

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?

Page 116:07 to 116:14

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.

Page 116:23 to 120:17

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.

Page 121:13 to 123:10

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.