49:22 to 50:14

00049:22 Q. (By Mr. Lemmon) And then you actually
23 then saw it happen twice?
24 A. Right. Yes, sir.
25 Q. Did -- who -- who assigned the task to
00050:01 you to go and vacuum the catch pan?
02 A. Steve Curtis.
03 Q. And who is he?
04 A. He's the Assistant Driller.
05 Q. And did he assign it to you both times?
06 A. Yes, sir.
07 Q. Do you know whether or not Caleb said
08 anything to anyone about going and vacuuming out
09 the catch pan, like say -- saying that he thought
10 it was odd?
11 A. I -- no, sir.
12 Q. He only said it to you, as far as you
13 know?
14 A. Yes, sir.

Page 51:11 to 52:05

00051:11 Q. Why don't you tell us about what happened
12 at and around the time of the blowout.
13 A. Okay. We -- we were trying to clean up
14 for the -- the BP guys, and the vacuum is full,
15 so I asked Caleb to show me how to use the
16 vacuum.
17 Q. Let me -- let me stop you there.
18 A. Okay.
19 Q. You said -- when you say "clean up for
20 the BP guys," what does that mean?
21 A. Well, we -- we do cleaning up, and the --
22 the -- the tracks and everything were -- were
23 filled with water, so we wanted to suck that out
24 and make it look real clean and nice for
25 everybody.
00052:01 Q. But you're talking about for the BP
02 Executives who were on board the --

03 A. Yes, sir.
04 Q. -- vessel that day?
05 A. Yes, sir.

Page 52:10 to 52:21

00052:10 Q. (By Mr. Lemmon) Okay. And so you asked
11 Caleb to show you how to use the vacuum. What
12 happened after that?
13 A. So he showed -- we went down to the
14 vacuum machine, and he showed me how to reverse
15 everything from suck -- to blow it into a cutting
16 box to empty it, and when we were doing that, you
17 know, he showed me how to do it, I pushed the
18 button, and then I was watching him, and I see
19 mud and stuff flying. I saw him look up, and I
20 went and looked up, and that's when I saw the mud
21 coming out of the derrick.

Page 53:09 to 53:25

00053:09 Q. Okay. And was that something that was
10 unusual to you?
11 A. Yes, sir.
12 Q. Okay. And then what happened?
13 A. We ran up the corner.
14 Q. Could you -- could you smell anything?
15 A. No, not at that time.
16 Q. Okay.
17 A. Huh-uh. We ran up -- ran back up to
18 the -- the rig floor. We came in the back door
19 behind the drillstring. Caleb had a -- a two-way
20 radio on. He was calling Dewey, and there was
21 mud in the -- the seawater and some Chiksan lines
22 that we hooked up to -- to the -- I think it was
23 called a cement head -- was falling down on the
24 floor. So Caleb said, "Let's go to the heavy
25 tool room because there's a -- a roof over it."

Page 54:05 to 54:15

00054:05 Q. Okay.
06 A. So we went back there, and he tried to
07 call Dewey -- went to use the phone to call Dewey
08 in -- in the Drill Shack, because there --
09 there's phones in there. And that's when he
10 turned around and told me he smelled gas.
11 And I said, "Well, what do you want to
12 do?"
13 He said, "Run."
14 Q. Could you smell gas at that point --
15 A. I never smelled gas.

Page 55:04 to 56:13

00055:04 Q. And so when he said to run, where did you
05 go?
06 A. Right in the heavy tool room, there's
07 a -- a door that goes down to the deck, with, you
08 know, a set of stairs. So we -- we ran out and
09 went down to the deck.
10 Q. So you ran up the stairs or down the
11 stairs?
12 A. Down the stairs.
13 Q. Okay. And where does that take you to?
14 A. It takes you to the main deck on the --
15 on the starboard side, the starboard forward.
16 There's a -- a place where they keep like all
17 the -- the drill -- the drill bits and the pipe,
18 and we ran across that, and that's when the power
19 shut down.
20 Q. Okay. Now, when the power shut down, had
21 there been an explosion yet?
22 A. No, sir.
23 Q. Okay. Now, could you hear -- what could
24 you hear going on?
25 A. Oh, man, it was -- it was like an awful
00056:01 like hissing sound. The -- the water and the mud
02 was falling down on us, and then the degasser
03 blew, which was up on top of the deck of the
04 heavy tool room.
05 Q. The degasser blew meaning what?
06 A. Meaning it didn't like explode, but it
07 caught on fire. And Caleb had a light. So we
08 started walking -- you know, started trying to
09 get out of there.
10 Q. Where were you headed to, do you know?
11 A. Where was I headed to?
12 Q. Yeah.
13 A. The lifeboat deck.

Page 57:01 to 57:10

00057:01 kind of frozen. I was just staring up, and I saw
02 the Crane Operator running.
03 Q. Who was that?
04 A. Dale Burkeen.
05 Q. Okay.
06 A. "Bubba."
07 And that's when the -- the rig floor,
08 heavy tool room area blew. We --
09 Q. Was that the first explosion?
10 A. I believe it was.

Page 57:25 to 58:09

00057:25 Q. Well, stop. Before I --

00058:01 A. Sure.
02 Q. -- go there, how long is it between the
03 time when the lights went out and the explosion
04 happened?
05 A. It seemed like forever. I have no idea,
06 to be honest with you.
07 Q. Okay. Do you think it was maybe a matter
08 of minutes or --
09 A. H'm, maybe -- maybe a minute, maybe.

Page 59:15 to 60:17

00059:15 second or third explosion, because we were
16 turning the corner, and the -- where the galley
17 area is just came down in on us, on -- on down
18 the stairs. So that blocked our exit from there.
19 So we turned and ran another way and got up to
20 the -- to the lifeboat station via the -- where
21 the smoke station was.
22 Q. Okay. Now, the -- the first explosion
23 would have been the degasser, or the front --
24 whether it was an explosion or not --
25 A. Right.
00060:01 Q. -- the first event was a degasser?
02 A. Right.
03 Q. The second one was the explosion where
04 you saw Dale get killed, and then --
05 A. Right.
06 Q. -- the third was when the galley area
07 fell into the path of where you were going?
08 A. Yes, sir.
09 Q. And from there, where did you go?
10 A. I ran up to the lifeboat station. And I
11 guess I was in such a state of panic I couldn't
12 even remember which lifeboat I was supposed to be
13 in. And there was two guys trying to take a
14 muster, which is a list of who was supposed to be
15 on what lifeboat. And, you know, he couldn't see
16 the list because it was dark. He didn't have a
17 flashlight.

Page 60:20 to 60:25

00060:20 Q. Okay.
21 A. And I was trying to get to see which
22 lifeboat I was supposed to be on. And finally I
23 just said, "I'm just going to get in one," you
24 know. So I -- I jumped in on the one on the
25 left.

Page 61:24 to 61:25

00061:24 Q. Okay. And where did you go there?

25 A. Went to the DAMON B BANKSTON.

Page 63:24 to 63:25

00063:24 Q. Were there enough phones available on the
25 DAMON BANKSTON?

Page 64:05 to 64:14

00064:05 A. They had satellite phones.
06 Q. Did they let you use them?
07 A. No, sir.
08 Q. Do you know why?
09 A. No, sir.
10 Q. While you were at -- and you say they had
11 them, this is Transocean had them, Transocean
12 people had them, or do you know?
13 A. Whoever was up on the Bridge of the DAMON
14 BANKSTON had them.

Page 74:15 to 74:25

00074:15 Q. I want to ask you, from the -- the
16 totality of your time that you worked on the
17 DEEPWATER HORIZON, in any capacity, do you recall
18 if the rig had previously done Temporary
19 Abandonments of wells that it had drilled?
20 A. Not that I'm aware of.
21 Q. So as far as you know, this was the first
22 time, while you were on the rig, that the
23 DEEPWATER HORIZON had done a Temp -- Temporary
24 Abandonment?
25 A. Yes, ma'am.

Page 75:05 to 75:13

00075:05 Q. Okay. And do you recall, again, your
06 to -- the totality of your tenure on the rig, any
07 times at which the rig crew had performed
08 something called a negative pressure test?
09 A. No, no.
10 Q. Do you know if the rig crew performed a
11 negative pressure test at any point on April
12 20th?
13 A. I do not know.

Page 76:16 to 77:21

00076:16 Q. And you talked a little bit earlier today
17 about the gas levels --
18 A. M-h'm.
19 Q. -- that you observed while you were on

20 the rig and while it was drilling the Macondo
 21 Well. And I think you said there was something a
 22 little bit unusual about them in your experience?
 23 A. I just -- I had never seen them before --
 24 Q. Oh, okay.
 25 A. -- get to that level, to where other
 00077:01 people on the rig were talking about it. I mean,
 02 normal levels were -- were normal.
 03 Q. Okay.
 04 A. And then to see them go above what they
 05 were on the rig, I can't exactly remember the
 06 number, but people were like, "Wow, that's high."
 07 Q. Okay. So what was unusual about the gas
 08 levels you experienced on -- on the Macondo, it
 09 was the lev -- the height -- the level, the
 10 extent of them --
 11 A. Yes, ma'am.
 12 Q. -- how high the gas level was. Okay.
 13 And what about the frequency? Was it
 14 more frequent or less frequent than you had
 15 experienced on other wells?
 16 A. Yes, ma'am, it was more frequent.
 17 Q. So it was unusual in both of those
 18 regards --
 19 A. Correct.
 20 Q. -- more often and higher?
 21 A. Yes, ma'am.

Page 80:04 to 80:08

00080:04 Q. Do you recall any discussions among the
 05 rig crew generally about whether there was
 06 anything about this well that made it easier or
 07 harder to anticipate kicks?
 08 A. No, ma'am.

Page 85:16 to 85:22

00085:16 Q. (By Ms. Lawrence) Well, I think you said
 17 the Floorhands reported to Dewey Revette, the
 18 Driller?
 19 A. Correct, yes.
 20 Q. But in terms of like everybody on the rig
 21 floor, was there someone out there who was like
 22 the -- ultimately in charge?

Page 85:24 to 86:07

00085:24 A. It would just been Dewey. I mean, you
 25 had a Toolpusher.
 00086:01 Q. (By Ms. Lawrence) Uh-Huh.
 02 A. He was over Dewey.
 03 Q. Okay.

04 A. He was like Dewey's Supervisor. And then
05 you have the OI -- the Senior Tool -- Toolpusher.
06 Q. Okay.
07 A. And then the OIM.

Page 87:07 to 87:13

00087:07 Q. Did -- was there ever any discussion or
08 did anyone, any other members of the rig crew
09 that you worked with share with you their
10 opinions of any of the individual BP Company Men,
11 for example, "Oh, this guy is really good, I have
12 a lot of respect for him," or that -- "I think
13 that guy's new," that kind of thing?

Page 87:15 to 87:21

00087:15 A. Yeah. I mean, we talked about them every
16 once in a while.
17 Q. (By Ms. Lawrence) Okay.
18 A. I think Sepulvado was probably the most
19 respected.
20 Q. Okay. Anyone who -- anyone who was
21 regarded as less than competent by the rig crew?

Page 87:23 to 88:09

00087:23 A. No.
24 Q. (By Ms. Lawrence) Okay. I just want to
25 go back and revisit for a moment your description
00088:01 of events on April 20th of 2010.
02 A. (Nodding.)
03 Q. And just starting with the -- the
04 Pre-Tour Meeting for that day, and it sounded
05 like that day you must have been on a night shift
06 because you were coming on shift --
07 A. M-h'm.
08 Q. -- at 11:00 a.m.?
09 A. Yes, ma'am.

Page 89:01 to 90:02

00089:01 Q. Okay. I think you said, for the most
02 part, Dewey Revette was like running the meeting
03 or -- or speaking -- making the Presentation --
04 A. Yes.
05 Q. -- for the most part. And was that
06 usual?
07 A. Typical, yes.
08 Q. And I want you to tell me everything you
09 can recall about what specifically Dewey said.
10 He was talking about a procedure that was going
11 to be taking place, is that -- displacement or

12 something?

13 A. Yeah. I mean, I really don't remember
14 exactly what he was talking about. I don't -- I
15 didn't know what he was talking about.

16 Q. Okay.

17 A. And so I was just listening. I was more
18 trying to figure out what he was talking about
19 when he was saying it.

20 Q. Okay. So you don't remember
21 specifically --

22 A. No, ma'am.

23 Q. -- how he described it? Okay.

24 A. Huh-uh.

25 Q. Okay. But at some point, you said the BP
00090:01 Representative indicated that there was something
02 different or going to be a change of some kind?

Page 90:04 to 90:06

00090:04 A. Correct.

05 Q. (By Ms. Lawrence) Tell me everything you
06 remember about that. Did he interrupt?

Page 90:08 to 90:16

00090:08 A. Yes, he did. Yeah, he -- he interrupted
09 when Dewey was talking, and said that he --
10 there's a change of plans. And then him and
11 Dewey, you know, were speaking to each other, and
12 that's when the -- then I think Jimmy Harrell,
13 who was the OIM, stepped in.

14 Q. (By Ms. Lawrence) And what happened then?
15 When -- how did that happen, Jimmy Harrell, the
16 OIM, stepped in? What did he say?

Page 90:18 to 90:23

00090:18 A. He -- he was basically saying, you know,
19 he didn't like -- he was disagreeing with what
20 the BP man was saying.

21 Q. (By Ms. Lawrence) Okay. And do you
22 remember what he said he didn't like about the --
23 the change?

Page 90:25 to 91:07

00090:25 A. I think it was he didn't like it because
00091:01 we -- I don't think we had ever done it before,
02 the way the BP man was -- was talking about doing
03 it.

04 Q. (By Ms. Lawrence) And you said that --
05 something about it involved displacement of the
06 riser to seawater instead of mud?

07 A. Right.

Page 93:20 to 93:24

00093:20 Q. Do you recall any discussion, outside of
21 the catch pan vacuum tank overflow situation you
22 were dealing with, any discussion of any
23 particular problems or concerns that people
24 seemed to be dealing with?

Page 94:01 to 94:08

00094:01 A. I don't know what it was, but I know
02 their -- they had some alarms go off inside the
03 Drill Shack. I don't know what they were for,
04 but that was mentioned by Caleb to me.
05 Q. Did he mention how he knew that there
06 were alarms going off inside the Drill Shack?
07 A. Because he was inside the Drill Shack.
08 Q. Okay.

Page 94:11 to 94:20

00094:11 Q. (By Ms. Lawrence) And did he indicate if
12 he knew what they were, alarm -- what the alarms
13 were indicating?
14 A. No, he didn't.
15 Q. Okay. Did he seem concerned about them?
16 A. Yes, he did.
17 Q. And do you recall about what time that
18 was?
19 A. About 5:30-ish was right around the time
20 that we would normally have eaten.

Page 106:23 to 107:04

00106:23 Q. Did you -- have you ever worked on any
24 other deepwater drilling rig?
25 A. No, sir.
00107:01 Q. Okay. Did you work on any other rig,
02 whether it be shallow, or anything else, other
03 than the DEEPWATER HORIZON?
04 A. No, sir.

Page 107:20 to 108:16

00107:20 Q. Did you take your orders -- your work
21 direction, your orders from Transocean?
22 A. Yes, sir.
23 Q. And did you ever take orders from anybody
24 else, outside of Transocean, when you were aboard
25 the DEEPWATER HORIZON?

00108:01 A. "Orders" as in?
02 Q. How to perform your work.
03 A. Yes, sir.
04 Q. Who -- who else did you take orders from?
05 A. The Safety -- the -- they had a Safety
06 guy on the rig --
07 Q. Who's "they"?
08 A. -- at all times. BP did.
09 Q. Okay.
10 A. I apologize.
11 Q. Okay.
12 A. And at times he would come out, and, you
13 know -- you know, discuss the jobs that we were
14 doing, and maybe he had a way of doing it better.
15 Q. Do you recall that gentleman's name?
16 A. Mitch Gill.

Page 111:10 to 112:22

00111:10 Q. Okay. When did you start your -- your
11 hitch that led up to April 20th, 2010?
12 A. I was getting off in two hours.
13 Q. Okay.
14 A. So three weeks before the explosion
15 happened.
16 Q. And when you began working on the
17 DEEPWATER HORIZON, were the hitches the same
18 duration or did they change at some point?
19 A. They changed.
20 Q. Okay. It's been represented to me that
21 they were previously two weeks; is that correct?
22 A. Yes, sir.
23 Q. All right. And then at some point they
24 changed to three weeks --
25 A. Yes, sir.
00112:01 Q. -- is that correct?
02 All right. Do you recall approximately
03 when it was that they changed from two weeks to
04 three weeks?
05 A. No, I don't. I don't recall. I --
06 Q. Okay.
07 A. My -- my guess -- best guess may have
08 been in September.
09 Q. Was it when you were on site at Macondo?
10 A. I do believe so.
11 Q. Okay. And then once you started your
12 three -- three-week hitch, you'd worked 12 hours
13 a day, is that correct -- 12-hour shifts till the
14 end of that hitch; is that correct?
15 A. We -- you -- you had a 12-and-half-hour
16 day.
17 Q. A 12 and half, I'm sorry.
18 A. Yeah. And then, you know, whenever
19 you -- you had to wait until your relief relieved
20 you.

21 Q. Right.
22 A. It could be 13.

Page 118:21 to 118:24

00118:21 Q. If there was a dif -- if you were given
22 inconsistent direction, one from Transocean and
23 one from somebody that was not Transocean, who
24 would you ultimately go with?

Page 119:01 to 120:10

00119:01 A. I would go with the Transocean.
02 Q. (By Mr. Kraus) Do you have -- do you know
03 what Stop Work Authority is?
04 A. Yes, sir.
05 Q. Is that the same thing as Timeout For
06 Safety, or are those two separate functions?
07 A. Pretty much the same thing, yes.
08 Q. Pretty much the same thing. You -- did
09 you have Stop Work Authority when you were
10 onboard the DEEPWATER HORIZON?
11 A. Yes, sir.
12 Q. Did you ever exercise it?
13 A. Yes, sir.
14 Q. On how many occasions did you ever -- did
15 you exercise it?
16 A. Maybe once or twice.
17 Q. On those one or two times that you
18 exercised Stop Work Authority, did it ever stop
19 Drilling Operations?
20 A. No, sir.
21 Q. Okay. When you were aboard the DEEPWATER
22 HORIZON, did you ever -- are you aware of anybody
23 from Transocean, or anybody that was aboard the
24 rig, ever exercising Stop Work Authority to stop
25 Drilling Operations?
00120:01 A. No, sir.
02 Q. Have -- did anybody ever tell you that
03 that situation ever occurred outside of the time
04 you were on the rig?
05 A. No, sir.
06 Q. As a Transocean employee aboard the
07 DEEPWATER HORIZON, would you feel comfortable
08 cause -- calling Stop Work Authority to stop
09 Drilling Operations?
10 A. No, sir.

Page 120:12 to 120:13

00120:12 Q. (By Mr. Kraus) Okay. Why is that?
13 A. I didn't want to lose my job.

Page 122:19 to 122:23

00122:19 Q. When you worked -- you previously
20 testified that you worked two-week hitches and
21 then went to three-week hitches. Did you have a
22 preference for one over the other?
23 A. I liked the three weeks.

Page 123:01 to 123:07

00123:01 Q. Was your whole drilling crew scheduled to
02 go off the rig, then, two hours after the
03 explosion on the DEEPWATER HORIZON?
04 A. We were scheduled to get off tour.
05 Q. Okay.
06 A. And then we would typically get off about
07 6:00 a.m. in the morning via helicopter.

Page 123:14 to 124:11

00123:14 Q. Okay. And I don't mean to be repetitive,
15 but you don't recall any alarms of any type going
16 off aboard the vessel? Other than what you
17 testified Mr. Holloway reported to you in the
18 drilling shack, you don't recall any alarms going
19 off?
20 A. No, sir.
21 Q. Okay. Do you recall any announcement of
22 any type?
23 A. No, sir.
24 Q. Do you recall anybody saying anything on
25 the pub -- was there a public address system of
00124:01 some sort?
02 A. An intercom.
03 Q. Intercom?
04 A. Yes.
05 Q. Do you recall anything being said over
06 the intercom prior to the explosion?
07 A. No, sir.
08 Q. Do you recall anything being said on the
09 intercom after the explosion?
10 A. I just remember someone saying this was
11 not a drill.

Page 128:07 to 133:04

00128:07 Q. And when you saw that mud shooting up to
08 the top of the derrick, you and Caleb Holloway
09 were preparing to clean out a catch pan, right?
10 A. We were preparing to clean out the vacuum
11 tank.
12 Q. Okay. Let me just make sure I have this
13 right. Preparing to clean out the vacuum tank of

14 the vacuum that you were then planning to use to
15 clean out the catch pan under the rotary table?
16 A. Yeah. And -- and the rig floor in
17 general, as well.
18 Q. Okay.
19 A. (Nodding.)
20 Q. So in addition to cleaning the catch pan,
21 you were going to do some general cleaning on the
22 rig floor there with that vacuum?
23 A. Yes, sir.
24 Q. And you were emptying the vacuum
25 container in preparation for that activity of
00129:01 cleaning the catch pan and the general cleaning
02 on the rig floor --
03 A. Yes, sir.
04 Q. -- when -- when you saw the mud shoot up
05 to the top of the derrick?
06 A. Yes, sir.
07 Q. Okay. And you and Caleb were working
08 together on that?
09 A. Yes, sir.
10 Q. And he was showing you how to go about
11 emptying the vacuum, and things like that?
12 A. Yes, sir.
13 Q. Okay. Who told you that you needed to
14 clean that catch pan?
15 A. Steve Curtis.
16 Q. Did he tell you why you needed to clean
17 out that catch pan?
18 A. H'm. No, sir.
19 Q. Okay. During your time on the HORIZON,
20 you've participated in Well Control Drills,
21 correct?
22 A. No, sir.
23 Q. You've never participated in a Well
24 Control Drill while on the HORIZON?
25 A. Yes, sir.
00130:01 Q. Okay. Did Well Control Drills occur on
02 the HORIZON while you were onboard the HORIZON?
03 A. Not that I know of.
04 Q. Okay. And is that true for both of your
05 hitches on the HORIZON while it was at Macondo,
06 no Well Control Drills that you're aware of?
07 A. Not that I'm aware of.
08 Q. Okay. You had well control training
09 prior to going out to the HORIZON rig, correct?
10 A. No, sir.
11 Q. Did you have well control training while
12 you were on the HORIZON rig?
13 A. No, sir.
14 Q. So you've never had any well control
15 training?
16 A. No, sir.
17 Q. Okay. Do you have any familiarity with
18 what happens at a Well Control Drill?

19 A. No, sir.
20 Q. Okay. Did you have any familiarity with
21 what happens during well control training?
22 A. No, sir.
23 Q. Okay. Do you know if any of your fellow
24 Floorhands on the HORIZON had participated in
25 Well Control Drills?
00131:01 A. Yes, sir.
02 Q. Okay. Did they tell you anything about
03 those Well Control Drills?
04 A. Yeah. Yes, they did. They -- my mentor,
05 Shane, went over some things with me, like if --
06 if we were in a well control situation, you know,
07 someone would go here and someone would go
08 there --
09 Q. Okay.
10 A. -- you know, that type of thing.
11 Q. Okay. Would -- would anybody be sent to
12 clean the catch pans as part of a response to a
13 well control situation?
14 A. Not that I know of.
15 Q. Okay. Anything else you remember Shane
16 telling you about response to a well control
17 situation?
18 A. I mean, he basically told me one person
19 has to stay at this valve, one person grabs the
20 radio and goes to the moon pool --
21 Q. Okay.
22 A. -- and then wait for instructions from
23 there.
24 Q. Okay.
25 A. That's what he basically told me.
00132:01 Q. Prior to the explosion on April 20th, do
02 you know if that procedure was followed?
03 A. Prior to the explosion? Like, that time?
04 When it was exploding at the time?
05 Q. Let's -- let's start with, at -- at any
06 point prior to the explosion, do you know whether
07 people were moving to those positions as they
08 would in response to a Well Control Event?
09 A. No, sir.
10 Q. No, sir, they weren't moving there?
11 A. No, they weren't.
12 Q. Okay.
13 A. Not that I know of. I mean, I don't know
14 what Adam, Shane, was doing at the time.
15 Q. Okay. But -- but you weren't moving into
16 a well control position as you understood it?
17 A. When -- when we saw the mud come up
18 through the derrick, that's when Caleb and I ran
19 to see what -- you know, what we were supposed to
20 do.
21 Q. Okay.
22 A. Yeah.
23 Q. But you were essentially, at that point,

24 waiting for somebody to tell you what to do in
25 the situation?
00133:01 A. Yes, sir.
02 Q. Okay. And did any instruction ever come
03 as to what to do?
04 A. No, sir.

Page 135:11 to 136:15

00135:11 Q. Okay. Now, your second hitch started on
12 March 31st, correct?
13 A. True.
14 Q. And -- and that's the hitch during which
15 you were a Floorhand, right?
16 A. Yes, sir.
17 Q. And that was your first hitch as a
18 Floorhand?
19 A. Yes, sir.
20 Q. So fair to say you were the most junior
21 Floorhand on the rig at the time of the incident?
22 A. Yes, sir.
23 Q. And essentially, I think you testified
24 earlier you were shadowing a more senior
25 Floorhand at that time?
00136:01 A. Yes, sir.
02 Q. Essentially learning the job of a
03 Floorhand during that hitch from May [sic] 31st
04 to the incident?
05 A. Yes, sir.
06 Q. Okay. You testified you don't know if a
07 positive pressure test was run on April 20th; is
08 that correct?
09 A. Yes, sir.
10 Q. So fair to say you've never been involved
11 in planning a positive pressure test?
12 A. Yes, sir.
13 Q. Never been involved in interpreting the
14 results of a positive pressure test?
15 A. No, sir.

Page 136:19 to 137:21

00136:19 Q. Never been involved in planning a
20 negative pressure test, correct?
21 A. Not that I'm aware of.
22 Q. Okay.
23 A. There -- there's a lot of things that I
24 did that I didn't even know I was doing. I was
25 just helping out.
00137:01 Q. Okay.
02 A. So I could have done it, but I wouldn't
03 know what it was called, if I did.
04 Q. Sitting here today, you don't remember
05 anything you did, though, that was, you know, in

06 anticipation of, or part of planning for a
 07 negative --
 08 A. No.
 09 Q. -- pressure test? Okay. And you've
 10 never been involved in interpreting the results
 11 of a negative pressure test, right?
 12 A. No, sir.
 13 Q. You said you're -- you're not familiar
 14 with displacement procedures, correct?
 15 A. Correct.
 16 Q. So you couldn't comment on whether a
 17 displacement procedure is appropriate, right?
 18 A. No, I could not.
 19 Q. And you could not comment on whether a
 20 displacement procedure is inappropriate, correct?
 21 A. Correct.

Page 139:04 to 139:17

00139:04 Q. -- other than those, your interaction
 05 with BP employees was in the context of group
 06 meetings like the Pre-Tour Meetings, correct?
 07 A. Correct.
 08 Q. Okay. And in those meetings, you were
 09 participating as a listener, correct?
 10 A. If -- if I had anything to add in the
 11 meetings, I could. I mean, it was free, it was
 12 an open mike type thing. You know, if I had a
 13 concern, or saw something, then I was free to
 14 speak up and say it.
 15 Q. Okay. Do you recall any times when
 16 you -- when you did speak up?
 17 A. No. No, sir.

Page 141:22 to 143:21

00141:22 Q. Okay. Did you participate in a Safety
 23 Standup Meeting on or around April 20th of 2010?
 24 A. April 20th?
 25 Q. I -- I apologize. April 11th. Did you
 00142:01 participate in a Safety Standup on or around
 02 April 11th of 2010?
 03 A. I believe so, yes, sir.
 04 Q. Okay. Was Transocean Company Policy
 05 regarding the use of the THINK planning process
 06 discussed at that Standup?
 07 A. I'm sure it was. I -- I don't recall the
 08 specifics of the meeting, but --
 09 Q. Okay.
 10 A. -- any Standup or any Safety Meeting they
 11 talk about THINK Plans and --
 12 Q. Okay.
 13 A. -- that sort of stuff.
 14 Q. So you do recall a -- a Safety Standup on

15 or around April 11th?
 16 A. Yes, sir.
 17 Q. And you recall that it's probably pretty
 18 likely that the THINK planning process was
 19 discussed at that meeting?
 20 A. Yes, sir.
 21 Q. That was pretty typical?
 22 A. Pretty typical, yes, sir.
 23 Q. Okay. On -- on April 20th, you -- you
 24 described earlier, the -- the THINK Plans that
 25 you filled out --
 00143:01 A. M-h'm.
 02 Q. -- relating to PM and -- and cleaning and
 03 things like that, right?
 04 A. Yes, sir.
 05 Q. Do you know if anybody filled out a THINK
 06 Plan regarding Displacement?
 07 A. Not that I'm aware of.
 08 Q. Okay. Are you aware that Transocean
 09 commissioned Lloyd's Register to conduct a study
 10 of Transocean's Safety Management Systems and
 11 Safety Culture and Climate?
 12 A. No, sir.
 13 Q. Okay. Let me just show you a couple of
 14 quotes --
 15 A. Sure.
 16 Q. -- included in the results of that study.
 17 If you flip to Tab 7. This is Exhibit 4261. And
 18 the page I'd like you to look at, although you're
 19 welcome to look through the whole thing, if you'd
 20 like --
 21 A. Okay.

Page 144:11 to 146:22

00144:11 Q. And I want to point you to the -- the two
 12 quotes at the bottom. And you can see that this
 13 is in reference to the 21 on/21 off hitch
 14 schedule. And there's a quote that says: "On
 15 their last week, they seem like they are in
 16 another world."
 17 Does -- does that ring a bell as
 18 something you heard your -- your crew mates say
 19 or opinions that you heard them express?
 20 A. No, sir.
 21 Q. Okay. How about the one below: "On the
 22 last week, you are so tired that you feel like a
 23 robot."
 24 Is that a quote that you've heard from
 25 crew mates or -- or similar to quotes you've
 00145:01 heard from crew mates --
 02 A. H'm --
 03 Q. -- with regard to the 21-day hitch?
 04 A. Not like a robot, no, sir. I mean,
 05 everybody is tired, but --

06 Q. Okay. Presumably more tired after 21
 07 days than after 14 days, right?
 08 A. Yes, sir.
 09 Q. Okay. What -- what if the quote were,
 10 "On the last night of a hitch, there's more
 11 goofing around because it's the last night out on
 12 the rig"?
 13 MR. KINCHEN: Object to form.
 14 Q. (By Mr. Piech) Would that be in line
 15 with --
 16 A. No, sir. M'm.
 17 Q. Okay. Are you familiar with the
 18 Transocean Health & Safety Policies and Procedure
 19 Manual?
 20 A. Do I know it exists? Yes, sir.
 21 Q. Okay. Have you ever read through it?
 22 A. No, sir.
 23 Q. Okay. But you said earlier you're
 24 familiar with the phrase "Time Out for Safety"?
 25 A. Yes, sir.
 00146:01 Q. And familiar with the essentially same
 02 notion of "Stop the Job"?
 03 A. M-h'm.
 04 Q. Okay. And you know that each Transocean
 05 employee has the obligation to interrupt an
 06 operation to prevent a safety incident from
 07 occurring, right?
 08 A. Right.
 09 Q. And you know that Transocean personnel
 10 have the obligation and the responsibility not to
 11 participate in an unsafe act, right?
 12 A. Right.
 13 Q. And Transocean personnel -- all
 14 Transocean personnel have the obligation and
 15 responsibility to interrupt any operation to
 16 prevent an unsafe act or unsafe condition from
 17 causing an accident, right?
 18 A. Right.
 19 Q. And each Transocean individual has the
 20 obligation and responsibility to take action to
 21 correct any unsafe behavior or condition, right?
 22 A. Yes, sir.

Page 148:24 to 149:20

00148:24 Q. Okay. And so when you were talking
 25 earlier about the, oh, plus or minus 10 kicks --
 00149:01 A. Yes, sir.
 02 Q. -- was that during that whole year and a
 03 quarter, or was that just the few weeks before
 04 the blowout?
 05 A. That was the few weeks before the
 06 blowout.
 07 Q. Okay. So you had about approximately 10
 08 kicks on the few weeks before the blowout?

09 A. Yes, sir.
10 Q. And by "the few weeks," are you talking
11 about your final hitch there, your final three
12 weeks there?
13 A. Yes, sir.
14 Q. Okay. And, again, you would know it was
15 a kick because, what, somebody tell you?
16 A. Yes, sir.
17 Q. Okay. Did you ever feel anything or see
18 anything or anything like that that would
19 indicate a kick?
20 A. No, sir.

Page 150:20 to 150:22

00150:20 Q. Okay. Do you recall anyone complaining
21 that day about how the mud was being transferred
22 from the HORIZON to the BANKSTON?

Page 150:24 to 151:05

00150:24 A. No, sir.
25 Q. (By Mr. Bowman) No. Whether you heard
00151:01 them complain, did you hear any rumors or word of
02 mouth or cheap talk, whatever you want to say,
03 about anyone complaining about they were having a
04 hard time doing their job because of the way the
05 mud was being transferred?

Page 151:07 to 152:07

00151:07 A. No, sir.
08 Q. (By Mr. Bowman) Okay. Did you know --
09 did you know anyone from Halliburton that was
10 working on the rig?
11 A. I don't remember his name, but there's
12 one guy that kind of was always around and real
13 talkative.
14 Q. Just talkative, kind of friendly sort?
15 A. Yeah.
16 Q. Okay. How about Sperry, did you deal
17 with anyone from Sperry?
18 A. Sperry?
19 Q. Yeah.
20 A. Yes, sir.
21 Q. Okay. Doing what?
22 A. I think putting tools together --
23 Q. All right.
24 A. -- on the -- on the bucket machine.
25 Q. Okay. Were they friendly, too?
00152:01 A. M-h'm. Oh, yeah.
02 Q. Okay. You didn't have any trouble with
03 anyone that you worked with from Halliburton or

04 Sperry?
05 A. No, sir.
06 Q. Okay.
07 A. Not at all.

Page 155:10 to 155:20

00155:10 Q. Was there a separate fire after the
11 second explosion, or did they all seem to be like
12 one big fire to you?
13 A. Yeah. When the degasser's on fire, it's
14 totally different than when the -- the rig floor
15 and the heavy tool room blew up.
16 Q. Okay. Explain that to me, then.
17 A. It was more of a -- a blast, and then
18 like the fire just came down. It wasn't just
19 like a TV explosion, where you see like all the
20 flame and smoke and stuff like that.

Page 157:01 to 158:14

00157:01 Q. Okay. And I know you've said you didn't
02 hear any gas alarms before all this happened?
03 A. Right.
04 Q. Did you -- anyone ever ask or mention
05 about why there were not any gas alarms?
06 A. No, not at the time.
07 Q. Well, afterwards, have you heard any
08 explanation as to why there weren't?
09 A. I've heard someone -- you know, rumors,
10 and people talking about someone shutting them
11 off, because they were going off so often and
12 keeping people awake or something.
13 Q. Okay. And do you know who told you that?
14 A. It was the ET.
15 Q. Okay. And by the "ET," what do you mean?
16 A. Mike Williams.
17 Q. Okay. And did you know him before
18 this -- did you know him while you were working
19 there on the rig?
20 A. Yes, sir.
21 Q. Okay. Because earlier, you said you had
22 heard some gas alarms and gas being called out?
23 A. Right.
24 Q. All right.
25 A. Yeah. That wasn't the day of the
00158:01 explosion.
02 Q. No. I understand.
03 A. It was like -- okay.
04 Q. So prior to that time, you had heard
05 alarms?
06 A. Right.
07 Q. And the alarms, did you hear them and see
08 them flashing or what?

09 A. Just see it -- saw them flashing.
10 Q. You'd just see the flashing?
11 A. Yeah.
12 Q. And but when the actual blowout came, you
13 saw nothing flashing?
14 A. Nothing.

Page 161:01 to 161:17

00161:01 Q. Now then, the day of the 20th, do you
02 recall what Dewey Revette was doing? And let
03 me -- let me kind of pin it in a little bit more.
04 A. Okay.
05 Q. Let -- let's go like, maybe, 5:00 o'clock
06 in the afternoon -- and -- and your -- your shift
07 started, what, 11:00 o'clock in the morning?
08 A. Yes, sir.
09 Q. And so you're there, you're -- you're
10 cleaning, you're sweeping, you're doing work.
11 A. (Nodding.)
12 Q. So like towards the end of the afternoon,
13 do you recall seeing Mr. Revette with anyone,
14 like the Company Man and maybe the OIM, just
15 meeting or talking?
16 A. Yeah, I do. I do remember a Company Man
17 in the Drill Shack.

Page 164:11 to 164:12

00164:11 Q. And did you ever see him come out?
12 A. No, sir.

Page 168:05 to 170:02

00168:05 Q. I am curious, you said today, and also
06 you said in the interview, about if you really
07 tried to stop the job from being run there could
08 be some repercussions. Why -- why do you think
09 that?
10 A. Why do I think that?
11 Q. Yes, sir.
12 A. I mean, it's just knowl -- common
13 knowledge.
14 Q. That -- that was just common knowledge --
15 A. Yeah.
16 Q. -- onboard?
17 A. Yeah. I mean, there's -- there --
18 there's always repercussions for anything like
19 that.
20 Q. Okay.
21 A. Yeah.
22 Q. And that was something that you were kind
23 of taught early on?

24 A. Yes, sir.
 25 Q. And without naming names -- I don't want
 00169:01 you to name names -- that was sort of something
 02 you were taught by some of your co-workers? I'll
 03 say it like that.
 04 A. Yes, sir.
 05 Q. Okay. The two times you did exercise
 06 Stop Work Authority, what was that about?
 07 A. One, I believe it was the -- the time we
 08 were doing the sign. We were putting a sign over
 09 the BOP, and it was just super windy, and I kind
 10 of stopped, you know, because everybody was kind
 11 of running around, and I wanted to kind of get
 12 everybody in the same space and talk to them.
 13 Q. M-h'm.
 14 A. And we ended up not even doing the job.
 15 The second one, I think it was a -- it
 16 was -- it was a -- a welder using a fire watchman
 17 for -- to work, to do work, instead of just fire
 18 watching.
 19 Q. So it sounds more like a personal safety
 20 standpoint of individuals?
 21 A. Yes, sir.
 22 Q. Did you see other people exercise Stop
 23 Work Authority anytime -- when it related to more
 24 than just an individual; in other words,
 25 someone's trying to exercise Stop Work saying, "I
 00170:01 think this whole operation's unsafe. We need to
 02 change it," or anything like that?

Page 170:04 to 170:06

00170:04 A. No, sir, I don't believe so.
 05 Q. (By Mr. Bowman) Never heard --
 06 A. No.

Page 172:23 to 174:02

00172:23 You talked about at the Pre-Tour Meeting,
 24 Pre-Tour Meeting, the -- the OIM, Jimmy Harrell,
 25 made a reference about pinchers. Do you recall
 00173:01 that testimony you gave this morning?
 02 A. Yes, sir.
 03 Q. Okay. You indicated that you heard that
 04 about -- approximately how many people were in
 05 that meeting?
 06 A. My best estimate would have been at least
 07 30 people.
 08 Q. Sure. Did you talk to anyone else about
 09 that comment that Mr. Harrell made?
 10 A. I -- I talked to Caleb, Adam, Shane --
 11 Q. Okay.
 12 A. -- about it.
 13 Q. But it's your understanding that Caleb

14 heard that comment, also?
15 A. Yes, sir.
16 Q. Okay. Anyone else besides those three
17 individuals?
18 A. No, sir.
19 Q. Okay. Since the incident, have you
20 talked -- and I certainly don't want to ask you
21 about conversations with your Counsel -- but
22 other than your attorneys, have you talked to any
23 other people who heard that comment?
24 A. I talked to Doug Brown about it.
25 Q. Doug Brown?
00174:01 A. Yeah. He said he remembered hearing it,
02 too.

Page 174:04 to 174:16

00174:04 Anybody else?
05 A. No, sir.
06 Q. I'm going to ask you a few questions
07 about the -- the blowout, and the -- what you
08 observed at the time. And let's start with the
09 mud. You saw mud coming down from the degasser;
10 is that correct?
11 A. No, I saw it coming out of the derrick.
12 Q. At -- coming out of the derrick?
13 A. Right.
14 Q. Okay. Did you see mud coming out of
15 the -- out of the rotary?
16 A. No.

Page 174:22 to 174:24

00174:22 Q. (By Mr. Kinchen) What direction was the
23 mud going, up or down, in the derrick?
24 A. Up.

Page 175:10 to 175:21

00175:10 I -- I do believe, though, you mentioned
11 that you saw the heavy tool area exploding?
12 A. Yes, sir.
13 Q. What's under that area? Do you know?
14 A. Oh, man. I think it's the sand traps, if
15 I'm not mistaken.
16 (Discussion off the record.)
17 Q. (By Mr. Kinchen) Okay. Are the shaker
18 house and pump room near there?
19 A. Yes, sir.
20 Q. Okay. Near the sand trap?
21 A. Yes, sir.

Page 176:07 to 176:16

00176:07 Q. Okay. Now, you're not aware if any
 08 replacement parts had been ordered at any time,
 09 are you?
 10 A. No, sir.
 11 Q. Okay. Did you ask anyone with
 12 Maintenance, the Maintenance Department, about
 13 the status of the job or what was going on?
 14 A. I -- not in the Maintenance Department.
 15 I asked -- I asked my Supervisor, Dwayne Romero,
 16 about it.

Page 176:22 to 178:03

00176:22 Q. You did not exercise Stop Work Authority
 23 with respect to the rusted bracket, did you?
 24 A. No, no, sir.
 25 Q. Okay. And you didn't consider that to be
 00177:01 a situation that was unsafe to the point
 02 requiring Stop Work Authority?
 03 A. I was told it wouldn't -- it would be
 04 okay.
 05 Q. Okay. And speaking of the Stop Work
 06 Authority, or the -- the Time Out for Safety,
 07 Mr. Piech was asking you some questions about
 08 the -- the -- is it the Health -- the HSSE
 09 Manual. Do you recall that?
 10 A. M-h'm.
 11 Q. And you -- you -- you were acknowledging
 12 that that provided all Transocean employees with
 13 the authority and right and obligation to
 14 exercise Stop Work Authority in an unsafe
 15 condition, correct?
 16 A. Correct.
 17 Q. And that Manual does not limit that
 18 authority to particular situations or -- or areas
 19 of the rig, correct?
 20 A. Correct.
 21 Q. Okay. And you had training on this in
 22 your TOPS training, too, correct?
 23 A. Yes, sir.
 24 Q. Okay. And, again, that training did not
 25 limit the crew members' ability to exercise Stop
 00178:01 Work Authority in only certain situations or --
 02 or certain areas of the rig, correct?
 03 A. Correct.

Page 178:05 to 178:11

00178:05 Q. (By Mr. Kinchen) When the mud was coming
 06 up the derrick, was it coming up all the way from
 07 the rig floor, or from the crown of the derrick?
 08 A. It was coming up from the rig floor,
 09 yeah.

10 Q. All the way from the rig floor?
11 A. Yeah.

Page 178:14 to 179:15

00178:14 Q. (By Mr. Kinchen) And when was that? Was
15 that the entire time you were -- you -- you
16 were -- you were observing that, or did that --
17 did -- did it start coming up -- did you observe
18 it coming up the rig floor at a certain point
19 of -- in time while you were watching it?

20 A. When -- when we ran up to -- to the rig
21 floor, I mean, when -- when we looked up, we
22 could see it coming up through the -- you know,
23 through the derrick and coming down.

24 Q. Okay. Coming up from the rig floor?

25 A. I mean, I -- I -- I assumed that --
00179:01 that's where it was coming from, because I really
02 didn't see anywhere else it could come from.

03 Q. Okay.

04 A. And there is a -- you know, the drill
05 line spool, which you can't see the rotary table
06 from where we were.

07 (Discussion off the record.)

08 Q. (By Mr. Kinchen) And when you got back on
09 the deck, did you -- what -- were you observing
10 the same thing?

11 A. The same thing.

12 Q. Okay. And, again, from the rig floor --

13 A. Yes, sir.

14 Q. -- the -- the mud was coming up?

15 A. Yes, sir.