

Deposition Testimony of:

Ross Skidmore

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Page 8:11 to 8:23

00008:11 Would the court reporter please
12 swear in the witness.
13 ROSS SKIDMORE,
14 after having been first duly sworn by the
15 above-mentioned court reporter, did testify
16 as follows:
17 EXAMINATION BY MR. GONZALEZ:
18 Q. Morning, Mr. Skidmore. How are
19 you?
20 A. I'm fine, thank you.
21 Q. I'm Ervin Gonzalez, and this is
22 Jeff Keiser, and we're here representing the
23 PSC this morning.

Page 8:25 to 10:01

00008:25 Q. Can you tell us by whom you're
00009:01 employed?
02 A. Through Swift.
03 Q. What relationship does Swift
04 have with BP?
05 A. I'm a contract or a consultant
06 for BP through Swift.
07 Q. Is Swift owned by BP?
08 A. No, no.
09 Q. What do you do for Swift?
10 A. I'm a -- subsea well supervisor
11 would be my title.
12 Q. Tell us what that means.
13 A. Well, I will be associated with
14 and assist in any subsea activities that
15 might be going on, ensuring that the
16 contractors and vendors will stay within the
17 parameters of BP's request as per the
18 procedures that are provided for certain
19 jobs, which will vary from subsea
20 construction work with flow line installation
21 or removal to subsea trees, BOPs, surface
22 equipment, running tools, things of that
23 nature. Working outside in the shop areas
24 along with vendors as far as preparing
25 equipment, staging it for work to be
00010:01 performed.

Page 10:10 to 11:14

00010:10 Q. Are you to take instructions
11 from BP personnel when on the job?
12 A. Yes, I am because I'm -- I'm
13 providing this service for BP.
14 Q. How does one become a subsea
15 engineer?

16 A. Well, the way I became a subsea
 17 engineer was through -- on job. I began my
 18 career in 1977 and -- with Penrod Drilling
 19 Company. I worked for the drilling
 20 contractors.
 21 And then in 1983 I was promoted
 22 to subsea engineer with Penrod, and I
 23 remained in that respect from that day on.
 24 Back then we only had one on the rig.
 25 Q. How did you start your career in
 00011:01 the oil drilling business?
 02 A. As a roustabout.
 03 Q. What year was that?
 04 A. 1977, Penrod Drilling --
 05 Q. That was --
 06 A. -- Company.
 07 Q. -- with Penrod?
 08 A. Yes, it was.
 09 Q. And tell us how you -- you rose
 10 up the structure.
 11 A. Well, I -- I began as a
 12 roustabout, was promoted to roughneck,
 13 derrick hand, assistant driller, and that's
 14 where I stepped over into the subsea.

Page 12:08 to 12:10

00012:08 Q. When did you become a subsea
 09 engineer?
 10 A. In 1983.

Page 12:20 to 13:14

00012:20 Q. On April of 2010, was your title
 21 subsea engineer supervisor?
 22 A. No, I was -- I was in the
 23 position I'm in now as a subsea well
 24 supervisor.
 25 Q. Okay. And as the subsea well
 00013:01 supervisor, tell us what your duties and
 02 obligations were.
 03 A. As -- as I mentioned earlier --
 04 on -- on the -- on the rig are you asking me?
 05 Q. Yes. In April of 2010.
 06 A. Okay. I -- I went to the rig
 07 with the understanding that upon the
 08 completion of the well, we were going to use
 09 the DEEPWATER HORIZON for a Nile project, a
 10 P&A of an old well. So that's why I went out
 11 there was for that.
 12 And while we were on the
 13 Macondo, we were going to run the lead
 14 impression tool and the lockdown sleeve.

Page 14:17 to 15:08

00014:17 Q. Who's your supervisor at Swift?
 18 A. I don't really have a supervisor
 19 at Swift. I -- I'm a -- I am 1099 as far as
 20 income taxes and all go.
 21 Q. Independent contractor?
 22 A. Yes, sir, I am.
 23 Q. So when you take instructions
 24 from someone, would that be directly from BP?
 25 A. Yes, it would.
 00015:01 Q. And in B -- the BP structure,
 02 who would be your immediate supervisor on --
 03 on the DEEPWATER HORIZON for the Macondo
 04 well?
 05 A. I work under Merrick Kelley. He
 06 is the team lead for the subsea group.
 07 Q. By whom is he employed?
 08 A. BP.

Page 25:12 to 25:18

00025:12 Q. Do you know if the capping stack
 13 technology was available in April of 2010?
 14 A. I do not.
 15 Q. As an expert in blowout
 16 preventers or someone that works in that
 17 field, had you heard of such a thing before?
 18 MS. O'CONNOR:

Page 25:20 to 25:20

00025:20 A. No, I had not.

Page 26:20 to 27:23

00026:20 Q. Right. But I want to talk just
 21 in general terms right now and then we'll get
 22 to the specifics.
 23 You said to you "snake bit" is
 24 like using the term "Murphy's Law," right?
 25 A. It would -- it would be the same
 00027:01 to me as saying, well, looks like, oh, Murphy
 02 is alive and well today, doesn't it?
 03 Q. Sure. And Murphy's Law, for
 04 those of us that may not be familiar with the
 05 term, that means anything that can go wrong
 06 shall at the very worst possible moment?
 07 A. That's the way I'd take it to
 08 mean, yeah.
 09 Q. And you used the term in an
 10 e-mail that you wrote to BP in Houston that
 11 the Macondo well project was snake bit?

12 A. Do you have that e-mail that I
13 could see that, because I -- I don't -- I
14 don't recall. I know I -- I had the
15 conversation with Pleasant, the -- the subsea
16 engineer on -- on the back deck of the --
17 Q. From Transocean?
18 A. From Transocean, yeah.
19 Q. What did you tell him?
20 A. I used the term in reference of,
21 "Boy, this is snake bit, isn't, it" or in
22 that -- in that reference, because that's --
23 that's my personality.

Page 28:05 to 33:17

00028:05 A. Could be, yeah.
06 Q. But in Louisiana snake bit and
07 in Texas and -- and other places --
08 A. Around my house.
09 Q. Sure. And when did you tell
10 Mr. Pleasant that you felt the project was
11 snake bit?
12 A. I -- I don't believe I said "the
13 project." I -- I believe I was referring to
14 the day, right now.
15 Q. Meaning what day?
16 A. Well, that would have been the
17 night of the 20th when we were on the back of
18 the DAMON BANKSTON after evacuation.
19 Q. Mr. Pleasant was a subsea
20 engineer?
21 A. I believe he was the night
22 subsea engineer. I just met him on the -- on
23 the rig. But I -- I knew the senior subsea
24 engineer, Mark Hay.
25 Q. When did you arrive at the
00029:01 Macondo well -- at the DEEPWATER HORIZON over
02 the Macondo well?
03 A. I believe it would have been
04 Friday, the 16th.
05 Q. April 16th?
06 A. Yes.
07 Q. And going back now to the
08 purpose why you were there.
09 A. Well, like I mentioned earlier,
10 when -- when I went out there, my relief was
11 staging equipment in South Louisiana for the
12 Nile project.
13 And as soon as Transocean had
14 finished the Macondo well, we were going to
15 use the DEEPWATER HORIZON to P&A an old well,
16 which we called the Nile project.
17 Q. Tell us what P&A means.
18 A. Plug and abandon. It was a --
19 an older gas well that had stopped our losses

20 production, and it was on a vacuum, so we
21 were going to have that well P&A'd and
22 recover the -- the subsea tree and equipment
23 from it.

24 Q. So you were going to work first
25 on the DEEPWATER HORIZON with its temporary
00030:01 abandonment and then on the Nile?

02 A. Well, no, all I was going to do
03 on the DEEPWATER HORIZON was assist with
04 Drill-Quip in running the lead impression
05 tool and the lockdown sleeve. Then as they
06 offloaded their equipment from that job, we
07 were going to take on the equipment that
08 would have been needed -- would have been
09 needed for the Nile project.

10 Q. We saw a lot of e-mails and
11 memoranda that indicated there were a lot of
12 change in plans with respect to the use of
13 the lockdown sleeve, whether we were going to
14 do it with the DEEPWATER HORIZON or whether
15 it was going to be another rig, and the
16 procedures for it changed quite often. Were
17 you involved in that?

18 A. I wasn't involved in any of the
19 decisions or anything, but it's not
20 surprising to me, because you can set a
21 lockdown sleeve any time. And it was just
22 whatever the well or that project would
23 dictate is when we would do it.

24 Q. Did you study that well?

25 A. No, I didn't study the well. I
00031:01 wasn't interested in that part of it. I have
02 my own little window that -- that I work out
03 of and --

04 Q. What is your little window of
05 the world?

06 A. The subsea.

07 Q. And what --

08 A. The subsea wells --

09 Q. -- does that include?

10 A. -- team.

11 What it would have included or
12 what it does include?

13 Q. Both. Well, let's start with
14 what it does include and what it did include
15 in --

16 A. Okay.

17 Q. -- in the Macondo well.

18 A. Well, it -- it would have
19 included with the Macondo well the same as
20 everywhere else, you know. We will assist
21 the vendors, whether it be Drill-Quip or
22 Cameron or whomever, with the running of the
23 subsea tools and equipment.

24 Q. In particular, which ones?

25 A. With Macondo it would have been
00032:01 Drill-Quip. It would have been the lead
02 impression tool and lockdown sleeve.
03 Q. And that would have been your
04 sole role?
05 A. As far as the Macondo well would
06 have been --
07 Q. Yes.
08 A. -- that's all I would have had
09 to do --
10 Q. All right.
11 A. -- been involved with on that
12 well.
13 Q. You were not involved in the
14 maintenance of the blowout preventer?
15 A. No, sir, I wasn't asked to have
16 anything to do with it. I do that type of
17 work when I'm asked to.
18 Q. And were you involved in a
19 negative pressure testing?
20 A. No.
21 Q. Were you involved in monitoring
22 the blowout preventer?
23 A. No, I was not.
24 Q. And with respect to sealing the
25 well, your role would have been limited to
00033:01 the lead impression tool and the lockdown
02 sleeves?
03 A. And that has nothing to do with
04 sealing the well. That's -- that particular
05 job, the lead impression tool and the
06 lockdown sleeve, would not even have been
07 started until the well is finished and
08 secured. It's a completely separate part.
09 Q. You understand what barriers
10 are?
11 A. I do.
12 Q. One barrier for this Macondo
13 well was the cement, right?
14 A. Okay. That would be a barrier.
15 Q. And the second barrier. Once
16 properly installed, would have been the
17 lockdown sleeve, correct?

Page 33:20 to 33:20

00033:20 A. No.

Page 33:24 to 35:10

00033:24 Q. Do you believe the lockdown
25 sleeve provides a mechanical barrier?
00034:01 A. Well, let -- let -- let
02 me explain to you. Now, before I -- I go

03 calling it a barrier, a lockdown sleeve is
04 still a open through bore to the annulus.
05 It's still the same ID as your casing string
06 below it would be.

07 It has a seal assembly to the
08 outside, but it is not an ID barrier to the
09 annulus. It is a tool that would be used for
10 when a subsea tree is installed on a wellhead
11 for production, then the tree would stab
12 inside of this and seal in that area.

13 Q. So once the -- once the lockdown
14 sleeve is in place and functioning as it
15 should function, you would agree with me that
16 it does provide a seal or barrier to
17 hydrocarbons coming up?

18 A. Well, it's -- it's not a well
19 blowout prevention piece of equipment,
20 because the ID of it, the inside diameter's
21 open to the annulus. So anything coming up
22 the bore of the well would just come on up.

23 It would assist in holding the
24 casing down, because it's locked into the
25 wellhead and it stabs inside the casing seal
00035:01 assembly and the casing hanger -- it lands
02 out on the casing hanger.

03 Q. Well, that's what the sleeve
04 does, right? It locks down the casing into
05 the wellhead?

06 A. Well, the casing locks itself
07 down. This is lock -- lands out on the
08 casing hanger, and it locks itself in. And
09 it would assist as far as if you have any
10 up-force on the casing to hold it in there.

Page 35:22 to 36:20

00035:22 So we know that the cement was a
23 barrier for hydrocarbons?

24 A. The cement -- to me cement is
25 called a barrier, yes.

00036:01 Q. To your knowledge, was there any
02 other barrier?

03 A. The blowout preventers are
04 considered a barrier.

05 Q. Was there any other barrier?

06 A. Well, the -- the -- I would
07 just -- I would just say the -- the cement
08 plug and the -- and the balance plug that
09 would be sent, and then after everything is
10 ready to go, we would run the lead impression
11 tool.

12 And all that lead impression
13 tool is going to give us is an indication
14 that the space-out and everything is correct
15 from the land-out point in the casing hanger

16 to where the lockdown sleeve would latch into
17 the wellhead profile.

18 Q. Right. But you don't believe
19 that that is a barrier. You believe the only
20 barrier the Macondo well had was the cement?

Page 37:01 to 37:09

00037:01 Q. Correct?
02 A. I'm -- I'm -- no, sir. I'm --
03 I'm just not going to -- I can't say on the
04 lockdown sleeve if -- if MMS, BOEM, if they
05 consider that a barrier. If they consider
06 that a barrier, then I would consider it a
07 barrier, also. I've never referred to it as
08 a barrier, because I'm not a -- a well design
09 engineer.

Page 38:16 to 38:19

00038:16 Q. All right. Now, the lockdown
17 sleeve, do you believe it's a barrier? Do
18 you believe it's a barrier?
19 A. I don't know --

Page 38:22 to 38:23

00038:22 A. -- if that would be a barrier or
23 not.

Page 38:25 to 39:25

00038:25 Q. Now, the lockdown sleeve, tell
00039:01 us how it works. Describe it for us and tell
02 us how it works.
03 A. Well, the lockdown sleeve is --
04 is ran through the -- through the riser. It
05 lands out on top of -- in the casing hanger,
06 and it latches into the profile of the
07 wellhead, and that's where it sits.
08 Q. What's its purpose?
09 A. When you run a subsea tree, it
10 will stab -- the production bore stab under
11 the subsea tree will stab into that, and it
12 provides a fluid flow for production from the
13 well to come out through the tree and route
14 to its pipeline and its final destination.
15 Q. As the oil's coming up?
16 A. As the oil is coming up or
17 whatever material that's . . .
18 Q. And describe for us what the
19 tree is.
20 A. The subsea tree would be a

21 control point for the product or the
22 production coming from the well, because it
23 has a choke on it and you could restrict or
24 allow the flow to increase. And it directs
25 it to the pipeline to the platform.

Page 41:17 to 42:19

00041:17 Q. Tell us how the lead impression
18 tool works.
19 A. The lead impression tool would
20 land out in the same area as the lockdown
21 sleeve, and it has little lead impressions on
22 the bottom. So when you land out, it will
23 mash them.
24 And up at the upper part where
25 it's -- where your lockdown sleeve locks into
00042:01 the profile, where the profile is in the
02 wellhead, it has lead blocks in the sides.
03 So when you pressure it up, it will extend
04 the blocks out into the profile. You bleed
05 the pressure off, and then you recover this
06 tool to surface.
07 And Drill-Quip would be removing
08 these lead impression blocks from the side of
09 the tool, they would inspect the underneath
10 side to ensure that it did, in fact, set down
11 all the way. Then you'll take these lead
12 impression blocks and they have a scale that
13 you compare it to and it would give you the
14 indication if the space-out is correct for
15 the lockdown sleeve or if it needs an
16 adjustment on it.
17 Q. So you do that first before you
18 bring down the lockdown sleeve?
19 A. Yes, sir.

Page 45:05 to 45:15

00045:05 Q. And that's my question. How
06 much time did you spend with BP's counsel
07 preparing for this deposition?
08 A. A couple hours one day and a
09 couple of hours a second day. But it's
10 pretty much letting me know what to expect --
11 Q. Sure.
12 A. -- you know, because after that
13 first time with the Coast Guard, that was a
14 shock for me. This is the first time I've
15 been involved in anything like this.

Page 48:11 to 48:16

00048:11 Q. Okay. Were you aware that the
12 decision to have the lockdown sleeve put in
13 with the DEEPWATER HORIZON equal to
14 \$2 million savings and save five and a half
15 days of time?
16 A. No --

Page 48:19 to 48:19

00048:19 A. -- not -- it wouldn't have --

Page 48:21 to 48:21

00048:21 A. -- concerned me.

Page 49:04 to 50:03

00049:04 Q. And so everyone knows what we're
05 looking at, we're looking at
06 BP-HZN-2179MDL00359943. And we're looking at
07 the bottom paragraph from Merrick Kelley.
08 That would have been your boss from BP,
09 right?
10 A. Uh-huh.
11 Q. Is that "yes"?
12 A. Yes.
13 Q. Okay. It's dated Saturday,
14 January 30, 2010, at 2:33 p.m., correct?
15 A. That's what it -- that's what
16 it's stating. I'm not sure if these times on
17 here are going to be correct, but the dates
18 are.
19 Q. Okay. And you're copied.
20 That's you, Ross Skidmore?
21 A. Yes, it is.
22 Q. And it's to Brad Tippetts?
23 A. Okay.
24 Q. It says: Brad, as discussed
25 last week, please see official notice below
00050:01 from Mark that they wish to proceed with LDS
02 installation provided the well is a keeper
03 and they run production casing.

Page 51:03 to 52:23

00051:03 Q. Second page, my expectation is
04 for you, Shane, Randy, to be offshore for
05 this operation. Randy will be staying --
06 will likely be staying on board to get the
07 rig ready for the Nile P&A work immediately
08 following Macondo. And it's signed Merrick,
09 right?
10 A. Yes.

11 Q. Okay. Now, if you go to the
 12 bottom of that second page, which is
 13 MDL00359944 which is part of that e-mail
 14 string from Mark Kelley, it starts -- to Mark
 15 Hafle, Mark to Mark.
 16 Mark, the five and a half
 17 days -- the 5.5 days assumes that you would
 18 have to install the LDS -- that means
 19 lockdown sleeve, right?
 20 A. Yes.
 21 Q. -- with a rig when the rig is
 22 mobilized for the completion. Since we are
 23 using HXT now -- what does that mean, HXT?
 24 A. I don't know.
 25 Q. -- you would be required to
 00052:01 latch BOPs test, and run LDS, then unlatch
 02 BOPs, install and test tree, and then latch
 03 BOPs back to tree before reentry for
 04 completion can begin.
 05 This sequence of activity is
 06 typically seven days; whereas, if you ran the
 07 LDS after production casing, you're looking
 08 at 1.5 days (39.5 hours is our best run so
 09 far). So basically I assume that the actual
 10 LDS portion is still the amount of time,
 11 i.e., 1.5 days, but you now use 7 days total
 12 (7 days - 1.5 days equals 5.5 days extra time
 13 and cost) to perform the same operation.
 14 If you turn the page, it then
 15 says: Incremental cost equals 5.5 rig days
 16 at \$400,000 equals \$2,200,000. So if you
 17 didn't install the LDS after production
 18 casing run and did it when the rig came back
 19 to start the completion, this is the
 20 additional expense associated with this
 21 decision.
 22 Did I read that correctly?
 23 A. I'm sure you did.

Page 52:25 to 53:02

00052:25 A. I'm not involved with these --
 00053:01 these decisions right here, so I -- I had --
 02 I didn't participate in any of this.

Page 53:05 to 53:09

00053:05 A. I have a copy of it.
 06 Q. And according to this document,
 07 which is written by BP, it meant the
 08 \$2,200,000 savings to do the lockdown sleeve
 09 with the DEEPWATER HORIZON?

Page 53:13 to 53:14

00053:13 Q. According to this document?
14 A. Well --

Page 53:17 to 53:18

00053:17 A. -- it looks to me like it's a
18 discussion between two people.

Page 53:20 to 55:04

00053:20 Q. About a \$2,200,000 savings,
21 correct?
22 A. I wasn't on the discussion.
23 I -- I don't know -- I don't know anything
24 about this right here. I really don't.
25 Q. All right. What we know is you
00054:01 received it?
02 A. It's -- it's outside of my --
03 outside of my work scope. I don't
04 participate in -- in these -- these -- this
05 area.
06 Q. Please focus on my question.
07 What we've established is you received this
08 document?
09 A. I might have received the e-mail
10 through there.
11 Q. Your name's on it?
12 A. But you saw I didn't reply.
13 Q. No, no, your name is on it?
14 A. Okay.
15 Q. Is that true?
16 A. Well, it appears to be up here,
17 not down here.
18 Q. But that's --
19 A. It's from Merrick to Mark Hafle.
20 Q. It means you received the string
21 of e-mails, correct?
22 A. I must have received the string
23 of e-mails.
24 Q. Okay. And in the string of
25 e-mails that you received is the amount of
00055:01 \$2,200,000, correct?
02 A. It's in that e-mail, yes.
03 Q. And that would represent a cost
04 savings to BP, correct?

Page 55:07 to 55:09

00055:07 A. In -- in one way of doing it, in
08 the way that it looks like Merrick is -- is
09 proposing there.

Page 55:14 to 55:18

00055:14 Q. Okay. We'll mark that as the
15 next exhibit number, which is -- 2227 is the
16 exhibit number for that document.
17 (Exhibit No. 2227 marked for
18 identification.)

Page 56:23 to 57:01

00056:23 Q. Now, how far did you get in --
24 when I say you, I also mean Drill-Quip as
25 well -- in installing the lockdown sleeve?
00057:01 A. We didn't.

Page 59:04 to 59:10

00059:04 Q. Were you going to move with the
05 DEEPWATER HORIZON over to the Nile?
06 A. Yes, I was. I would have stayed
07 on board and rode it over.
08 Q. When was it scheduled to leave
09 to the Nile, the DEEPWATER HORIZON?
10 A. Whenever this well was finished.

Page 60:03 to 60:11

00060:03 Q. Okay. And then the DEEPWATER
04 HORIZON would navigate to the Nile?
05 A. After we're finished with
06 Macondo, it would navigate to the Nile.
07 Q. And then you would do your job
08 in the Nile?
09 A. That's correct. We would -- we
10 should have all of our equipment on board and
11 would go from there.

Page 61:09 to 63:02

00061:09 Q. When is it normally installed?
10 A. In --
11 MS. O'CONNOR:
12 Objection, form.
13 A. Installed or prepared?
14 EXAMINATION BY MR. GONZALEZ:
15 Q. No, installed.
16 A. The lockdown sleeve?
17 Q. Yes.
18 A. After the completion of a well.
19 And it can be any time after that. It's just
20 do they want to do it while the -- while the
21 rig is on location or do they want to do it

22 off a vessel later in the future or -- I
23 understood it was going to be done right
24 there off the DEEPWATER HORIZON.
25 Q. Do you consider it to be a
00062:01 safety device, the lockdown sleeve?
02 A. Well, I've never looked at it as
03 a -- as a safety device. I've looked at it
04 as a -- a necessity if you're going to have
05 production and run a tree. But it also works
06 as a safety device if you look at it that
07 way.
08 Q. How does it work as a safety
09 device?
10 A. It would just ensure that
11 you're -- you have something locked down on
12 top of the casing hanger and seal assembly.
13 Q. And how does that help seal the
14 hydrocarbons out?
15 A. Well, you have a -- you have a
16 seal with your -- your casing hanger has a
17 seal assembly, but with the lockdown sleeve,
18 in addition, you do have a seal on -- to the
19 ID of the casing hanger to come up around the
20 outside of the lockdown sleeve.
21 Q. Now, your team was told to wait
22 to do your work until the mud had been
23 replaced with seawater, right?
24 A. Yes, the -- displaced the -- the
25 well out.
00063:01 Q. You thought that was unusual?
02 A. I didn't think it was --

Page 63:05 to 65:10

00063:05 A. -- unusual. It just isn't the
06 way I was wanting to do it.
07 EXAMINATION BY MR. GONZALEZ:
08 Q. You wanted to do it with the
09 mud?
10 A. Well, it was my thought, and I
11 sent my recommendation in.
12 Q. Tell us what you recommended.
13 A. I requested that we go ahead and
14 set the lockdown sleeve in mud, because when
15 you're pumping, once you clean that profile
16 out to run your lead impression tool in,
17 it's -- you've cleaned it out and the
18 drilling fluids or the mud, as I'm calling
19 it, has a viscosity, a higher viscosity, so
20 it has the ability to carry these cuttings
21 and debris out of the hole a lot more
22 efficiently than what seawater would.
23 So that's why I was wanting to
24 use the mud, because I could see that we
25 would have a -- a -- a better plan for

00064:01 success on this lockdown sleeve and lead
 02 impression tool with one run. And, you know,
 03 you have it less likely to -- to have a
 04 misrun and then you have to make a wash trip
 05 and then run the lead impression tool again
 06 and then run and set your lockdown sleeve.
 07 Q. Your suggestion was overruled?
 08 A. Yes, it was.
 09 Q. By whom?
 10 A. John Guide.
 11 Q. And who is he?
 12 A. I -- I -- I believe John Guide
 13 was the -- the team lead to the well site
 14 leaders. He would have been to the well site
 15 leaders as Merrick Kelley would be to myself.
 16 Q. Did he work for BP?
 17 A. Yes, sir.
 18 Q. So Mr. Guide said, "We're not
 19 doing it that way"?
 20 A. That's correct.
 21 Q. And he decided the lockdown
 22 procedure would occur after displacement of
 23 the mud with seawater?
 24 A. Yes.
 25 Q. In your 33 years of business,
 00065:01 you had never seen a lockdown sleeve done
 02 with seawater, not mud?
 03 A. Well, I -- I -- just I've --
 04 I've seen it in mud. You know, it's more
 05 common and -- but that's -- that's the way I
 06 prefer it.
 07 Q. Sure. You had --
 08 A. And it's -- it's only for that
 09 reason of viscosity. It has nothing to do
 10 with the well safety or any of that.

Page 65:16 to 66:11

00065:16 In your 33 years in this
 17 business, you have never seen an installation
 18 of a lockdown sleeve done with seawater as
 19 opposed to mud --
 20 MS. O'CONNOR:
 21 Objection, form.
 22 EXAMINATION BY MR. GONZALEZ:
 23 Q. -- correct?
 24 A. You know, I don't know if --
 25 if -- if I've ever seen it in saltwater or
 00066:01 not. If -- if I made that statement in
 02 the -- at -- at an investigation, then I made
 03 the statement.
 04 Q. All right. But as you sit here
 05 today, you cannot recall one incident where a
 06 lockdown sleeve was placed in --
 07 A. No.

08 Q. -- seawater as opposed --
09 A. No.
10 Q. -- to mud, correct?
11 A. Correct.

Page 66:21 to 66:22

00066:21 Q. What does it tell a person if
22 there's well kicks during this procedure?

Page 66:25 to 67:08

00066:25 A. If there's well kicks during a
00067:01 lockdown sleeve?
02 EXAMINATION BY MR. GONZALEZ:
03 Q. Right before.
04 A. Well, it means that the well is
05 not secured and it's flowing.
06 Q. It's flowing?
07 A. Well, that's what a well kick
08 is. It's what you asked, isn't it?

Page 67:22 to 70:12

00067:22 Q. Now, in order to install the
23 lockdown sleeve in the Macondo well, you
24 needed 100,000 pounds of force to close it
25 down, right?
00068:01 A. Well, 100,000 was the Drill-Quip
02 recommendation to be run underneath it.
03 Q. And how does that occur -- how
04 does it -- how you get 100,000 pounds of
05 force down to close a lockdown sleeve?
06 A. Well, you're -- you're actually
07 running that stinger -- the 100,000-pound
08 stinger underneath it. It's -- is you're not
09 pushing the weight down, you're pulling the
10 weight down with it. That way you don't put
11 your pipe in the compression on top. You'll
12 have a sufficient amount of weight
13 underneath.
14 And it also helps ensure that
15 your -- your tool is landed out and pulled in
16 true and square into its seat.
17 Q. How is it pulled down as opposed
18 to pushed down?
19 A. How or why?
20 Q. How.
21 A. How. All right. Well,
22 underneath your tool, you have a -- a
23 4-1/2-IF drill stem sticking out the bottom.
24 They would use a crossover to adapt it to
25 whatever they're going to use for --

00069:01 underneath it for weight, whether it be drill
 02 pipe, heavy weight pipe, collars, or
 03 whatever. That would be made up to the
 04 bottom of the tool. And that's where you'd
 05 get your weight underneath it.
 06 Q. Does it grab it?
 07 A. Well, it's -- it's threaded onto
 08 it.
 09 Q. Okay. And then it's --
 10 A. And --
 11 Q. -- pulled down hydraulically?
 12 A. No, no.
 13 Q. What's the method to --
 14 A. Let -- let me --
 15 Q. Right.
 16 A. -- let me -- let me see how I
 17 can explain this to you better. Here we go.
 18 Q. I'll hand you a piece of paper.
 19 A. Yeah. When you have your --
 20 (witness drawing) -- this being drill pipe
 21 going up to rig floor, this being your subsea
 22 tool. From here you would have your
 23 crossover. And this would be the stinger,
 24 as I -- as I call it, underneath it. Some
 25 people refer to it as tail pipe. And this
 00070:01 right here would equal 100 K.
 02 So when you're running your --
 03 your drill pipe in, here's the wellhead.
 04 Here's where it lands out. As you run your
 05 drill pipe in, this would land out on this
 06 profile right here, and you would have this
 07 100,000 pounds underneath it. So you can
 08 lower this tool down -- if they want 70,000
 09 pounds down, you can go ahead and put
 10 70,000 pounds down, or you can put up to
 11 100,000 pounds down without putting your
 12 drill pipe into compression.

Page 71:22 to 74:05

00071:22 Q. Mr. Skidmore, why was it that
 23 the cement plug had to be dropped to -- down
 24 under 3,000 feet because the lockdown sleeve
 25 was going to be placed in the Macondo well at
 00072:01 this -- in April 2010?
 02 A. Yes.
 03 MS. O'CONNOR:
 04 Objection to form.
 05 A. If -- if that lockdown sleeve
 06 was dropped down because of -- if the balance
 07 plug -- if the cement plug was dropped down
 08 because of the lockdown sleeve installation,
 09 it would be because of this stinger right
 10 here underneath.
 11 So whenever you land out this

12 tool in this wellhead, however long this tail
 13 pipe is or stinger to get you 100,000 pounds,
 14 you just need to ensure that you have this
 15 much room so you don't come down with the end
 16 of this and bump your cement plug.
 17 EXAMINATION BY MR. GONZALEZ:
 18 Q. So that's why they had to drop
 19 it lower than 3,000, so that the stinger
 20 would not interfere with the cement plug?
 21 A. Well, you know, if -- if they
 22 brought -- if they moved the position of the
 23 plug because of the lockdown sleeve, that
 24 would be why --
 25 Q. Okay.
 00073:01 A. -- but --
 02 Q. The --
 03 A. -- I don't -- I don't know --
 04 and -- and really I don't know why they moved
 05 the plug, but the only thing I was concerned
 06 with myself is that there is enough room
 07 underneath that lockdown sleeve for that tail
 08 pipe so we can set it without interfacing or
 09 bumping into the cement plug.
 10 Q. BP actually asked MMS for
 11 permission to move the plug down to 3 --
 12 between 3,000 and 3,300 feet --
 13 A. Okay.
 14 Q. -- once they decided to do the
 15 lockdown sleeve at the point where they were
 16 going to do it.
 17 A. Okay.
 18 MS. O'CONNOR:
 19 Objection to form.
 20 EXAMINATION BY MR. GONZALEZ:
 21 Q. And that would explain why,
 22 right?
 23 A. Well, if --
 24 MS. O'CONNOR:
 25 Objection to form.
 00074:01 A. -- it -- if -- they would have
 02 to have room to set it. You know, I -- I
 03 don't know why they did. But they would have
 04 to have room to set it due to the length of
 05 the tail pipe.

Page 74:07 to 75:07

00074:07 Q. Who was in charge of installing
 08 the lockdown sleeve on the Macondo well -- on
 09 the DEEPWATER HORIZON for the Macondo well?
 10 A. I would -- I would have to say
 11 all of us involved would be. We -- we just
 12 worked as a team.
 13 Q. Okay.
 14 A. You know, I wouldn't step out

15 and -- in front of you without you knowing
 16 and you wouldn't step out in front of me
 17 without me being aware of decisions made.
 18 Q. So would it be fair to say that
 19 you were one of the individuals in charge of
 20 installing the lockdown sleeve?
 21 A. Yes, sir, that would be fair to
 22 say.
 23 Q. Who would the other individuals
 24 in charge of installing the lockdown sleeve
 25 be?
 00075:01 A. There was three of us on board:
 02 Myself, Brad Tippetts, Shane Albers.
 03 Q. We've marked your drawing as
 04 Exhibit No. 2228, just so we're all clear.
 05 Now, why was it that you
 06 questioned the plan on the rig for the
 07 installation of the lockdown sleeve?

Page 75:10 to 76:09

00075:10 A. Questioned the plan? You mean
 11 the displacing of the --
 12 EXAMINATION BY MR. GONZALEZ:
 13 Q. Yes.
 14 A. -- drilling fluids out?
 15 Well, it's -- that's part of
 16 my -- what's expected of me. When I come out
 17 to a job, I -- I -- I look at the procedure,
 18 I look at what's -- what's going on, and
 19 it -- at any time -- even from the beginning
 20 of a procedure right up until the job begins,
 21 if any of us have an idea that might help
 22 make this -- make this job go better, safer,
 23 or -- or whatever, it's -- it's our duty to
 24 throw them the idea of what's on your mind.
 25 "Do you have an idea?" And if they say,
 00076:01 "Yeah, that's -- that's a better way of going
 02 about it than what we have," then that's the
 03 way we'll do it. If they've already made
 04 their decision, then they'll just say, "No,
 05 maybe next time."
 06 Q. And that's what happened in this
 07 case. They said, "We're not going to do it
 08 your way"?
 09 A. That's -- that's right.

Page 77:18 to 77:21

00077:18 Q. Now, the decision to install the
 19 lockdown sleeve using the DEEPWATER HORIZON,
 20 that was made by BP, right?
 21 A. That's correct.

Page 78:25 to 79:10

00078:25 Q. Would you agree with me that
00079:01 BP's decision to set the lockdown sleeve last
02 before temporary abandonment is what set in
03 motion the decision to set the surface plug
04 below 3,000 feet?
05 MS. O'CONNOR:
06 Objection to form.
07 A. I -- I don't know what made
08 their decision on it. I just know that you
09 have to have X amount of room in order to run
10 a lockdown sleeve.

Page 79:12 to 81:25

00079:12 Q. Were drill collars used?
13 A. We never got to that point.
14 Q. Are drill collars heavy?
15 A. Yes, they are.
16 Q. And what's the significance of
17 the use of a drill collar?
18 A. You would -- you could shorten
19 your length of your tail pipe with drill
20 collars versus -- heavy weight pipe is not as
21 heavy as the drill collars and drill pipe
22 would be even lighter than the heavy weight.
23 So the -- the -- the more drill
24 pipe or heavy weight that you would have to
25 use, the longer your tail pipe would be. The
00080:01 more drill collars that you use, the shorter
02 your tail pipe would be.
03 Q. So the surface plug could be
04 higher up if you're using a drill collar?
05 A. Well, it -- it -- your tail pipe
06 would be shorter. I don't know about the --
07 how they would go about setting their plug
08 or -- or come up with those numbers.
09 But they would have the option
10 of setting it closer with drill collars than
11 they would if we ran drill pipe --
12 Q. Right.
13 A. -- under it.
14 Q. Because less space would be
15 necessary --
16 A. That's correct.
17 Q. -- between the plug?
18 A. You would have less -- less -- a
19 shorter tail pipe in -- in order to set your
20 lockdown sleeve.
21 Q. Who made the decision not to use
22 drill collars on this project?
23 A. I don't know where the decision
24 came from.

25 Q. Would that be a BP decision?
00081:01 A. Yes, it would.
02 Q. Do you agree that setting the
03 plug deep in the well made the BP
04 engineers -- required removing a great deal
05 of drilling mud from the well during
06 temporary abandonment?
07 A. Ask me that again.
08 Q. Yes. Do you agree that setting
09 the -- the -- the plug deep in the well
10 required removing a great deal of drilling
11 mud from the well during temporary
12 abandonment?
13 A. Well, if they're wanting to
14 displace it from the top of the plug all the
15 way out, the deeper the plug, the more
16 drilling fluid that would be exchanged out
17 with seawater.
18 Q. Were you aware that the surface
19 plug was set in seawater?
20 A. No, no, I . . .
21 Q. Do you agree that the decision
22 by BP to set the lockdown sleeve during
23 temporary abandonment was done because it
24 would be quicker and at less expense than a
25 completion rig?

Page 82:03 to 82:05

00082:03 A. No, I -- I think it was -- the
04 decision was made to set it with a -- with
05 the DEEPWATER HORIZON because we were there.

Page 82:07 to 83:01

00082:07 Q. You also -- but that's that memo
08 we saw that said you'd save \$2.2 million --
09 A. Yeah, but --
10 Q. -- if you did --
11 A. -- that's -- that's back in
12 January, and -- and, you know, we're -- we're
13 talking about right here this decision being
14 in -- in April.
15 But back in January they were
16 throwing around a lot of ideas and plans
17 and -- and -- so I -- I wasn't really that
18 involved or interested in this string of
19 e-mails right here --
20 Q. Right.
21 A. -- on the -- the \$2.2 million,
22 because I have nothing to do with BP money.
23 Q. I understand that.
24 But the e-mail that we saw
25 together said there was a five-and-a-half-day

00083:01 savings, correct?

Page 83:04 to 83:07

00083:04 A. That's what it says.
05 EXAMINATION BY MR. GONZALEZ:
06 Q. And it was a 2.2 million cost
07 savings?

Page 83:10 to 84:07

00083:10 A. That's what it says right there.
11 EXAMINATION BY MR. GONZALEZ:
12 Q. All right, sir. And you have no
13 reason to disagree with that?
14 A. No, I'm -- I'm not disagreeing
15 with you. It's just --
16 Q. Okay.
17 A. -- I'm not familiar, I don't
18 recall a lot of these e-mails that went on
19 that -- that long ago.
20 Q. Who developed the program for
21 the Macondo well on the lockdown sleeve?
22 A. The program?
23 Q. Yeah.
24 A. The procedure?
25 Q. Yes, sir.
00084:01 A. God, I'd have to look on the
02 front of it to see who all -- who all signed
03 off on it.
04 Q. Would that -- would that be
05 Kelley?
06 A. Merrick would be one of the ones
07 that signed off on it, yes.

Page 85:02 to 85:09

00085:02 Q. Does the timing of the lockdown
03 sleeve, the implementation, or actually
04 installation of the lockdown sleeve, deal
05 with the timing of a negative pressure test?
06 A. If I'm understanding you
07 correctly, the -- the lockdown sleeve and the
08 lead impression tool has nothing to do with
09 the well or even the design of it.

Page 86:17 to 86:24

00086:17 Q. So necessarily, then, the
18 negative pressure test, that's part of the
19 testing that is done to make sure that the
20 well is secure?
21 A. The negative test would have

22 been part of the cementing job for the
23 Macondo well itself.
24 Q. So that has to be done --

Page 87:03 to 87:05

00087:03 Q. -- before you put the lockdown
04 sleeve, because you want to make sure that
05 the well is properly closed?

Page 87:09 to 87:12

00087:09 A. -- in this case -- in this case
10 that -- all of that would have already been
11 done and behind us before we even went to the
12 lockdown sleeve, correct.

Page 87:14 to 87:22

00087:14 Q. And if there's a problem with
15 the negative pressure test and it's
16 inconclusive, you certainly aren't ready to
17 be doing anything with a lockdown sleeve?
18 A. Well, that's correct. If there
19 was a -- a problem or a issue and -- and
20 they -- they determined that this -- this is
21 not a good test, then we never would have got
22 to the lockdown sleeve.

Page 88:09 to 88:22

00088:09 Q. Did the procedures create a
10 hydrostatic underbalance in the well?
11 A. Did the procedures create a
12 hydrostatic underbalance in the well.
13 What -- what procedures are you referring to?
14 Q. The --
15 A. The lockdown sleeve procedures
16 still?
17 Q. The displacement of -- the
18 displacement of mud --
19 A. With saltwater?
20 Q. -- with use of the -- of the
21 saltwater?
22 A. Well --

Page 88:25 to 89:22

00088:25 A. -- any -- if you -- if you're
00089:01 displacing drilling fluids out which weigh 11
02 pound, which I don't know what -- what the
03 drilling fluids weighed. Do you?

04 EXAMINATION BY MR. GONZALEZ:
 05 Q. I don't have those calculations,
 06 but I'm sure it's in some of the materials.
 07 A. Okay. Well, if -- if the
 08 drilling fluids displaced out are heavier
 09 than the saltwater that you're exchanging
 10 with, then that would be a hydrostatic
 11 difference.
 12 If -- if all the cement and the
 13 barriers and everything are in place, I don't
 14 believe you'd be affecting the well.
 15 Everything would be secured under the --
 16 under the concrete.
 17 Q. The crew removed a lot of mud
 18 during temporary abandonment, and this
 19 reduces the balancing pressures that the mud
 20 column in the wellbore exerted on the
 21 hydrocarbons in the formation.
 22 A. Okay.

Page 90:02 to 90:03

00090:02 Q. -- commonsense, right?
 03 A. I --

Page 90:06 to 90:07

00090:06 A. -- don't know when they started
 07 it --

Page 90:10 to 90:13

00090:10 A. -- and all because I'm not
 11 familiar with the drilling procedure. But
 12 any time you exchange fluids out, you are
 13 changing the hydrostatic level in the well.

Page 90:15 to 91:05

00090:15 Q. Do you agree with me that that
 16 would increase stress on the bottom hole
 17 cement?
 18 A. Increase stress on it --
 19 Q. Yes.
 20 A. -- by -- by relieving it? By --
 21 Q. Yes.
 22 A. -- by changing it out?
 23 I don't know what pressure's
 24 under the cement.
 25 Q. Well, we agreed that the
 00091:01 drilling mud's heavier, right?
 02 A. Drilling mud's heavier and
 03 you're taking the drilling mud out --

04 Q. Yeah. So it --
 05 A. -- and you're replacing it --

Page 91:09 to 92:07

00091:09 Q. All right. If -- if you have
 10 the drilling mud and it's heavier and it's
 11 pushing down --
 12 A. Okay.
 13 Q. -- then you take that out and
 14 you put something lighter, then it's easier
 15 for whatever's below to come up, right?
 16 A. Well, that's -- that's where I
 17 was going.
 18 Q. Okay.
 19 A. If -- if I knew what was
 20 underneath it, I could agree with you.
 21 Q. If it -- if it's hydrocarbons
 22 trying to pop out?
 23 A. I don't know -- you know, at
 24 that time I didn't -- I didn't have a thought
 25 that there was any kind of well problem or
 00092:01 that anything was underneath that cement
 02 trying to come up.
 03 Q. Well, yeah, I -- I -- I don't
 04 think that --
 05 A. But --
 06 Q. -- you at that time frame --
 07 A. -- I --

Page 92:12 to 94:11

00092:12 Q. I didn't -- I'm not suggesting
 13 that you thought that there was going to be a
 14 blowout. I'm not suggesting that. But now
 15 we know that there were hydrocarbons that
 16 were coming out of there, right?
 17 A. Now, in --
 18 Q. Do you agree with that?
 19 A. -- in reply to what you were
 20 saying that -- with wellbore pressures
 21 underneath it and you exchange that fluid
 22 out, you would increase the pressure against
 23 your -- your -- your barrier from underneath.
 24 By putting saltwater on top, you would
 25 increase the pressure on the barrier from
 00093:01 underneath.
 02 Q. And that barrier in this case
 03 was the -- the cement job done by
 04 Halliburton?
 05 A. Well, it would be the cement
 06 job, yeah.
 07 Q. And it was approved by BP?
 08 A. I don't know the process it goes

09 through, who approved it -- who all approved
 10 it. I know everything that's done in a well
 11 design goes all the way through the
 12 government, and everybody has to sign off and
 13 approve on it.
 14 Q. Including BP?
 15 A. But -- oh, I would imagine so.
 16 It's -- it's their lease.
 17 Q. And we know the cement failed?
 18 DEFENSE COUNSEL:
 19 Objection, form.
 20 A. Obviously.
 21 EXAMINATION BY MR. GONZALEZ:
 22 Q. Right, or there wouldn't have
 23 been a blowout?
 24 A. Yeah, we wouldn't be here today.
 25 Q. So the -- the -- just so we're
 00094:01 clear, the process of displacement of the mud
 02 by the seawater at that depth create -- now
 03 that we know that hydrocarbons were creating
 04 wellbore pressure, created more stress on the
 05 cement?
 06 A. From underneath?
 07 Q. Yes.
 08 A. I -- I would --
 09 MS. O'CONNOR:
 10 Objection, form.
 11 A. -- agree with you.

Page 94:13 to 95:18

00094:13 Q. Was there any other barrier in
 14 place at that point?
 15 A. I don't know.
 16 Q. That you know of?
 17 A. I don't know.
 18 Q. You don't know of any other
 19 barrier?
 20 A. No, I'm not familiar with what
 21 was going on with the well.
 22 Q. Are you familiar with the
 23 negative pressure test?
 24 A. Not really.
 25 Q. What it is?
 00095:01 A. No. Well, I know what it is.
 02 Q. Tell us --
 03 A. I don't know --
 04 Q. -- what it is.
 05 A. -- how -- how they were
 06 performing it or -- or the paths that were
 07 chosen or anything.
 08 Q. Were you involved with the
 09 negative pressure test on the DEEPWATER
 10 HORIZON for the Macondo well?
 11 A. Not at all.

12 Q. Did you hear individuals
13 discussing it?
14 A. No.
15 Q. Were you aware that there was a
16 discrepancy involving the negative pressure
17 test?
18 A. No, I was not aware.

Page 97:21 to 98:03

00097:21 Q. Now, on the lockdown sleeve,
22 this was the first time you were performing
23 it on your own, right?
24 A. That's correct.
25 Q. Now, you had witnessed several
00098:01 of them before?
02 A. Yes, and I've performed one
03 since then.

Page 99:08 to 99:10

00099:08 Q. Okay. Now, you had not
09 discussed this lockdown sleeve procedure with
10 anyone?

Page 99:22 to 99:23

00099:22 A. Yes, I -- I have discussed the
23 lockdown procedure within our team group.

Page 99:25 to 100:15

00099:25 Q. At the Macondo well in --
00100:01 between April 16th through the 20th, did you
02 have your supervisors on board?
03 A. No.
04 Q. Were you reporting to them
05 onshore?
06 A. Yes.
07 Q. And how were you communicating,
08 through e-mails or phone calls?
09 A. Any way we chose. We -- we were
10 using all, all of the above. We were using
11 phone conversations as well as e-mails.
12 Q. And that was communications --
13 you on the DEEPWATER HORIZON and your
14 supervisors for BP onshore?
15 A. Correct.

Page 101:12 to 102:03

00101:12 Q. Now, you felt aggravated that

13 the lockdown sleeve was not going to be
14 installed in mud, correct?

15 A. Well, not necessarily aggravated
16 that they weren't going to do it in mud, but
17 it -- aggravated because I had the -- the way
18 that I saw that I wanted to do it and I --
19 and I thought it was a -- a better chance for
20 success than with seawater. And there wasn't
21 any discussion involved, it was just we're
22 not going to do it that way.

23 Q. You actually were firm in your
24 discussions with Brian Morel that it should
25 be done in mud, right?

00102:01 A. Well, if -- if I didn't believe
02 that my idea was a good idea, I wouldn't have
03 presented it.

Page 102:07 to 102:12

00102:07 Q. Did you request and receive your
08 sequence of protocol from Brian Morel?

09 A. Yes, we did.

10 Q. Was it in writing?

11 A. Yes. I -- I believe he -- he
12 might have sent it to Shane or -- or Brad.

Page 103:01 to 105:16

00103:01 Q. By the 19th was the date in
02 sight when you were planning on installing
03 the lockdown sleeve?

04 A. Yes. I was looking at the
05 schedule and we were discussing it and it
06 looked like it would be about 10:00 o'clock
07 the next morning. That would be
08 10:00 o'clock of the morning of the 21st.

09 Q. Of the 21st or the 20th?

10 A. The 21st.

11 Q. The 21st.

12 A. The 20th is when I first found
13 out, you know, a reasonable time of when this
14 was going to take place.

15 Q. So at that point you were under
16 the impression that there had been -- well
17 integrity had been achieved?

18 A. Well, at that point I was
19 assured that well -- well -- well integrity
20 would be achieved by that time in the morning
21 and we would begin working.

22 Q. When did you receive that
23 information? Was it the 19th or the 20th?

24 A. It was the 20th.

25 Q. Okay.

00104:01 A. It was the 20th.

02 Q. Morning of or afternoon?
 03 A. Afternoon.
 04 Q. And who told you that?
 05 A. Oh, my. It might -- it might
 06 have been Don or it might have been Brian.
 07 Q. Brian Morel?
 08 A. Yes, sir.
 09 Q. Or Don what?
 10 A. Or Don Vidrine. He was a well
 11 site leader.
 12 Q. For BP?
 13 A. Yes.
 14 Q. And by "well integrity," we mean
 15 that the well will be effectively closed?
 16 A. That's correct.
 17 Q. Did you run a lead impression
 18 block?
 19 A. No, we had not performed any of
 20 that as yet.
 21 Q. That would have also occurred on
 22 the 21st?
 23 A. That's correct. That would have
 24 been the first one to do would have been the
 25 lead impression tool and then followed by
 00105:01 lockdown sleeve.
 02 Q. Have you ever run a lockdown
 03 sleeve yourself through the hangers?
 04 A. Through the hangers?
 05 Q. Yeah.
 06 A. To the hangers.
 07 Q. Yeah, to the hangers. I'm
 08 sorry.
 09 A. Yeah.
 10 Not -- not by myself, no,
 11 I've -- same respect as I'm in right now, you
 12 know, it would be I'd be there to assist
 13 and -- and just ensure that it is done within
 14 the parameters that BP is wanting it to be
 15 done in. But in the past, no, I've never
 16 taken one all the way by myself.

Page 108:07 to 108:12

00108:07 Q. Gotcha. Was this lockdown
 08 sleeve operation the deepest you had seen
 09 before?
 10 A. I would guess -- I would guess
 11 it was, if it wasn't the deepest. That's --
 12 that's pretty deep water.

Page 110:11 to 111:04

00110:11 How often had you worked with
 12 Drill-Quip before?

13 A. Well, Drill-Quip's been around
 14 quite a while, so it goes back a number of
 15 years, you know, with various things. We've
 16 used Drill-Quip wellheads and BOP connectors
 17 and Drill-Quip running tools and equipment.
 18 Q. Did they design the lockdown
 19 sleeve?
 20 A. Yes.
 21 Q. And the lead tool as well?
 22 A. Yes.
 23 Q. Was there anything about this
 24 project that gave you concerns before the
 25 blowout other than what you've already
 00111:01 discussed with us?
 02 A. No. Up -- up until the
 03 incident, I didn't -- I didn't have any --
 04 any thoughts of this ever happening.

Page 114:14 to 115:16

00114:14 Q. Page 276, starting at line 10:
 15 Mr. Skidmore, did you ever mention to someone
 16 on the back deck of the BANKSTON, the boat
 17 that evacuated you, that at some time prior
 18 to the blowout, that you had sent an e-mail
 19 to the BP office asking for a snakebite kit.
 20 You were overheard saying that, and I want to
 21 ask you about that, what that means.
 22 Answer: Well, I hate it, but it
 23 did.
 24 Question: Well, I apologize to
 25 have to ask you, but I knew you had and I
 00115:01 wanted to get your explanation.
 02 We're now into line 21.
 03 A. Uh-huh.
 04 Q. Answer: Yes, and I'm afraid I
 05 just -- just my personality might be causing
 06 some conflict with some of it, but this
 07 was -- this would be -- this would just be in
 08 reference to just, oh, sorry luck you might
 09 be having at the time.
 10 A. Uh-huh.
 11 Q. Was that your answer, sir?
 12 A. That was my answer.
 13 Q. Okay. And that's consistent
 14 with what you were telling us earlier, that
 15 it's like Murphy's Law?
 16 A. Yes.

Page 115:22 to 116:07

00115:22 Q. And you also told that to
 23 Mr. Pleasant?
 24 A. Yes, that's who I was -- that --

25 that's who made the statement that I said
 00116:01 that.
 02 Q. Right. But the e-mail that had
 03 been sent to the BP office you believe was to
 04 Mr. Kelley?
 05 A. If I wrote somebody an e-mail,
 06 that would probably be to Merrick, that's
 07 right, because --

Page 118:17 to 118:20

00118:17 Do you agree with me that
 18 questions, inconsistencies with negative
 19 pressure tests should be resolved before
 20 moving forward --

Page 118:24 to 119:01

00118:24 Q. -- in sealing a well?
 25 A. Yes, I would agree with you, but
 00119:01 I would have thought they would have been.

Page 122:05 to 123:19

00122:05 Q. Tell us what mud circulation is.
 06 A. Mud circulation, it -- the -- it
 07 would begin in the mud pump room, and with
 08 your pumps going, you would be pushing the
 09 mud up through piping up to the derrick,
 10 through the gooseneck, the Kelley hose, down
 11 through your top drive, through your drill
 12 pipe, down through the drill stem, out the
 13 bit, and up around the outside of the pipe,
 14 returning to surface, to the flow line, to
 15 the shale shakers, back to the mud pit again.
 16 Q. Was it done in this case?
 17 A. Circulation?
 18 Q. Yeah.
 19 A. At -- at -- at what point?
 20 Q. Right before --
 21 A. Might be circulated.
 22 Q. Right before you were going to
 23 place the lockdown sleeve.
 24 A. A wash trip.
 25 Q. The wash trip, right.
 00123:01 A. Yeah, I -- I believe everything
 02 had been washed out. And, now, when they
 03 were displacing out, you would come up as you
 04 displace out and you can pump and circulate
 05 right there and come on out --
 06 Q. Were you aware --
 07 A. -- with your bit.
 08 Q. I'm sorry.

09 A. No, I'm through. Go ahead.
10 Q. No, no, you need to finish.
11 A. That -- that -- that was it.
12 You know, if -- if you're displacing out at a
13 certain depth and as you come -- as you
14 displace it out, you can bring your bit up or
15 your -- your mule shoe or whatever you're
16 pumping through to that point, circulate, and
17 then come on out of the hole, and that would
18 be a -- a wash trip that would have been
19 included in the displacement of the well.

Page 125:23 to 125:24

00125:23 Q. Does mud circulation before a
24 cement job promote safety?

Page 126:02 to 126:03

00126:02 A. I don't -- I don't know how --
03 how that question applies to anything.

Page 126:05 to 126:12

00126:05 Q. Well, it --
06 A. Promotes safety from
07 circulating, because you're constantly
08 circulating.
09 Q. Well, one of the things that it
10 does, it allows potentially gas-bearing --
11 A. Oh, I understand.
12 Q. -- influxes --

Page 126:15 to 126:24

00126:15 Q. -- to be safely removed and to
16 remove pockets of gas, right?
17 A. Yes.
18 Q. And that's a safety issue?
19 A. Yes.
20 Q. All right. So if that step is
21 forgone or not done, then you don't have the
22 opportunity to remove dangerous gas influxes
23 and gas pockets?
24 A. I agree.

Page 127:02 to 127:04

00127:02 A. Was it done?
03 EXAMINATION BY MR. GONZALEZ:
04 Q. Unfortunately, no.

Page 128:13 to 128:14

00128:13 Q. Were you involved at all in the
14 post-blowout matter, after the blowout?

Page 128:21 to 130:11

00128:21 Q. Well, I'm -- my questions are
22 really specific to the Macondo well and well
23 control well intervention after it blew out.
24 That's what I'm talking about now.

25 A. Oh, okay. Yes, I was -- I was
00129:01 on the Q4000.

02 Q. At what point?

03 A. Well, when I -- after the --
04 after the incident I went home and I got me
05 another -- my driver's license and my credit
06 cards and all of that situated and came back
07 down to Houma to get my certifications and
08 water survival cards and my offshore permits
09 back. And then I went to Berwick, Louisiana,
10 and I was assisting with the junk shot
11 manifold, and somewhere in that one week or
12 so I -- I was asked to go out on the Q4000.

13 Q. So the top -- were you involved
14 with the top kill and junk shot?

15 A. Well, I'd have to say yes and
16 no. I was involved in the -- the
17 fabrication. As far as building the junk
18 shot manifold, it being transported out
19 there, setting it on the seabed, hooking it
20 up, running the CoFlex line from the junk
21 shot manifold to the BOP, and then I went
22 home for two weeks.

23 And when I came back, the junk
24 shot had already -- they've already used the
25 junk shot, so I didn't get to assist with any
00130:01 of that.

02 Q. Were you doing junk shot prep?

03 A. The prep that I did was --
04 was -- was the building -- the fabrication of
05 the manifold itself and going through the
06 functionality and familiarizing myself on how
07 to actually function it and working with it,
08 and that was it.

09 I didn't -- I did not get to see
10 what the junk shot looked like or to -- to
11 witness it being loaded or applied.

Page 131:02 to 131:17

00131:02 Q. And tell us exactly what you did
03 with respect to the junk shot.

04 A. About the same as usual. I was

05 working along with Cameron and witnessing it,
 06 the -- the fabrication of it, and the
 07 goosenecks and -- and the assembly of the
 08 CoFlex hoses. And then I went through the --
 09 the function pressure test on it, you know, I
 10 witnessed the pressure test and the -- the
 11 function test on it.
 12 Q. The -- the -- the junk shot
 13 was -- initially they tried to use enough mud
 14 to choke the well, and then they -- after
 15 that they tried using golf balls and other
 16 rubber --
 17 A. That's the junk shot.

Page 133:25 to 134:12

00133:25 Q. Who were you getting your
 00134:01 instructions from?
 02 A. BP.
 03 Q. Who was in charge of the
 04 post-blowout intervention?
 05 A. I don't know.
 06 Q. But you were getting your
 07 instructions from BP?
 08 A. From BP, that's correct.
 09 Q. Were you working solely on
 10 post-blowout intervention during that time,
 11 the summer months of 2010?
 12 A. Yes.

Page 134:16 to 135:05

00134:16 Q. What were you on the Q4000 for?
 17 A. Well, we -- first went out there
 18 on part of it, we pulled the control pod off
 19 of the -- I was working with -- along with
 20 the Transocean superintendents then. That
 21 would have been Ray Peycard and them. We
 22 pulled a control pod from the BOP.
 23 Q. The yellow or the blue?
 24 A. Yellow, I believe it was.
 25 Q. The one with --
 00135:01 A. We --
 02 Q. -- the leak?
 03 A. We pulled both pods eventually.
 04 They were both pulled, but I believe the
 05 yellow might have been first.

Page 136:03 to 137:03

00136:03 Q. There's two pods, right, a blue
 04 and a yellow?
 05 A. There's a blue and a yellow.

06 Q. The blue one had a low battery
 07 charge, right?
 08 MS. O'CONNOR:
 09 Objection.
 10 A. I don't recall which one had
 11 what.
 12 EXAMINATION BY MR. GONZALEZ:
 13 Q. Okay. But what --
 14 A. We'd have to look back on it.
 15 Q. One of them had a -- a low
 16 battery charge, right?
 17 A. One of them had a low battery
 18 charge.
 19 Q. And the other one had a solenoid
 20 leak, right?
 21 MS. O'CONNOR:
 22 Objection --
 23 A. One of them --
 24 MS. O'CONNOR:
 25 -- form.
 00137:01 A. I don't know if it's a leak or a
 02 malfunction or what it was, because parts
 03 were changed out.

Page 137:05 to 138:07

00137:05 Q. Okay. All right. One of them
 06 had a malfunction of sorts, yes?
 07 A. Yes.
 08 Q. And the other one had a low
 09 battery charge?
 10 A. Yes.
 11 Q. And it's either the yellow or
 12 the blue for each?
 13 A. Each one of them had a
 14 malfunction of sorts.
 15 Q. Were they fixed, to your
 16 knowledge?
 17 A. Yes, they were.
 18 Q. And then they were placed back
 19 in?
 20 A. That's correct.
 21 Q. And this happened during the
 22 time frame in May 2010?
 23 A. I -- I don't recall the dates
 24 when we were doing all this, but, yeah, that
 25 would be a good -- a good guesstimation on
 00138:01 it.
 02 Because we used two different
 03 rigs: We used the Q4000 for the first pod,
 04 and we used the ENTERPRISE -- the ENTERPRISE
 05 for the other pod.
 06 Q. Were you involved with both?
 07 A. Yes, I was.

Page 140:12 to 141:02

00140:12 Q. With what procedures did you
13 operate the manifold?
14 A. I operated the manifold with
15 Cameron's function procedure that they have.
16 They -- that explains to you how to do it.
17 Q. Okay. Who's the manufacturer of
18 the manifold, Cameron?
19 A. Cameron manufactured it.
20 Q. And in conjunction with what
21 projects were you running the manifold as it
22 relates to the post-blowout matters?
23 A. Well, whatever -- this would be
24 prior to the capping stack. So it would just
25 be during the Macondo well kill, whatever
00141:01 they would be trying to do off of the BP
02 side, whatever they'd come up with.

Page 147:23 to 148:10

00147:23 Q. Were you involved in bringing up
24 the BOP?
25 A. I -- I was present when the BOP
00148:01 was recovered on the Q4000.
02 Q. What was your involvement?
03 A. Just witnessing, just
04 witnessing. I was there along with -- along
05 with Transocean and their superintendents
06 and -- and the Q4000, when they recovered
07 the -- the BOP to surface, moved it over,
08 secured it, and they -- and they began
09 corrosion inhibiting treatments to it as per
10 Transocean's procedures. And then I left.

Page 148:23 to 149:19

00148:23 Q. Did you note any defects with
24 the BOP as it came up or once it was up?
25 A. Well, there -- there was a lot
00149:01 of defects with the BOP because of what had
02 to be done in order to remove the pods. You
03 know, the -- Transocean had to cut lines
04 and -- and all of that. So they had quite a
05 bit of repairs to do.
06 And I didn't -- I didn't note
07 anything that was obvious that might have
08 been a -- a problem or a cause, because that
09 BOP had been through so much down there
10 during this.
11 Q. Do you know why the BOP was not
12 able to stop the blowout?
13 A. I do not.

14 Q. Do you think it was designed to
15 stop the blowout?
16 A. I think BOPs are designed to
17 stop blowouts and have well control.
18 Q. And if the BOP is not able to
19 stop the blowout, what's plan B?

Page 149:22 to 150:04

00149:22 A. Well, now, that's -- that's a
23 tough question right there. BOPs are
24 designed to stop the blowout. If you cannot
25 stop the blowout, then you have a choice to
00150:01 make with the EDS and you leave the location.
02 But the EDS function should
03 include the closing of the sheer rams and
04 securing the BOP.

Page 150:06 to 150:22

00150:06 Q. And if that doesn't work, what's
07 the next plan?
08 A. If you cannot successfully EDS
09 off a well -- EDS being the emergency
10 disconnect system. If you cannot
11 successfully EDS off a well and you can't
12 move your rig off location, you're looking at
13 evacuation.
14 Q. And in terms of stopping the
15 well flow, would the next step be the relief
16 well?
17 A. Well, I believe that's what was
18 used in this case, wasn't it?
19 Q. So until we were able to cap
20 the -- until BP was able to cap the -- the
21 well in July, the only plan it had was to
22 have -- create another relief well --

Page 151:01 to 151:03

00151:01 Q. -- to kill the well?
02 A. That -- that was another way of
03 killing the well, correct.

Page 154:22 to 154:25

00154:22 Q. This is a report, Congress of
23 the United States, House of Representatives.
24 And we'll mark that as the next
25 exhibit number. 2230 will be the next

Page 155:03 to 155:04

00155:03 (Exhibit No. 2230 marked for
04 identification.)

Page 155:14 to 155:21

00155:14 Q. And here's what it says. I'm
15 going to ask you some questions about it, but
16 I'll read it first.
17 The mechanical seal at the
18 wellhead required a lockdown sleeve to seal
19 the well against pressure from below as well
20 as pressure from above.
21 Do you agree with that?

Page 155:24 to 155:24

00155:24 A. No, I probably wouldn't.

Page 167:07 to 169:25

00167:07 MR. GONZALEZ:
08 Next one is my Tab 11, which is
09 his Tab 10.
10 A. Okay.
11 EXAMINATION BY MR. GONZALEZ:
12 Q. Bates stamp number, last four
13 numbers, 1850. And I'd like to direct your
14 attention to the middle. It's an e-mail from
15 Mark Hafle dated Tuesday, March 2, 2010. And
16 you're copied on it, right, Mr. Skidmore?
17 A. Yes, I am.
18 Q. And it states: Brad, here's the
19 final plan . . .
20 We will not be using any drill
21 collars.
22 A. Okay.
23 Q. Who's Mr. Hafle?
24 A. He's -- he's on the drilling
25 side on their team. I don't -- I don't know
00168:01 Mark personally.
02 Q. Okay. And he works for BP?
03 A. Yes.
04 Q. And the drilling collars are
05 those heavier collars that we were talking
06 about that would allow the use of less pipe,
07 right?
08 A. That's correct.
09 Q. And the cement plug to be a
10 little higher up?
11 MS. O'CONNOR:
12 Objection to form.
13 A. If you're -- if you're using
14 collars, you would have -- you would need

15 less room --
16 EXAMINATION BY MR. GONZALEZ:
17 Q. Right.
18 A. -- below.
19 Q. So is -- is this -- is Mr. Hafle
20 working for BP?
21 A. Yes.
22 Q. And he's confirming here that
23 drill collars will not be used on this
24 project, right?
25 A. Well, that's what he's saying.
00169:01 Q. The rest of it says: The rig
02 has 5-1/2-inch HWDP.
03 What's that?
04 A. Heavy weight drill pipe.
05 Q. 58 number feet, and we will rent
06 additional 5-1/2-inch heavy weight drill pipe
07 to have 100,000 buoyed weight below the
08 LDS/LIT tool.
09 And that's what you explained to
10 us in your drawing, right?
11 A. Yes, sir.
12 Q. You need a crossover from the DQ
13 tool.
14 What's DQ?
15 A. Drill-Quip.
16 Q. To get a 5-1/2-inch HT55 box.
17 And tell us what that is.
18 A. That's the type of thread, the
19 crossover, that you'll need to go from the --
20 the tools. Say the lead impression or
21 lockdown sleeve will have a 4-1/2 IF, and
22 you'll have to get a crossover that will go
23 from 4-1/2 IF to that right there.
24 Q. Okay.
25 A. 6-5/8 full hole.

Page 170:09 to 171:21

00170:09 Q. Then it says: You need a
10 crossover from the DQ tool to get a
11 5-1/2-inch HT55 box for the weight string.
12 The landing string will be the rig's
13 6-5/8-inch drill pipe with 6-5/8 FH
14 connections. So you may need a XO for the
15 top of the running tool, also.
16 What is XO?
17 A. Crossover.
18 Q. Okay. And Mark Hafle is the
19 drilling engineer for BP?
20 A. He's -- I don't know his -- his
21 title. He's -- he's on the drilling side
22 over there and --
23 Q. Okay. I was just looking at the
24 e-mail.

25 A. Yes.
00171:01 Q. It says --
02 A. And it's obvious --
03 Q. Yeah.
04 A. -- he's making the call.
05 Q. Right.
06 A. You know, he's in the position.
07 I -- I just don't know his official title --
08 Q. Right.
09 A. -- with BP.
10 Q. Yeah, we were just reading it
11 from his e-mail?
12 A. That's correct.
13 Q. Right.
14 And that's going to be Exhibit
15 No. 2233.
16 (Exhibit No. 2233 marked for
17 identification.)
18 EXAMINATION BY MR. GONZALEZ:
19 Q. Does the decision not to use
20 drill collars save money?
21 A. I don't -- I don't --

Page 171:24 to 172:10

00171:24 A. -- see where it would save any
25 money. It's just what's available, you know,
00172:01 what they -- what they choose to use. You
02 can see we're not making a call on what's
03 going to go under it. We're told what's
04 going to be put there. And that's all my
05 interest is.
06 If they tell me I'm going to be
07 running drill collars under it, I'm going to
08 go out on the deck and I'm going to look and
09 see if -- make sure they're putting drill
10 collars under it.

Page 172:12 to 172:22

00172:12 Q. Do you know the cost of drill
13 collars?
14 A. No, I do not.
15 Q. Do you know if it saved money?
16 A. No, I do not.
17 Q. Okay. So that's something you
18 would not know about?
19 A. I would not know.
20 Q. I need to ask somebody else that
21 question?
22 A. That's right.

Page 173:16 to 173:20

00173:16 How often were the procedures
17 for the LS -- lockdown sleeve, LDS, changed
18 before it was actually implemented in its
19 final form?
20 A. I don't know --

Page 173:23 to 174:11

00173:23 A. -- how many times it was
24 changed. You know, it started out with
25 Rashod Austin back in January or whatever
00174:01 that date was we were looking at, and -- and
02 then it moved on up to Brad and -- and Shane.
03 And every -- as long as we're not called out
04 and ready on the job, they'll put a procedure
05 together and they'll pass it around through
06 the team, and we'll all look at it. And
07 that's just the opportunity for them to
08 change it. I can't answer it. I don't know
09 how many times.
10 EXAMINATION BY MR. GONZALEZ:
11 Q. Was it changed a lot?

Page 174:14 to 174:20

00174:14 A. It's changed some, changed a few
15 times, I guess, but I -- I don't know how
16 many times.
17 EXAMINATION BY MR. GONZALEZ:
18 Q. Even while you were on board
19 between the 16th and the 20th, it changed a
20 few times, right?

Page 174:23 to 175:04

00174:23 A. Some procedural work changed,
24 but I don't know about the lockdown sleeve
25 procedure, because there's only one way to
00175:01 run a -- a lockdown sleeve and a lead
02 impression tool. The only thing that would
03 change would be how you're going to apply
04 that procedure with what vessel you're on.

Page 175:09 to 176:01

00175:09 Q. What tests you're going to run
10 before and what tests you're going to run
11 after, that could change?
12 A. Not -- not really the tests on
13 the lockdown sleeve, that's -- that's pretty
14 much going to be whatever it takes to set it.
15 Q. But on the well itself?

16 A. But on the well itself, what
 17 would change on it as far as the procedure
 18 would go would be your tail pipe or the
 19 type -- pipe that's going to be used, is it
 20 6-5/8, is it HT55, or things like that.
 21 But the actually running of the
 22 tool, the tool's always going to take 100,000
 23 pounds to set it no matter where you're at.
 24 And you're not going to run it and set it
 25 unless the well is secure and finished where
 00176:01 it's just another individual job on its own.

Page 186:07 to 187:13

00186:07 Q. Okay. If you can go to your
 08 Tab 13, please.
 09 A. Okay.
 10 Q. And it's Bates Stamp
 11 No. BP48824. And we're looking at the top
 12 from Brian Morel dated April 12, 2010, to
 13 Brad Tippetts. And it states -- oh, you're
 14 copied on this, right, Mr. Skidmore?
 15 A. Uh-huh.
 16 Q. Is that "yes"?
 17 A. Yes, it is.
 18 Q. Thank you.
 19 Our plan is to still have mud in
 20 the riser and wellbore when we set the LDS.
 21 Now, tell us what that's saying.
 22 A. Our plan is still to have mud in
 23 the riser. That means you would set the
 24 lockdown sleeve before you displace with
 25 saltwater.
 00187:01 Q. And that was consistent with
 02 what you wanted to do, right?
 03 A. Correct.
 04 Q. But at some point that was
 05 changed so that it would be done in seawater?
 06 A. That's correct.
 07 Q. And that's what you had
 08 disagreed with?
 09 A. That's right.
 10 Q. Okay. Yeah, we're marking that
 11 as the next exhibit number, 2235.
 12 (Exhibit No. 2235 marked for
 13 identification.)

Page 201:19 to 206:23

00201:19 Q. If you can turn to the next tab,
 20 please, which is your 22. And it's an
 21 e-mail -- I'm sorry. Bates Stamp No.
 22 BP317602. And it's from Ross Skidmore. Do
 23 you know him?

24 A. Uh-huh. Yes, I do.
25 Q. All right. It's an e-mail you
00202:01 wrote on April the 20th, 2252, 2010. That's
02 right before the blowout, right?
03 A. That's the letter that I wrote
04 John in relation to the mud versus seawater
05 of setting the lead impression and the
06 lockdown sleeve.
07 Q. And what time did the blowout
08 explosion occur?
09 A. Somewhere around 10:00 o'clock
10 that evening.
11 Q. And this is around --
12 A. That time is not correct.
13 Q. Okay. Do you remember what time
14 you wrote this?
15 A. No, but it was in the -- it was
16 in the afternoon, evening time, because I
17 didn't -- I went and laid down about 9:30
18 that night, and this was prior to that. And
19 I got a response back before I went and laid
20 down, so it was early enough for me to send
21 this letter and get a reply back.
22 Q. All right. So not 2252?
23 A. Nah.
24 Q. And you write to John
25 Skidmore -- I'm sorry.
00203:01 You write to John Guide. And
02 who is Mr. Guide?
03 A. I understand Mr. Guide was in
04 the position as, like, the team lead for the
05 well site leaders --
06 Q. For --
07 A. -- BP.
08 Q. For BP?
09 A. Yes.
10 Q. And you also sent this to
11 Mr. Vidrine. And who is he?
12 A. Don Vidrine, Bob Kaluza were
13 well site leaders on the rig HORIZON at the
14 time I was out there.
15 Q. And you copied your supervisor
16 in Houston --
17 A. Merrick --
18 Q. -- Merrick Kelley?
19 A. Correct.
20 Q. And you're talking about doing a
21 wash run prior to the lead impression tool?
22 A. Yes.
23 Q. What is a wash run?
24 A. The wash run would -- would be a
25 trip that you would make with the drill pipe
00204:01 down to that landing profile and just
02 circulate, just wash it off.
03 Q. Circulate mud?

04 A. No. This is because they had
05 already gotten rid of the mud and put
06 seawater in. And I was wanting it to remain
07 mud because of the carrying capabilities of
08 it, so . . .

09 Q. So you're -- this is you're
10 recommending doing a wash trip with mud?

11 A. No.

12 Q. What -- what's the wash trip
13 with is my --

14 A. The wash trip is with whatever
15 they have in the hole.

16 Q. Even if it's --

17 A. And at the time --

18 Q. -- seawater?

19 A. -- it's seawater.

20 Q. That's my question.

21 A. That's why I'm requesting a wash
22 trip, because they're check -- they're going
23 to change it out to seawater.

24 Q. Okay. And you write: I had a
25 conversation with Don and Bob, HORIZON well
00205:01 site leaders, WSLs --

02 A. Uh-huh.

03 Q. -- what has been recommend as to
04 resolve this through you.

05 So you're writing directly to
06 Mr. Guide.

07 My main reason for the wash trip
08 is due to the fact we are displacing to
09 saltwater prior to the LIT run. We could see
10 enough debris fallout due to a lack of
11 viscosity to possibly leave enough standoff
12 to cause a bad LIT impression. If that is
13 the case, we would then need to run the wash
14 sub prior to the second LIT run. I see four
15 hours now versus a greater amount later.
16 Myself, I would prefer making the wash run.

17 It would take about four hours
18 to do this wash run?

19 A. That's the number I used at the
20 time. I didn't -- I didn't know how long it
21 would take them to trip, but that was numbers
22 I used when I sent it in to him.

23 Q. Right. And your point is let's
24 spend the four hours now so that we don't
25 have to spend a lot more time later with
00206:01 complications?

02 A. Let's plan for success. We've
03 already changed it out to seawater. We know
04 seawater doesn't carry debris out. And by
05 the time they trip all the way out of the
06 hole, rattles and flakes off of the riser's
07 going to come down and settle, let's make
08 this a wash trip, wash it out, then trip in

09 with the LIT tool and go from there.
10 Q. Was it done?
11 A. No, we never got to the -- any
12 of this before we had the incident.
13 Q. Did you get a response to this?
14 A. Yes, I did.
15 Q. And what did they say?
16 A. Wasn't going to happen.
17 Q. Did they explain why?
18 A. No. I guess he felt like he
19 didn't need to.
20 Q. Well, let's mark that one as the
21 next exhibit, No. 2238.
22 (Exhibit No. 2238 marked for
23 identification.)

Page 206:25 to 207:21

00206:25 Q. Next tab number is 23, BP 34097.
00207:01 And I'm looking first at your e-mail on the
02 bottom there, Ross -- Ross Skidmore dated
03 April 20, 2010, to Merrick Kelley, Jason
04 Fraser, and looks like K.D. Davis?
05 A. Yes.
06 Q. And you say: This will be close
07 if the wash run gets shot down. Wash run
08 would add approximately four hours if done.
09 What is it you're referring to?
10 A. This letter that -- conversation
11 that I was having with -- I'm thinking.
12 Q. Yeah.
13 A. I think it was. Because we --
14 we -- we stay in communication in our group,
15 but I'm thinking I was referring to that
16 letter that I sent John Guide.
17 Q. Was Mr. Kelley in agreement with
18 you?
19 A. Yes.
20 Q. He thought the wash run should
21 be done, also?

Page 207:24 to 207:25

00207:24 A. Well, let's say he didn't shut
25 me down.

Page 208:15 to 208:18

00208:15 Q. And the wash run would have made
16 it more likely that your procedure would have
17 been successful?
18 A. In my mind.

Page 209:06 to 209:09

00209:06 But, incidentally, if there had
07 been some gas pockets or gas eruptions, it
08 would have helped clean that out?
09 A. Well, if --

Page 209:12 to 209:15

00209:12 A. -- there would have been
13 anything there, what little saltwater would
14 help, it might have helped. It wouldn't have
15 hurt. That's why we were wanting to do it.

Page 209:17 to 209:20

00209:17 Q. If you could go to -- let's mark
18 that one as Exhibit 2239.
19 (Exhibit No. 2239 marked for
20 identification.)

Page 209:25 to 210:16

00209:25 Q. And this is an e-mail from John
00210:01 Guide dated April 20, 2010, to you, Ross
02 Skidmore?
03 A. There's --
04 Q. And --
05 A. -- his reply.
06 Q. Yeah.
07 His response is: We will never
08 know if your million dollar flush run was
09 needed. How does this get us to sector
10 leadership?
11 What is your understanding of
12 what he meant?
13 A. It's not going to happen.
14 Q. And what does "how does this get
15 us to sector leadership" mean?
16 A. I don't --

Page 210:19 to 210:22

00210:19 A. -- know what state of mind he
20 was in. Because if you notice nobody's
21 copied. This is just between John and
22 myself.

Page 210:24 to 211:01

00210:24 Q. Right.
25 And he estimated that the four

00211:01 hours would run a million dollars?

Page 211:04 to 211:10

00211:04 A. No, that -- that's what he said.
05 You know, he don't know if you're talking
06 about the million dollar flush run or the
07 million dollar baby. It's a term that he
08 used, and it -- and I didn't -- I didn't
09 refer to any dollar value on it, but I read
10 that and I said, well, it ain't gonna happen.

Page 211:12 to 211:16

00211:12 Q. Clearly. But my question is:
13 With respect to the million dollar flush run,
14 had he calculated it based on time or the
15 expense of the -- of the -- of the wash run?
16 A. I don't --

Page 211:19 to 211:23

00211:19 A. -- see where he calculated it
20 for what it would take to run a -- a flush
21 run. You know, I -- I don't know why he
22 chose those terms. I don't know what was on
23 his mind at the time.

Page 211:25 to 212:03

00211:25 Q. Right. But if the words he
00212:01 chose were that he thought it was a million
02 dollar flush run and didn't know if it was
03 necessary?

Page 212:06 to 212:07

00212:06 A. I don't know if he thought it
07 was or if he just used that term.

Page 212:09 to 212:13

00212:09 Q. Right. We will never know if
10 your million dollar flush run was needed.
11 A. Uh-huh.
12 Q. Right?
13 A. That's what he said.

Page 212:19 to 213:21

00212:19 Q. What is sector leadership?

20 A. I was hoping you could help me
 21 with that one, because I don't want to ask
 22 him.
 23 Q. Who's sector leadership?
 24 A. I don't know. I don't know.
 25 Q. And did he respond -- did he
 00213:01 discuss it with you again?
 02 A. No, this is the only
 03 communication that John and I had.
 04 Q. Now -- and so we're clear, the
 05 date is correct, April 20, 2010?
 06 A. The date is correct, but the
 07 time is not.
 08 Q. Right. Because that would have
 09 been during the crisis?
 10 A. That would have been -- yeah, I
 11 would have had to have got that on the boat.
 12 Q. So this is -- he responded
 13 before the blowout?
 14 A. Quickly, yeah, he did.
 15 Q. Oh, it was -- it was right away?
 16 A. Yeah, it was -- it was pretty
 17 quick. Didn't waste any time with that one.
 18 Q. Okay. That will be Exhibit
 19 No. 2240.
 20 (Exhibit No. 2240 marked for
 21 identification.)

Page 220:11 to 220:19

00220:11 Q. -- sometimes you get a salary
 12 increase, sometimes you get both. Did you
 13 get any of that?
 14 A. I did not get a bonus. I got a
 15 pay raise.
 16 Q. And without telling me the
 17 amount, can you tell us the percentage?
 18 A. It's probably 5 percent. It's a
 19 small amount.

Page 221:15 to 221:19

00221:15 EXAMINATION BY MR. CHAKERES:
 16 Q. Good afternoon, Mr. Skidmore.
 17 My name is Nat Chakeres. I'm with the United
 18 States Department of Justice, Environment
 19 Division.

Page 227:09 to 227:20

00227:09 Q. But you said just a moment ago
 10 that you'd been around other lockdown sleeve
 11 installation procedures?

12 A. Yes, I have.
13 Q. What was your role in -- more
14 precisely in these other procedures?
15 A. If -- if -- what role I would
16 have had would have been from a subsea
17 engineer standpoint, and that would just be
18 assisting on request and on the rig floor as
19 far as rigging up operations with what would
20 be required and needed for that job.

Page 228:03 to 229:02

00228:03 Q. Could you give me a couple
04 examples of things you might have been asked
05 to do?
06 A. Well, from my -- from my
07 standpoint as a senior subsea engineer, in --
08 in days past, because subsea work was
09 unfamiliar ground in a lot of ways and we
10 handled all of the subsea tools, anything
11 that went through the BOPs, we were
12 responsible for the BOPs themselves. And if
13 we had any subsea tooling that would be made
14 up, we would be on the rig floor ensuring
15 that it is made up properly, this tool is
16 going to be able to stay on throughout the
17 process of the run, it's not going to fall
18 off or damage the BOPs in any way, and the --
19 the size on it would be correct to where it
20 would fit through the flex joint as it goes
21 down through the -- to the BOPs.
22 Q. What kind of tools are they
23 using?
24 A. Well, one of them, like what we
25 were referring to right there, would be the
00229:01 lead impression tool, lockdown sleeve,
02 wellhead testing equipment.

Page 230:16 to 230:23

00230:16 There was some confusing
17 testimony -- it was at least confusing to me
18 this morning -- about what was a barrier and
19 what wasn't. And I believe that your
20 testimony was the lockdown sleeve should not
21 be considered a barrier to flow because
22 there's -- it's open in the middle and there
23 could still be flow through it?

Page 231:01 to 231:05

00231:01 A. That's -- that's my reasoning.
02 The -- the answer that I gave, that's

03 correct. I wouldn't -- I didn't call that as
 04 a barrier to the well, because it's open
 05 through the center.

Page 231:07 to 232:07

00231:07 Q. Okay. Would you consider a
 08 column of mud appropriately weighted to be a
 09 barrier to flow?
 10 A. I don't -- I don't believe mud
 11 would be called a barrier. Mud would be a
 12 tool used in -- in drilling the well to hold
 13 the formation back at a balanced pressure.
 14 Q. Okay. If there's cement on the
 15 bottom and there's mud above that cement,
 16 that mud is a backup in case the cement is --
 17 is not good to hold back hydrocarbons? Would
 18 you agree with that statement?
 19 A. No, sir. Now, this is my
 20 opinion.
 21 Q. Well, that's -- that's what
 22 we're interested in getting here.
 23 A. Yeah.
 24 Q. Why not?
 25 A. Well, mud is a -- is a fluid
 00232:01 that's used in the -- the drilling and the
 02 work done inside the well. The barrier would
 03 be the cement that has been placed down
 04 there, and that should be a sufficient.
 05 A. If it was -- if -- if the job
 06 was done properly and it was tested, then you
 07 should believe that to be a -- a barrier.

Page 232:13 to 232:17

00232:13 Was there any discussion when
 14 the decision was being made as to whether to
 15 set the LDS in mud or seawater that taking
 16 part of the column of mud out would reduce
 17 hydrostatic pressure on the bottom?

Page 232:20 to 233:13

00232:20 A. Okay. None of that -- I -- I
 21 was not in on any discussion with that, and I
 22 had no thoughts of that being a problem as
 23 far as well safety or barriers or any of that
 24 would go.
 25 The only objection that I had to
 00233:01 changing to mud column out with saltwater was
 02 its ability to carry the cuttings and keep
 03 that landing profile clean.
 04 EXAMINATION BY MR. CHAKERES:

05 Q. But you never heard anybody else
06 raise that issue?
07 A. No, I did not.
08 Q. Okay. Do you know why the
09 decision was made to set the LDS in seawater
10 versus mud?
11 A. No, I do not.
12 Q. You don't have a guess?
13 A. Don't have a clue.

Page 234:18 to 236:08

00234:18 But if you could describe for me
19 what the concern is about running -- tripping
20 down into the hole after you set the lockdown
21 sleeve.
22 A. It's a seal area in -- inside
23 the -- the lockdown sleeve for when you run
24 your tree for future production, flow. And
25 the least that you disturb an area like that,
00235:01 the better off you are. So if you don't have
02 to do it, don't do it.
03 Q. Okay. Is there -- are you
04 familiar with the wear bushing?
05 A. Yes.
06 Q. Did I pronounce that correctly?
07 A. Yes, you did.
08 Q. Okay. What is it?
09 A. A wear bushing would be -- say,
10 if you run a string of casing, you land that
11 string of casing out in the wellhead, and
12 you're going to -- you have more hole to
13 drill. Once you land the casing, set the
14 seal assembly, test that you recover, back to
15 surface, pick up your wear bushing running
16 tool, run your wear bushing in, and that
17 protects that area from where the casing
18 hanger is hung back over the next profiles
19 where the next string of casing will be hung.
20 So it's a protective sleeve that
21 when you come down through the annulus with
22 your drill bit, it can deflect off and send
23 her up and keep going.
24 Q. Are you familiar with whether a
25 wear bushing could be placed on the lockdown
00236:01 sleeve?
02 A. I'm -- I'm -- I'm not familiar
03 with that, have not -- have not done that, to
04 my knowledge, in the past.
05 Q. And you've never seen that done?
06 A. I have not seen that done with a
07 wear bushing and going through, not to my
08 recollection.

Page 238:04 to 239:21

00238:04 Q. Have you ever used any of those
05 kinds of plugs in the past?
06 A. I have been around them when
07 they were used and in the well. I did not
08 run it myself.
09 Q. Are you familiar with any
10 problems that those plugs present?
11 A. No, sir, I am not.
12 Q. Okay. So as far as you know,
13 those are viable options to -- to use in --
14 in surface plugs?
15 A. You're -- it's -- it's outside
16 of my -- my work area, not -- not in my
17 group. That would be more the drilling side
18 that would have the expertise to help you on
19 that with the -- that type of equipment.
20 Q. Okay. I want to go back -- you
21 mentioned this morning that you were working
22 with Shane Albers and Brad Tippetts?
23 A. Yes, sir.
24 Q. I believe that both of those men
25 were -- were challenger engineers with BP?
00239:01 A. Yes, sir.
02 Q. And that means they're sort of
03 still very junior engineers in training. Is
04 that accurate?
05 A. They would be new to BP and into
06 this group, yes, sir.
07 Q. Okay. Do you have any concerns
08 about their level of training and knowledge?
09 A. No, sir. I don't have a problem
10 working with Shane or Brad anywhere.
11 Q. Okay. They -- I'm going to
12 represent that Shane testified previously in
13 this case --
14 A. Okay.
15 Q. -- and said he had never run a
16 lockdown sleeve before.
17 You -- and you don't have a
18 problem with -- with the engineers you're
19 working with not having done these procedures
20 before?
21 A. No, sir --

Page 239:24 to 240:05

00239:24 A. -- I do not.
25 EXAMINATION BY MR. CHAKERES:
00240:01 Q. Okay. And Shane and Brad, to
02 your knowledge, would have developed the
03 procedures for installing -- running the lead
04 impression tool and installing the lockdown
05 sleeve?

Page 240:08 to 240:08

00240:08 A. I believe --

Page 240:11 to 240:16

00240:11 A. -- they were writing the
12 procedures, but they weren't writing the
13 procedures word for word. We were using
14 Drill-Quip's procedure, and they were just
15 applying it to the rig that it would be used
16 on.

Page 240:18 to 242:12

00240:18 Q. Okay. I'd like you to turn to
19 Tab 2 there in your --
20 A. Okay.
21 Q. -- in your binder in front of
22 you.
23 A. Okay.
24 Q. Okay. Does that look like the
25 Drill-Quip procedure? It says Drill-Quip --
00241:01 for the lockdown sleeve?
02 A. Yes, it does, it does.
03 Q. Are you familiar with that
04 document? You can flip through it a little
05 bit.
06 A. Well, I'm -- I'm -- I would say
07 I'm familiar with the Drill-Quip procedure,
08 yes.
09 Q. Okay. We're going to go ahead
10 and -- and mark this exhibit as Exhibit 2241.
11 (Exhibit No. 2241 marked for
12 identification.)
13 EXAMINATION BY MR. CHAKERES:
14 Q. Now, if you could flip to
15 page 12 of that document.
16 A. Okay. I'm there.
17 Q. And the last bullet there
18 says -- well, why don't you read the last
19 bullet.
20 A. Drill-Quip recommends running
21 100,000 pounds of weight below the running
22 tool. Consult the operator to determine the
23 distance from the top of the wellhead housing
24 to the cement top in the last casing string.
25 Weight above running tool can be substituted
00242:01 for weight below running tool.
02 Q. Okay. So it's that last
03 sentence I'm interested in.
04 Have you ever been around a job

05 where weight was used above the running tool
06 instead of below?
07 A. Well, you always have weight
08 above the running tool, but the concern that
09 you have is you do not want to put your drill
10 pipe into compression. So you use sufficient
11 amount of weight below the tool to get the
12 job done.

Page 244:06 to 247:02

00244:06 Q. Okay. If you could flip to
07 Tab 4.
08 A. 4?
09 Q. Yeah.
10 A. Okay.
11 Q. Now, this is an e-mail that was
12 previously marked as Exhibit 854.
13 A. Okay.
14 Q. And you're -- the last time
15 you're cc'd is sort of the third message down
16 in that string, if you see it.
17 A. Okay.
18 Q. And this is from Brad Tippetts
19 to Brett Cocalles. And I just want to
20 start -- stop right there.
21 Do you know Brett Cocalles?
22 A. I don't know Brett Cocalles.
23 Q. Okay. The subject line says:
24 RE: XO on HORIZON.
25 Is that what it says there --
00245:01 A. It says --
02 Q. -- in that middle one?
03 A. -- re: Crossover on HORIZON.
04 Q. Okay. And it's sent Friday
05 February 26, 2010?
06 A. Yes.
07 Q. Okay. And Brett -- I'm sorry --
08 Brad Tippetts asks a couple of questions of
09 Brett Cocalles in that middle one. And then
10 you're not cc'd on this, but there's --
11 there's two messages above that. And the
12 message above is from Brett Cocalles to Mark
13 Hafle with a cc to Brian Morel. Do you see
14 that?
15 A. The one above this?
16 Q. Yes.
17 A. Yes, sir.
18 Q. And Brett Cocalles says: Mark,
19 are you working this with Brad? I think he
20 may need a little help.
21 Did I read that correctly?
22 A. Yes.
23 Q. Let's just stop right there for
24 now.

25 Do you think that -- well,
00246:01 you -- you -- you previously said you didn't
02 think you had any issues with Shane and --
03 and Brad on -- on -- on -- in terms of their
04 competence to do this job?
05 A. And I don't.
06 Q. Okay. The last e-mail there at
07 the top is from Brian Morel to Brett Coteles
08 and Mark Hafle. And he says: Tell them to
09 pick one -- well, it says "on" but -- person
10 to work with. I'm sick of them asking stupid
11 questions to each of us.
12 Did I read that correctly?
13 A. Uh-huh, sure looks like you did.
14 Q. Okay. Does that concern you
15 that the drilling engineers think that --
16 that Brad's questions are stupid?
17 A. No, it doesn't.
18 Q. Why not?
19 A. Well, I don't know what these
20 men were doing at that time. I wasn't
21 involved in any of this mails. And evidently
22 they didn't think it was a concern or they
23 would have e-mailed Merrick Kelley, our boss,
24 or one of us other people in it.
25 They were just dealing straight
00247:01 with Brad and Shane. Brad and Shane are
02 hungry, wanting to learn and move ahead.

Page 248:06 to 248:19

00248:06 Q. Okay. Do you think those are
07 stupid questions?
08 A. Not with me knowing who's asking
09 the question I don't.
10 Q. What does that mean?
11 A. That means Brad is asking
12 something here that he wants a little
13 clarification on. He doesn't have access to
14 what this pipe weighs. He's trying to get
15 100,000 pounds for a stinger underneath the
16 tool. And he's asking someone that he
17 thought was accessible that would be able to
18 just shoot him a line back saying this pipe
19 is so many pounds a foot.

Page 248:23 to 250:25

00248:23 Q. I'd like to go back to something
24 you spoke about this morning, your preference
25 once the decision was made to run the tool --
00249:01 run the lockdown sleeve in seawater versus
02 mud to have a -- a flush done before running
03 the lead impression tool.

04 I think you testified this
05 morning that on the day of the 20th, you
06 e-mailed John Guide. And I want to back up
07 from that point.

08 Who did you talk to about
09 changing the procedure before e-mailing John
10 Guide?

11 A. Okay. In our -- the way I do my
12 business, if I see something and I want to
13 get my suggestion in there, I want all
14 parties concerned to know, so I thought this
15 over. I approached Don Vidrine, the well
16 site leader; and I contacted Merrick Kelley.
17 I don't remember if I wrote him a letter or
18 just called him.

19 And Don Vidrine said he didn't
20 have a problem with that being changed or
21 whatever he thought needed to be done as long
22 as it was approved from above him. In other
23 words, he told me this is not a rig level
24 decision to be made.

25 So I -- I spoke with my
00250:01 supervisor and told him I would like to send
02 this to John Guide. And Merrick said it
03 sounds good to him, send it to him, see what
04 he says. Then I sat down and I wrote the
05 letter and I sent it to John.

06 Q. Okay. Did you talk to Bob
07 Kaluza at all about this?

08 A. You know, I don't recall if Bob
09 was standing in the room or not. But I
10 remember speaking to Don, face to face with
11 Don, because it was a rare moment when he was
12 by himself in his office and didn't have a
13 lot of other things going on. I approached
14 him.

15 Q. Okay. And let's just look again
16 at that e-mail that John Guide sent back to
17 you. It's Tab 8 in this binder, but we're
18 not going to reintroduce it. I believe that
19 that was introduced by my colleague this
20 morning as Exhibit 2240, for the record. Are
21 you there?

22 A. I'm there.

23 Q. Okay. Is it safe to say that
24 John Guide's e-mail has got some sarcasm in
25 it?

Page 251:03 to 251:05

00251:03 A. I don't know if -- if I would
04 call that sarcasm or just a comment from a
05 real busy man.

Page 251:07 to 253:16

00251:07 Q. Well, how did you take the
08 comment: How does this get to -- get us to
09 sector leadership?
10 A. Well, I didn't -- I didn't -- I
11 never said I liked the comment. I wasn't
12 happy with it. But that decision was made
13 from above me, and that's the way it was
14 going to be in my mind, so I didn't question
15 him any farther.
16 Q. Well, I don't know if that's --
17 that's an answer to the question I was
18 asking. I just -- I just want to know how
19 you feel about the comment: How does this
20 get us to sector leadership.
21 A. Well, could you explain to me
22 what he meant by that? What is sector
23 leadership?
24 Q. So you -- you weren't sure what
25 he meant by "sector leadership"?
00252:01 A. No, I -- I read the whole thing
02 for what it is. We will never know if your
03 million dollar flush run was needed. How
04 does this get us to sector leadership?
05 I read that, and I said that's
06 definitely a no, it's not gonna happen. And
07 I didn't -- you can't just sit and wear your
08 feelings on your cuffs out there. You just
09 take it for what it means and go on and do
10 your job.
11 Q. Okay. Did you talk to Merrick
12 Kelley after this exchange?
13 A. Oh, I probably did. I don't
14 recall, you know, any word for word because
15 it was right after this -- this time is
16 wrong.
17 Q. Right.
18 A. But the date is correct. It was
19 right after this when I kind of -- I guess I
20 had me a little walkabout there on the rig,
21 and I went to bed about 9:30 that night. In
22 both of these exchanges, the time is wrong
23 on -- on the one I sent out as well, 2352,
24 23 --
25 Q. It looks like you sent it --
00253:01 A. It isn't but two minutes apart
02 on this, and he didn't reply that quick.
03 Q. I think it actually --
04 A. Well, five --
05 Q. -- shows that he replied before
06 you sent it.
07 A. Okay. Well, there it is. That
08 ain't gonna happen, is it?
09 But it was -- it was close

10 enough to the end of the day when I got that
11 I -- you know, I went and laid down and got
12 me a book and I read --
13 Q. Okay.
14 A. -- about 9:30 that evening. So
15 sometime that evening is when he replied to
16 me.

Page 254:03 to 256:25

00254:03 Had you worked with Don Vidrine
04 before?
05 A. Yes, I have.
06 Q. Okay. Did you have any concerns
07 about his ability to do his job as a well
08 site leader?
09 A. No, I did not.
10 Q. Okay. How about Bob Kaluza?
11 A. I just met Bob that hitch out
12 there, but he came from -- he came from the
13 PDQ, the THUNDERHORSE.
14 Q. Okay. Now, are you familiar
15 with the concept of stop work authority?
16 A. Yes. Stop the job?
17 Q. Yes.
18 A. Yes.
19 Q. Can you explain to me what that
20 means?
21 A. That means you have as much
22 right as I have to stop the job if you see a
23 safety concern.
24 Q. Have you ever exercised stop the
25 job authority?
00255:01 A. Oh, yes, I have, but I can't
02 come up with any life-saving stories.
03 Q. Well, I don't need life-saving
04 stories, but can you think of any -- any
05 instances where you've -- you've stopped a
06 job?
07 A. Yes. It's -- it's common. It's
08 a common occurrence. You know, you may be
09 moving a piece of equipment from one place to
10 the other and you look over there and you
11 don't like the way it's tied on or shackled
12 as it's strayed, it's cocked itself. You're
13 going to stop the job. You're going to walk
14 over there, identify the problem, discuss it
15 with the hands that are present, correct it,
16 and right back to work again.
17 Q. Okay. I have a question about
18 something you testified to this morning, and
19 I just -- I'm not clear on what the -- what
20 the response meant. And I think the -- the
21 gentleman this morning asked you was this the
22 deepest lockdown sleeve you'd ever worked on,

23 and I think you said yes, but I didn't know
24 what "deepest" meant, if it --
25 A. Deepest water.
00256:01 Q. That's what -- that's what you
02 were interpreting?
03 A. That's the way I was seeing it,
04 because the lockdown sleeve is -- is in the
05 wellhead and the wellhead's always at the
06 same place, it's on the seabed. So the
07 deepest a lockdown sleeve could -- the only
08 thing would change it would be the water
09 depth.
10 Q. Okay. The other deepest that
11 may -- that I was thinking of is the distance
12 between the -- the surface plug and the mud
13 line. Is that the -- the deepest distance
14 between the surface plug and the mud line
15 you've ever seen?
16 A. I've never given that any
17 thought, because that's not in my field of
18 expertise, but I do have a concern with
19 that -- that surface plug in order to have
20 enough sufficient weight under the running
21 tool.
22 So however long that stinger is
23 under your lockdown sleeve and your lead
24 impression tool is how much room you need to
25 work with.

Page 257:16 to 257:21

00257:16 Q. So whose job is it to -- to make
17 sure that the well is secure for -- for you
18 guys to do your job?
19 A. Well, that would have to come
20 from the drilling side, a different
21 department from what I'm in.

Page 260:04 to 261:10

00260:04 Did I understand correctly that
05 you've been responsible for installing a
06 lockdown sleeve on a job that occurred after
07 the incident?
08 A. Yes, I have been.
09 Q. When was that?
10 A. Just couple of months ago. It
11 was on the Ensco 8501.
12 Q. Where was that?
13 A. I don't recall. It was -- it
14 was -- I think it was in Mississippi Canyon
15 area.
16 Q. How did the procedures on that
17 job differ from the ones that were expected

18 to be followed on the Macondo well?

19 A. Oh, they didn't. About the only
20 difference we had was -- with Macondo, we had
21 the -- the lockdown sleeve and tool assembled
22 in the shop at Drill-Quip. And on that job
23 it came out where we had to install the
24 lockdown sleeve on the running tool would be
25 about it.

00261:01 Q. Was it going to be in mud or in
02 seawater?

03 A. Oh, goddog, you know, I don't
04 remember. I'd have to look back and see, get
05 my notes and look it up.

06 Q. What stage of the process was
07 the lockdown --

08 A. It's going to -- it's going to
09 be seawater, because we ran the tree after
10 that.

Page 264:10 to 264:15

00264:10 EXAMINATION BY MR. ALEXANDER:

11 Q. Good afternoon, Mr. Skidmore.
12 My name is Ben Alexander. I represent
13 Transocean. I have here with me my
14 colleague, Mr. Robert Blankenship. How are
15 you today, sir?

Page 264:24 to 268:10

00264:24 Q. Okay. So you were on the BP
25 subsea team sent out to the DEEPWATER HORIZON
00265:01 to supervise the running of the lead
02 impression tool and the lockdown sleeve; is
03 that right?

04 A. Correct.

05 Q. Okay. And then y'all were going
06 to do some work on the Nile after the rig was
07 finished with the Macondo well, as I
08 understand it?

09 A. Correct.

10 Q. Okay. Now, in connection with
11 the lead impression tool and the lockdown
12 sleeve on Macondo, your team would have been
13 working with the Drill-Quip hand. And I have
14 his name as Charles Credeur. Does that jog
15 your -- your memory?

16 A. I knew Charles.

17 Q. Okay. I think he was the only
18 Drill-Quip guy on the rig.

19 A. That's right.

20 Q. All right. And the way it was
21 going to work was he was going to actually do
22 the work in running the tools while the --

23 your team was going to kind of supervise and
24 observe; is that right?

25 A. That's correct.

00266:01 Q. Okay. All right. And you
02 mentioned the lockdown sleeve when it's set,
03 it will -- it will assist in holding the
04 casing hanger down. Even though there's --
05 there's a -- you know, a flow path in the
06 middle of the wellbore, it will hold the
07 casing hanger down and -- and seal flow paths
08 on the outer annulus. Is that a fair
09 assessment?

10 DEFENSE COUNSEL:
11 Objection, form.

12 A. I said that it will assist in
13 holding the casing down, and it had the seal
14 where it stabs into the casing hanger, and it
15 has a primary and secondary seal on the
16 bottom of it, correct.

17 EXAMINATION BY MR. ALEXANDER:

18 Q. Okay. So if downhole forces are
19 pushed upward on the casing and act upon its
20 buoyancy, the lockdown sleeve will at least
21 assist in preventing the casing hanger from
22 lifting up off the wellhead?

23 A. The way I see it.

24 Q. Okay. If the casing hanger did
25 lift up off the wellhead, that would create a
00267:01 possible channel of flow for hydrocarbons
02 from the outer annulus in the wellbore, would
03 it not?

04 A. I would -- I would think it
05 would.

06 Q. I want to ask you a little bit
07 about the safety orientation that the
08 trans -- Transocean crew gave you when you
09 got on the rig. I think you had some good
10 things to say about it in your Coast Guard
11 hearing.

12 But I wanted to ask you: Did
13 you feel it was a comprehensive safety
14 orientation?

15 A. I did, and I'm glad to see it's
16 coming up at this presentation as well.

17 Q. I'm sorry?

18 A. I said I did find it was a
19 competent safety orientation, and I'm glad to
20 see that that point was brought up during
21 this part of the investigation --

22 Q. Well, I appreciate that --

23 A. -- of the well.

24 Q. -- Mr. Skidmore.

25 Would you agree the crew did a
00268:01 good job of demonstrating the rig safety
02 features?

03 A. The crew did an outstanding job
04 of it.
05 Q. And I think -- and I read that
06 you testified that for not knowing what was
07 about to happen, they had you pretty well
08 schooled up on the safety features on the
09 rig?
10 A. And I'll be thankful for that.

Page 274:21 to 275:03

00274:21 Q. Okay. Okay. And then -- and
22 then one, two, three -- four bullets below,
23 it reads similar to what you read earlier in
24 the Drill-Quip procedure that Drill-Quip
25 recommends running 100,000 pounds of weight
00275:01 below the running tool. And -- and that
02 would be the stinger you referred to, right?
03 A. Yes.

Page 276:02 to 278:23

00276:02 Q. Okay. And then this procedure
03 also says: Another option is that you can
04 set it with weight above the lockdown sleeve.
05 But you mentioned that you don't want to put
06 your drill pipe under compression.
07 Can you explain to me what you
08 meant by that?
09 A. Yes. And Transocean would be
10 the first one to jump up and wave the red
11 flags about putting drill pipe into
12 compression.
13 You have a number of reasons.
14 One's the torque that's on it. Your tool
15 joints -- when your string is -- you have
16 your -- your stinger assisting in pulling it
17 down, you have your weight gathered right
18 there, you land out, and you're keeping
19 everything straight in your wellbore. When
20 you put something into com -- into
21 compression, it would have a tendency to lay
22 over to the side, and it's just not something
23 you want to do.
24 Q. Could the drill pipe actually
25 bow?
00277:01 A. Yes, it could lay to one side.
02 Q. Let me ask you this: You were
03 aware that BP had requested from MMS a
04 deviation to set the cement plug lower than
05 originally planned, right?
06 MS. O'CONNOR:
07 Objection to form.
08 A. At the time I don't recall if I

09 was aware of that or not that -- that they
10 were applying for these permission to change
11 this and that, because that wouldn't have
12 really been in that much of an interest or a
13 concern of mine.
14 EXAMINATION BY MR. ALEXANDER:
15 Q. Well, let me ask you this: If
16 they would not have received approval from
17 MMS and they would have had to set the plug
18 at 300 feet, how would your team have gone
19 about setting the lockdown sleeve?
20 A. Probably would not have set the
21 lockdown sleeve at that time.
22 Q. So you'd have -- you would have
23 done it on another vessel or -- or facility?
24 A. Yeah, I'm not making the
25 decision, but my way of thinking, that if it
00278:01 would not have got -- been allowed to have
02 the -- the balance plugs set where they
03 needed it, then they just would not have been
04 able to set the balance plug from the rig at
05 that time.
06 Q. Okay. But you would agree with
07 me that insofar as Drill-Quip is concerned,
08 they at least allow for setting the sleeve
09 from the top as an option?
10 A. I think they allow a percentage
11 of it. I don't think they would allow you to
12 push down with the drill pipe.
13 The depth -- your water depth is
14 going to dictate how much weight you have to
15 work with with your handling string, the top
16 portion of it. The deeper the water, the
17 more weight you would have that you would be
18 able to use.
19 But the more shallow the water,
20 the less weight you would have, because if
21 your drill string weighs X amount and you
22 need 100,000 or 68,000, you would just be
23 that much closer to compression.

Page 280:02 to 280:10

00280:02 Q. Okay. Okay. And -- but
03 it would -- it would be -- it would have been
04 BP's decision to go with using the drill pipe
05 rather than drill collars for the stinger; is
06 that right?
07 A. It -- it would have came from
08 the design teams, I would imagine.
09 Q. The BP design team?
10 A. I would imagine.

Page 281:15 to 284:24

00281:15 Q. Okay. Do you know if the -- the
16 well team engineers ever asked your team for
17 that calculation?
18 A. I can say they didn't ask me.
19 Q. Okay.
20 A. Because I wasn't always sitting
21 in the office when business was going on.
22 Q. And so if you don't know, that's
23 fine, you can just say --
24 A. Yeah, I -- I don't.
25 Q. Okay. Do you know why a depth
00282:01 of 3,300 feet below the mud line was selected
02 for setting the surface plug?
03 A. Not a clue.
04 Q. When you received that
05 information, were you surprised?
06 A. No.
07 Q. Okay. Then I think you
08 mentioned in your Coast Guard testimony that
09 when you got on the rig, you -- you received
10 a -- a procedure from Mr. Brian Morel. Do
11 you recall that? You mentioned you walked
12 across the hall to his office and he handed
13 you a -- a Reader's Digest version of --
14 A. That's correct.
15 Q. -- the temporary abandonment
16 plans?
17 A. Yes.
18 Q. Okay. Can you look at Tab 2 in
19 your binder for me, please? It's been marked
20 as Exhibit 836.
21 First page is an e-mail followed
22 by a document entitled -- well, it -- it's --
23 I'll represent to you it's the plan for
24 running the production casing through a
25 temporary abandonment of the well.
00283:01 Does that look like the
02 procedure that Mr. Morel gave to you?
03 A. What -- what I got -- I
04 didn't -- if I got the whole procedure, I
05 went right -- I would have thumbed right to
06 the back of it to where our job would have
07 began.
08 Q. Okay. But -- but does that --
09 the document you're looking at look like the
10 procedure that he handed to you on the rig?
11 A. Yes, it is -- it looks like the
12 procedure.
13 Q. Okay. And if you would, take a
14 look at page ending in 306, that number in
15 the bottom right corner.
16 A. Okay.
17 Q. See at the top where it says:
18 9.3, Lead Impression/Lockdown Sleeve Ops?
19 A. 306 -- at the top?

20 Q. Yeah, 9.3, it's a heading.
 21 A. Lead impression/lockdown
 22 sleeve -- yes, yes, yes.
 23 Q. Okay.
 24 A. I'm sorry.
 25 Q. And then below that 9.3.1 says:
 00284:01 Surface cement plug?
 02 A. Okay.
 03 Q. All right. And then if you turn
 04 the page -- I'm sorry.
 05 If you look below 9.3.1, this
 06 actually appears to be the procedure for
 07 running the lead impression tool and the
 08 lockdown sleeve, right?
 09 A. Yes.
 10 Q. Okay. And then if you turn the
 11 page, 9.4.1 says "surface cement plug" and
 12 has a procedure for pumping the surface plug;
 13 is that right?
 14 A. That's what it's saying there.
 15 Q. Okay. So according to this
 16 procedure, you would have been running the
 17 lockdown sleeve before pumping the surface
 18 plug? When I say you, I mean the personnel
 19 on the rig.
 20 A. Yes.
 21 Q. Okay. Do you recall that being
 22 BP's initial plan?
 23 A. No, no, I don't -- I don't
 24 recall this coming in to play with it at all.

Page 286:15 to 287:18

00286:15 Q. Okay. And I'd just like to ask
 16 again: It is possible to run the cement plug
 17 through the lockdown sleeve without damaging
 18 the seal, is it not?
 19 A. Well, I would say it would be
 20 possible to run -- to run through --
 21 something through the lockdown.
 22 Q. Okay. And it would also be
 23 possible to set a wear bushing on the
 24 lockdown sleeve to perform that operation;
 25 would you agree?
 00287:01 A. If they -- they have one, yeah,
 02 then that would be . . .
 03 Q. Okay. And then if you refer
 04 back in -- in the second page of Tab 3,
 05 Exhibit 837 -- and you were directed to this
 06 e-mail earlier -- it's the e-mail on the top
 07 of the page from Mark Hafle, it's actually
 08 cut off from the first page to the second,
 09 but it says: LDS ID is bigger than hanger we
 10 would be running through anyway.
 11 So that would indicate that it

12 has an opening big enough to run the tools
13 needed to set the cement plug after the
14 lockdown sleeve was set?
15 A. Yes.
16 Q. Okay. Okay. The initial
17 procedure also had the lockdown sleeve being
18 set in mud; is that right?

Page 287:21 to 287:21

00287:21 A. I -- I believe so.

Page 287:23 to 288:13

00287:23 Q. Okay. And you already mentioned
24 that, you know, your experience beforehand
25 was that lockdown sleeves are set in mud
00288:01 quite often?
02 A. My -- my preference.
03 Q. Okay. And -- and you mentioned
04 the -- the reason for your preference is
05 because cuttings and debris from the riser
06 can fall on that profile that the lockdown
07 sleeve is going to set on and that could lead
08 to faulty results from the lead impression
09 tool, right?
10 A. Yes.
11 Q. Okay. And then you would have
12 problems trying to land out the lockdown
13 sleeve on that profile?

Page 288:16 to 288:16

00288:16 A. You would have --

Page 288:18 to 289:13

00288:18 Q. You could have problems?
19 A. Incorrect. You would have a --
20 you would not have a good lockdown with the
21 lockdown sleeve.
22 Q. Okay. And that's what you were
23 referring to in that e-mail to John Guide
24 that we've discussed before?
25 A. Correct.
00289:01 Q. Okay. But at that point you
02 knew the lockdown sleeve would be running
03 seawater, so you wanted to do a wash run
04 first?
05 A. Correct.
06 Q. Okay. Are you -- I know you
07 answered, but I -- I just have to ask. Are
08 you certain that Mr. Guide's response in that

09 e-mail was sent to you before the blowout?
10 A. Yes, I am.
11 Q. Okay.
12 A. Because I went to bed with that
13 thought on my mind.

Page 293:13 to 294:03

00293:13 I'm marking it as Exhibit 2242.
14 It is BP-HZN-2179MDL000451111 -- I think
15 that's the right amount of ones.
16 Middle e-mail from Merrick
17 Kelley to Brian Morel. If you look at the
18 third sentence in that e-mail starting with
19 "I know," can you read that sentence for the
20 record, please?
21 A. I know -- well -- okay.
22 I know you are under pressure to
23 finish Macondo so we can get Nile P&A moving
24 and not jeopardize Kaskida and IFT. Okay.
25 Q. Was BP pressuring the rig to
00294:01 finish the Macando well so that it could move
02 on to the Nile project?
03 A. I'm -- I'm --

Page 294:06 to 294:12

00294:06 A. -- not aware of any pressure
07 that was put on any of us to -- to hurry
08 or -- or finish and get a move on.
09 EXAMINATION BY MR. ALEXANDER:
10 Q. Okay. So nothing like that was
11 emphasized to you?
12 A. No, it -- it was not.

Page 296:13 to 297:11

00296:13 Did you have any trouble finding
14 the lifeboat station?
15 A. No, I did not.
16 Q. Okay. And at the station was a
17 rig crew attempting to take a muster?
18 A. Yes.
19 Q. Okay. Now, you mentioned that
20 muster didn't go very well because of the
21 noise and the conditions going on?
22 A. Yes.
23 Q. You think that was -- was the
24 rig crew doing all they could to keep things
25 as orderly as possible?
00297:01 A. I feel like -- I feel like the
02 people that were trying to maintain control
03 doing all they possibly could and yet avoid a

04 direct confrontation with -- from some
05 certain individuals.
06 Q. Right. And -- and the crew also
07 waited at that lifeboat station as long as
08 possible to make sure as many people as
09 possible could evacuate the rig; is that
10 right?
11 A. I truly believe that.

Page 297:23 to 298:04

00297:23 EXAMINATION BY MR. BOWMAN:
24 Q. Hi, Mr. Skidmore, my name is
25 Bruce Bowman. We met just a second ago
00298:01 before we were starting this deposition,
02 right?
03 A. Yes, sir.
04 Q. And I represent Halliburton.

Page 310:11 to 310:16

00310:11 Q. I -- well, not really. But
12 here's the thing: Have you ever heard the
13 term "bladder effect" being used before?
14 A. Well, no --
15 Q. Okay.
16 A. -- not -- not with those words.

Page 313:03 to 313:13

00313:03 I guess I ought to ask kind of a
04 basic question: When you were answering
05 earlier, what were you talking about in your
06 own mind as far as a barrier?
07 A. I would call a barrier a plug,
08 an isolation point, between the surface and
09 the well below.
10 Q. Okay. An isolation plug of some
11 type?
12 A. Yes, I would consider that a
13 barrier.

Page 314:09 to 314:23

00314:09 Q. Okay. How about float collar?
10 A. Well, I know what a float collar
11 is, but I wouldn't -- I wouldn't call a float
12 collar a barrier unless it had been cemented
13 through.
14 Q. Okay. And if it had been
15 cemented through, would you call it a barrier
16 then?
17 A. Well, I'd call the cement a

18 barrier.
19 Q. Okay. But not the float collar
20 on top of it?
21 A. No, sir, I wouldn't.
22 Q. Okay. Because it's not an
23 isolation plug. Okay.

Page 315:03 to 315:11

00315:03 Q. What -- what's the purpose of --
04 of the seal assembly?
05 A. On any seal assembly?
06 Q. Yes, sir.
07 A. Okay. I would -- I would say --
08 say, with the casing string --
09 Q. Uh-huh.
10 A. -- run -- ran a string of
11 casing, set the seal assembly above it.

Page 315:14 to 315:23

00315:14 A. Casing, a string of casing. And
15 then run the seal assembly. And then at that
16 point, from the outside of the casing,
17 anything pertaining to the outside of the
18 casing up, that seal assembly would be -- be
19 a barrier in that respect from the outside of
20 the casing and up, but it would not be a
21 barrier from the well coming up the annulus
22 or the center of the string. That would put
23 me back on the cement plug.

Page 319:19 to 321:01

00319:19 Q. Yeah. Let's go to Tab 47. I
20 want to show you an exhibit that has
21 previously been marked as Exhibit 856 and
22 it's at Tab 47.
23 A. From Brian.
24 Q. Yes, sir.
25 And -- and you see the date of
00320:01 this is April 12th?
02 A. Yes.
03 Q. And if I'm reading it right, it
04 says: Our plan is still to have mud in the
05 riser and wellbore when we set the LDS 14 and
06 ppg.
07 Do you see that?
08 A. Yes, sir.
09 Q. So did that plan change sometime
10 after April 12th and before April 20th?
11 A. It must have.
12 Q. Yeah. That -- that's what I was

13 trying to get into. I was reading this
 14 over --
 15 A. Yes.
 16 Q. -- so -- okay.
 17 And how were you told that plan
 18 changed?
 19 A. Well, I was -- I believe Brad or
 20 Shane told me that we're going to be -- going
 21 to be displacing out with seawater before
 22 they set the lockdown sleeve. And I thought
 23 about it, and that's when I went and spoke
 24 with Don Vidrine and my boss, Merrick Kelley,
 25 and -- and I went ahead and composed that
 00321:01 letter and sent it to John Guide.

Page 323:19 to 326:08

00323:19 Q. When you were out in relief
 20 operations and you mentioned something about
 21 a blue pod or a yellow pod and they were --
 22 you did something with them and they got
 23 repaired?
 24 A. Yes, sir.
 25 Q. Okay. Let's -- let's kind of
 00324:01 zero in, if you could, about the time period.
 02 What time period are we talking about?
 03 A. Well, this would be -- gosh,
 04 almighty. I can't -- I can't put a date on
 05 it. I can't put a date on it. It was
 06 after -- when I was out on the Q4000 and we
 07 had all of them -- the BOEM and the FBI and
 08 Transocean was out there.
 09 And this was -- this was
 10 Transocean that was doing the work as far as
 11 pulling the pods and doing the repairs. And
 12 they were doing this along with the FBI
 13 witnessing and -- and the BOEM and all of
 14 that, and I was -- I was there alongside with
 15 them.
 16 Q. Okay. And so you saw someone
 17 pull the pods up, right?
 18 A. We pulled the pod, that's
 19 correct.
 20 Q. Someone being including you,
 21 huh?
 22 A. Yes, sir.
 23 Q. Okay. And then what happened to
 24 those pods?
 25 A. They were inspected and gone
 00325:01 through.
 02 Q. While on the --
 03 A. On the Q4000.
 04 Q. On the Q4000?
 05 A. Yes, sir.
 06 Q. Okay. And then --

07 A. One of them was.
08 Q. Okay. Do you know which one?
09 A. Yellow, I believe it is.
10 Q. Yellow one. Okay.
11 And then what happened to the
12 pods?
13 A. And then it was reran. And we
14 established communications for that pod from
15 the Q4000, meaning we -- we installed an HVU,
16 a hydraulic supply with a hot line, and we
17 installed a muck system out there for the
18 electronic controls, the same as it would
19 have had when it was on -- on the rig. And
20 then we ran the pod back subsea, landed it
21 out on the BOP, and we did the same thing
22 with the blue pod from the ENTERPRISE.
23 Q. And after doing whatever repair
24 work or work on those pods, did the pods
25 work?
00326:01 A. Yes.
02 Q. Okay. How do you know -- I
03 mean, you've done work on BOPs or -- right or
04 wrong?
05 A. Yes, sir.
06 Q. Okay. And how -- how do you
07 know if a blind sheer ram is going to work
08 when it needs to work?

Page 326:16 to 328:09

00326:16 Q. I'll go one step further, close
17 or able to sheer whatever pipe is in there
18 and seal off the bore, okay?
19 A. Okay. Well, you'll know that
20 the function is being made when you hit the
21 button. You'll see the hydraulic fluid
22 transfer. You'll have a gallon count,
23 whether it be for that particular set of
24 shears. If it takes 26 gallons to close it,
25 you'll have a gallon count on it.
00327:01 And you will be able to see if
02 there's pressure under the shears when they
03 close it through a pressure transducer that
04 would be installed in a lower cavity on
05 the -- on the BOP.
06 Q. Uh-huh.
07 A. And you would know if they're
08 sealing off from another standpoint by if
09 you're still connected to the riser, your
10 flow would stop.
11 Q. The flow would stop?
12 A. Yes, sir.
13 Q. The flow doesn't stop, there's
14 something going on?
15 A. It's leaking.

16 Q. Yeah, it's leaking. Okay.
 17 Are there tests that are done
 18 periodically to see if the pressures on the
 19 blind sheer ram are sufficient to actually
 20 cut through whatever particular pipe would be
 21 in it at any one time?
 22 A. That -- that rig -- any rig out
 23 there would have the specifications that came
 24 from the equipment manufacturer on what that
 25 blind sheer ram can do versus, say, that
 00328:01 casing ram could do and -- and the pressures
 02 it would take. But you have the ability to
 03 adjust your pressures as needed, also, with
 04 your manifold pressure.
 05 Q. Okay. So you would re --
 06 correct me if I'm wrong. You would rely on
 07 the pressures from the manufacturer --
 08 A. Yes, sir.
 09 Q. -- right?

Page 328:13 to 328:22

00328:13 Q. Would you do some sort of
 14 independent test, say, if the manufacturer
 15 was right?
 16 A. There would be -- Transocean
 17 would have witnessed the test with the
 18 manufacturer.
 19 Q. Okay. So TO would have
 20 witnessed the original test?
 21 A. Yes, that would be part of their
 22 acceptance testing of the equipment.

Page 329:06 to 334:10

00329:06 Q. Good afternoon, Mr. Skidmore.
 07 My name is Joe Redden, and I represent
 08 Cameron. I just have a few questions for
 09 you.
 10 A. Yes, sir.
 11 Q. You testified earlier this
 12 morning that you are currently involved in
 13 some work that BP is having done at Cameron
 14 facilities?
 15 A. Yes.
 16 Q. Okay. And tell me again what
 17 that work is.
 18 A. What it is, is they have a set
 19 of -- in -- and it's at Patterson, I believe,
 20 is where they're -- where they're doing this
 21 work. They have a set of -- a small set of
 22 BOPs for workover and completions in there,
 23 and they're refurbishing them.
 24 Q. Okay. And so BP has hired

25 Cameron to refurbish these BOPs?

00330:01 A. Well, they have -- they have
02 stripped them down and inspected them. And I
03 don't know what stage that BP is going to go
04 with -- with Cameron. But I believe they're
05 going to be doing an upgrade procedure with
06 them.

07 Q. All right. This is well control
08 equipment that BP owns?

09 A. Yes. This is BP-owned
10 equipment, and it's well intervention
11 equipment. It's not a full 18-3/4 BOP.

12 Q. Okay. But it is nevertheless
13 well control equipment?

14 A. It would be, yes, sir.

15 Q. And so BP has come to Cameron to
16 have Cameron do the refurbishing work on its
17 well control equipment, correct?

18 A. Yes, sir.

19 Q. And is that because BP considers
20 Cameron to be the expert on well control
21 equipment?

22 MS. O'CONNOR:
23 Object to form.

24 A. I believe -- I believe Cameron
25 to be an expert with BOPs.

00331:01 EXAMINATION BY MR. REDDEN:

02 Q. Okay. And I assume that you've
03 worked with Cameron equipment over the years
04 quite a bit, have you not?

05 A. Yes, I have.

06 Q. And have you found the Cameron
07 blowout preventers to be good, reliable
08 equipment?

09 A. Yes, I have.

10 Q. All right. Do you consider
11 Cameron to have expertise in the manufacture
12 and operation of well control equipment such
13 as BOPs?

14 A. Yes, I do.

15 Q. Okay. Have you also had
16 occasion to work with Cameron people over the
17 years?

18 A. Yes, I have.

19 Q. And have you found those people
20 to be knowledgeable about well control
21 equipment?

22 A. Yes, I have.

23 Q. All right. You mentioned that
24 some of your work on the intervention efforts
25 such as the manifold for the junk shot,
00332:01 correct?

02 A. Yes.

03 Q. And I think you said that that
04 was actually manufactured by Cameron?

05 A. Yes, it was.
06 Q. And cam -- was Cameron working
07 with BP and others to try to figure out how
08 to get that well capped?
09 A. Yes, they were.
10 Q. All right. And when they built
11 the -- the manifold, was it your
12 understanding that was at BP's direction?
13 A. It was at --
14 MS. O'CONNOR:
15 Object to form.
16 A. -- BP's request, and Cameron
17 jumped in and had the ideas and the -- the
18 means and built it there in a real short
19 time, and we got it tested and sent out to
20 the location.
21 EXAMINATION BY MR. REDDEN:
22 Q. Okay. And did the Cameron hands
23 that you were working with seem to know what
24 they were doing?
25 A. Yes, they did.
00333:01 Q. Were there also Cameron hands on
02 the Q4000 when they brought up the pods from
03 subsea?
04 A. Yes, there were.
05 Q. All right. And were they
06 involved in some of the -- the testing of
07 the -- the battery and the solenoid and so
08 forth that were --
09 A. Every bit of it.
10 Q. All right. You mentioned that
11 you, I think, at one point received some
12 training at Cameron?
13 A. Oh, this -- yes, sir, I have.
14 Q. What kind of training was that?
15 A. Well, it was -- it was a general
16 coming in and the training on the
17 introduction to the new U2 type BOPs when
18 they came out. And y'all had the facility
19 out the old Katy Road where you manufactured
20 the rubber goods. And we -- we did the
21 walk-through with all of that. And the VBRs
22 were coming out and got schooled on how --
23 how these work and what to expect from them
24 and what they can and can't do.
25 Q. Was that helpful to you?
00334:01 A. Yes, greatly.
02 Q. As a subsea engineer?
03 A. Yes, sir.
04 Q. Who were you working for at that
05 time?
06 A. At that time it was between
07 Penrod and Reading & Bates.
08 Q. I believe that's all I have.
09 Thank you, sir.

10 A. Thank you.

Page 334:16 to 334:25

00334:16 EXAMINATION BY MR. FITCH:

17 Q. Mr. Skidmore, I just briefly
18 introduced myself to you before sitting down
19 here. Let me say again my name is Tony
20 Fitch, and I represent two defendants in this
21 case. I represent two separate companies
22 that are collectively referred to in this
23 case as Anadarko. And I represent three
24 separate companies that are collectively, for
25 shorthand, referred to in this case as MOEX.

Page 335:17 to 341:18

00335:17 Q. And our disk. It's Exhibit 859.

18 A. 21. 859.

19 Q. Okay. And you see there are two
20 e-mails there, right?

21 A. Yes, sir.

22 Q. And you see the -- the first
23 one, the one at the bottom, is from
24 Mr. Kelley to Mr. Tippetts?

25 A. Uh-huh.

00336:01 Q. And you see he wrote there in
02 the second sentence "with all." See where I
03 am?

04 A. Yes, sir, I do. With all the
05 trouble . . .

06 Q. All righty. With all the
07 trouble they are having, we need to make sure
08 you get a good wash trip down to the wellhead
09 before the LIT, likely to be debris in the
10 casing and with the AV drop being large where
11 the wellbore goes from casing internal
12 dimension to 18.75 inches bore it will
13 important to ensure best chance of good lead
14 impression run.

15 I read that correctly that
16 Mr. -- Mr. Kelley --

17 A. Yes.

18 Q. -- wrote to Mr. Tippetts, right?

19 A. Yes, sir.

20 Q. Okay. Did you have any
21 indication of what the reference "all the
22 trouble they are having" means?

23 A. Well, Mr. Fitch, I was not
24 copied on that one, but I know what you're --
25 what -- what the man's talking about there.

00337:01 Q. Okay. And -- and you see it was
02 sent to you? You see the e-mail above it?

03 A. I see the one above, yes.

04 Q. Okay. Okay. But what was your
05 understanding of what he was talking about?
06 A. Well, the importance of a wash
07 trip is because -- the AV is the -- the
08 annulus velocity when it --
09 Q. Okay.
10 A. -- because of the circulating
11 coming from the 7-inch, then you're coming to
12 the 9-7/8s, and then you're coming to an
13 18-3/4 bore and time this volume comes up, it
14 slows down as it gets bigger --
15 Q. Okay.
16 A. -- then it slows down again.
17 And then if we go from mud to seawater, you
18 have less ability. So that's why we would be
19 requesting a wash trip.
20 Q. Okay. So -- and so you agreed
21 with Mr. Kelley's recommendation or
22 instruction to Mr. Tippetts there?
23 A. Well, I do agree, but I don't
24 recall seeing this --
25 Q. Fair enough.
00338:01 A. -- seeing this valve.
02 Q. But Mr. Kelley there is
03 basically expressing the same view that you
04 expressed subsequently to Mr. Guide that we
05 ought to do this wash trip, correct?
06 A. Yes, sir.
07 Q. Okay. And then I had also asked
08 you about that phrase "with all the trouble
09 they are having." Did you have any
10 understanding of what that means?
11 A. No, I wouldn't. He might know
12 what he meant by it, but I wouldn't know
13 because I haven't been involved in the
14 well's --
15 Q. Okay.
16 A. -- history.
17 Q. Before you sent your e-mail to
18 Mr. Guide, you had discussed this with
19 Mr. Kelley; is that right?
20 A. Yes, I didn't want to jump above
21 any of my supervisors' heads.
22 Q. Okay. So you told -- one thing
23 you discussed with Mr. Kelley was that, gee,
24 this is my opinion and I'd like to try to
25 convince Mr. Guide. That's the one thing you
00339:01 told Mr. Kelley in essence, right?
02 A. In so many words --
03 Q. Or --
04 A. -- yeah, nice --
05 Q. -- more than so many words
06 probably?
07 A. -- that's a nice way --
08 Q. Okay.

09 A. -- of putting it.
10 Q. Did you have any more discussion
11 with Mr. Kelley about the actual subject
12 matter, why we ought to do the wash run?
13 A. I -- I had my -- my initial
14 discussion with him pertained -- had that
15 included the I want to do the wash run and
16 why I wanted to do the wash run.
17 Q. Okay. So you told him your
18 views?
19 A. Yes.
20 Q. And did he tell you, "Yes, I
21 agree with you"?
22 A. Yes, he did.
23 Q. Okay. So Kelley agreed with
24 you?
25 A. Yes.
00340:01 Q. And then did you say, in
02 essence, "But you've also told me that
03 Mr. Guide has said we're not going to do it";
04 is that right?
05 A. No, sir.
06 Q. Okay.
07 A. I spoke with Mr. Kelley before I
08 sent Mr. Guide the letter.
09 Q. Okay. So you didn't know one
10 way or the other where Guide was leaning?
11 A. Right.
12 Q. Okay.
13 A. I -- I had to speak to my
14 supervisor first to let him know I was
15 sending a -- a letter up-line and -- because
16 if he would have thought that I shouldn't
17 have sent the letter, he would have sent it.
18 Q. Okay. So you knew, am I
19 correct, that the decision of whether or not
20 to do the wash run was not your decision?
21 A. Yes.
22 Q. Okay. And did you think that it
23 was Mr. Kelley's decision or did you know --
24 did you think it was Mr. Kelley's decision?
25 A. No.
00341:01 Q. Okay. And how did you know
02 that?
03 A. Because I knew that a decision
04 like this would be made from the drilling
05 side, and that's why I approached the well
06 site leader first.
07 Q. Okay. And so did you expect
08 Mr. Guide to make the decision or did you --
09 Mr. Guide was not on the drilling side. Is
10 that your understanding?
11 A. Mr. Guide was the team lead for
12 the well site leaders is the way I understood
13 it.

14 Q. That's right. Okay.
 15 Did you expect that Mr. Guide
 16 would make the decision or that Mr. Guide
 17 would -- would consult with the engineers?
 18 A. What I --

Page 341:21 to 341:23

00341:21 A. -- expected to happen was
 22 Mr. Vidrine to either make the decision or
 23 take it up to the next level.

Page 341:25 to 343:14

00341:25 Q. Oh, okay.
 00342:01 A. And he told me he agreed.
 02 He did -- I can't say he told me he agreed.
 03 He told me that he didn't have a problem if
 04 they wanted to change that to leave it in mud
 05 or not, but he would -- did not have the
 06 authority to make that decision at rig level.
 07 I would have to take it to John Guide.
 08 Q. Okay.
 09 A. At that point I went in and I
 10 called -- I called -- I'm -- I'm pretty sure
 11 I called him and not wrote a letter. I
 12 called Merrick Kelley, my boss, and I told
 13 him of my discussion with Don Vidrine and
 14 that if I wanted this to be any attention, I
 15 would have to go to John Guide with it, and I
 16 explained to him my reasons why I would like
 17 to do the mud or do the wash trip if they're
 18 going to go to saltwater --
 19 Q. Uh-huh.
 20 A. -- to seawater. And he says,
 21 "It sounds good to me." He says, "Write the
 22 letter." So I did. And I believe I copied
 23 him on that letter.
 24 Q. Uh-huh. And did you have an
 25 understanding as to whether Guide would make
 00343:01 the decision at that point or whether he
 02 would consult with the engineers first?
 03 A. I believed in my mind that John
 04 Guide had the authority to -- to bring it to
 05 the engineers' attentions and for them to
 06 make a community decision on whether yay or
 07 nay this will happen.
 08 Q. Okay. So you believe, am I
 09 correct, that it was a decision with
 10 engineering implications that Guide should --
 11 should consult with the engineers about
 12 before making his decision --
 13 A. Uh-huh.
 14 Q. -- is that correct?

Page 343:18 to 345:03

00343:18 Q. It's a little --
 19 A. I believe --
 20 Q. -- more complicated.
 21 A. I believe that a -- a decision
 22 relating to well design would not happen
 23 without John Guide's knowledge of it.
 24 Q. And did you believe that this
 25 decision regarding well design would not
 00344:01 happen, also, without the engineers being
 02 consulted?
 03 A. No, sir, I was -- was certain
 04 that they're going to have to be in on it as
 05 well.
 06 Q. Okay. So the answer is yes, you
 07 believe that they would be in on it as well?
 08 A. Correct.
 09 Q. Okay. After you heard from
 10 Mr. Guide in -- in his return e-mail, did you
 11 have a subsequent discussion with Mr. Kelley?
 12 A. I'm sure I did.
 13 Q. When you say I'm sure I did, do
 14 you mean you -- you guess you did or you
 15 actually remember doing so?
 16 A. I'm just saying knowing my
 17 personality, I probably got right on the
 18 phone with him and let him know. But I don't
 19 recall sitting down and saying, "Well,
 20 Mr. Kelley, listen to this."
 21 Q. Okay. Do you recall Mr. Kelley
 22 saying anything to you about Mr. Guide's
 23 decision?
 24 A. No.
 25 Q. Okay. Did you have any further
 00345:01 conversations about this with Mr. Vidrine?
 02 A. No, I did not. That was the end
 03 of story right there.

Page 348:01 to 348:06

00348:01 Q. Okay. And did Mr. Kelley ever
 02 say to you in -- in -- in so many -- more or
 03 less so many words, "We're going to --
 04 we're -- we're going to take a timeout here
 05 and do a risk assessment on all these
 06 changes"?

Page 348:09 to 348:21

00348:09 A. While I was on the rig?
 10 EXAMINATION BY MR. FITCH:

11 Q. Yes, sir, from April 16th on.
12 A. I don't -- I don't recall
13 anything like that being said to me.
14 Q. Okay. During the -- during the
15 weeks before April 16th when some of the
16 e-mails that you've seen this morning were
17 being exchanged about the LIT and LDS
18 procedures, did Mr. Kelley ever -- ever say,
19 "We'd better do a risk assessment on -- on
20 these changes that we're considering"?
21 A. I believe --

Page 348:24 to 349:20

00348:24 A. I believe one of those mails
25 that came out today, it did include me on it,
00349:01 and I said I was not going to be able to make
02 it, that my relief will have to be there.
03 EXAMINATION BY MR. FITCH:
04 Q. Okay. And so that was a meeting
05 that was going to discuss that --
06 A. I would -- I believe that --
07 Q. -- in your opinion?
08 A. -- would be correct --
09 Q. Okay.
10 A. -- yeah.
11 Q. And other than that did you hear
12 of any additional -- strike that.
13 Did you hear of any suggestion
14 that a formal risk assessment would be done
15 about these various changes that were being
16 made?
17 A. I do not --
18 MS. O'CONNOR:
19 Object to form.
20 A. -- recall one.

Page 353:19 to 354:04

00353:19 Q. Okay. Did you at any time have
20 any communications with anyone associated
21 with MOEX with respect to the work that you
22 were doing on the rig?
23 A. No, sir, I did not.
24 Q. Okay. Did you at any time ever
25 hear anyone else on the rig having
00354:01 communications with Anadarko folks or MOEX
02 folks about the work being done on the rig at
03 Macondo?
04 A. No.

Page 354:16 to 354:17

00354:16 Q. Good afternoon, sir. My name is
17 Dennis Barrow. I represent Drill-Quip.

Page 355:13 to 356:17

00355:13 Generally speaking, is it
14 accurate that it is the operator that lays
15 out the order of operations for the well?
16 A. From the procedure, I agree.
17 Q. And your involvement on the
18 Macondo well specifically related to running
19 the lead impression test and the lockdown
20 sleeve?
21 A. Yes.
22 Q. Specifically with respect to the
23 running of the lead impression test and the
24 lockdown sleeve, tell me who it was, what
25 entity, that decided when those two
00356:01 procedures would be run.
02 A. It would be dictated by the --
03 the drilling procedure that was at hand, and
04 that would not happen until the well was
05 cemented and secure.
06 Q. Okay. Is it accurate that it
07 was someone within BP that made the decision
08 on when to run the lead impression test and
09 the lockdown sleeve?
10 A. I -- I would leave that to be
11 so.
12 Q. In your experience working in
13 the drilling industry, is that generally the
14 way it works, that it is the operator who
15 makes the decision as to when to run a lead
16 impression test or a lockdown sleeve?
17 A. That is the way I believe it.

Page 357:06 to 357:11

00357:06 Q. And -- and tell me how you
07 interpret well control equipment.
08 A. I consider well control
09 equipment in -- in the -- in respect to the
10 blowout preventers and the controls they're
11 on.

Page 357:17 to 357:21

00357:17 Q. Therefore, would you consider a
18 lockdown sleeve to be a safety device with
19 respect to well control activities?
20 A. That is more the point -- way
21 that I would view it as.

Page 360:05 to 360:08

00360:05 Q. Drill-Quip provides a
06 recommendation on the necessity for achieving
07 100,000 pounds of tail weight, true?
08 A. True.

Page 361:01 to 361:09

00361:01 Q. And there are a variety of ways
02 to achieve that tail weight?
03 A. Yes, it is.
04 Q. Drill pipe is one?
05 A. Uh-huh. Yes.
06 Q. Heavy weight drill pipe is one?
07 A. Yes.
08 Q. Drill collar is another?
09 A. Yes.

Page 362:20 to 363:02

00362:20 Q. And that's what I'm referring to
21 is that with respect to setting a lockdown
22 sleeve, is it typical that the decision of
23 how to achieve tail weight would be left to
24 the operator?
25 A. I would -- I would have -- well,
00363:01 I'd be speculating on -- as far as to my
02 knowledge, it's to the operator.