

Deposition Testimony of:

Graham Vinson

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Page 6:09 to 6:13

00006:09 Q. My name is Aimee Williams, and
10 I'm with the law firm of Godwin Ronquillo. I
11 represent Halliburton Energy Services in this
12 matter. And Sperry-Sun is also a subsidiary
13 of Halliburton. I may refer to Sperry-Sun

Page 7:11 to 7:13

00007:11 Q. And that, in fact, realtime data
12 could be viewed in the Houston office during
13 office hours, correct?

Page 7:15 to 7:16

00007:15 A. It can be viewed in the Houston
16 office at all times of the day and night.

Page 8:03 to 8:05

00008:03 Q. Typically, when would there be
04 someone in the Houston office to view
05 realtime data?

Page 8:07 to 8:11

00008:07 A. Under normal operations where
08 the well was going according to the well plan
09 that sat on the rig, normal business hours
10 would start at 5:00 a.m. and typically end
11 sometime around 6:00 to 7:00 p.m.

Page 10:09 to 10:14

00010:09 Q. (BY MS. WILLIAMS) Between the
10 hours of 5:00 a.m. and 6:00 to 7:00 p.m.
11 Monday through Friday and on the weekends as
12 needed, was there someone continuously
13 monitoring realtime data in the Houston
14 office?

Page 10:16 to 11:08

00010:16 A. The data is continuously
17 monitored in the Houston office in general
18 Monday through Friday, 5:00 a.m. to typically
19 6:00 to 7:00 p.m. in the evening. The people
20 on the wells team then take their laptops
21 home, and they monitor the well from home as
22 needed.
23 In the event of someone on the

24 rig needing some consultation from the
 25 Houston office, they have their laptop at
 00011:01 home, regardless of what day of the week it
 02 is, and they can actually monitor from there.
 03 On weekends, again, they have
 04 their laptops at home. Under normal
 05 operations they may or may not be watching
 06 their laptop. That's why we actually have
 07 the specialist at the rig to be the eyes and
 08 ears for that.

Page 12:04 to 13:12

00012:04 Q. (BY MS. WILLIAMS) And by
 05 continuously monitoring the realtime data in
 06 the Houston office between the hours of
 07 5:00 a.m. to 6:00 to 7:00 p.m. Monday through
 08 Friday and weekends as needed, I mean,
 09 sitting in front of the monitor watching the
 10 realtime data come in, is that what you're
 11 referring to?
 12 A. So if I understand your
 13 question, your expectation is that no
 14 rest room breaks are being taken, and one
 15 person is sitting there with their eyes to a
 16 computer monitor between the hours of
 17 5:00 a.m. and 7:00 p.m.?
 18 Q. Correct. At least one person.
 19 A. That is not humanly possible.
 20 Q. What is your definition of
 21 continuously monitor?
 22 A. We have particular specialists
 23 and experts on the rig, including the mud
 24 loggers, the domain of the Transocean's
 25 employees, as well as driller, toolpusher,
 00013:01 OIM captain, that monitor the data 24/7. The
 02 office monitors the data as they need to view
 03 the data.
 04 Under normal drilling operations
 05 I can't sit here and tell you that Bobby,
 06 Marty or Jonathan is actually glued to their
 07 computer screen for 13 consecutive hours
 08 Monday through Friday.
 09 Q. So it is -- in other words,
 10 no -- someone in the Houston office is not
 11 continuously watching a realtime data 24
 12 hours a day, seven days a week?

Page 13:14 to 13:19

00013:14 A. Continuously watching data is
 15 the domain of a number of individuals. There
 16 is not a single-point accountability person
 17 to specifically sit in one chair with one

18 computer screen for a 13-hour period
19 continuously watching the data feed.

Page 17:15 to 17:24

00017:15 and again today, the primary monitoring,
16 24-hour, seven-days-a-week monitoring, the
17 response -- primary responsibility for 24
18 hour -- 24/7 monitoring of the realtime data
19 was with the rig, correct?
20 A. The primary responsibility
21 resides at the rig.
22 Q. And isn't it true that driller
23 and assistant driller are primarily
24 responsible for monitoring the realtime data?

Page 18:01 to 18:15

00018:01 A. I am not educated in all the
02 roles and responsibilities of the Transocean
03 driller and assistant driller. I don't
04 actually know what their actual roles and
05 responsibilities are.
06 What I do know is on their
07 driller's console, they have all of the
08 capability to monitor all parameters during
09 the drilling of the well.
10 Q. (BY MS. WILLIAMS) Within the BP
11 team, I believe you testified yesterday that
12 the wellsite geologist and pore pressure frac
13 gradient expert were the primary people
14 responsible for monitoring the realtime data;
15 is that accurate?

Page 18:17 to 19:08

00018:17 A. The pore pressure frac gradient
18 expert on the rig monitors the resistivity,
19 sonic and gamma ray logs. They take a data
20 feed from the Sperry-Sun mud logging on the
21 gas data, and they work with the Sperry-Sun
22 sample catchers to actually do an analysis of
23 the cuttings that we actually drill. That's
24 their primary data feed.
25 Q. (BY MS. WILLIAMS) And the
00019:01 wellsite geologist?
02 A. The wellsite geologist provides
03 a coordination having an overall view of not
04 only the PPFG expert's view of the pressure
05 in the well, but also how does the
06 stratigraphy that we are actually drilling
07 compare to the predrill prediction of the
08 well.

Page 20:18 to 21:14

00020:18 Q. What data does the TIGER team
 19 use to derive pore pressure?
 20 A. Refer back to yesterday. How
 21 many hours do we have just to talk about the
 22 amount of data? I'll shorten it.
 23 We utilize 3D seismic data. We
 24 utilize 2D seismic data. We utilize all
 25 sweeps of well logs that are available on
 00021:01 analog wells. We do comprehensive 3D basin
 02 modeling, both 2D and 3D. We do
 03 comprehensive seismic velocity to pressure
 04 analysis. And that's probably the simple
 05 answer to that question.
 06 Q. And how do you obtain this data?
 07 A. Seismic data is acquired from
 08 seismic vendors. The well log information is
 09 either BP owned or gotten through the well
 10 log databases. Velocity data is a processing
 11 technique that is used to extract the
 12 information from seismic. Basin modeling is
 13 geological inputs into a really fancy
 14 computer program.

Page 22:21 to 23:02

00022:21 Q. (BY MS. WILLIAMS) Is Kate Paine
 22 still working for BP as a contractor?
 23 A. She is. We are not in
 24 operations.
 25 Q. And as a contractor, does Kate
 00023:01 Paine receive any kind of quarterly or annual
 02 reviews?

Page 23:21 to 24:23

00023:21 Q. (BY MS. WILLIAMS) And do you do
 22 that on an as-needed basis with Kate Paine?
 23 A. As a contractor, yes. At the
 24 end of each well, Kate and I will sit down
 25 and we will talk about the well that was just
 00024:01 worked on.
 02 Q. And what type of feedback have
 03 you given her?
 04 A. I have given her feedback that
 05 she is an excellent technical specialist,
 06 which is the reason I hired her. I have also
 07 given her some feedback that if -- I would
 08 prefer her to be a little less direct in her
 09 response to questions.
 10 Q. Have you received complaints
 11 about Kate Paine from those who work with her

12 on a rig?
13 A. I have received some concerns
14 from folks about Kate in the past.
15 Q. What type of concerns?
16 A. Her direct nature of -- of
17 answering questions. Kate is very good,
18 technically. She usually knows much more
19 about the topic than the people that are
20 asking the questions, and sometimes she
21 overloads them with information; that she
22 needs to slow down so they can absorb what
23 she's actually trying to tell them.

Page 25:11 to 25:15

00025:11 Q. Have there been complaints about
12 her work product?
13 A. I have never received any
14 complaints from anyone on Kate's technical
15 work.

Page 26:10 to 26:13

00026:10 Q. (BY MS. WILLIAMS) Do you agree
11 that Halliburton as a cementing contractor
12 needed to be provided with accurate
13 temperature data --

Page 26:15 to 26:16

00026:15 Q. (BY MS. WILLIAMS) -- for the
16 formation?

Page 26:18 to 26:24

00026:18 A. I understand that temperature is
19 an input to the design of the cement slurry.
20 Q. (BY MS. WILLIAMS) Do you agree
21 that it's -- do you agree with me, yes or no,
22 though, that Halliburton as a cementing
23 contractor needed to be provided with
24 accurate temperature --

Page 27:01 to 28:01

00027:01 Q. (BY MS. WILLIAMS) -- as an
02 input?
03 A. Again, I'm not a cementing
04 expert. I understand that temperature is one
05 of the input variables to actually designing
06 a successful cement job.
07 Q. And do you agree with me that

08 Halliburton as the cementing contractor
09 needed to be provided with accurate pore
10 pressure and frac gradient data?

11 A. Pore pressure and frac gradient
12 data is an input as temperature to the design
13 of the cement slurry.

14 Q. Do you know whether anyone on
15 the TIGER team provided pore pressure frac
16 gradient data to Halliburton prior to
17 Halliburton pumping cement on the Macondo
18 well?

19 A. The pore pressure -- the
20 post-well pore pressure frac gradient
21 information for Macondo resided in the wells
22 team. So I can't speak for the wells team.
23 That information as it pertains to the design
24 of the cement slurry would come from the
25 wells group. It would not come directly from
00028:01 the TIGER team.

Page 31:11 to 31:19

00031:11 Q. Have you spoken with anyone from
12 Halliburton regarding the cementing
13 operations on the Macondo well?

14 A. I have not.

15 Q. Have you formed any opinions
16 regarding the cementing services provided by
17 Halliburton on the Macondo well?

18 A. I have no expertise whatsoever
19 as it pertains to cementing operations.

Page 33:15 to 34:03

00033:15 Have you had any discussions with anyone in
16 which Sperry-Sun's mud logging services for
17 the Macondo well were questioned or
18 criticized?

19 A. There was some discussion when
20 the MARIANAS rig was on. There were some
21 concerns expressed at the time by the wells
22 team leader of the MARIANAS.

23 Q. And what were those discussions?

24 A. I don't recall the nature or
25 details of those discussions. I just can
00034:01 remember a personal conversation with George
02 questioning whether we should have somebody
03 else.

Page 34:21 to 35:03

00034:21 Q. Why is that?

22 A. My association with Sperry-Sun

23 dates back almost 15 years. There is a
24 reason why we continue to employ Sperry-Sun
25 on the DEEPWATER HORIZON.
00035:01 Q. And you had -- you've always had
02 good experiences with Sperry-Sun; is that
03 why?

Page 35:05 to 35:06

00035:05 A. My personal experience with
06 Sperry-Sun has been very good.

Page 36:08 to 38:07

00036:08 Q. Did you have any discussions
09 with anyone in which Sperry-Sun's mud logging
10 services for the Macondo well were questioned
11 or criticized?

12 A. I'm not aware of any personal
13 communication to me that the mud logging
14 services were being questioned.

15 Q. Have you formed an opinion
16 regarding the mud logging services provided
17 by Sperry-Sun on the Macondo well?

18 A. Again, I have no information to
19 suggest that Sperry was not doing per the
20 contract what they were supposed to be doing
21 on the Macondo well.

22 Q. Do you have any information that
23 Sperry-Sun's mud loggers did anything wrong
24 on the Macondo well?

25 A. I am not aware of, as you say,
00037:01 they did anything wrong. My association with
02 the mud loggers, back to my previous answer,
03 ends at the point in time at which the
04 open-hole well logs in the well are
05 completed.

06 At that point the mud logging
07 services are then part of the completion of
08 the well, and that is primarily monitored
09 from the wells group, not from the TIGER
10 team.

11 Q. Do you have any information
12 suggesting that Sperry-Sun's mud loggers
13 missed clear signs of a kick?

14 A. Kick in which interval?

15 Q. In any interval on the Macondo
16 well.

17 A. I have no personal knowledge at
18 the time of the event. I have an opinion
19 based on the kick, that last kick deeper in
20 the well, as to what might have been done
21 better to make sure that that event did not
22 happen.

23 Q. And what is that opinion?
 24 A. That actually relates back to
 25 the e-mail that was introduced yesterday from
 00038:01 Bobby Bodek in terms of Bobby's role in going
 02 to the rig to do a lessons learned with both
 03 the mud logging team, Kate Paine and our
 04 wellsite geologist as to making sure that we
 05 understand all of the leading and lagging
 06 indicators to deliver the next two hole
 07 sections without any NPT.

Page 40:17 to 41:11

00040:17 A. I can answer. There was a kick
 18 in the well. I don't recall the depth. And
 19 after reviewing -- after the kick had
 20 actually occurred, I asked Bobby to -- can I
 21 actually see the details -- can I -- I
 22 actually specifically asked Bobby, Show me
 23 the mud logging report.
 24 And Bobby initially -- what he
 25 gave me back was the typical morning report.
 00041:01 I said, No, I want to see the
 02 data the mud loggers were viewing when this
 03 event occurred.
 04 And so Bobby produced that for
 05 me.
 06 In my opinion, when I look at
 07 that and I look at the total duration of the
 08 flow that occurred during that kick event, it
 09 was my opinion that Sperry-Sun missed it.
 10 Q. Your wellsite geologist also
 11 missed it, correct?

Page 41:13 to 41:21

00041:13 A. I answered: In my opinion, the
 14 mud logger missed the duration of the flow
 15 event.
 16 Q. (BY MS. WILLIAMS) Do you know
 17 whether the mud loggers brought the flow
 18 event to anyone's attention on the rig?
 19 A. The data that the mud loggers
 20 were actually viewing is the same data that
 21 is seen on the screens around the rig.

Page 42:04 to 42:08

00042:04 A. If you're asking me, do I know
 05 if the mud logger on tour actually got up out
 06 of their chair or got on the phone and called
 07 somebody on the rig, I do not know the answer
 08 to that. I don't work on the rig.

Page 42:21 to 42:22

00042:21 Q. (BY MS. WILLIAMS) Did the BP
22 wellsite geologist also miss the event?

Page 42:24 to 43:05

00042:24 A. The BP wellsite geologist is our
25 coordinator on the rig. Their primary
00043:01 accountability is to not actually provide mud
02 logging services. That is the accountability
03 of Sperry-Sun, not my wellsite geologist.
04 Q. (BY MS. WILLIAMS) What about
05 Kate Paine? Did she also miss the event?

Page 43:07 to 43:11

00043:07 A. Kate Paine's primary
08 accountability, again, is not to provide mud
09 logging services. She actually interprets
10 well log data and cuttings information from
11 the wellbore.

Page 43:17 to 43:17

00043:17 This is Exhibit 1069. It's behind Tab 15.

Page 43:22 to 44:06

00043:22 Q. And this is an e-mail -- I'd
23 like to direct you to the second e-mail from
24 the top, from you to Robert Bodek, March 20,
25 2010, subject: Remainder of Macondo. This
00044:01 is the e-mail where you and Mr. Bodek are
02 talking about sending Mr. Bodek out to the
03 DEEPWATER HORIZON rig, correct?
04 A. Correct.
05 Q. After the March 8th kick?
06 A. Correct.

Page 45:21 to 45:25

00045:21 Q. (BY MS. WILLIAMS) So Mr. Bodek
22 was being sent out to the rig to work with
23 the PPFG experts, the wellsite geologist and
24 mud loggers to tighten up PPFG detection
25 issues, correct?

Page 46:02 to 46:06

00046:02 A. That is why I sent Bobby to the

03 rig.
 04 Q. (BY MS. WILLIAMS) Okay. So it
 05 wasn't just the mud loggers who Mr. Bodek was
 06 supposed to be working with to work on PPFG

Page 46:11 to 46:11

00046:11 A. In general.

Page 46:16 to 47:18

00046:16 Q. And Mr. Bellow was more senior
 17 than Mr. Bodek, correct?
 18 A. By ten years.
 19 Q. By ten years.
 20 Was he -- what was Mr. Bellow's
 21 exact title in relation to Mr. Bodek? Was he
 22 his mentor? Was he his supervisor?
 23 A. He is not a supervisor. I am
 24 the supervisor of both of them.
 25 Q. Okay. What was his title in
 00047:01 relation to Mr. Bodek?
 02 A. They -- they carry the same job
 03 function. They are both operations
 04 geologists. Bobby is just less senior than
 05 Jonathan is.
 06 Q. So how did that mentorship work?
 07 How --
 08 A. Jonathan was Bobby's technical
 09 mentor.
 10 Q. Okay.
 11 A. So at any -- at any point in
 12 time during the well, if Bobby had a
 13 technical question that he wanted more
 14 clarification or understanding of, he would
 15 go to Jonathan and -- and seek counsel.
 16 Q. Was that a formal written
 17 relationship or was it an informal
 18 relationship?

Page 47:20 to 48:07

00047:20 A. It was not a written
 21 relationship as it pertained to their annual
 22 performance objectives. It was an
 23 expectation I have of every senior-level
 24 leader on my team to mentor any junior staff,
 25 regardless of what their job function is.
 00048:01 Q. (BY MS. WILLIAMS) And Mr. Bodek
 02 had five years of experience, correct?
 03 A. He did.
 04 Q. Why is it that you were sending
 05 the more junior person of the two out to the

06 rig to work on such critical issues as PPFG
07 detection?

Page 48:09 to 48:13

00048:09 A. "Junior" does not imply not
10 capable. He just had less experience. Bobby
11 was fully capable in the task that I was
12 asking him to do, to go out and be the lead
13 on the rig to do that.

Page 48:22 to 49:08

00048:22 Q. You mentioned yesterday that you
23 know Joe Keith from Sperry-Sun or that you've
24 worked with him in the past?
25 A. I had -- I had worked with
00049:01 Joseph back in the late '90s.
02 Q. Was that when you were working
03 out on a rig yourself?
04 A. That was correct. I actually
05 sat in the mud logging shack with Joe Keith
06 many a night.
07 Q. And what's your opinion of
08 Joseph Keith?

Page 49:10 to 49:11

00049:10 A. I have no opinion to believe
11 that Joseph is not an excellent mud logger.

Page 51:09 to 51:13

00051:09 Table 1 on Bates No. 6052. It's the second
10 page of the document.
11 This table shows the sands that
12 were identified on the Macondo well?
13 A. (Witness nods.)

Page 52:17 to 52:20

00052:17 Q. (BY MS. WILLIAMS) Were either
18 you or the TIGER team involved in this
19 petrophysical review that identified this
20 additional hydrocarbon zone in June 2010?

Page 52:22 to 53:03

00052:22 A. I can only speak for myself. I
23 was not involved in that petrophysical
24 review.
25 Q. (BY MS. WILLIAMS) How might the

00053:01 TIGER team have missed this additional
02 hydrocarbon zone when it was logging the
03 Macondo well initially?

Page 53:05 to 53:13

00053:05 A. The TIGER team -- we are not the
06 petrophysicists for the well. We are not
07 accountable for delivering the petrophysical
08 interpretation of the well. We only
09 facilitate the offshore operation in
10 acquiring the data.
11 Q. (BY MS. WILLIAMS) Whose
12 responsibility is it to identify hydrocarbon
13 zones?

Page 53:15 to 53:18

00053:15 A. It would be the responsibility
16 of the petrophysicist for the well.
17 Q. And is that Galina?
18 A. Skripnikova.

Page 54:07 to 54:10

00054:07 Q. When was the first time you
08 heard about this additional hydrocarbon zone
09 that was identified in June 2010 after the
10 blowout?

Page 54:12 to 54:23

00054:12 A. My first recollection of, as you
13 describe, an additional possible hydrocarbon
14 zone was roughly two to three weeks actually
15 after the logging job was complete.
16 Q. (BY MS. WILLIAMS) And when was
17 the logging job complete?
18 A. I would need to look at the
19 morning report. It was complete sometime in
20 early April, as I recall.
21 Q. And so you found out about this
22 additional hydrocarbon zone after the blowout
23 or before the blowout?

Page 54:25 to 55:01

00054:25 A. My recollection is that it was
00055:01 after.

Page 55:18 to 55:19

00055:18 Q. And how was -- how was this
19 additional hydrocarbon zone discovered?

Page 55:21 to 56:04

00055:21 A. I don't actually know the
22 details of how it was discovered because I
23 was not actually part of the petrophysical
24 review that you actually referenced earlier.
25 Q. (BY MS. WILLIAMS) If this
00056:01 additional hydrocarbon zone had been
02 discovered before the blowout on April 20th,
03 2010, how would that have impacted decisions
04 made by the TIGER team?

Page 56:06 to 56:11

00056:06 A. In your question you said, had
07 this additional hydrocarbon zone been -- I am
08 not aware that there is an additional
09 hydrocarbon zone at the depth that's actually
10 indicated on this -- this reference in front
11 of me.

Page 57:04 to 57:04

00057:04 Exhibit 3069.

Page 57:19 to 57:22

00057:19 Q. If this additional hydrocarbon
20 zone had been discovered before the blowout
21 on April 20th, 2010, how would that have
22 impacted decisions made by the TIGER team?

Page 57:24 to 58:14

00057:24 A. Two responses and two parts to
25 your question.
00058:01 First, I am not aware that there
02 is an additional hydrocarbon zone 2 feet
03 thick, as denoted in this e-mail, is below
04 the resolution of the logging tools that
05 would have been run in that well. So
06 classifying something as gas would be
07 strictly an interpretation based on logging
08 tools that do not have the resolution
09 capability to deliver that interpretation.
10 Second answer to the second part
11 of the question is the TIGER team did not
12 have the accountability for providing
13 petrophysical evaluation in the Macondo well.

14 That actually falls to Galina Skripnikova.

Page 59:03 to 59:09

00059:03 A. The TIGER team makes no
04 decisions as it pertains to any part of the
05 Macondo operation post the TD of the last
06 logging run in the well. We do not
07 provide the petrophysical interpretation. At
08 the time that the last TD logging run is
09 done, we are working on our post-well report.

Page 59:17 to 59:24

00059:17 Q. So any discussions you've had
18 with John Guide after the incident on
19 April 20th, 2010, have related to other BP
20 business or personal matters?
21 A. John is a friend of mine. We
22 exercise together. We will have lunch
23 together on occasion. But I did not have any
24 discussions. I chose not to.

Page 60:01 to 60:12

00060:01 previously marked as Exhibit 1326. This is
02 Tab 20 in your notebook. At the top of the
03 e-mail string on the first page Bates marked
04 5882 is an e-mail from Kate Paine responding
05 to Mr. Bodek's March 18th e-mail, the lessons
06 learned e-mail.
07 A. Correct.
08 Q. The next-to-the-last paragraph,
09 Ms. Paine states that: We were discussing
10 that there would be gas present in the well,
11 and we weren't to be spooked into thinking we
12 would be under-balanced by its existence.

Page 60:18 to 60:25

00060:18 A. Since I'm not actually part of
19 this e-mail chain, I can't actually speak for
20 what Kate was actually thinking when she
21 actually penned this e-mail.
22 Q. (BY MS. WILLIAMS) Did the TIGER
23 team expect to have gas in the well -- in the
24 Macondo well unrelated to well control
25 issues?

Page 61:02 to 61:12

00061:02 A. It is not atypical as you drill

03 any exploration well to, as you say,
04 encounter gas. That can be encountered in
05 many forms. It does not actually have to be
06 encountered in sands.
07 Q. (BY MS. WILLIAMS) Did the TIGER
08 team go into the Macondo well expecting to
09 encounter certain levels of gas, and that may
10 have -- and that may have led to missing some
11 of the early indications of the kicks that
12 they encountered?

Page 61:14 to 61:24

00061:14 A. The predrill prediction, as
15 documented in our statement of requirements
16 for Macondo, did not indicate that we were
17 going to encounter gas at the reservoir level
18 in Macondo.
19 Shales that are contained within
20 the overburden of the column we drilled
21 through do contain gas components. And in
22 fact we use pieces of that information to
23 actually determine what the pressure is
24 actually doing in the well.

Page 62:14 to 62:16

00062:14 Q. My name is Janika Polk, and this
15 is my colleague, Lee Ziffer, and we represent
16 Anadarko.

Page 63:05 to 63:11

00063:05 Q. Have you ever had any
06 communications with anyone from Anadarko
07 regarding the Macondo well?
08 A. I personally have not.
09 Q. And that includes pre- and
10 post-incident?
11 A. Correct.

Page 63:24 to 65:03

00063:24 Q. Earlier in your testimony you
25 talked about some of the risks that were
00064:01 identified in the predrill data package. Do
02 you remember that testimony?
03 A. I do.
04 Q. One of the risks that you talked
05 about was narrow pore pressure frac gradient.
06 Do you recall that?
07 A. I do.
08 Q. Can you identify for me the

09 risks that are associated with narrow pore
10 pressure frac gradient.

11 A. Specific risks?

12 Q. Yes.

13 A. There are -- in a narrow pore
14 pressure frac gradient window, in order to
15 deliver that well to total depth, it
16 typically will require many casing strings to
17 be set.

18 In my opinion, the primary risk
19 in a well like that in my experience is
20 making sure that you get each successive
21 casing point set in the proper location.

22 Q. Any other risk?

23 A. Narrow pore pressure frac
24 gradient unto itself does not -- not pose as
25 a -- an additional risk. The casing design
00065:01 of the well is designed to actually mitigate
02 that risk based on the information contained
03 in the pore pressure frac gradient plot.

Page 65:12 to 66:07

00065:12 Q. (BY MS. POLK) Who would have
13 communicated those risks?

14 A. As we work as a
15 multidisciplinary team, in my testimony
16 yesterday I referred to a part of a stage
17 gate called an NDS assessment.

18 So the actual wells team is
19 involved in the NDS assessment where we
20 actually have our first discussion of what we
21 consider to be -- what we call overburden
22 risks, which PPFG is a part of that
23 discussion.

24 Then that information is then
25 summarized in what we call a statement of
00066:01 requirements. That is the signoff document
02 at the select to define stage gate which then
03 goes to the wells organization for the basis
04 of design.

05 Q. Let me turn your attention now
06 to some testimony that you previously offered
07 about Kate Paine.

Page 66:09 to 66:16

00066:09 Q. Now, you thought that Kate Paine
10 was qualified for her job, right?

11 A. I hired her, so she would be
12 qualified.

13 Q. Okay. And did you think she did
14 a good job?

15 A. I have no reason to suggest that

16 she did not.

Page 67:11 to 67:15

00067:11 A. And so Kate has a certain
12 personality style as to how she actually
13 communicates information. And she
14 communicates that from a subsurface point of
15 view.

Page 67:23 to 68:16

00067:23 Q. Is that what you mean when
24 you're saying "subsurface"?
25 A. Which actually speaks to her
00068:01 technical capability. Kate is very thorough
02 in the work that she actually does. And
03 given that she is tasked by me to actually
04 provide wellsite pore pressure frac gradient
05 detection, that actually involves working
06 with a large variety of people, both onshore
07 and on the rig.
08 And what is important there is
09 that she condenses the vast amount of
10 information that is coming to her, and that
11 she consolidates that down into a firm
12 recommendation.
13 Q. Being thorough is a good thing,
14 right, particularly in these types of
15 operations?
16 A. It is a very --

Page 68:18 to 69:01

00068:18 A. -- good thing.
19 Q. (BY MS. POLK) And do you
20 encourage those who work under you -- Kate
21 Paine worked under you; is that correct?
22 A. She did.
23 Q. Okay. Do you encourage Kate and
24 other folks that worked under you to be
25 active and to provide recommendations
00069:01 relative to how you could improve operations?

Page 69:03 to 69:11

00069:03 A. In prior testimony I indicated
04 that the TIGER team does not actually have
05 decision-making authority as it pertains to
06 the operation of the well.
07 So in that context, what Kate is
08 to do is she informs on particular decisions
09 as they pertain to needing information from

10 the pore pressure frac gradient detection
11 point of view.

Page 70:04 to 70:15

00070:04 Q. And a part of that is to
05 actively be involved in providing
06 recommendations on those job duties and how
07 one can do better, correct?
08 A. Learning comes in many forms.
09 Q. Okay.
10 A. Specifically with respect to
11 Macondo, Kate was actually providing a
12 particular function. And I had an
13 expectation of Kate that she would actually
14 have input into decisions as they pertain to
15 the pore pressure frac gradient in the well.

Page 72:06 to 72:09

00072:06 (Exhibit 3070 was marked.)
07 Q. (BY MS. POLK) 3070 is an e-mail
08 from Robert Bodek to yourself and also
09 Jonathan Bellow.

Page 72:18 to 72:23

00072:18 Q. (BY MS. POLK) That e-mail says
19 that: George is probably going to pitch a
20 fit about having Kate do PPFG on Macondo.
21 What was that about? Do you
22 recall being involved in discussions
23 surrounding that?

Page 72:25 to 73:18

00072:25 A. I was involved in this
00073:01 discussion.
02 Q. (BY MS. POLK) Okay. What was
03 the issue that -- and was this the George
04 Gray that you mentioned earlier? Is this the
05 same individual that you talked about with
06 Ms. Williams?
07 A. Same person.
08 Q. Okay. What was the discussion
09 about here surrounding this e-mail?
10 A. George pitched a fit about many
11 things, both within his area of expertise and
12 outside of his area of expertise.
13 This particular fit-pitching by
14 George was not related to Kate's technical
15 capability. It was the fact that Kate's
16 personality just rubbed wrong on George. And

17 I did intervene, and Kate did work the well.
 18 So I resolved that issue.

Page 73:22 to 74:04

00073:22 introduced as Exhibit 1314. This is the
 23 e-mail that Ms. Paine sent you, and several
 24 other individuals were copied.
 25 Let me direct your attention
 00074:01 first to the first line that says: Whether
 02 or not I monitor the Macondo well is
 03 inconsequential.
 04 What was meant by that?

Page 74:06 to 74:11

00074:06 A. I actually employ two
 07 contractors to do PPFG work. Kate is one of
 08 two individuals. So her reference there is
 09 that whether I do it or not doesn't matter
 10 because she also knows that I have another
 11 person that is equally capable.

Page 74:17 to 74:24

00074:17 A. My two individuals are both
 18 technically capable equally. What Kate was
 19 concerned was, is that she was actually aware
 20 that her personality and George's just didn't
 21 work that well together, and she was just
 22 wondering if it would be better if John
 23 actually did the well as opposed to her doing
 24 the well.

Page 76:12 to 76:12

00076:12 is previously marked Exhibit 1524 -- or 74.

Page 76:17 to 77:04

00076:17 Q. (BY MS. POLK) Mr. Vinson, if
 18 you could help me identify the leading
 19 indicators versus the lagging indicators.
 20 What are the leading indicators?
 21 A. In my opinion -- this is how I
 22 define them -- the leading indicators are
 23 flow in/flow out. It can also include weight
 24 on bit, torque, standpipe pressure,
 25 computation of d-exponent. Those are the
 00077:01 primary list.
 02 Q. And these are the indicators
 03 that you felt were within the rig personnel's

04 domain; is that correct?

Page 77:06 to 77:10

00077:06 A. Those particular indicators that
 07 I just mentioned are actually monitored by
 08 the mud logging --
 09 Q. (BY MS. POLK) Okay.
 10 A. -- team on the rig.

Page 78:05 to 78:23

00078:05 Q. Now, this information would have
 06 also have been available to Ms. Paine?
 07 MR. KEEGAN: Objection to form.
 08 A. This information is available to
 09 Ms. Paine.
 10 Q. (BY MS. POLK) Okay. What are
 11 the lagging indicators?
 12 A. My definition of lagging
 13 indicators are parameters that we actually
 14 use to compute pore pressure that actually
 15 happen after the bit had passed that depth.
 16 So, for example, gas data is a
 17 lagging indicator. Cuttings analysis is a
 18 lagging indicator. Any conversion of
 19 attributes from a resistivity or sonic log to
 20 pressure is a lagging indicator.
 21 Q. So these indicators would not
 22 become apparent until after a kick has
 23 started; is that correct?

Page 78:25 to 79:07

00078:25 A. The leading indicators that I
 00079:01 actually discussed would be available as the
 02 event is occurring. The lagging indicators
 03 would be behind the interval, depending on
 04 what the thickness of interval that was
 05 actually drilled is and what was the position
 06 of those sensors relative to the drill bit
 07 depth at the time.

Page 80:15 to 80:24

00080:15 (Exhibit 3071 was marked.)
 16 Q. (BY MS. POLK) This is an e-mail
 17 from Marty Albertin to a number of
 18 individuals, including yourself,
 19 BP-HZN-2179MDL00031696. Do you see that?
 20 A. I do.
 21 Q. Does this e-mail identify that
 22 there were some anticipated pore pressure

23 problems or concerns in this particular hole
24 section?

Page 81:01 to 81:11

00081:01 A. This e-mail does not convey that
02 there was any problems.
03 Q. (BY MS. POLK) What is it
04 conveying, in general?
05 A. This is a summary of -- this is
06 Marty's summary of his expectation in terms
07 of the next hole section we were getting
08 ready to drill.
09 Q. And is that pretty standard for
10 him to send this type of summary prior to
11 going to a next -- another section?

Page 81:13 to 82:02

00081:13 A. This particular summary would be
14 a followup to the entire wells team
15 conversation that is had. We actually do
16 what is called a pre-hole drilling assessment
17 meeting.
18 So prior to having set the
19 previous casing shoe, before we actually
20 drill 1 foot and take the leakoff test, the
21 team gathers, and we actually review what is
22 the expected forecast of the next hole
23 section we're getting ready to drill.
24 Marty will have provided this
25 information in that forum, and then he will
00082:01 have followed up with an e-mail to everyone
02 just as a reminder.

Page 82:09 to 82:09

00082:09 (Exhibit 3072 was marked.)

Page 82:17 to 82:19

00082:17 Q. Were you aware that in the days
18 leading up to the March 8th kick there were
19 losses?

Page 82:21 to 83:04

00082:21 A. I had actually read this e-mail,
22 so I was aware there was losses being
23 experienced.
24 Q. (BY MS. POLK) What did you
25 attribute those losses to?

00083:01 A. I did not at the time actually
 02 form an opinion.
 03 Q. Did it concern you?
 04 A. It did not.

Page 83:11 to 83:11

00083:11 (Exhibit 3073 was marked.)

Page 83:19 to 83:20

00083:19 Q. And did you attribute those
 20 losses to anything in particular?

Page 83:22 to 85:10

00083:22 A. In this particular instance,
 23 frankly, this is not an uncommon occurrence
 24 in terms of cementing casing shoes. In my
 25 past experience in exploration wells we have
 00084:01 to squeeze casing shoes at particular
 02 intervals, primarily because there can
 03 potentially be a weak formation where the
 04 cement is not set in a completely impermeable
 05 shale, where the cement actually has a better
 06 chance of coming down and circulating back up
 07 the annulus.

 08 So when I actually read those at
 09 this particular one, it didn't create any
 10 concern for me whatsoever.

 11 Q. (BY MS. POLK) And you weren't
 12 concerned about the prior e-mail that
 13 referenced losses, either?

 14 A. I believe they're almost
 15 related, one and the same. It's just that
 16 there is a bit depth at a different place
 17 from what the hole depth is. So in my -- I
 18 believe these are related to the same event.

 19 Q. So no?

 20 A. I was not concerned.

 21 Q. Let me direct your attention to
 22 Tab 25. And I have a section tabbed for you
 23 on Page 12 of that document. It's already
 24 been entered as Exhibit 153.

 25 In this e-mail on Page 12, in
 00085:01 the fifth paragraph down, the first sentence
 02 starts: John said that he was very upset
 03 about this event, noting that one of the
 04 primary responsibilities of the wellsite
 05 leaders on the -- and the rig crew as well
 06 control.

 07 Were you aware that -- of John
 08 Guide being upset about -- and if you need to

09 look more at the e-mails, just let me know.
10 But were you aware that John Guide was upset?

Page 85:16 to 86:02

00085:16 A. John never expressed to me any
17 concerns about the performance of the TIGER
18 team on this well, nor did he ever personally
19 communicate to me that he was personally very
20 upset.
21 Q. (BY MS. POLK) And you said you
22 guys are friends, right?
23 A. I have a good working
24 relationship with John.
25 Q. So you -- during this time
00086:01 period were you communicating him -- with him
02 on a regular basis?

Page 86:04 to 86:10

00086:04 A. I spoke to John Guide on almost
05 a daily basis.
06 Q. (BY MS. POLK) And he never
07 mentioned this to you?
08 A. I was never -- this is the first
09 time I've read this, and this was never
10 expressed to me.

Page 87:05 to 88:05

00087:05 A. John never expressed to me in my
06 three-year association in the four to six
07 wells that we drilled together that he ever
08 had any concerns with performance of my team.
09 Q. Okay. Does it surprise you
10 that -- to see these interview notes that --
11 to see these comments about the TIGER team
12 expressed in these interview notes?
13 A. It doesn't concern me.
14 Q. Why not?
15 A. Because the prediction of pore
16 pressure frac gradient and the detection of
17 it is a very technical science. It is
18 actually outside the domain of the detailed
19 understanding of drilling engineers. It's
20 not their core expertise.
21 So to a drilling engineer, if
22 you actually take a kick, my team failed
23 because there is an expectation that we know
24 the pressure of the reservoir to the nearest
25 100th of 1 percent of the actual value.
00088:01 That's an unrealistic expectation of what the
02 science is capable of delivering.

03 Q. So Mr. Guide wasn't necessarily
04 competent to comment on the TIGER team's
05 performance?

Page 88:07 to 88:17

00088:07 A. John is completely competent
08 with respect to the ways in which pore
09 pressure frac gradient are actually
10 interpreted and the decisions that a
11 competent wells team leader or drilling
12 engineer would make with those decisions.
13 John's expertise is not in the prediction and
14 detection of pore pressure frac gradient.
15 Q. And that's the TIGER team's
16 expertise, right?
17 A. That is our expertise.

Page 89:20 to 89:23

00089:20 Q. (BY MS. POLK) Did Mr. Guide
21 ever communicate to you that he believed that
22 Ms. Paine was unnecessarily raising mud
23 weights after the March 8th kick?

Page 89:25 to 90:01

00089:25 A. John did -- John did not
00090:01 actually communicate that to me.

Page 90:23 to 92:05

00090:23 Q. Did the rate of drilling have
24 any impact on those monitoring the various
25 parameters that we talked about, their
00091:01 ability to identify leading indicators?
02 A. The -- the rate of drilling from
03 a lagging indicator point of view primarily
04 affects the gas data and the cuttings
05 analysis. It does not have an effect on the
06 data acquisition of the resistivity, sonic
07 and gamma ray logs.
08 Q. What about for leading
09 indicator?
10 A. Leading indicators are leading
11 indicators. So at whatever rate you are
12 drilling, that information is actually
13 readily available.
14 Q. So there was no impact from the
15 rate of drilling on the ability to identify
16 them?
17 A. If we are referencing --
18 speaking with respect to leading indicators

19 of flow in/flow out, d-exponent, weight on
20 bit, and torque, those are instantaneous
21 measurements that one can sample at any point
22 during the interval being drilled, regardless
23 of the drill rate.

24 Q. Are there any leading indicators
25 that are impacted by the rate of drilling?

00092:01 A. I refer to my previous answer.
02 The data is sampled instantaneously, so
03 regardless of the drill rate, one can
04 actually see the values of those at whatever
05 the drill rate is.

Page 92:16 to 93:18

00092:16 Q. Okay. Are there any that you
17 didn't list that are affected by the rate of
18 drilling?

19 A. I would actually have to see an
20 entire list of the parameters that we
21 actually gathered because there is hundreds.

22 Q. Okay.

23 A. So that's why I shortened it
24 down to the five or six that I actually use.

25 Q. Okay. So sitting here today,
00093:01 you can't think of any that are impacted by
02 the rate of drilling?

03 A. I don't have any that come to
04 mind.

05 Q. Okay. Does the rate of drilling
06 have any impact on the team's ability to
07 monitor pore pressure?

08 A. The rate of drilling actually
09 impacts the number of connections that one
10 has in the hole. So if we are monitoring
11 connection gas, obviously if we are drilling
12 faster, there will be more of those
13 connections in the hole as opposed to if
14 we're drilling slower.

15 The cuttings that actually come
16 up to the service as a function of that are
17 related. It's not impacting our computation
18 from the resistivity and sonic logs.

Page 94:01 to 95:01

00094:01 Q. Okay.

02 A. If I am drilling quickly and I
03 have multiple connections in the hole, then
04 what I am not seeing is each individual
05 connection before -- in making an
06 interpretation -- before the next connection
07 comes up. That may or may not be an impact
08 because I'm also doing the same thing with

09 the resistivity and sonic logs.
 10 Q. Okay. So there are some things
 11 that you may not be able to see, but it may
 12 or may not have any impact on your ultimate
 13 goal of monitoring pore pressure?
 14 A. It --
 15 MR. KEEGAN: Objection to form.
 16 A. It may or may not impact the
 17 interpretation at any point in depth in the
 18 well.
 19 Q. (BY MS. POLK) Okay. But
 20 there's an effect, right? Meaning the rate
 21 of drilling can have certain effects, but
 22 whether or not it results in any impact on
 23 your ability to properly do your job is
 24 another issue, correct?
 25 A. There is a piece of information
 00095:01 that may not be known at the time.

Page 95:24 to 97:01

00095:24 that's already been marked as Exhibit 1556,
 25 and it's an e-mail from Gord Bennett to
 00096:01 Jonathan Bellow. And in the second
 02 paragraph -- you'll see I have that paragraph
 03 highlighted. Could you just quickly read
 04 that paragraph, please.
 05 A. I have not heard of anyone being
 06 consistently successful in detecting
 07 overpressured sands, even though everyone
 08 talks about them after the fact.
 09 MR. KEEGAN: Slow down a little for the
 10 court reporter.
 11 THE WITNESS: Okay.
 12 A. Especially when drilling a
 13 section in two days, you don't get any trends
 14 realtime, as things are happening pretty
 15 fast, as you mentioned. We would have to
 16 stop at predetermined depths and to have the
 17 rig and towns teams analyze the data with a
 18 preset number of criterias (including the
 19 ones you mentioned in your e-mail). This
 20 does not fit with the current drilling
 21 practice on the rig.
 22 Q. Had Gord Bennett or Jonathan
 23 Bellow ever had discussions with you about
 24 things happening pretty fast on the rig?
 25 A. I had no discussions with
 00097:01 Jonathan or Gord related to "fast."

Page 97:12 to 97:15

00097:12 Q. (BY MS. POLK) Are you aware
 13 that there was an identified time frame by

14 which the -- there was a goal to complete the
15 well?

Page 97:17 to 97:23

00097:17 A. Each and every well that we
18 drill has an AFE with a days versus depth
19 chart.
20 Q. (BY MS. POLK) And were you
21 aware as to where the crew stood in terms of
22 meeting that -- the deadline set forth in
23 that document?

Page 97:25 to 98:02

00097:25 A. I was. We were -- we were
00098:01 behind the days versus depth chart as defined
02 in the predrill of the well.

Page 98:09 to 99:23

00098:09 Q. (BY MS. POLK) Did you ever make
10 any recommendations or do you know if anyone
11 from your team ever made any recommendations
12 that the rate of drilling slowed down after
13 the March 8th kick?
14 A. I am not personally aware of any
15 recommendations that were made.
16 Q. Did you feel that it was -- it
17 would have been appropriate that the rate of
18 drilling slow down following the March 8th
19 kick?
20 A. I'll refer to my previous
21 testimony. There are leading indicators and
22 lagging indicators. Fast is a relative term,
23 and it's relative to many different people
24 based on their particular point of view and
25 their knowledge of the subject matter.
00099:01 If there was a belief that we
02 were out-drilling our indicators, I would
03 have had a full expectation that Bobby Bodek
04 and/or Jonathan Bellow would have
05 communicated that to John Guide. And John
06 would have listened to that particular
07 information, and John would have been -- may
08 or may not have made a choice to call the rig
09 and say, Slow down.
10 Q. So you can out-drill your
11 indicators, right?
12 A. You can actually out-drill some
13 of your indicators.
14 Q. Okay. So rate of drilling does
15 have some impact, right?

16 A. In my previous testimony I
17 mentioned that if you have more than one
18 connection in the hole --
19 Q. Uh-huh.
20 A. -- there is a piece of
21 information that exists that you may not have
22 which may or may not impact your
23 interpretation of pressure.

Page 101:06 to 102:09

00101:06 Q. Was part of his -- the reason
07 that he was sent out to the rig to make sure
08 that recommendations associated with the
09 lessons learned from the March 8th kick were
10 implemented?
11 A. I had Bobby go to the rig
12 because I run my team under a model of
13 continuous improvement. And Bobby's remit
14 was, Go to the rig. I do not want another
15 nonproductive time event related to the
16 subsurface; essentially, the places that I
17 control on this well.
18 And so I wanted him to go out
19 and make sure that he engaged the entire
20 crew, mud loggers, wellsite geologists, pore
21 pressure frac gradient expert, and he had the
22 appropriate conversations, and actually doing
23 a retrospective look at the NPT events that
24 we actually had on the well, such that
25 everyone that I mentioned was on the same
00102:01 page with respect to what those lessons
02 learned were.
03 Q. Do you feel like Mr. Bodek
04 accomplished the goal that he -- that you
05 wanted him to accomplish in going out to the
06 rig?
07 A. We did not have another well
08 control event on the well during the drilling
09 phase.

Page 102:20 to 102:23

00102:20 Q. Mr. Vinson, I'm Catherine
21 McCulley. I represent MOEX Offshore and the
22 related MOEX entities that have been named as
23 parties in this litigation.

Page 103:07 to 104:11

00103:07 Could you explain what
08 connection gas is and what background gas is,
09 please.

10 A. The background gas is -- so when
 11 we actually drill a hole section, there is a
 12 volume of hole that is created by the
 13 cuttings created by the bit. So the pore
 14 space that would exist at those cuttings, if
 15 they contain gas, that is actually circulated
 16 back up to the surface. So that is a
 17 continuous parameter we monitor, which is
 18 called background gas.

19 When we actually stop drilling,
 20 based on having a drill stand get down to the
 21 bottom of its length, and we make a
 22 connection to put on another stand of drill
 23 pipe, that wellbore has actually sat for the
 24 duration of the time that it takes to make
 25 that connection.

00104:01 Then when you kick the pumps
 02 back on, we actually time that connection.
 03 And that particular gas -- if there was -- if
 04 there was any feed-in of this gas at the
 05 bottom of the well, we would then do an
 06 analysis of it when it actually made its way
 07 to the surface.

08 Q. And that's something that the
 09 TIGER team would do?

10 A. We do do that. It's also
 11 monitored by the mud logging crew.

Page 105:05 to 105:08

00105:05 involvement in any way with the MOEX group in
 06 connection with the acquisition of that
 07 interest?

08 A. I did not.

Page 105:23 to 106:02

00105:23 Q. Okay. You testified earlier
 24 with regard to the predrill data package that
 25 was marked as Exhibit 1312 that in general
 00106:01 practice, a reduced version of that document
 02 would be provided to nonoperating parties?

Page 106:05 to 106:23

00106:05 A. It is my experience that a PDDP
 06 package is typically uploaded to our well
 07 space database, and that our parties of
 08 interest on the well have access to that
 09 database. So they should be able to view
 10 that information.

11 Q. (BY MS. McCULLEY) All right.
 12 My question is: Do you have any particular

13 information with regard to provision of that
14 information to MOEX in connection with the
15 Macondo well?
16 A. So are you asking me
17 specifically --
18 Q. Yes.
19 A. -- was that information sent to
20 MOEX?
21 Q. Yes. Do you have any knowledge
22 that it was or it wasn't?
23 A. I don't know the answer to that.

Page 107:22 to 108:13

00107:22 Q. Did your TIGER team group have
23 any technical discussions with any
24 representatives of MOEX?
25 A. I'm not aware of any interaction
00108:01 between the TIGER team and MOEX.
02 Q. Are you aware of any interaction
03 between MOEX and Kate Paine?
04 A. I'm not aware of any.
05 Q. What about Bobby Bodek or
06 Jonathan Bellow?
07 A. I'm only aware that Bobby had
08 some e-mail communications as it pertained to
09 what data was being acquired on the well and
10 what information from that -- from that
11 particular data set was going to be
12 distributed to MOEX. But that's only through
13 personal communication.

Page 110:09 to 111:11

00110:09 Q. With regard to the temporary
10 abandonment procedure, as far as you know,
11 did MOEX have any involvement in the
12 decisions relating to that procedure?
13 A. Again, outside the expertise of
14 the TIGER team. You would have to ask
15 someone with the wells organization what
16 their involvement was.
17 Q. If any?
18 A. I do not know what involvement
19 MOEX either had or did not have. That would
20 come from the wells group.
21 Q. Okay. To your knowledge, did
22 anyone from MOEX visit the rig during the
23 drilling operations or temporary abandonment
24 operations for the Macondo well?
25 A. With respect to the parties of
00111:01 interest of the well, I have no knowledge as
02 to who did or did not actually go to the rig.
03 Q. At any time did MOEX or its

04 representatives provide technical advice to
 05 the TIGER team?
 06 A. I'm not aware of any technical
 07 advice that came to us via MOEX.
 08 Q. And you're not aware of any
 09 participation of any decisions that the TIGER
 10 team made by the MOEX representatives?
 11 A. I'm not personally aware of any.

Page 111:20 to 111:22

00111:20 BY MR. KINCHEN:
 21 Q. Hi, Pinky.
 22 A. Hi, Chris.

Page 116:17 to 117:16

00116:17 Q. I'm going to hand the witness
 18 what was previously marked as Exhibit 1343.
 19 It's the Martin Albertin e-mail of April the
 20 2nd with the attachment.
 21 Pinky, if you could turn to the
 22 last page of that attachment. Can you
 23 describe that for me. What is that document
 24 or that page?
 25 A. That is April 2nd, 2010. That
 00117:01 is the pressure integrity test at the
 02 9-7/8ths-inch liner.
 03 Q. And is that pressure integrity
 04 test a formation integrity test or a leakoff
 05 test?
 06 A. That is a formation integrity
 07 test.
 08 Q. Is there anything about the
 09 shape of the curve -- do you have any
 10 concerns about the shape of the curve?
 11 A. I have no concerns about the
 12 shape of the curve.
 13 Q. Based on the shape of the curve
 14 and the test results there, do you have an
 15 opinion as to whether that is a valid
 16 formation integrity test?

Page 118:13 to 122:21

00118:13 Q. (BY MR. KEEGAN) Do you have any
 14 opinions about the graph on that page?
 15 A. I do have opinions.
 16 Q. What's the opinion?
 17 A. This is a formation integrity
 18 test of a exposed 10 feet of open hole that
 19 has the appearance of being very strong.
 20 Q. And do you have any concerns

21 that the test was erroneous?
22 A. This is not an erroneous test.
23 Q. And why did you say that?
24 A. There is no indications on the
25 shape of the curve that would suggest to me
00119:01 that it was, quote, erroneous.
02 Q. Okay. You testified quite a bit
03 about the predrill data package. One of the
04 areas that you testified regarding was the
05 management of change.
06 When is the predrill data
07 package finalized?
08 A. Again, it relates to our stage
09 gate definitions. So we actually create the
10 predrill data package in the select gate, and
11 it is part of the documents that exist during
12 the signoff of that select to define gate.
13 Q. Once drilling has started, is
14 the predrill data package changed at any
15 time?
16 A. The predrill data package has
17 one date of issue. And there are no changes
18 to the predrill data package unless there is
19 additional information prior to drilling of
20 the well that suggests that the pore pressure
21 frac gradient curve may have some
22 information -- there needs to be some
23 information brought into it. We would update
24 with an MOC. We would only change that
25 particular figure in the predrill data
00120:01 package.
02 Q. And the TIGER team updates pore
03 pressure and fracture gradient information
04 while it's drilling; is that right?
05 A. The TIGER team, through our
06 specialist on the rig with our SPA in the
07 office, our accountability is per GP 10-16
08 that was entered into evidence yesterday.
09 That is a BP standard and a requirement by my
10 team to do it.
11 Q. How often do they update pore
12 pressure and fracture gradient information
13 while drilling?
14 A. We have a continuous
15 foot-by-foot assessment of pressure during
16 drilling.
17 Q. And does that updated pore
18 pressure and fracture gradient information
19 require an MOC to reflect the changes to the
20 information?
21 A. It does not.
22 Q. Once drilling has started, is
23 there any MOC requirement to change -- would
24 this be changed through an MOC?
25 A. It would not.

00121:01 Q. And by "this," for the record,
02 is the predrill data package, Exhibit 1312.
03 Mr. Vinson, who has access to
04 the TIGER team's pore pressure estimates?
05 A. The single-point accountability
06 on the rig.
07 Q. And when you say "the rig," who
08 do you mean, the rig?
09 A. That document exists on the rig
10 for any party on the rig to view.
11 Q. And is that information, the
12 pore pressure estimates, is that information
13 posted to well space?
14 A. It is.
15 Q. Who has information -- who has
16 access to information about the fracture
17 gradient readings or estimates?
18 MR. THIBODEAUX: Objection; form.
19 MR. KEEGAN: Basis?
20 MR. THIBODEAUX: Again, I don't need to
21 set forth the basis. Speaking objections are
22 not provided for in the PTO.
23 MR. KEEGAN: Paul, you should pull the
24 PTO up.
25 Q. (BY MR. KEEGAN) To your
00122:01 knowledge, who has access to information
02 about the fracture gradient estimates and
03 measurements?
04 A. That information exists in the
05 Houston office, so the subsurface team, the
06 TIGER team and the wells team have that
07 information. That information also is
08 available in the drilling well plan which
09 sits on the rig.
10 Q. And when you say "sits on the
11 rig," what do you mean?
12 A. We actually -- the wells group,
13 not the TIGER team, actually produces a
14 comprehensive well plan that describes the
15 entire operation of the well from start to
16 finish. And that particular binder, very
17 large, actually resides on the rig in
18 physical paper form.
19 Q. In the instance of a lost
20 circulation event, who would be aware of the
21 ECD at the time of the event?

Page 122:23 to 123:04

00122:23 A. The information is gained
24 through the PWD tool in the BHA, which means
25 it is picked up by the mud logging unit, and
00123:01 then it is displayed to all the various
02 parties on the rig. It would exist on the
03 rig floor, and I believe the company man

04 would also have access to it.

Page 124:02 to 124:09

00124:02 Q. (BY MR. KEEGAN) Are you aware
03 of who has access to the mud weight
04 information at any given time on the rig?
05 A. I am aware that that information
06 actually exists among various displays on the
07 rig. It is a critical element that has to be
08 known by the parties actually responsible for
09 carrying out the drilling operation.

Page 124:16 to 124:17

00124:16 Q. Are you aware of what data is
17 monitored realtime?

Page 124:19 to 125:07

00124:19 A. I am aware of parts.
20 Q. (BY MR. KEEGAN) What parts of
21 the realtime data are you aware of?
22 A. I am aware that we monitor
23 pressure while drilling. We have a
24 foot-by-foot estimate of ESD, ECD, flow
25 in/flow out, d-exponent, resistivity
00125:01 readings, gamma ray readings, sonic readings,
02 if in the BHA. We also have a measure of the
03 directional inclination and azimuth of the
04 well.
05 Q. And are you aware of who has
06 access to the realtime data from the
07 DEEPWATER HORIZON to the Macondo well?

Page 125:09 to 125:13

00125:09 A. In my large experience of
10 working on offshore rigs, that information is
11 readily available to all parties on that rig.
12 Q. (BY MR. KEEGAN) And do the
13 partners have access to the realtime data?

Page 125:16 to 125:17

00125:16 A. The partners do have access to
17 the realtime information.

Page 125:20 to 125:22

00125:20 Q. (BY MR. KEEGAN) How are you
21 aware that the partners have access to the

22 realtime data?

Page 125:24 to 126:06

00125:24 A. The realtime access is actually
25 provided. There is actually a request made
00126:01 by the party of interest, and the particular
02 INSITE system is set up for them to be able
03 to view that information.
04 Q. (BY MR. KEEGAN) And are you
05 aware whether the partners made that request
06 in this incident?

Page 126:10 to 126:18

00126:10 A. I am personally aware that that
11 request was made by Anadarko.
12 Q. (BY MR. KEEGAN) And how are you
13 personally aware that that request was made
14 by Anadarko?
15 A. I was asked by Bobby what was
16 our policy around realtime information being
17 given to parties of interest because it is
18 not a routine matter of course.