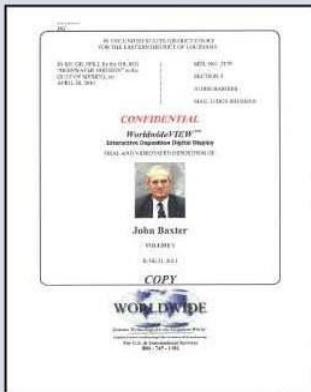


# OMS Not Applied Across Operations

John Baxter



management system, will it deliver the same -- let me remember the words. It's something like it will deliver the same intent as OMS, the BP business is then required to carry out some kind of gap assessment. And the point is that the question is then what, if anything additional, should be applied. And of course, OMS is an element of OMS, taking an isolation, no, may not be the right thing to do. The other thing is that OMS is a very high-level risk assessment.

Q. Okay. Do you remember what my question was? Did BP do a risk assessment on the DEEPWATER HORIZON?

A. No. It wasn't a requirement within the OMS system.

Q. Did OMS apply to the DEEPWATER HORIZON?

A. No.

Q. Did BP do a gap assessment on the DEEPWATER HORIZON?

A. I don't know how the contract was set up because it's not -- not something I was involved in.

Q. Did BP do a gap assessment on any of the lease facilities in the Gulf of Mexico?

A. I don't know because that's the business's responsibility. It's not anything I would be involved in.

Q. You were involved with looking at a gap assessment on the DEEPWATER HORIZON?

A. Yes.

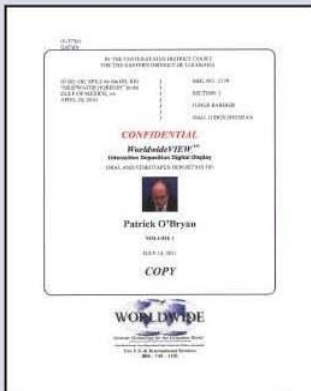
PERMANENT TO CONFIDENTIALITY ORDER

Page 175

**Q: Did OMS apply to the DEEPWATER HORIZON?**  
**A: No.**

*Deposition of John Baxter (Group Head of Engineering and member of GORC) as Fed. R. Civ. P. 30(b)(6) witness on behalf of BP p.l.c. at 175:14-15, June 21-22, 2011*

Pat O'Bryan



1 don't operate the drilling rig with a BP OMS.

2 But we do -- the rig belong to

3 the Drilling Contractor, and we operate the

4 rig under the -- under the Drilling

5 Contractor Safety Management System.

6 The only drilling rig that we

7 had in our fleet that would fall under the BP

8 OMS is the BP-owned rig, the PDQ on Thunderhorse

9 #1000.

10 Q. My Mr. Barti when about well

11 Control Manual, which -- which company's

12 well control manual is -- is used to operate

13 a rig such as the DEEPWATER HORIZON, or the

14 THUNDERHORSE, or any of the third party offshore

15 rigs?

16 A. Drilling Contractor.

17 Q. Is it?

18 A. Yes.

19 Q. And how do you know that?

20 A. Well the OMS, it says that there

21 is to be a breakdown of the Well Control

22 Manual between the BP Well Control Manual and

23 the Drilling Contractor Well Control Manual.

24 Identify any issues, similar to the Safety

25 Management System, we would operate under?

PERMANENT TO CONFIDENTIALITY ORDER

Page 413

**“The only drilling rig that we had in our fleet that would fall under the BP OMS is the BP-owned rig, the PDQ on Thunderhorse.”**

*Deposition of Pat O'Bryan (Vice President, Drilling & Completions) at 413:6-9, July 14-15, 2011*