

Deposition Testimony of:

James Mansfield

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Page 8:14 to 8:17

00008:14 JAMES BRENT MANSFIELD,
15 after having been first duly sworn by the
16 above-mentioned court reporter, did testify
17 as follows:

Page 9:02 to 12:15

00009:02 EXAMINATION BY MR. HAYCRAFT:
03 Q. Mr. Mansfield, my name is Don
04 Haycraft and beside me is Haris, my
05 colleague, we're representing BP today. If
06 at any time I ask you a question that you
07 don't fully understand, will you tell me that
08 you don't understand it?
09 A. Yes, sir.
10 Q. On April 20th, 2010, were you a
11 crew member aboard the DEEPWATER HORIZON?
12 A. Yes, sir.
13 Q. What was your job title?
14 A. 1st assistant engineer.
15 Q. I've shown you, before we got
16 started, an exhibit taken or a web page taken
17 from the deepwater.com website, which has
18 been marked for the deposition as Exhibit
19 2162.
20 (Exhibit No. 2162 marked for
21 identification.)
22 EXAMINATION BY MR. HAYCRAFT:
23 Q. Do you recognize that as a
24 general job description for 1st assistant
25 engineer, North American division for
00010:01 Transocean?
02 A. Yes, sir.
03 Q. Have you had a chance to at
04 least glance through it and see if it's
05 relatively accurate?
06 A. Yes, sir.
07 Q. Is it?
08 A. Yes, sir.
09 Q. Where did you graduate from
10 college?
11 A. The Merchant Marine Academy.
12 Q. When did you graduate from Kings
13 Point?
14 A. In 2000.
15 Q. What were your degrees?
16 A. Bachelor of science in marine
17 engineering.
18 Q. There's another degree program
19 at Kings Point?
20 A. Yes, sir.
21 Q. And what's that called?
22 A. At that time, there was a

23 bachelor of science -- there was a shipyard
 24 management program which was a new -- a newer
 25 program and there was also systems
 00011:01 engineering. The one that I had, they
 02 consider it straight engine. It was kind of
 03 a nickname.

04 Q. So with your bachelor of science
 05 in marine engineering from Kings Point, what
 06 was your first occupation?

07 A. Sailing on the Great Lakes on --
 08 with Interlake Steamship Company on a
 09 freighter.

10 Q. What license did you carry at
 11 that time?

12 A. Third assistant engineer.

13 Q. What license did you get upon
 14 graduation from Kings Point?

15 A. Third assistant engineer, and --
 16 yes, sir.

17 Q. Go ahead. Well, you were
 18 talking about --

19 A. There were other degrees, I
 20 guess, you know, those were the bachelor of
 21 Science degrees, and you could get a mate's
 22 license from Kings Point as well.

23 Q. Did marine engineering and a
 24 third engineering license permit you to work
 25 as a licensed officer in engine rooms of
 00012:01 ships?

02 A. Yes, sir.

03 Q. After the Great Lakes work, what
 04 did you do next?

05 A. I worked for a small time on a
 06 riverboat, a casino boat and I forget the
 07 name of the town -- Rising Sun, Indiana and
 08 after that, I got a job with American
 09 Overseas Marine, and I worked from 2003 to
 10 2008 with AMC, as a third and second
 11 engineer.

12 Q. On what type of vessels?

13 A. It was called an MPS ship,
 14 maritime pre-position ship, under MSC
 15 contract with the Marine Corps.

Page 13:06 to 13:19

00013:06 Q. What did you do after leaving
 07 that company in 2008?

08 A. In 2008, I started working for
 09 Transocean.

10 Q. What was your first position?

11 A. My first position, I actually
 12 was hired on as a rig mechanic.

13 Q. Aboard what vessel?

14 A. The DEEPWATER HORIZON.

15 Q. Can you tell us the month in
16 2008 that you began as a rig mechanic aboard
17 DEEPWATER HORIZON?
18 A. Yes, sir, in September, yes,
19 sir.

Page 14:02 to 21:19

00014:02 Q. That's fine. Did you work
03 continuously for Transocean aboard the
04 DEEPWATER HORIZON from September '08 until
05 April 20th, 2010?
06 A. Yes, sir.
07 Q. When did you get promoted from
08 rig mechanic to second -- first assistant or
09 second assistant engineer?
10 A. The exact day I'm not
11 100 percent sure. I'm pretty sure it was in
12 October, November of 2009.
13 Q. And what position did you
14 assume?
15 A. That was first assistant
16 engineer.
17 Q. So am I correct in understanding
18 that from October or November of 2009 until
19 April 20th, 2010, you were first assistant
20 engineer aboard DEEPWATER HORIZON?
21 A. Yes, sir.
22 Q. As first assistant engineer, did
23 you have maintenance responsibility for the
24 diesel engines aboard the DEEPWATER HORIZON?
25 A. Yes, sir.
00015:01 Q. And how many diesel engines were
02 there?
03 A. We had six.
04 Q. And were each of those diesel
05 engines part of a generator set?
06 A. Yes, sir.
07 Q. Was each of the six engines in
08 its own separate engine compartment?
09 A. Yes, sir.
10 Q. What hitches did you work
11 beginning in September '08 and by that, I
12 mean, 14 on 14 off, or 21 on 21 off?
13 A. I worked 21.
14 Q. Did you work a 21-day hitch, 21
15 on 21 off, from the time you were rig
16 mechanic up through and including your time
17 as first assistant engineer?
18 A. Yes, sir.
19 Q. On board the DEEPWATER HORIZON,
20 you were considered part of the marine crew?
21 A. Yes, sir. I would say -- the
22 engine -- actually, the maintenance mechanic
23 department more, we consider, from what I

24 take, two different, the marine was one of
25 the DPOs and the captain, is the way I took
00016:01 it.
02 Q. So you viewed yourself as part
03 of the engine room crew?
04 A. Right, engine room crew, and the
05 maintenance crew.
06 Q. Did you work a 12-hour shift?
07 A. Yes, sir.
08 Q. What were your hours?
09 A. When I first started, my hours
10 were either noon to midnight or midnight to
11 noon and then when I became first engineer,
12 it changed to 1800 to 0600.
13 Q. From that description, I take it
14 you were on duty the evening of April the
15 20th when the events began happening?
16 A. Yes, sir.
17 Q. I want to talk a bit more about
18 the engines and sort of walk through some of
19 the technical aspects of the engines. Can
20 you identify the six engines by type and
21 model?
22 A. They were Wdrtsild engines and
23 they were Vasa 32s.
24 Q. I have a document that says they
25 were -- the diesel engines, the Vasa 32s were
00017:01 rated at 7290 kilowatts each. Does that
02 sound right?
03 A. Yes, sir, it sounds right.
04 Q. And the Vasa 32 is a medium
05 speed 4-stroke turbo charged and inner cooled
06 diesel engine with direct fuel injection, is
07 that right?
08 A. Yes, sir.
09 Q. Its normal operating-- the
10 Wdrtsild Vasa 32 engine has a normal
11 operating speed of 720 RPMs?
12 A. Yes, sir.
13 Q. And that's a constant speed
14 engine?
15 A. Yes, sir.
16 Q. Is speed control for each of the
17 six Wdrtsild Vasa 32 engines provided by a
18 Woodward 723PLUS solid state speed and load
19 controller system?
20 A. The Woodward part, I recognize,
21 as far as the exact numbers, they sound
22 right.
23 Q. Okay. Did the -- did you spend
24 most of your time in the ECR, the engine
25 control room?
00018:01 A. Yes, sir, that was where I had
02 my desk and office.
03 Q. And did the engine control room,

04 ECR, have an SVC panel?
05 A. Yes, sir.
06 Q. And what would you monitor on
07 the SVC panel with regard to any of the six
08 Wdrtsild Vasa 32s?
09 A. You can monitor everything,
10 temperatures, pressures, whether it was
11 online, connected to the bus, everything
12 could be monitored.
13 Q. Let's look at a tab in the
14 binder in front of you, which is Tab No. 3
15 and we will give it an exhibit number, we
16 will give it an exhibit number, we will give
17 it Exhibit No. 2163, and we will put that
18 label on there.
19 (Exhibit No. 2163 marked for
20 identification.)
21 EXAMINATION BY MR. HAYCRAFT:
22 Q. And what I understand this to
23 be, and you tell me, you may not actually
24 recognize the document, but it's a printout
25 from Transocean of a training record of
00019:01 certain crew members, and in this case, the
02 field selected included you, Mr. Mansfield.
03 If you could just glance through it, it
04 appears to be in reverse chronological order
05 starting with the certification in
06 February 22, 2010, and then a number going on
07 to the second and into the third pages of
08 certifications that you had through your job
09 at Transocean.
10 A. Yes, sir.
11 Q. Does that appear accurate?
12 A. To the best of my knowledge, I
13 have never looked at my list of courses I've
14 taken, so -- it appears accurate.
15 Q. Well, I'm not going to give you
16 a quiz on any of the courses, but for
17 purposes of this question, you may need to
18 review the listing. Did you ever take a
19 course from Kongsberg on the Simrad ESD,
20 emergency shutdown device?
21 A. No, sir.
22 Q. In the ECR, did you have a
23 panel, a matrix, I'm not sure of the proper
24 name, but a panel that included the Kongsberg
25 alarm system and ESD buttons?
00020:01 A. Yes, sir.
02 Q. Did you ever receive any
03 training in how to operate the ESD in the
04 engine control room of the DEEPWATER HORIZON?
05 A. No, sir.
06 Q. Is it true that the Wdrtsild
07 Vasa 32 engines were each equipped with
08 certain devices that would engage or -- well,

09 let me ask it in a noncompound way.
 10 Is it true that the Wdrtsild Vasa 32 engines
 11 were each equipped with systems to prevent
 12 engine overspeed?
 13 A. Yes, sir.
 14 Q. And overspeed is a condition
 15 where an engine's revolutions per minute,
 16 RPMs, go beyond their normal operating speed?
 17 A. Yes, sir.
 18 Q. And you told us earlier that the
 19 normal operating speed of the Wdrtsild
 20 engines was 720 RPM; right?
 21 A. Yes, sir.
 22 Q. And that the shutdown or
 23 overspeed controls on each of the six engines
 24 come in to play or engage, become
 25 operational, at certain percentages above the
 00021:01 normal operating speed of 720 RPM?
 02 A. Yes, sir.
 03 Q. And the purpose of an overspeed
 04 trip protection is to prevent the engine from
 05 going to -- beyond preset levels of RPM and
 06 creating an overspeed condition, is that
 07 correct?
 08 A. Yes, sir.
 09 Q. And that a purpose of the
 10 overspeed controls, the trip protections that
 11 we just -- that I just mentioned in my
 12 question, is to prevent a mechanical failure
 13 of the engine caused by the overspeed
 14 condition?
 15 A. Yes, sir.
 16 Q. And that among the results of an
 17 overspeed condition can be the throwing of a
 18 camshaft or the breaking of a connecting rod?
 19 A. Yes, sir.

Page 21:23 to 21:25

00021:23 Q. And those types of mechanical --
 24 those kinds of mechanical breakdowns can be
 25 an ignition source?

Page 22:04 to 22:05

00022:04 I guess, yes, sir, I guess that
 05 would be possible.

Page 22:07 to 22:12

00022:07 Q. And, is that based -- I'm not
 08 asking that -- whether that's ever occurred
 09 in your lifetime or your ship experience, but

10 by virtue of your training in marine
11 engineering you know that to be a contingency
12 that can be caused by an overspeed condition?

Page 22:16 to 22:16

00022:16 Yes, sir.

Page 22:18 to 22:22

00022:18 Q. One of the purposes of the
19 mechanical, electrical or other overspeed
20 prevention devices is to prevent not only the
21 engine from breaking up, but to prevent the
22 engine from being an ignition source?

Page 23:22 to 24:04

00023:22 "Q One of the purposes of the
23 mechanical, electrical or other
24 overspeed prevention devices is to
25 prevent not only the engine from
00024:01 breaking up, but to prevent the engine
02 from being an ignition source?"
03 THE WITNESS:
04 Yes.

Page 24:10 to 24:17

00024:10 Q. Do you agree, sir, based on your
11 experience and course work and your degree in
12 marine engineering, that a potential cause of
13 an overspeed condition is combustible gas
14 entering the ventilation ducts into the
15 engine room and the ingestion of such gas as
16 an additional fuel source?
17 A. Yes, sir.

Page 24:21 to 25:07

00024:21 Q. Did the engines on board the
22 DEEPWATER HORIZON aspirate their combustion
23 air from inside the engine rooms?
24 A. No, sir.
25 Q. Where did the engine -- where
00025:01 did the air come from?
02 A. From what I call the main deck
03 which would be the outer most deck.
04 Q. Okay. Is it true that the air
05 intakes for the engine rooms are protected by
06 detectors connected to the IACS system which
07 detects combustible gasses?

Page 25:11 to 25:12

00025:11 THE WITNESS:
12 I don't know.

Page 25:14 to 25:18

00025:14 Q. I take it, judging from that
15 answer, that you're not familiar with the
16 Kongsberg Simrad combustible gas detection
17 and dampers and so forth that are connected
18 to that?

Page 25:21 to 26:07

00025:21 THE WITNESS:
22 I do know that there are dampers,
23 you know, that do correspond with running of
24 the engine and, you know, the dampers don't
25 open, then -- but as far as the gas detection
00026:01 system, I'm not real familiar with that, sir.
02 EXAMINATION BY MR. HAYCRAFT:
03 Q. Okay. Do you understand that if
04 the ventilation dampers do not close upon the
05 detection of combustible gas that the
06 DEEPWATER HORIZON engines would be able to
07 ingest gas from the outside air?

Page 26:10 to 27:20

00026:10 THE WITNESS:
11 Yes, sir.
12 EXAMINATION BY MR. HAYCRAFT:
13 Q. Is it true that the -- each of
14 the Wdrtsild Vasa 32 engines had included
15 with them electropneumatic shutdown devices?
16 A. Yes, sir.
17 Q. They also included, each of
18 them, a mechanical overspeed device?
19 A. Yes, sir.
20 Q. And each of them had a charge
21 air cutoff valve?
22 A. Yes, sir.
23 Q. And manual shutoffs, that is, at
24 the SVC you could shut down an engine?
25 A. Okay.
00027:01 Q. Is that true?
02 A. I call that remote, yes, sir,
03 that's what I would call -- by pushing a
04 button, you could stop it, yes, sir.
05 Q. And -- well, at the panel for
06 the SVC area that you worked at, did you have

07 a separate shutdown device for each of the
08 six Wdrtsild Vasa 32s?
09 A. Yes, sir.
10 Q. I'm sorry?
11 A. The ESD had separate -- on the
12 screen you could call up which engine you
13 wanted, you had two sets, the start/stop
14 button, it was a -- you know, the computer
15 screen, depending on which engine you had
16 pulled up, it wasn't six different control
17 systems for six different engines, it was two
18 different computer systems that could be
19 pinpointed on what engine you wanted to
20 control.

Page 28:02 to 36:08

00028:02 Q. I will ask this, and just tell
03 me if you don't remember, but I've understood
04 from other testimony that that evening the
05 engines that were in operation were the No. 3
06 and the No. 6.
07 Do you know that one way or the
08 other?
09 A. I know that that's what I was
10 told.
11 Q. Do you know that of your own
12 memory?
13 A. No, sir.
14 Q. Would operating two engines at
15 any one time be a normal mode of operation?
16 A. Yes, sir.
17 Q. One, to supply the electrical
18 power for the rig and the other to be the
19 backup generator of power for the rig?
20 A. So to speak, however, they're
21 both online supplying the same amount of
22 power at the same time, it's a load factor.
23 If you have two or three splitting the load,
24 you know, it makes the load on the engine
25 less, the more engines you have running, so
00029:01 they -- they provide the same amount of
02 power.
03 Q. Okay. Could one engine supply
04 the electrical power for the entire rig?
05 A. It could if -- yeah, depending
06 on the consumption.
07 Q. But in a DP mode, would it be
08 typical to have two engines going at the same
09 time?
10 A. Yes, sir.
11 Q. As opposed to three?
12 A. It just depends on the load. If
13 the load is such that you would need three
14 engines or four or five or six sometimes, but

15 never one. That was just not a safe
16 operating procedure.

17 Q. Turning to the electropneumatic
18 overspeed device on each of the six Wdrtsild
19 Vasa 32s, do you -- do you know that on the
20 DEEPWATER HORIZON that that device was set to
21 engage when the RPMs went 13 percent higher
22 than the normal operating RPM?

23 A. I don't know the exact
24 percentage, but it was something like that.

25 Q. And the way that operates, that
00030:01 particular system operates, is when the
02 measured speed reaches the trip speed,
03 whether it be 13 percent or something like
04 that, a signal is sent that stops -- that
05 goes to a stop solenoid valve that's called
06 CV153?

07 A. I don't know the -- I do know
08 the stop solenoid part of it, I recognize the
09 exact number. I don't know.

10 Q. Fair enough. And the valve
11 opens and pneumatic pressure then triggers
12 the device that shuts off fuel supply to the
13 cylinder?

14 A. Yes, sir.

15 Q. And the compressed air is what
16 actuates the valve?

17 A. Yes, sir.

18 Q. Is this device commonly called
19 an overspeed trip?

20 A. Yes, sir.

21 Q. In addition to the
22 electropneumatic overspeed device, or the
23 so-called trip, overspeed trip, there is also
24 an electronic overspeed control?

25 A. Yes, sir.

00031:01 Q. And do you recall that the
02 electronic overspeed trip device engages at,
03 again, 13 percent in excess of the normal
04 operating RPMs?

05 A. I don't know the exact
06 percentage, but that sounds right.

07 Q. And I'm reading here that this
08 device employs something called a diesel
09 engine speed measuring system,
10 D-E-S-P-E-M-E-S. Does that ring a bell with
11 you?

12 A. What?

13 Q. DESPEMES.

14 A. It doesn't ring a bell.

15 Q. Okay. But when this
16 electronically -- this diesel engine speed
17 measuring system electronically detects the
18 overspeed condition, it sends an electronic
19 signal which goes to a stop solenoid on the

20 engine that then triggers the mechanical
21 electropneumatic device. Is that true?
22 A. It sounds like it, yes, sir,
23 that's the way it operates.
24 Q. Okay. And these are -- the
25 Woodward electropneumatic system and then the
00032:01 DESPEMES electronic system are two separate
02 devices that detect overspeed and can shut
03 off fuel supply to the engines, that's their
04 purpose, right?
05 A. Yes, sir.
06 Q. In addition to those two
07 overspeed trip devices, do the -- did the
08 Wdrtsild 32s also have a governor that can
09 signal the rack to shut off the fuel supply?
10 A. Yes, sir.
11 Q. How does that operate?
12 A. Basically centrifugal force in
13 the governors, the RPMs increase, it gets to
14 the point where it trips the fuel rack and
15 brings it to zero, zero fuel.
16 Q. Mr. Brown referred to something
17 called droop balls.
18 A. Yes, sir.
19 Q. I didn't really understand it
20 last week, but maybe you can give me
21 another -- you can take another stab at
22 explaining it to me who doesn't know engines.
23 A. I don't know the -- I know
24 the -- because they're like balls, I guess as
25 centrifugal force increases, I think they
00033:01 rise -- I don't know the in's and out's of
02 them, but I have heard of them before.
03 Q. Your hands actually did a good
04 job, centrifugal force creates the balls to
05 go at a location different than when they're
06 less centrifugal force and then the droop
07 balls actuate something mechanically?
08 A. Yes, sir.
09 Q. What is that?
10 A. Call it the overspeed trip, the
11 mechanical overspeed trip and -- you know, I
12 have never seen inside the actual governor to
13 see those droop balls, but -- besides maybe a
14 picture in class, but it would just
15 mechanically, you know, eventually get to the
16 fuel rack and trip it to go to zero.
17 Q. In addition to all that we've
18 just discussed, there is something on these
19 Wdrtsild, each of these Wdrtsild Vasa 32s
20 called rig saver?
21 A. Yes.
22 Q. Cap bar, rig, cap saver, explain
23 to us what a rig saver is on a Wdrtsild Vasa
24 32?

25 A. Basically mechanically operated
00034:01 wafer valve that would set off the supply
02 side air into the air intake.
03 Q. And how does that activate?
04 A. It's a -- spring loaded so
05 that's what actuates the wafer, it gives a
06 signal to trip.
07 Q. And then what causes the wafer
08 to make that movement that you're describing?
09 A. I've never seen it personally,
10 but I know that it's a spring force that does
11 it.
12 Q. What causes the spring force to
13 engage? Is it detection of gas in the air
14 intakes?
15 A. As far as I know, it's all with
16 the shutdown, so with an overspeed, I know it
17 would trip with an overspeed. That's the way
18 we tested them was with overspeed.
19 Q. So the rig saver engages when
20 the RPMs get to a certain point?
21 A. Yes, sir.
22 Q. And that's in addition to the
23 electrical -- the electropneumatic overspeed,
24 the electronic overspeed and the governor
25 overspeed?
00035:01 A. Yes, sir.
02 Q. So if I count right, that would
03 be four separate ways that a Wdrtsild Vasa 32
04 is prevented by the devices that are part of
05 it to not reach an overspeed condition?
06 A. Yes, sir.
07 Q. Do you know what the Wdrtsild
08 manufacturer's -- well, first of all, aboard
09 the DEEPWATER HORIZON in the ECR, did you
10 have available to you, you and your
11 maintenance group have available to you the
12 Wdrtsild Vasa 32 engine manual?
13 A. Yes, sir.
14 Q. Was that available in a hard
15 copy or on the computer or both?
16 A. I know it was hard copy, I don't
17 know if we could have accessed the same thing
18 on the computer.
19 Q. Do you know what the
20 manufacturer's recommended schedule for
21 checking the functions of all automatic stop
22 devices that we've just gone over was?
23 A. No, sir, I don't know.
24 Q. Do you know from your experience
25 on board DEEPWATER HORIZON in the maintenance
00036:01 group how often each of these automatic stop
02 devices were checked?
03 A. I know we did them for Coast
04 Guard inspections.

05 Q. How often was that?
06 A. I'm pretty sure they're annual
07 inspections and I wasn't there for all of the
08 inspections, but I did do at least one.

Page 36:18 to 37:20

00036:18 Q. If you or I were to ask
19 Transocean to learn what the scheduled
20 maintenance or the scheduled testing of the
21 automatic stop devices was on the DEEPWATER
22 HORIZON, where would we -- who would we ask
23 and where -- compound question, but where
24 would we go, in other words?
25 A. I would have looked on the
00037:01 maintenance, in the maintenance program on
02 the computer and answered the question
03 myself.
04 Q. Would that make an inquiry of
05 the RMSII?
06 A. Yes, sir. Correct. If that was
07 the latest. I can't recall the exact name of
08 the program.
09 Q. That was IMPAC and then RMSII?
10 A. Right, okay. So RMSII, yes,
11 sir, either one, they both had that
12 information.
13 Q. And would the DEEPWATER
14 HORIZON's -- would it be noted in the
15 computer-based maintenance system, that is,
16 the calling out of a maintenance item and
17 then the completion of a maintenance item
18 when an automatic stop device was tested,
19 that would be entered on the system?
20 A. Yes, sir.

Page 38:08 to 38:10

00038:08 Q. That actually reminds me, was
09 Steve Bertone your boss?
10 A. Yes, sir.

Page 38:17 to 39:03

00038:17 Q. Would he be on the same hitch as
18 you?
19 A. The days varied slightly, so not
20 exactly matching up.
21 Q. But at some point, during any of
22 your 21-day hitches, he would overlap?
23 A. Yes, sir, correct.
24 Q. When he wasn't on board the
25 DEEPWATER HORIZON, were you the top officer

00039:01 in the maintenance group?
02 A. There was a guy that replaced
03 him also.

Page 39:13 to 41:10

00039:13 Q. Did you ever -- do you have a
14 recollection of ever checking, other than the
15 one time that you do remember of checking the
16 overspeed stop devices for a Coast Guard
17 inspection, do you remember consulting the
18 Wdrtsild maintenance -- engine manual to see
19 what the recommended intervals for checking
20 the stop devices was?

21 A. I don't recall.

22 Q. Would you agree that the rig
23 saver is -- you've probably said this using
24 another term, but I will ask this question
25 because I have it written down, would you
00040:01 agree with this description of the rig saver
02 as a spring-loaded guillotine valve which can
03 be triggered manually or pneumatically?

04 A. That sounds correct.

05 Q. Okay. And that rig saver is
06 used to provide positive air shutoff;
07 correct?

08 A. Yes, sir.

09 Q. And that ensures that the engine
10 will not overspeed as a consequence of the
11 ingestion of combustible gas?

12 A. Yes, sir.

13 Q. And that device works to
14 initially reduce the fuel rack in order to
15 compensate for the increased energy supply?

16 A. I don't know.

17 Q. I'm going to show you a picture
18 just to see if this -- do you remember I
19 asked you about the Woodward, and I said the
20 723PLUS and you said I don't know about the
21 number.

22 A. Yes, sir.

23 Q. I'm going to show you a picture
24 to see if that refreshes your recollection.

25 A. Yes, sir.

00041:01 Q. Do you recognize that?

02 A. Yes, sir.

03 Q. Since you do recognize it, does
04 that refresh your memory that the digital
05 device on the -- that each of the Wdrtsild
06 Vasa 32s is equipped with a Woodward 723PLUS
07 digital control?

08 A. Yes, sir.

09 (Exhibit No. 2164 marked for
10 identification.)

Page 41:17 to 42:02

00041:17 On your hitch on DEEPWATER
18 HORIZON what was the typical maintenance
19 crew? By position and then by name?
20 A. Steve Bertone was the
21 maintenance supervisor. The guy that was my
22 opposite daytime mechanic supervisor was
23 Jerry Isaac and Doug Brown was chief, was one
24 of the -- he was a chief mechanic, second
25 engineer -- you know, chief mechanic/second
00042:01 engineer. There was a third engineer, his
02 name was Gerald Oldham, Gerald Oldham.

Page 42:06 to 43:17

00042:06 A. And then the rotation of the
07 motormen, Terry Sellers was out there at some
08 point in time, Willie Stoner was out there at
09 some point in time, Paul Meinhart was out
10 there. Ronnie Arnold was one of the other
11 motormen.
12 Q. Did you -- did you, during your
13 time on the DEEPWATER HORIZON, did the
14 complement or the number of maintenance crew
15 increase, decrease, stay the same?
16 A. Yes, sir. It increased from
17 when I started in September '08 to April
18 2010.
19 Q. What were the positions that
20 were added?
21 A. The -- we got one extra
22 motorman, so instead of having one motorman
23 on tour, we had two, and that was the actual
24 only number increase in the engine department
25 was an extra motorman and that was it as far
00043:01 as numbers, number increase. There were some
02 title changes, but number increased by one.
03 Q. So an extra motorman sometime
04 between September '08 and April 2010?
05 A. Yes, sir, and I can easily say
06 it was after January of 2009, I just don't
07 know the exact time.
08 Q. Do you know the reason for the
09 addition of a motorman?
10 A. To keep up with the
11 maintenance -- the jobs that needed to be
12 done.
13 Q. Did you have any view that the
14 engine or excuse me, the maintenance
15 department was or was not able to keep up
16 with both the repairs and then the planned
17 maintenance?

Page 43:20 to 43:23

00043:20 THE WITNESS:
21 It was constant hard work to keep
22 up, to try to attempt to keep up with the
23 work.

Page 43:25 to 44:01

00043:25 Q. Did you have enough manpower to
00044:01 keep up with the work?

Page 44:04 to 44:05

00044:04 THE WITNESS:
05 We could have used more people.

Page 44:07 to 44:24

00044:07 Q. Well, I understand your answer
08 and I don't mean to push, but I just want to
09 know if you had a view that more people would
10 enable the maintenance crew to do the needed
11 repairs plus engage in preventive
12 maintenance?
13 A. Yes, sir.
14 Q. Have you ever heard the phrase
15 "condition" or "condition-based maintenance"
16 on DEEPWATER HORIZON?
17 A. I've heard condition-based
18 maintenance. Specific to DEEPWATER HORIZON,
19 I don't know. I have heard it before.
20 Q. Do you understand what the
21 phrase means?
22 A. I can give my attempt of the
23 definition.
24 Q. Go ahead, please.

Page 45:02 to 45:05

00045:02 THE WITNESS:
03 That you're performing
04 maintenance based on the condition of what
05 you're going to work on.

Page 45:07 to 45:19

00045:07 Q. This may sound like I'm trying
08 to put words in your mouth, but don't -- you
09 know, you don't have to accept what I'm
10 saying. There's been some testimony that in

11 his mind, and the person is Doug Brown, that
12 condition-based maintenance meant to him that
13 Transocean's attitude was "use it until it
14 breaks and then repair it."
15 I'm not asking you to accept that
16 either Doug Brown either said that or that it
17 is, in fact, true. I just put that out there
18 for you to react to based on your own
19 experience.

Page 45:22 to 46:01

00045:22 THE WITNESS:
23 I feel like it was triaging, kind
24 of moving from determining what the most
25 important problem was and attacking that one
00046:01 first before you move on to the next.

Page 46:03 to 46:09

00046:03 Q. In other words, you would -- you
04 prioritized and did the most important
05 maintenance -- well, I should say -- let me
06 start over, you prioritized and did a repair
07 before doing a planned or preventive
08 maintenance job?
09 A. That would --

Page 46:12 to 46:13

00046:12 THE WITNESS:
13 That would be possible.

Page 46:15 to 46:16

00046:15 Q. I need to know what you know,
16 what you experienced, not what's possible.

Page 46:20 to 47:12

00046:20 Q. If you don't know, or disagree,
21 do tell me.
22 A. We made -- that decision was
23 made, you know, if you had a repair to make,
24 if you had PMs due, then you would make the
25 repair first.
00047:01 Q. Would a PM include checking the
02 overspeed control devices, that would be a PM
03 item as opposed to a repair item?
04 A. Yes, sir, to test the overspeed?
05 Q. Uh-huh (indicating
06 affirmatively.)

07 A. Yes, sir.
08 Q. So testing the overspeed would
09 be an example of an item that might be put
10 lower on the priority list because a repair
11 had to be made on some other mechanical
12 aspect?

Page 47:16 to 47:22

00047:16 THE WITNESS:
17 Every day was different and like
18 there was triage, like we determined what
19 repairs needed to be done first. Sometimes
20 PMs would be determined the say way. Did we
21 ever make that specific determination on an
22 overspeed test? I don't know.

Page 48:02 to 48:06

00048:02 Q. When you were working in the
03 maintenance group as one of the officers
04 aboard the DEEPWATER HORIZON, when the vessel
05 was in a drilling mode, who was the person in
06 charge of the vessel?

Page 48:10 to 48:10

00048:10 Jimmy Harrell, the captain.

Page 48:17 to 48:18

00048:17 (Whereupon, a brief recess was
18 taken.)

Page 48:23 to 49:24

00048:23 Q. Did you want to clarify
24 anything, Mr. Mansfield?
25 A. Yes, sir. On that last
00049:01 question, I understand the question to be who
02 was in charge of the rig at the time of
03 drilling and that would be Jimmy Harrell.
04 Q. Was your department in charge of
05 the maintenance and repair of the watertight
06 doors on the DEEPWATER HORIZON?
07 A. Yes, sir.
08 Q. What would be among -- can you
09 describe for us what preventive maintenance
10 there would be on watertight doors?
11 A. Yes, sir, to give it a visual
12 check, visual inspection, operate, operate,
13 see if it was operating correctly, checking

14 the oil level in the reservoir in the system
15 and checking the pressure in the -- the
16 pressure receiver for -- I can't recall the
17 exact term on it, but basically checking
18 levels and checking connections and giving it
19 a basic overview.

20 Q. Were watertight -- were there
21 watertight doors on the DEEPWATER HORIZON
22 that were able to be operated remotely from
23 the bridge?

24 A. Yes, sir.

Page 51:11 to 51:23

00051:11 Q. Do you remember that during
12 April there were gentlemen, surveyors from a
13 company call ModuSpec that were doing a
14 survey on board DEEPWATER HORIZON?

15 A. The name ModuSpec does ring a
16 bell, but other than that, I can't even tell
17 you why they were there.

18 Q. Did you -- was part of your job
19 during their time on board to show them
20 pieces of mechanical -- I can't say it,
21 mechanical equipment within your
22 jurisdiction?

23 A. I don't remember.

Page 53:22 to 54:22

00053:22 Q. Would he be -- would the
23 watertight doors and their ability to
24 maintain watertight integrity between
25 compartments, would that be within the marine
00054:01 side of the vessel crew as opposed to the
02 maintenance department?

03 A. It was kind of a tossup in an
04 ongoing discussion of who would perform the
05 inspection and who would actually do the
06 maintenance.

07 Q. When you say it was a tossup,
08 was it a divided responsibility or did you
09 guys sort of trade back and forth? How did
10 that work?

11 A. Sort of traded back and forth
12 and sometimes we -- the engine room felt like
13 in order to get a good inspection, we had to
14 do it ourselves, so if we had -- if we -- you
15 know, sometimes we did it ourselves,
16 sometimes the ABs would go around and do the
17 inspection, but we would always do the
18 maintenance on them.

19 Q. I take it from your answer that
20 you viewed your main role and responsibility

21 as taking care of those six Wdrtsild Vasa
22 32s.

Page 55:01 to 55:21

00055:01 I wouldn't say that, I would say
02 that any -- you know, the maintenance on the
03 engines, the thrusters, and the watertight
04 doors, you know, we did the maintenance on
05 the watertight doors, you know, the
06 mechanical part of it, things that were
07 electronic, you had the assistance of the
08 electrical department, so it wasn't just the
09 engines, but, unfortunately, if you look at
10 it, you know, the engines pretty much can be
11 connected to every part of the rig, you know,
12 because they were supplying the electricity,
13 so -- but the -- to me, the specific division
14 between maintenance was, the mechanics did
15 the drillers, the drilling equipment,
16 everything on the drill floor, the drawworks
17 and then subsea did all the subsea equipment,
18 so we did -- the marine equipment, the
19 engines, the thrusters, the pumps, the
20 auxiliary pieces of equipment, that was our
21 responsibility.

Page 56:06 to 56:09

00056:06 introduction, am I correct that you've never
07 seen any part of the ModuSpec report from its
08 survey of the DEEPWATER HORIZON?
09 A. No, sir.

Page 58:16 to 59:14

00058:16 Q. Okay. When you were -- on that
17 last hitch on DEEPWATER HORIZON, did you do
18 any maintenance work to your recollection on
19 watertight doors on the DEEPWATER?
20 A. Yes, sir.
21 Q. Can you -- if it refreshes your
22 memory, feel free to look at the exhibit that
23 had the listing.
24 A. I don't know specifics, I don't
25 know specific times when we did them, but,
00059:01 you know, we did -- I can't give specific
02 times, you know, but we did -- we replaced
03 pumps in the reservoir, we replaced, in the
04 control cabinet, I forget -- cards, I think
05 they called them. I say "we," it was kind of
06 -- it was a hand-in-hand job because it's
07 electronics and mechanical parts are so close

08 together and operate hand in hand.
09 So, you know, we replaced springs
10 on the doors, the handle, the levers to
11 operate them. You know, those are some of
12 the things we did. I see the no bolt down
13 there, we replaced bolts in the linkages, you
14 know.

Page 59:16 to 60:17

00059:16 you mentioned that when the DEEPWATER HORIZON
17 was in a drilling mode of operation, that
18 Jimmy Harrell would be the person in charge?
19 A. Yes, sir.
20 Q. Did you understand when Captain
21 Kutcha or the other captain, if he was on
22 your hitch, when they became the persons in
23 charge of the vessel?
24 A. Yes, sir. It is my
25 understanding, and this is not from reading a
00060:01 policy, but it was my understanding from
02 hearsay that when the vessel was underway,
03 moving between -- a rig move, so to speak,
04 that was the only time that the captain was
05 in charge of the rig and basically when it
06 was off location the captain, when it was on
07 location, the OIM.
08 Q. When you say "hearsay," are you
09 talking about what crew members on the
10 DEEPWATER HORIZON expressed?
11 A. Yes, sir.
12 Q. Have you ever received any well
13 control training?
14 A. No, sir.
15 Q. Well control wasn't in your job
16 function?
17 A. No, sir.

Page 64:10 to 65:13

00064:10 Q. Did you have any -- did you
11 interact with any of the BP well site
12 leaders, company men?
13 A. The only time I interacted
14 really with BP was getting the permit signed
15 for bringing on fuel was really the only --
16 you know, and hearing them talk at the
17 pretour, but that wasn't a personal
18 interaction, so I didn't have really a lot of
19 personal interaction with them.
20 Q. Okay. Is it fair to say that
21 either -- well, Steve Bertone when he was on
22 board with you or the other fellow, whose
23 name you can't remember --

24 A. Yes, sir.
25 Q. -- would that be Michael
00065:01 Desello?
02 A. Yes, sir, Mike Desello, and
03 there was another guy, too, but he was a
04 temporary, and I can't remember his name,
05 but, yes, sir, he was the guy they made
06 permanent.
07 Q. So you fellows would be in
08 charge of doing the maintenance work on the
09 DEEPWATER HORIZON?
10 A. Yes, sir.
11 Q. You didn't need BP to tell you
12 where to go or what to do?
13 A. No, sir.

Page 65:17 to 65:18

00065:17 Q. Did you take any directions from
18 the BP company men?

Page 65:22 to 65:25

00065:22 I think they would give maybe
23 direction at pretour, there was a safety guy
24 on board sometimes, personally, no, didn't
25 direct -- no personal direction.

Page 66:02 to 68:20

00066:02 Q. There was a person on board the
03 DEEPWATER HORIZON called the RSTC?
04 A. Yes, sir.
05 Q. Tell us what that is?
06 A. The rig safety and training.
07 Q. Coordinator?
08 A. Coordinator, I'm rough on that.
09 So he did checks. He did safety checks. If
10 he had questions about how you -- what was
11 the proper way to set up scaffolding if you
12 were going to clean the intakes on the
13 engine, he was the guy you could get to
14 help -- he had to actually sign out. He
15 checked all the harnesses and lifting
16 equipment, the inspection tags, things like
17 that, which we didn't -- we had some lifting
18 equipment that was obviously the deck for the
19 crane crew. He was basically the safety guy
20 or the safety -- he coordinated classes, too,
21 if you were going to take classes.
22 Q. Did you take OJT modules?
23 A. Yes, sir, I did.
24 Q. While on board?

25 A. Yes, sir.
00067:01 Q. And so there was an RSTC, did
02 you call him the safety man or the RSTC?
03 A. We called him RSTC.
04 Q. And then you would -- there
05 would be a pretour meeting each day before
06 your tour would begin?
07 A. Yes, sir.
08 Q. And a BP company man would
09 typically be at the pretour meeting?
10 A. Yes, sir.
11 Q. Would the whole crew getting
12 ready to go to work be in that meeting?
13 A. Yes, sir.
14 Q. And what were the purpose of
15 those pretour meetings to your -- as far as
16 your impression was?
17 A. To coordinate -- my impression
18 was to make sure that anything, as far as us,
19 any maintenance we were going to do wasn't
20 going to overflow into somebody else's
21 department and affect their task of the day
22 and if it was, to address them and try to
23 coordinate times that it wouldn't.
24 Q. So the pretour meeting from your
25 perspective was a coordinating of the
00068:01 different departments?
02 A. Right. Everybody was -- every
03 department head was given a chance to speak
04 up if -- you know, and the driller, you know,
05 obviously, the focus was drilling, I mean,
06 that was the main goal and so we were to
07 support them, you know, and so it was to --
08 to know what they were doing and if they were
09 going to be cementing or whatever, you know,
10 to make sure that they had drill water, so it
11 was kind of a coordination -- I took it as a
12 coordination thing, and a heads-up on big
13 safety issues. If there were accidents on
14 other rigs, we would talk about them and
15 things like that.
16 Q. And that happened each -- at the
17 beginning of each tour?
18 A. Yes, sir.
19 Q. So every 12 hours?
20 A. Yes, sir. 1100 and 2300.

Page 69:22 to 73:06

00069:22 Q. Jumping back to some earlier
23 testimony about the issue of manpower for
24 doing the maintenance, both repairs and
25 preventive maintenance, at any time while
00070:01 serving as an officer aboard DEEPWATER
02 HORIZON, did you express any concerns you had

03 about the manpower issue to any of your
04 bosses?
05 A. Yes, sir.
06 Q. Who did you express that to?
07 A. To Steve Bertone and the chief
08 engineers and the captains and -- yes, sir.
09 Q. And tell me, let's take
10 Mr. Bertone as an example, what -- during
11 your tenure aboard the DEEPWATER HORIZON,
12 what did you tell him?
13 A. Specific conversation, I don't
14 know, but the gist of it was, usually when
15 something was pointed out about this job
16 needs to be done or that job needs to be
17 done, it would be pointed out, hey, if we
18 could get more people, it would be nice, and
19 the thing was that it came out -- I'm pretty
20 sure in January of 2009, that they were going
21 to get us more people so, to me, it was like
22 a goal that just hadn't quite been achieved,
23 you know, that the intent was to get more
24 people. So it was always in conversation, I
25 tried to get, you know, and nothing ever in
00071:01 writing.
02 Q. But you told Bertone,
03 Mr. Bertone for sure?
04 A. Yes, sir. And the captains, you
05 know.
06 Q. Captain Kutcha?
07 A. Yes, sir. They were directly
08 involved in getting permits signed and
09 isolations, depending on what we were working
10 on, so it was kind of a topic of
11 conversation, you know.
12 Q. Okay. And you believe that
13 although the events of April 20th prevented
14 it, that you think that things were in
15 progress to get more manpower?
16 A. Yes, sir, I think -- yes, sir.
17 Q. When you were serving in the ECR
18 on DEEPWATER HORIZON, did you have to have a
19 bridge command to shut down any of the
20 Wdrtsild Vasa 32 engines?
21 A. No, sir.
22 Q. You had authority to shut down
23 an engine?
24 A. Yes, sir.
25 Q. Similar question, but pushing
00072:01 the ESD, did you have authority in your role
02 in the engine room to push the ESD button on
03 any particular engine?
04 A. That was -- I don't know --
05 Q. I don't mean to cut you off, go
06 ahead.
07 A. No. Just, you know, shutting

08 down an engine, you know, that was something
09 that we practiced, if we noticed something
10 that -- hey, this, you know, there's a leak,
11 let's switch engines, that was something that
12 we did on a regular basis. As far as
13 operating the emergency shutdown, that was
14 really something that was really never
15 covered.

16 Q. And by not covered, you mean you
17 and your department had not been trained on
18 that?

19 A. Yes, sir.

20 Q. Did you receive any training
21 while serving on the DEEPWATER HORIZON in
22 what your department should do in a well
23 control situation?

24 A. What we did, it was understood
25 that you would have a member of the engine
00073:01 room in the control room at all times and
02 that the engine room would have control of
03 the engines versus the bridge having control
04 of the engines.

05 Q. Did you do drills for that?

06 A. No, sir.

Page 78:10 to 78:21

00078:10 engines. Do you know that the No. 3 engine
11 had previously had any trouble one way or the
12 other?

13 A. I mean, we had -- the
14 maintenance was so regular on all six I can't
15 say that No. 3 specifically had certain
16 problems, you know, not that I recall.

17 Q. And what do you mean, the
18 maintenance was regular?

19 A. Well, preventive maintenance.

20 Q. Preventive maintenance?

21 A. Right, right.

Page 79:01 to 81:03

00079:01 Q. Okay. That's fair enough. Do
02 you recall if any of the overspeed devices or
03 governors of any of these engines were on a
04 preventive maintenance list as far as
05 priority items to be fixed?

06 A. No, sir.

07 Q. You don't know one way or the
08 other?

09 A. Right.

10 Q. How actually did that work, and
11 by that, I'm talking about, I guess you have
12 items that you had to work on every day?

13 A. Yes, sir.
 14 Q. And would some of the high --
 15 items be high priority, middle priority and
 16 low priority?
 17 A. Yes, sir. And the program would
 18 determine and then -- you know, we would
 19 determine because a -- you know, a repair, if
 20 you had a repair that had to be done, you
 21 would do that, you know.
 22 Q. Okay.
 23 A. First. Like I mentioned before
 24 about triage, kind of prioritizing.
 25 Q. You prioritize?
 00080:01 A. Right.
 02 Q. And who would actually do the
 03 prioritizing?
 04 A. Myself.
 05 Q. That would be you?
 06 A. Yes, sir.
 07 Q. And who would then -- someone
 08 put the list together to show you so you
 09 could prioritize, is that fair?
 10 A. We didn't have a manually
 11 created work list, you know, we had the
 12 maintenance program that would do the PMs
 13 because the repairs wouldn't come up on that
 14 list, you know, repairs were something you
 15 identify or the watch before you identified
 16 as something being wrong. If they could fix
 17 it, hey, this needs to be fixed, so the
 18 program would be based on -- there were daily
 19 PMs. There were weekly PMs. There were
 20 monthly PMs. There were quarterly,
 21 bi-annual, annual, so it would spit them out
 22 according to day -- you know, every month
 23 they would be listed for you.
 24 Q. Let me --
 25 A. I say there weren't any manually
 00081:01 created lists, I take that back there are
 02 audits, there were audits, you know, BP
 03 performed audits, so.

Page 81:06 to 81:13

00081:06 document that's Tab 3 and we will mark this
 07 as Exhibit 2167. Just so I will understand,
 08 would you see something like this?
 09 A. This wasn't a regular -- I guess
 10 what I was thinking about were the
 11 maintenance, like the preventive maintenance
 12 was a regularly spit-out thing by the
 13 computer.

Page 81:15 to 82:02

00081:15 A. Whereas, this was -- yeah, so
16 there were -- auditors came to the rig, there
17 was no regular schedule and they did create
18 work lists, so there were manual work lists
19 created. What I was trying to say was we
20 didn't create necessarily a manual work list
21 that we went by, but this -- the auditors did
22 make this list and coming down through the
23 chief engineer, he would say, hey, you know,
24 these are items we need to do and if a repair
25 came up, sometimes a repair would supercede
00082:01 getting an item done from the list for that
02 day.

Page 82:06 to 82:13

00082:06 Q. Okay. I got you. So like this
07 particular exhibit we're looking at, 2167,
08 you would actually see the exhibit?
09 A. Yes, sir, correct.
10 Q. But then something else might
11 trump it because something else might need to
12 be done more?
13 A. Yes, sir, correct.

Page 83:22 to 84:25

00083:22 Q. I'm going to hand you what is in
23 our book Tab 15, and it's already been marked
24 as Exhibit 933, and is that one of the
25 computerized work lists?
00084:01 A. Yes, sir.
02 Q. This one looks like it's dated
03 the 19th. Do you see that?
04 A. Yes, sir, I see that.
05 Q. Okay. And so just kind of tell
06 me basically what it is and how you used it?
07 A. Okay. If this is, depending if
08 this is a created job, repair or -- it looks
09 like -- depending, you know, you could create
10 your own job, if you found a repair that
11 needed to be done, you would create that job.
12 Whereas, the -- so you can create the job,
13 you can name it, if you had parts, you could
14 put parts on it, you could put who worked on
15 it, names, you could put -- and what you did
16 and if it was a PM, you could also put parts
17 on it if it required parts on the PM, and I
18 was just trying to see -- because I haven't
19 actually -- I know the morning report was
20 something you could look at. I didn't really
21 ever look at it, so I'm trying to --
22 Q. Okay.

23 A. So, I mean, it looks like the --
24 do you want to go down each one of them and
25 try to --

Page 86:06 to 88:25

00086:06 Q. Can you go over to Page 35573?
07 A. (Complying) yes, sir.
08 Q. Okay. Down at the bottom, it
09 talks about high priority, maintenance,
10 planned maintenance, do you see that?
11 A. Yes, sir.
12 Q. This program, like on the 19th,
13 how would it come into existence?
14 A. How would the program --
15 Q. I'm sorry, how would this
16 document come into existence?
17 A. From what I understand, you
18 could request a printout of the morning
19 report. Like I said, I never personally did.
20 I'm pretty sure like the chief
21 engineer, the maintenance supervisor and the
22 captain, probably the maintenance supervisor
23 is the one who generated this kind of stuff,
24 so it was something that -- it was to give
25 you a heads up of jobs that were overdue.
00087:01 And normally they would produce it and then
02 send it back to the engine room.
03 Q. So like at the bottom it says,
04 priority and it lists 35 days overdue or
05 something, right?
06 A. Yes, sir.
07 Q. And if we go to the next page,
08 and it talks about engine checks, see at the
09 top of Page 35574 it talks about engine
10 checks on --
11 A. Yes, sir.
12 Q. -- and it has days overdue.
13 What does that mean, days overdue?
14 A. Days overdue, that speaks for
15 itself, those are days that PM is overdue, as
16 per that main engine check PM, a lot of times
17 -- you know, the main engine checks, because
18 it was a new program, a lot of PMs got done,
19 but didn't get closed out. The main engine
20 checks, was, you know, one of the ones that
21 would sometimes get overlooked. Now, I can't
22 speak specifically for which main engine
23 check PM that is, so I guess it's hard to --
24 Q. All you can do is read what it
25 says?
00088:01 A. Right, read what it says,
02 because you could go in, you know, this is
03 from a report, my guess is that when I pulled
04 up this PM, it would give me the job -- you

05 could click on tabs to pick up what the main
 06 engine check consisted of.
 07 Q. Kind of down in the middle of
 08 the page it talks about replace rig saver
 09 gaskets on MGE6. Do you see that?
 10 A. Okay.
 11 Q. And it says 166 days overdue.
 12 First of all, what is a rig saver gasket on
 13 MGE6, if you know?
 14 A. Rig saver gasket is like a
 15 wafer, you know, rig savers come like -- it's
 16 a wafer - like the guy -- I mentioned a
 17 guillotine, good explanation. So there will
 18 be gaskets between those pieces when they're
 19 put together.
 20 Q. Okay. So let me ask you this:
 21 If you're coming on board, your duty on the
 22 19th -- not just you, anybody, how would
 23 somebody know that on the 19th they were
 24 supposed to or not supposed to work on
 25 replacing the rig saver gasket on MGE6?

Page 89:04 to 90:03

00089:04 They would be told, you know.
 05 And you can look at the job list and you
 06 could see what jobs were overdue. We did try
 07 to attack the overdue jobs, you know, that
 08 was one of the prioritizing ways we did it
 09 was try to attack the most overdue jobs.
 10 EXAMINATION BY MR. BOWMAN:
 11 Q. Makes sense. And who would --
 12 would that be like up to the various people
 13 there on the -- in the engine room to figure
 14 out what jobs to attack first?
 15 A. Yes, sir.
 16 Q. And --
 17 A. With help from, I'm sorry, with
 18 help -- I mean, the chief engineer is kind of
 19 -- you know, I supervised, I was the hands-on
 20 supervisor, and, obviously, when they deem
 21 something necessary, they would tell us also.
 22 Q. Sure, and then after you finish
 23 working on it, you tell them or enter a
 24 little report showing it was due?
 25 A. Correct.
 00090:01 Q. And then after you finished it,
 02 it would come off of this days overdue deal?
 03 A. Correct.

Page 94:05 to 95:22

00094:05 Q. Okay. So I'm going to ask you a
 06 series of questions, and I would like you to

07 keep in mind the time period September 2008
 08 until April 20th, 2010.
 09 A. Okay.
 10 Q. April 20th, being the date of
 11 the explosion?
 12 A. Yes, sir.
 13 Q. During that time period, did you
 14 communicate with anyone from Anadarko about
 15 the Macondo well or the DEEPWATER HORIZON?
 16 A. No, sir.
 17 Q. During that time period, did you
 18 communicate with anyone from MOEX Offshore
 19 2007 about the Macondo well or the DEEPWATER
 20 HORIZON?
 21 A. No, sir.
 22 Q. During this time period, are you
 23 aware of anyone from Anadarko visiting the
 24 DEEPWATER HORIZON rig while the well was
 25 being drilled?
 00095:01 A. No, sir.
 02 Q. During that time period, are you
 03 aware of anyone from MOEX Offshore 2007
 04 visiting the DEEPWATER HORIZON rig?
 05 A. No, sir.
 06 Q. To your knowledge, did anyone
 07 from Anadarko participate in inspecting the
 08 DEEPWATER HORIZON engine control room?
 09 A. No, sir.
 10 Q. Same question with respect to
 11 MOEX Offshore 2007?
 12 A. No, sir.
 13 Q. Are you aware of anyone
 14 informing Anadarko of the results of any
 15 inspections performed on the DEEPWATER
 16 HORIZON engine control room?
 17 A. No, sir.
 18 Q. Are you aware of anyone
 19 informing MOEX Offshore 2007 of the results
 20 of any inspections performed on the DEEPWATER
 21 HORIZON engine control room?
 22 A. No, sir.

Page 97:05 to 104:02

00097:05 you. Did you know Jason Anderson?
 06 A. (Nodding head affirmatively)
 07 yes, sir.
 08 Q. Based on what you knew of
 09 Mr. Anderson, was he a hard working employee,
 10 sir?
 11 A. Yes, sir.
 12 Q. Did you consider him to be a
 13 safety conscious employee, sir?
 14 A. Yes, sir.
 15 Q. Were you aware of anything that

16 suggested that Mr. Anderson would ever take
 17 risks that would endanger the life of the
 18 crew of the DEEPWATER HORIZON?
 19 A. No, sir.
 20 Q. Based on your experiences, he
 21 wasn't the type of person to become
 22 complacent in his job, was he, sir?
 23 A. No, sir.
 24 Q. Did you know Mr. Dewey Revette,
 25 Mr. Mansfield?
 00098:01 A. Yes, sir.
 02 Q. Based on what you knew of
 03 Mr. Revette, was he a hard-working
 04 individual?
 05 A. Yes, sir.
 06 Q. Was he safety conscious?
 07 A. Yes, sir.
 08 Q. Was he the type of person to act
 09 in a way to endanger the life and the safety
 10 of the crew?
 11 A. No, sir.
 12 Q. Did you like these gentlemen?
 13 A. Yes, sir.
 14 Q. You know Jimmy Harrell, don't
 15 you, sir?
 16 A. Yes, sir.
 17 Q. He was the OIM aboard the
 18 DEEPWATER HORIZON at the time of the
 19 incident?
 20 A. Yes, sir.
 21 Q. And you had worked with
 22 Mr. Harrell when he was the OIM during your
 23 time on the DEEPWATER HORIZON from the time
 24 you started; correct?
 25 A. Yes, sir.
 00099:01 Q. He had an open-door policy?
 02 A. Correct.
 03 Q. Good fellow?
 04 A. Yes, sir.
 05 Q. Safety conscious?
 06 A. For sure.
 07 Q. Worked hard at it?
 08 A. Yes, sir.
 09 Q. Detail oriented?
 10 A. Yes, sir.
 11 Q. Supportive of you and the crew
 12 and your concerns?
 13 A. Always.
 14 Q. Do you know Randy Ezell?
 15 A. Uh-huh (indicating
 16 affirmatively).
 17 Q. She is taking it down,
 18 sometimes --
 19 A. Yes, sir.
 20 Q. I appreciate that. Good fellow?

21 A. Yes, sir.
22 Q. Hard working guy?
23 A. Yes, sir.
24 Q. Knowledgeable about his job as
25 far as you know?
00100:01 A. Yes, sir.
02 Q. Was Mr. Ezell someone that
03 people looked up to on the rig?
04 A. Yes, sir.
05 Q. Mr. Bertone, you worked with him
06 quite a bit, didn't you, sir?
07 A. Yes, sir.
08 Q. Hard-working guy?
09 A. Yes, sir.
10 Q. Safety conscious?
11 A. Yes, sir.
12 Q. Have you ever seen anything that
13 Mr. Bertone did that would suggest to you
14 that he was putting the crew in an unsafe or
15 dangerous position?
16 A. Never. No, sir.
17 Q. He worked hard on safety issues,
18 didn't he?
19 A. Yes, sir.
20 Q. And you worked hard with him,
21 isn't that true?
22 A. Yes, sir.
23 Q. I want to turn to the work that
24 you did for a minute. I've had the
25 opportunity to look at some of your work
00101:01 evaluations, you got some feedback in terms
02 of your work with the DEEPWATER HORIZON,
03 didn't you, sir?
04 A. Yes, sir.
05 Q. And that feedback was all good,
06 isn't that true?
07 A. Correct.
08 Q. And Transocean recognized that
09 you were a hard worker, isn't that fair?
10 A. Yes, sir.
11 Q. And they recognized that you did
12 everything you could to follow Transocean's
13 policies and procedures; correct?
14 A. Yes, sir.
15 Q. You got positive feedback from
16 Transocean, isn't that fair?
17 A. Yes, sir.
18 Q. Felt good about the way you were
19 progressing in the company?
20 A. Yes, sir.
21 Q. Felt like you were on the right
22 track to continue to move up, right?
23 A. Yes, sir.
24 Q. I want to ask you a question,
25 one thing I read, you remember filling out an

00102:01 appraisal form for your job?
02 A. Yes, sir.
03 Q. That was something you did as
04 just part of the evaluation procedures?
05 A. Yes, sir.
06 Q. I read something I think you
07 wrote and I want to see if you remember it,
08 in May of 2009, these are comments that I
09 believe you might have said -- I want you to
10 listen to me and tell me if you recall maybe
11 saying something like this.
12 Quote: "I take pride in being a
13 Transocean employee and being part of the
14 team DEEPWATER HORIZON. Everyone on this rig
15 has treated me with respect starting the
16 first day that I came aboard. I will
17 continue to do my best in whatever position
18 that I may hold with Transocean," end quote.
19 Do you recall writing those
20 words?
21 A. Yes, sir.
22 Q. You meant them, didn't you?
23 A. Yes, sir.
24 Q. And you still mean them, is that
25 right?
00103:01 A. Yes, sir.
02 Q. You worked hard to meet your
03 responsibilities, didn't you?
04 A. Yes, sir.
05 Q. And you understood your
06 responsibilities, didn't you, Mr. Mansfield?
07 A. Yes, sir.
08 Q. You understood those engines,
09 didn't you?
10 A. Yes, sir.
11 Q. Now, as I understand from your
12 testimony and just from looking at some
13 records, you joined the Transocean and the
14 DEEPWATER HORIZON in September of 2008?
15 A. Yes, sir.
16 Q. And I understand during the
17 course of your employment on the rig, you
18 voiced some concerns about needing some more
19 help, isn't that right?
20 A. Yes, sir.
21 Q. Do you know, we have from
22 September 2008 to the day of the tragedy, of
23 course --
24 A. Yes, sir.
25 Q. -- can you give me a sense of
00104:01 when during that time you first kind of
02 raised that issue?

00104:04 first -- when I first talked to the chief
05 engineer about it -- originally, I say
06 originally, it was noticed as soon as I got
07 on the rig.
08 You get on the rig and you make
09 an assessment, never a formal complaint made.
10 It was always, you know, you would talk about
11 it. I would say early on, when I first got
12 on the rig, it was noted and Transocean then
13 came back with a new -- they changed the
14 manning, and bring on engineers in the engine
15 room, so that was kind of a goal. They were
16 going out -- I'm pretty sure that came out in
17 January of 2009.

18 Q. Okay.

19 A. And that was -- I can't tell you
20 the day that we got that extra guy in the
21 engine room, the extra motorman.

22 Q. Are you familiar with the legal
23 manning -- you mentioned manning
24 requirements. Are you familiar with the
25 legal requirements --

00105:01 A. I can't spout off what the
02 requirements are. I know they are there. I
03 don't know what they are specifically.

04 Q. When you expressed that you
05 wanted some more help in your job, it was
06 based on what you got up and did every day,
07 it wasn't based on the fact that you believed
08 there was some violation of legal manning
09 requirements, is that fair?

10 A. Yes, sir, that's fair.

11 Q. And at some point, they added --
12 after you began, they added some folks to
13 your team to help in those responsibilities,
14 is that true?

15 A. Yes, sir.

16 Q. Did you perceive that as being a
17 partial response to at least some of the
18 concerns you raised?

19 A. Yes, sir.

20 Q. And then as I understand it,
21 there were times when there was an effort
22 made to allocate other crew members in
23 different departments to help --

24 A. Correct.

25 Q. -- the engine room
00106:01 responsibilities, is that fair?

02 A. That's fair.

03 Q. And so if those folks were
04 available, you could maybe commandeer them
05 and get them --

06 A. Correct.

07 Q. -- to do some stuff to help you
08 out?

09 A. Yes, sir.
10 Q. Were there also times,
11 Mr. Mansfield, when the crew would have
12 access to people coming on board the rig that
13 might be available from other parts of the
14 fleet?
15 A. Yes, sir.
16 Q. And they would be brought in to
17 perhaps help--
18 A. Correct.
19 Q. -- do some of those job
20 responsibilities?
21 A. Correct, they called it the
22 labor pool.
23 Q. Right. So you had some extra
24 people on the vessel itself that might be
25 available when necessary; is that right?
00107:01 A. Correct.
02 Q. And then we had some people that
03 -- from the labor pool, I think you said,
04 could be bought in, is that right?
05 A. Yes, sir.
06 Q. Those were helpful?
07 A. Yes, sir, very much.
08 Q. Gave you some more resources to
09 help you do your job?
10 A. Right.
11 Q. Have you ever heard the phrase
12 "time out for safety"?
13 A. Yes, sir.
14 Q. What does that phrase mean to
15 you, Mr. Mansfield?
16 A. It means if anybody at any time
17 identifies something that is going to
18 jeopardize the safety of the job, they can
19 call -- you know, take a timeout and say,
20 let's fix it before we continue.
21 Q. And that was something that you
22 had invoked before, isn't that true?
23 A. Yes, sir.
24 Q. That's something you've seen
25 your colleagues invoke?
00108:01 A. Correct.
02 Q. And that is something that
03 Mr. Harrell supported; isn't that right?
04 A. Correct.
05 Q. Did you ever see anybody get
06 fired or reprimanded for calling time out for
07 safety?
08 A. No, sir.
09 Q. What is a think plan?
10 A. A think plan. Well, three types
11 of them, a written think plan, basically,
12 what it is is an analysis of a job, it's an
13 overview of the job you're going to do. If

14 it's a big enough job, determining if --
15 depending on how involved it is, you might
16 write it all down and go through with every
17 member of the team. If it's an individual
18 job, you're just going to go do, you might
19 just do a mental think plan to yourself, go
20 through all the hazards, identify hazards and
21 what's your -- the steps you're going to take
22 to get the job done. And then if it's a -- a
23 verbal think plan is also another style. You
24 can just talk about it with everybody that's
25 involved and required for every job.

00109:01 Q. That was whether it was written
02 or mental or verbal, that was part of
03 Transocean's policies and procedures to
04 ensure things were conducted in a safe
05 manner?

06 A. Correct.

07 Q. And those were policies and
08 procedures that you followed, is that
09 correct?

10 A. Yes, sir.

11 Q. And you expected the people that
12 you oversaw to follow?

13 A. Yes, sir.

14 Q. In fact, you would make sure
15 they followed the safety procedures?

16 A. Correct.

17 Q. And you supported the people
18 that worked under you if they needed to call
19 a time out for safety?

20 A. By all means.

21 Q. You let them know that, hey, I
22 will support you and this rig management team
23 will support you?

24 A. That's right, yes, sir.

25 Q. We were talking earlier about
00110:01 pretour meetings --

02 A. Yes, sir.

03 Q. -- was safety discussed at
04 pretour meetings?

05 A. Yes, sir.

06 Q. Was it the first topic
07 discussed?

08 A. Probably. It was a big topic.

09 Q. It was a big topic?

10 A. Yes, sir.

11 Q. And I think one of the things
12 that you discussed earlier was that there
13 would be discussion about coordination of
14 what different departments on the rig would
15 be doing?

16 A. Correct.

17 Q. Because you didn't want one
18 department of the rig to be doing something

19 that might inadvertently create an unsafe
20 situation for another part.
21 A. That's correct.
22 Q. And you had the opportunity to
23 speak up in these if something jumped out at
24 you that might be unsafe, right?
25 A. Yes, sir.
00111:01 Q. And you would?
02 A. Right.
03 Q. You wouldn't hesitate?
04 A. That was for everybody, that was
05 understood, anybody.
06 Q. That's right. People's
07 contribution in terms of making a safer
08 environment were accepted no matter what
09 level employee they were, is that fair?
10 A. Correct.
11 Q. You talked about something
12 called permits.
13 A. Permits to work, sir.
14 Q. Could you explain that to me?
15 A. The permit to work, if you had a
16 permit to work or an isolation certificate,
17 because a lot of stuff that we worked on you
18 had to secure electricity to it, secure
19 valves so there were mechanical isolations.
20 Permit to work was for a piece of equipment
21 that was critical, a critical system, which
22 pretty much, the way I took it, was anything
23 in the engine room for the most part was
24 critical because the engine basically
25 determined what was going to run.
00112:01 I looked at it as a -- to cover
02 my people, make sure everybody is in order.
03 I wasn't going to let paperwork get us so --
04 you know, be a shortcoming of a job.
05 Q. Right.
06 A. So permit to work was something
07 you had to get -- you had to fill it out
08 first. You filled it out before you went and
09 got signatures because you didn't want
10 someone to say, "Hey, this isn't correct, you
11 got to refill it out."
12 So to me it was communicating to
13 all departments via the OIM and the captain
14 what you're going to do and what it's going
15 to affect, and if they -- you know, you're
16 getting their permission to work on it
17 because, you know, they have a bigger picture
18 of all the jobs that you are going on on the
19 rig.
20 Q. So you expected the people that
21 worked under you to follow those procedures?
22 A. By all means.
23 Q. And they did?

24 A. Yes, sir.
25 Q. And you followed those
00113:01 procedures?
02 A. Correct.
03 Q. As far as you know, other people
04 on the rig followed those procedures?
05 A. Correct.
06 Q. Who signed them, the captain?
07 A. The captain and the OIM. The
08 captain had to be woken up. He didn't really
09 have an opposite --
10 Q. Right.
11 A. -- but the OIM, the night
12 toolpusher could sign -- depending on what --
13 sometimes you will go ahead and -- that was
14 an area, you know, I couldn't tell you the
15 specifics of when the toolpusher --
16 Q. Right.
17 A. -- I mean, I know we had them,
18 but I can't repeat to you -- because they
19 were considered day workers, the OIM and
20 captain worked from 06 to 1800, those were
21 their hours, so we could get the OIMs -- the
22 toolpusher to sign off on certain jobs via --
23 and not have the OIM at night.
24 Q. Let me ask you a question, if
25 something were to occur on the rig and the
00114:01 OIM or the captain was asleep, you felt --
02 you wouldn't hesitate if it was serious to
03 wake them up?
04 A. Correct. Right. It wasn't -- I
05 didn't view the -- having the toolpusher sign
06 at night to let the OIM sleep. It was just
07 the criticality of jobs. Some jobs you
08 didn't need the OIM to wake up, some jobs you
09 did.
10 Q. The toolpusher might make that
11 evaluation, in other words, I'm not
12 comfortable signing off on this, we need to
13 wake up Jimmy or whoever the OIM was?
14 A. Correct.
15 Q. Smart card. Do you remember
16 filling out a smart card?
17 A. Oh, yes, sir. Start card.
18 Q. Start card. I'm sorry. What
19 types of things would you put on a start
20 card?
21 A. Feedback. Basically, my
22 impression of it was you were observing a
23 job, either a hazard, you could observe a
24 hazard and then you would have to identify
25 the hazard, then you would have to show how
00115:01 you either brought it to someone's attention
02 to fix it. Basically you weren't just
03 identifying hazards and walking away. You

04 would improve the safety condition of
05 something with a start card usually.
06 Q. And you were supposed to fill
07 one out every day?
08 A. Correct, at a minimum.
09 Q. Right. The goal, I guess, was
10 to make sure that people focus on recognizing
11 hazards because they know they have to fill
12 one of these out?
13 A. Correct.
14 Q. So they look for opportunities
15 to recognize a hazard so they could fill out
16 their card?

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00116:07 were lots of audits on this rig?
08 A. Yes, sir.
09 Q. By BP, by ModuSpec, by ABS, by
10 Coast Guard, by MMS?
11 A. Correct.
12 Q. Lots of people looking at the
13 rig, fair enough?
14 A. Correct, yes, sir.

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00116:23 Q. When you started, what was your
24 hitch length?
25 A. Twenty-one days.
00117:01 Q. I may ask you some about your
02 past employment in a little while. You had
03 actually -- previous jobs, you had worked
04 longer hitches, hadn't you?
05 A. Yes, sir.
06 Q. For example, had you worked a 40
07 on 40 off?
08 A. Well, I worked -- my most was a
09 120 days and 120 days.
10 Q. 120 days on and 120 days off?
11 A. Four months on, four months off.
12 Q. What position was that?
13 A. I started out as third engineer.
14 I was overseas with that company called
15 American Overseas Marine. I upgraded my
16 license to second during that time.
17 Q. I've got you. You understood
18 during the time that the DEEPWATER HORIZON
19 was drilling wells that there was a customer,
20 so to speak, a company that was in charge of
21 coming up with the drilling procedures and
22 stuff like that, is that fair?
23 A. Correct.
24 Q. Who was the customer? When I

25 say customer, do you know who I'm referring
00118:01 to?
02 A. Charterer -- BP, you know, who
03 contracted -- I guess that's the term, the
04 rig.
05 Q. And during the time you were
06 aboard the rig, was BP the customer the
07 entire time?
08 A. Yes, sir.
09 Q. And they had a company man on
10 board the rig, isn't that true?
11 A. Correct.
12 Q. Is there any doubt in your mind,
13 Mr. Mansfield, that if the company man saw
14 something he didn't like he could just stop
15 it?
16 A. By all means, there's no doubt
17 in my mind.
18 Q. I understand. And you
19 understood -- just based on your
20 understanding of the industry, that it wasn't
21 Transocean's well?
22 A. Correct.
23 Q. And it wasn't Transocean that
24 was trying to get the oil or gas out of the
25 well so it could make money, fair?
00119:01 A. Correct.
02 Q. Transocean's job was there
03 because BP asked them to come and put the bit
04 in ground and drill the well, fair?
05 A. Correct.
06 Q. Now, I know you said that you
07 had a lot of different responsibilities, and
08 I want to ask you just a little bit about the
09 engines. Were you aware of any condition as
10 of April 20, 2010 that you felt was a
11 critical safety problem with any of the
12 engines?
13 A. No, sir.
14 Q. Because that's your job and you
15 would make sure that wasn't the case?
16 A. Correct.
17 Q. You slept on that rig half the
18 time you were out there in your life?
19 A. Correct.
20 Q. From 2000 -- September 2008 to
21 April 20, 2010, you lived half your life on
22 that rig?
23 A. Correct.
24 Q. And you took your job
25 responsibilities in terms of the safety
00120:01 conditions of those engines very seriously?
02 A. Correct.
03 Q. And the people you worked with
04 and the people that worked for you took their

05 job seriously, too?
06 A. Yes, sir.
07 Q. Specifically, are you aware of
08 any condition as of April 20th, 2010, that
09 would prevent any of the overspeed devices
10 from functioning?
11 A. No, sir.
12 Q. And that was -- part of your job
13 was to be aware of those types of conditions,
14 fair?
15 A. Correct.
16 Q. And you weren't aware of any?
17 A. No, sir.

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00121:13 out to you as being troublesome the last time
14 you tested or were involved in testing of the
15 overspeed or rig savers?
16 A. No, sir.
17 Q. Sounds like to me a lot of your
18 work was performed in the ECR?
19 A. Correct.
20 Q. Now, you had a -- there was --
21 in the ECR, there was a computer screen that
22 would show alarms when they went off, is that
23 true?
24 A. Yes, sir.
25 Q. And when those alarms went off,
00122:01 you could hear them and you could see them on
02 the screen, correct?
03 A. Correct.
04 Q. Now, when -- and you've seen
05 that before and I'm not referring
06 specifically to April 20th or April 19th,
07 because I know you don't have any memory of
08 that. But you have a recollection of seeing
09 an alarm on the screen?
10 A. Correct.
11 Q. Now, when that alert for a
12 specific alarm would come up on the screen,
13 you could -- could you hit the screen and
14 acknowledge that alarm?
15 A. You could acknowledge it, yes,
16 sir.
17 Q. And then it would stop, the
18 sound would stop?
19 A. The sound would stop, correct.
20 Q. But the alarm, you could still
21 see the alarm there?
22 A. That's correct, it would stay
23 illuminated, flashes when it's going off, and
24 when you acknowledge it, it just stays
25 illuminated and then until that alarm is
00123:01 cleared, it won't go away.

02 Q. Now, when an alarm comes up and
 03 it's illuminated, are there ways in which you
 04 can find out some more information about that
 05 alarm?
 06 A. Yes, sir.
 07 Q. What do you have to do to do
 08 that?
 09 A. Just -- you pull this -- right
 10 click versus left click, you know.

Page 125:01 to 128:24

00125:01 Q. Do you know Andrea Flatus?
 02 A. Yes.
 03 Q. Do you have any reason as you
 04 sit here to question her competency or
 05 training?
 06 A. No, sir.
 07 Q. Yancy Keplinger?
 08 A. Yes, sir.
 09 Q. You know Yancy?
 10 A. Yes, sir.
 11 Q. Do you have any reason to
 12 question his competency situate or training?
 13 A. No, sir.
 14 Q. And who was the first mate that
 15 you dealt with most often in your --
 16 A. Chief mate?
 17 Q. Chief mate, sorry.
 18 A. Dave Young was the one. I had
 19 worked a lot with Mike and I can't tell you
 20 Mike's last name. He would have been on the
 21 rig at that time. He was Dave's opposite.
 22 Anyway, I dealt with both of them.
 23 Q. You dealt with both of them?
 24 A. Yes, sir.
 25 Q. Both in your view were
 00126:01 knowledgeable about their jobs and properly
 02 trained as far as you know?
 03 A. Correct.
 04 Q. Dave, if you needed some
 05 assistance on something you kind of felt was
 06 a marine issue, but that fell within your job
 07 responsibilities --
 08 A. Right.
 09 Q. -- Dave had tried to get you
 10 some help to fulfill those responsibilities
 11 at times, fair?
 12 A. Correct.
 13 Q. You worked well with Mr. Young?
 14 A. Oh, yes, sir.
 15 Q. Found him knowledgeable in your
 16 interactions with him?
 17 A. Correct.
 18 Q. You said earlier you could push

19 a button to shut down an engine, is that
20 right?
21 A. Correct.
22 Q. I guess, for example, there's a
23 condition on this engine I want to work on, I
24 need to shut it down, you could just hit a
25 button and shut it?
00127:01 A. And stop it, right.
02 Q. That's different from -- I think
03 you were asked some questions about the ESD?
04 A. Yes, sir.
05 Q. We're not talking about -- we're
06 talking about two different scenarios, right?
07 A. Yes, sir.
08 Q. One is during the course of you
09 performing your job responsibilities in
10 maintenance, you would shut down an engine if
11 you needed to work on it, right?
12 A. Correct.
13 Q. Whereas, an ESD function would
14 be due during an emergency situation?
15 A. Correct.
16 Q. Is there a danger that arises if
17 the rig loses its engines' --
18 A. Yes, sir.
19 Q. -- power? What is that danger
20 as far as you understood?
21 A. Coming off location, you know,
22 drifting off location. You know, anything
23 that -- you stop drilling basically, if you
24 lose power, you know, you -- everything
25 stops, you know, except the emergency -- the
00128:01 gentleman asked me about how many engines,
02 that's the emergency generator also.
03 There's six plus the small emergency
04 generator, you know, but that's not -- that
05 emergency generator is not designed to
06 continue operation, it's designed to get back
07 started, you know, so, yeah, yes, sir, a
08 potential oil spill, I guess, if you were to
09 -- if you're drifting, you break the BOP off
10 the wellhead or break the riser, you know,
11 lots of implications of tragedies, I guess.
12 Q. The name, engine control room,
13 obviously, suggest that you and the people
14 there have some control over the engines,
15 correct?
16 A. Correct.
17 Q. But in terms of operating the
18 vessel, the fact that it's called the engine
19 control room shouldn't mean that somehow
20 you're controlling the vessel movement,
21 right?
22 A. No, sir.
23 Q. That's done on the bridge?

24 A. Correct.

Page 129:04 to 129:06

00129:04 that the dampeners in the engine rooms were
05 not designed to close automatically upon the
06 detection of combustible gas?

Page 129:10 to 130:18

00129:10 I would say that when I was asked
11 that question, I was under the impression,
12 from my understanding of the operation of
13 them, that they did not operate like he said
14 with the gas detection. They operated
15 according to the engine being online or not
16 being online.

17 EXAMINATION BY MR. JOHNSON:

18 Q. The fire dampeners, the
19 dampeners would close if there was a fire
20 detected in an engine room?

21 A. Right, yes, sir.

22 Q. If you -- if you have a
23 situation where you need to shut down an
24 engine in an emergency situation, you have to
25 be cognizant of the importance of staying on
00130:01 location as a vessel, is that fair?

02 A. Correct.

03 Q. That is something that the
04 bridge needs to evaluate in terms of their
05 emergency response?

06 A. Correct.

07 Q. And you would rely upon the
08 bridge to evaluate that?

09 A. Yes, sir.

10 Q. You wouldn't want to be -- in an
11 emergency situation, you wouldn't just want
12 to be hitting buttons, shutting down engines,
13 correct?

14 A. Correct.

15 Q. You would want to understand
16 what was going on, make a deliberate decision
17 as to how to conduct yourself, correct?

18 A. Correct.

Page 130:24 to 131:15

00130:24 Q. But in your job, have you ever
25 seen a situation where you get more than one
00131:01 alarm that comes up on the screens that were
02 in the ECR?

03 A. Yes, sir, multiple alarms so to
04 speak, yes, sir.

05 Q. Do they come in on top of each
06 other?
07 A. Well, they -- what it is,
08 there's a log, I mean, you know, it will give
09 you a chronology, so you can go to a list.
10 It will tell you what happened first. You
11 can do a chronological troubleshoot, you
12 know, an investigation, so to speak of what's
13 going on, so the -- I think that the screen,
14 it will go to the screen the alarm comes up
15 on, I'm pretty sure. I'm not 100 percent on

Page 131:25 to 135:16

00131:25 Q. If you were doing some
00132:01 diagnostics, in other words, if an alarm came
02 in and you were looking at it and trying to
03 get some more information like we talked
04 about earlier, and another alarm came in, do
05 you know what, if anything, would happen to
06 the screen?

07 A. I'm not sure, but I know that we
08 had to -- that was something that we were
09 aware of, not to be caught up in one alarm
10 and another one going off.

11 Q. Right.

12 A. We just kind dealt with it.
13 That's -- what I would do is I would first
14 pull up -- I would pull up the chronological
15 page. We had two computers doing the same
16 thing. One was the administrator -- there
17 were different ways you could log in under
18 different operating status, OS, that was the
19 indication, OS1 through 5, I think
20 administrator.

21 So we had two different screens
22 going on, I think that was kind of a safety
23 thing, too, to be a backup. You could do the
24 same thing from either one, so you could use
25 them at the same time. You could have the
00133:01 screen with the chronology up on this one and
02 be tending to what's going on over here. So
03 it was kind of a --

04 Q. Understand. You talked about
05 earlier that you could pull up some
06 information on the engines?

07 A. Right.

08 Q. Is that on the same system?

09 A. Yes, sir.

10 Q. Okay. So, for example, if you
11 wanted to see what the RPMs of an engine
12 were, you could pull that up, too?

13 A. Right, you could, yes, sir.

14 Q. Was that a different page than
15 the alarms?

16 A. Every page had alarms. The
 17 pages were, you know, you could -- it's kind
 18 of like a -- what do you call it, a window
 19 thing, where you could keep cascading
 20 windows, you know what I mean? You could hit
 21 power, that's going to be all six engines.
 22 I'm not sure if there were several different
 23 main buttons you could push that would get
 24 you to a system, like seawater system or
 25 power and then you could narrow it down to
 00134:01 what pump you want to look at, what seawater
 02 pump was giving you the alarm.
 03 You could go to the engines, it
 04 will give you all six engines. You can click
 05 on engine No. 1 and then it will bring up
 06 cylinder temperatures, it will bring up fuel
 07 oil pressure, lube oil pressure, you know, so
 08 there were different -- you could manipulate
 09 it differently, there were just several
 10 different pages per piece of equipment.
 11 Q. So if I understand what you're
 12 saying, there was a screen you could look at
 13 that would identify alarms?
 14 A. Correct.
 15 Q. And then you could navigate to
 16 different -- the same screen, but different
 17 parts to access information to help you
 18 understand like the condition of the engines?
 19 A. Correct.
 20 Q. Okay. You talked a little bit
 21 earlier about plan maintenance versus
 22 corrective maintenance?
 23 A. Correct.
 24 Q. I think one of the words I wrote
 25 down here was every day was different.
 00135:01 A. Yes, sir.
 02 Q. And I guess that's because
 03 something you may -- you may notice something
 04 that needs to be repaired one day and you
 05 don't wake up knowing that's going to happen?
 06 A. Correct.
 07 Q. But when you recognize it, you
 08 have to decide how to address it, fair?
 09 A. Correct.
 10 Q. And then daily, there's a
 11 certain amount of planned maintenance that
 12 may be due that you want to try to work on?
 13 A. Correct.
 14 Q. For example, on April 19th, I
 15 think -- well, let me see this document right
 16 here.

Page 135:25 to 140:15

00135:25 Is that Exhibit 933, counsel?

00136:01 MR. JOHNSON:
02 It is, and I'm going to give it
03 back to him.
04 EXAMINATION BY MR. JOHNSON:
05 Q. When you had a corrective
06 maintenance item, and you had planned
07 maintenance items and you had to kind of
08 figure out, okay, how are we going to
09 prioritize these, you and the people that you
10 worked with would engage in like a mini-risk
11 assessment, is that fair?
12 A. Correct.
13 Q. You had to decide what is the
14 criticality of these things that we're asked
15 to look at?
16 A. Correct.
17 Q. And that was something that you
18 wouldn't just decide on your own; you would
19 have a discussion about?
20 A. Correct.
21 Q. You might, if there was any
22 doubt in your mind, you might elevate it to
23 Mr. Bertone or even higher, fair?
24 A. Correct.
25 Q. On Exhibit 933, which I think
00137:01 I've stolen from you. Here it is right here.
02 This was an RMS morning report from April
03 19th, 2010?
04 A. Okay.
05 Q. Is that what it says?
06 A. Yes, sir.
07 Q. I just want to make sure we're
08 looking at the same document.
09 A. Yes, sir.
10 Q. And you were asked some
11 questions about this, but one of the things
12 that I wanted to ask you about, I think you
13 said -- here on this first page it's got work
14 done April 19th, 2010, Brent Mansfield?
15 A. Correct.
16 Q. I think what you said was that
17 you may not have been -- you weren't the
18 person who actually performed that, is that
19 right?
20 A. Yes, sir.
21 Q. Because you were the supervisor,
22 your name is in there?
23 A. Correct.
24 Q. And what these entries reflect
25 is that you had the folks that worked under
00138:01 you, and I think you said the motormen, one
02 of the motormen would probably have been the
03 person who performed these tasks?
04 A. Yes, sir.
05 Q. And then when they were closed

06 out, and work done means that this work was
 07 actually done by one of the motormen
 08 underneath you?
 09 A. Correct.
 10 Q. What was the work done on
 11 April 19th, 2010?
 12 A. Well, according to this, they
 13 replaced, that was a PM, 180-day PM. You
 14 want to go off this or do you want to go from
 15 my recollection of what we did that day?
 16 Q. I just want to clarify -- it
 17 indicates that --
 18 A. 180-day PM on the water fountain
 19 filters, changed the filters, so, I guess,
 20 the potable water filter 001, on that next
 21 one I'm not 100 percent sure what that is,
 22 but could that have been on a pump? It's
 23 hard to say. I don't really know.
 24 Q. But they're water filters?
 25 A. Correct.
 00139:01 Q. I mean, you guys obviously want
 02 to have clean water when you're out there?
 03 A. Correct, yes, sir.
 04 Q. And in terms of criticality that
 05 day and evaluating and risk assessing, you
 06 felt that -- you felt like, hey, this is
 07 important, this needs to be done, I'm going
 08 to have one of my guys do this stuff?
 09 A. Correct.
 10 Q. Fair enough. This risk
 11 assessment process where you balanced, you
 12 know, what's planned and then, you know, what
 13 we have to get done over here in correcting
 14 things, that was a process that you took very
 15 seriously, fair?
 16 A. Correct.
 17 Q. That was a process that the
 18 people underneath you took very seriously?
 19 A. Correct.
 20 Q. That was a process that the rig
 21 management took very seriously; correct?
 22 A. Yes, sir.
 23 Q. Because you lived on the rig?
 24 A. That's right, yes, sir.
 25 Q. You had occasions to deal with
 00140:01 Wdrtsild during your course on the DEEPWATER
 02 HORIZON, right?
 03 A. Yes, sir.
 04 Q. And, in fact, Wdrtsild personnel
 05 were on the rig periodically to assist in
 06 maintenance aboard the rig?
 07 A. Correct.
 08 Q. And you had their e-mail
 09 addresses, of some Wdrtsild personnel if you
 10 needed to e-mail and to get a part or

11 something like that?
12 A. Correct.
13 Q. If you had a question, maybe you
14 could ping them by e-mail and ask a question?
15 A. Yes, sir.

Page 141:02 to 147:16

00141:02 Q. Mr. Mansfield, I just have a few
03 more questions in this part of the
04 deposition. I wanted to ask you just about a
05 few more of the colleagues, and these are
06 more people that you -- worked under you or
07 worked with you on a day-by-day basis. You
08 mentioned one -- we talked about Doug Brown.
09 A. Yes, sir.
10 Q. Hard worker?
11 A. Yes, sir.
12 Q. Conscientious?
13 A. Yes, sir.
14 Q. Safety oriented?
15 A. Yes, sir.
16 Q. Did his job well?
17 A. Yes, sir.
18 Q. Jerry Oldham?
19 A. Yes, sir.
20 Q. Hard working?
21 A. Yes, sir.
22 Q. Safety conscious?
23 A. Yes, sir.
24 Q. Knowledgeable?
25 A. Correct.
00142:01 Q. Trained well?
02 A. Yes, sir.
03 Q. Competent?
04 A. Yes, sir.
05 Q. Terry Sellers, did I get that
06 right?
07 A. Yes, sir, Terry Sellers.
08 Q. Was he a motorman?
09 A. Yes, sir.
10 Q. Knowledgeable?
11 A. Yes, sir.
12 Q. Trained well?
13 A. Yes, sir.
14 Q. Good worker for you?
15 A. Yes, sir.
16 Q. Safety conscious?
17 A. Yes, sir.
18 Q. Willie Stoner?
19 A. Yes, sir.
20 Q. Hard worker?
21 A. Correct.
22 Q. Solid guy?
23 A. Yes, sir?

24 Q. Well trained?
25 A. Yes, sir.
00143:01 Q. Competent?
02 A. Uh-huh (indicating
03 affirmatively).
04 Q. Knowledgeable?
05 A. Correct.
06 Q. Same with Paul Meinhart, are all
07 of those true, hard worker?
08 A. Yes, sir.
09 Q. Competent, knowledgeable?
10 A. Yes, sir.
11 Q. And Ronnie Arnold?
12 A. Yes, sir.
13 Q. Hard worker?
14 A. Yes, sir.
15 Q. Well trained?
16 A. Correct.
17 Q. Did good work for you?
18 A. Yes, sir.
19 Q. Have I left anybody off that
20 worked underneath you or with you on a
21 day-to-day basis?
22 A. There are other people that I
23 did work with. Some of them, we rotated
24 hitches there, and I forget exactly what time
25 it was, but there was a day whenever the guys
00144:01 went from 14 days to 21 days, a long time the
02 motormen were doing 14 days along with the
03 drill crew and I forget what the time frame
04 was, but everybody went to 21, whenever that
05 was.
06 So a lot of people that we did
07 work with, you might not work with, you know,
08 before, and because we were 21 and they were
09 14, we worked with them more, but once you
10 got on a certain schedule, after everybody
11 went 21, there were some guys you didn't, you
12 know --
13 Q. Didn't see as much?
14 A. Right. There are other names,
15 but we can't -- I don't remember everybody.
16 Q. I understand. Let me ask you
17 this: Of the people that you worked with
18 most often, other than the names we went
19 through, was there somebody that stood out to
20 you as just being incompetent or not well
21 trained and not knowledgeable about their
22 job?
23 A. No, sir.
24 Q. Safety drills conducted weekly?
25 A. Yes, sir.
00145:01 Q. Most of the time on Sundays?
02 A. Correct.
03 Q. But different times on Sundays?

04 A. Correct. The same time for the
05 most part, but they did vary every now and
06 then, yes, sir.
07 Q. And the circumstances of the
08 drills changed, fair?
09 A. Yes, sir. Scenario.
10 Q. The scenario --
11 A. Yes, sir.
12 Q. -- that you had to face --
13 A. Correct.
14 Q. -- and conduct your evacuation,
15 or whatever your emergency procedure was,
16 would vary in the different drills, correct?
17 A. Yes, sir.
18 Q. And that's because the rig
19 management wanted to make sure that the crew
20 was prepared to deal with those different
21 scenarios?
22 A. Correct.
23 Q. If you did the same scenario
24 each time, you would only be prepared to
25 react to that?
00146:01 A. Yes, sir.
02 Q. Do you remember BP conducting an
03 audit of the rig in 2009?
04 A. Yes, sir.
05 Q. And you had some
06 responsibilities after that audit was done on
07 closing out some things, right?
08 A. Correct.
09 Q. And you worked hard to get those
10 things closed out, right?
11 A. Yes, sir.
12 Q. Do you remember either directly
13 from BP or hearing that BP was very happy
14 about the progress of those being closed out?
15 A. Yes, sir.
16 Q. That they were commending the
17 crew, like yourself for working hard to get
18 those things done quickly?
19 A. Yes, sir.
20 Q. You got that feedback?
21 A. Correct.
22 Q. Anyone from BP in your time
23 working with Transocean ever, that you heard
24 or that you became aware of in any way, ever
25 question the competency of the people that
00147:01 you worked with?
02 A. No, sir.
03 Q. Did they ever say to you or did
04 you ever hear that anyone from BP questioned
05 the ability of the people you worked with to
06 do their jobs?
07 A. No, sir.
08 Q. Never questioned your competency

09 or your abilities?
 10 A. No, sir.
 11 Q. You were asked this, I just want
 12 to make sure I have it on the record. And I
 13 don't want to get into your discussions with
 14 your lawyer, but you currently have a legal
 15 claim against Transocean, correct?
 16 A. Yes, sir.

Page 148:17 to 148:20

00148:17 Q. Remember the questions about the
 18 various crew members on the DEEPWATER
 19 HORIZON?
 20 A. Yes, sir.

Page 149:05 to 150:10

00149:05 Q. Did anything about any of the
 06 company men's behavior or activities that you
 07 witnessed make you question their competence?
 08 A. No, sir.
 09 Q. Did any of their activities or
 10 statements during pretour meetings suggest
 11 they were anything but knowledgeable?
 12 A. No, sir.
 13 Q. Anything at any of those
 14 meetings that made you question whether they
 15 were safety conscious?
 16 A. No, sir.
 17 Q. Did you feel that the BP company
 18 men were part of the team out there on the
 19 DEEPWATER HORIZON?
 20 A. Yes, sir.
 21 Q. In connection with shutting down
 22 of the engines, do I understand what your
 23 testimony is that you were depending on the
 24 bridge to assess an emergency situation in
 25 order to provide you with the necessary order
 00150:01 to shut down an engine?
 02 MR. JOHNSON:
 03 Objection to form.
 04 THE WITNESS:
 05 My take was that you would put
 06 your heads together before you made the
 07 decision, you know, however, that also being
 08 said, I had no fear in shutting an engine
 09 down if I witnessed a fire or something --
 10 you know -- so.

Page 150:12 to 150:15

00150:12 Q. If you thought an engine was

13 ingesting combustible gas and overspeeding,
14 would that be a reason to shut the engine
15 down.

Page 150:19 to 150:20

00150:19 I've never been in that
20 situation, but -- so I don't know.

Page 150:22 to 151:02

00150:22 Q. Did -- do I understand -- well,
23 let me make sure, you did not -- you received
24 no training -- did you receive any training
25 from Transocean in how to assess the
00151:01 emergency shutdown system?
02 A. No, sir.