Deposition Testimony of:

Michael Williams

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00007:10 MICHAEL KEITH WILLIAMS
11 was called as a witness by the Plaintiffs and,
12 being first duly sworn, testified as follows:

Page 8:06 to 8:09

00008:06 Q. Morning, Mr. Williams. My name is David
07 Pfeffer. I'm an attorney with the United States
08 Department of Justice in the Civil Division in
09 the Admiralty Section.

Page 9:16 to 12:04

00009:16 Q. All right. As of April 20th, 2010, what
17 was your employment?
18 A. I was employed by Transocean as a Chief
19 Electronics Technician.
20 Q. And how long had you been in that
21 position up to that time?
22 A. Less than one year.
23 Q. All right. Let's go through your history
24 with Transocean, if you could. When did you
25 start working with Transocean?
00010:01 A. I believe my hire-on date was November
02 of 2007.
03 Q. All right. And what was your position at
04 that time?
05 A. I was a Roustabout.
06 Q. Okay. And just generally, if you could
07 tell me, what did -- what kind of things did you
08 work on?
09 A. As a Roustabout, I reported to the Crane
10 Operator, basically deck crew. We moved
11 equipment around as required, as needed, cleaning
12 and general maintenance -- or general
13 housekeeping.
14 Q. Okay. And --
15 A. No maintenance.
16 Q. Are you finished? I'm sorry.
17 A. I'm through.
18 Q. And what -- how long were you in that
19 position?
20 A. Less than two years.
21 Q. What was your next position with
22 Transocean?
23 A. After I had gotten my first permanent
24 assignment aboard the DEEPWATER HORIZON, I let it
25 be known of my prior work history and my Avionics
00011:01 Technician training in the Marine Corps. I was
02 given the opportunity to take some placement
03 tests that were, I guess, the standardized tests
04 through the Transocean fleet, proved my worth and

my knowledge base for electronics, and I was offered a position as an Electronics Technician Trainee.
Q. Okay. Do you know the approximate date in which you went into that position?
A. I believe it was April of '08.
Q. Electronics Technician, is that the title that you --
A. Correct.
Q. Okay. And at what point did you become the Chief Electronics Engineer?
A. Chief Electronics Technician --
Q. Pardon me.
A. -- approximately three months later.
Q. And what were the circumstances regarding that? I assume it was a promotion?
A. It was a promotion. It was a forced promotion.
Q. Okay. And what were the circumstances leading you into that position?
A. We had had some wholesale changes throughout the rig, from OIM all the way down to the Seamen. There were a lot of people moving to other companies, moving throughout our company, pretty much a mass exodus away from this rig.

Page 14:01 to 14:06

Q. When did you come onboard the DEEPWATER HORIZON for the first time?
A. July of '08, if I recall correctly.
Q. Did you work on any other rigs after you came onboard in July of 2008?
A. No, sir, I did not.

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Q. Okay. Can you just generally describe your background with electronics for me?
A. All four years of high school, I took an electronics elective, versus PE, or whatever.
Q. M-h'm.
A. And after graduating from high school, I joined the Marine Corps as an Avionics Technician.
Q. And how were -- how long were you in the Marine Corps?
A. A little over four years.

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Q. Okay. Let's walk through the responsibilities of -- or the position you had as

of April 20th of Chief Electronics Engineer. Can you just tell me a little bit about the responsibilities that your position required of you?

A. Yes. I -- well, we need to say Chief Electronics Technician. I don't --

Q. My apologies. I'll probably get that wrong a couple of times today.

A. I do not hold an Engineering degree.

That -- that's a very broad question. As I've explained, in the past, I worked on everything from the prop to the top. If it had a wire and a signal, sending to a computer or a database, basically, we were responsible for it.

Q. Okay.

A. From phone systems to safety systems.

Q. Okay. Did you work on -- well, did you have any responsibilities with respect to the BOP or its control systems?

A. I had zero responsibility when it comes to the BOP.

Q. Okay. Did you work on any of the BOP panels?

A. I worked on the BOP purge panel, yes, sir, I did.

Q. Okay. Can you generally describe what -- well, first, when did you last work on the BOP purge panel?

A. It was either the hitch when the blowout occurred or one hitch prior.

Q. And what --

A. The last function, the last time I serviced the BOP panel.

Q. What did that work entail?

A. There was an ongoing issue with the purge system, that it was unable to maintain purge in automatic mode; therefore, they were running it in bypass. At some point, I saw the Work Order when I became a Chief and elected to investigate it myself, several other Chief employees, I dug through their work notes, went through, you know, how they had troubleshot the system and -- and what their findings were.

I went up -- myself and a new Electronics Technician, who had taken my job, went up to try to resolve the issue.

Q. You -- do you hap -- do you know what the purge panel's function is?

A. Yes, I do.

Q. Okay. What is the function of the purge panel?

A. The function of the purge is to maintain a positive air pressure inside the BOP control panel. And the reason for that is the electronics inside that panel are not

intrinsically safe, which means they can generate a spark at any time, which in a hazardous location, which the drill floor is, that's not acceptable.

Q. And what does -- you mentioned a bypass setting. What does that setting do that's different from any other setting that that panel may have?

A. Well, there was two -- two setting options. There was automatic and bypass. It was performed with a key switch that was inconspic -- inconspicuously placed at the bottom of the box. You had to get down physically on your knees to get to it.

In automatic mode, the way this system was designed to operate was that you could open the access glass doors on the front of the panel. You could access any of the buttons for the functions of the BOP. If, however, there are sufficient leaks around the buttons or the

00019:01 gasket, when you open those glass panels in automatic, if it does not maintain a positive pressure of -- I -- I believe it's .2 psi, which is very low but it is positive pressure, then the panel power supply would shut down.

In bypass mode, it didn't care if the panel was wide open with the actual buttons exposed to the elements. The backside of the buttons, the wiring, the -- the intricacies inside the box could be exposed and the panel would maintain power continuously

Q. Were you instructed to place it in bypass by anyone in particular?

A. I was never instructed to place that piece of equipment in bypass, no.

Q. Okay. Did you -- did you make a decision to place that piece of equipment in bypass yourself?

A. No, sir, I did not. The only position I ever changed that piece of equipment to was automatic. I changed it from bypass to automatic.

Q. And this was either on the hitch -- was this either on the hitch that -- that the blowout occurred or the hitch prior, or did it occur --

00020:01 A. At a -- at some point before the blowout, yes, I had placed the equipment in automatic mode and ordered the -- the parts that were required to get it to reset itself versus having to be manually reset using a trick with my mouth, a piece of hose, and a piece of bubble gum.

Q. And there are multiple BOP panels on the rig, correct?

A. Yes, sir. There's two.

Q. And this particular BOP panel that we're

talking about, where was that located?
A. That was actually located in the Driller's shack.
Q. Okay. Did you have anything to do with the other BOP panel?
A. No, sir. It did not have a purge on it.
Q. Okay.
A. It was in a safe location.
Q. Do you happen to know if that purge panel remained in the automatic setting that you placed it in up to April 20th?
A. The -- the last time that I was called for that panel, it had gone down. Someone had left the back door open to the Driller's shack too long. The Driller's shack itself was also a
00021:01 purged environment. Someone had stood with the back door open too long. They had lost purge in that room. The alarm for the Driller was received at his station, and at the same time, someone had opened the doors to the BOP control panel, which it's designed to leak some air out.
You -- you can't have -- it can't be a completely sealed environment, because you pressurize a vessel, it becomes dangerous. So that when they opened the doors, with the lack of positive pressure in the shack and the lack of now seals from the glass doors, the BOP panel did power itself down.
Q. Was the setting --
A. In automatic.
Q. -- changed?
Was the setting changed after that, or did it remain in automatic?
A. My part of -- of that issue was they called me. The Assistant Driller Don Clark called me in my office, said that the panel was dead, I needed to get up to the rig floor immediately. By the time I had arrived at the rig floor, Mark Hay, Senior Subsea Supervisor, had al -- had beaten me up there -- apparently he
00022:01 was called, as well -- and he had flipped the key switch from "Automatic" to "Manual." The panel powered itself back up.
Q. Did you have any discussion about why it was placed in that setting at that time?
A. Yes, I did. With the BP Company Man that was present.
Q. Okay. And do you know the name of the Company Man at that time?
A. Yes, I do. It was Mr. Donald Vidrine.
Q. Okay. What -- can you just describe this conversation for me?
A. He asked -- I asked Mr. Vidrine if he would like me to place that panel back in automatic. At that time, Mr. Hay reported that,

"The entire fleet runs on the bypass. Leave it the hell alone."

I -- Mr. Vidrine looked at me and asked me do I know how to repair the system. I said, "Yes, I know how to put the system in automatic, but a permanent repair is going to require a part which I have on order," and had been on order for some period of time.

The decision was made that we would not flip that switch from "Manual," or bypass, to "Automatic" until the next rig move.

Q. So the expectation was that it would be placed back in automatic at some point?

A. Yes.

Q. Okay. You mentioned some of the other systems that you work with, and I believe you said safety systems. Did I hear you correctly?

A. Yes, sir.

Q. What would be encompassed within the safety systems category?

A. Fire and gas system; ESD Systems; all the IACS, Integrated Automatic Control Systems; PAGA, which would be our loud speaker system. Anything associated with those.

Q. With respect to the fire and gas system, does that -- does that system work in conjunction with any other safety systems?

A. It does. It works in conjunction with the IACS, which is the Integrated Automatic Control System. There are several pieces of -- of the Simrad Safety System that -- that are comprised of a -- of a fire and gas, an ESD vessel control, thruster control. There -- it's a -- a very large series of subsystems that all report back to a central system.

Q. How about the -- the emergency shutdown system, does that have any interaction with the fire and gas system?

A. Yes, sir, it does. It is in the Cause and Effect Matrix.

Q. Okay. If fire and gas is detected on the rig, what is the response of the emergency shutdown system?

A. It depends on where the gas or fire is located and depending on what mode the outputs of those sensors are placed in.

Q. What are the different modes that the sensors could be placed in?

A. There are, off the top of my head, at least four modes. There's a -- just your normal active mode. There would be a passive mode. There would be an inhibited mode, and there would also be an override mode.

Q. So what happens in active mode?

A. In active mode, the -- the sensor's data

is used by the entire IACS system and would follow the flow chart of the Cause and Effect Matrix.

Q. Would the emergency shutdown system automatically activate the dampers and close off airways if it's set in automatic -- in active mode?

A. In some instances, yes.

Q. Okay. Are you aware of where the fire and gas sensors are located with respect to any air intakes near the engine room?

A. Every one of them, yes, sir.

Q. Okay. Let's walk through those air intakes. Can you tell me where the -- the air intakes that include fire and gas sensors near the engine room are located?

A. There are -- all the sensors are on the aft side of centerline of the rig. The first air intake would be on the port side. There's a combustible and toxic sensor there. Underneath the riser skate there's another two sets of intakes that would each have a fire -- or a toxic and combustible. And then on the starboard side there's also another air intake that would have a toxic and combustible sensor.

Q. Four total air intakes to the engine room?

A. That I'm aware of, yes, sir.

Q. Do you know -- first, do you know what setting that those ESD functions related to these four air intake systems into the engine room were running in on April 20th?

A. You'd have to rephrase that question. It doesn't make technical sense.

Q. Sure. On April 20th do you know what mode the ESD system was running in with respect to these four sensors at the air intakes to the engine control -- into the engine room?

A. I -- I have no idea.

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Q. Let me -- let me rephrase to be more specific in time frame. Do you recall at any time knowing what mode those sensors were running in?

A. Well, first of all, let me clarify, they're not ESD sensors. ESD is a system that is the emergency shutdown system. It relies on data from sensors; however, they're not ESD sensors. So we need to clarify that.

These are toxic and -- and combustible gas detectors. They're going to sense what level of gas is coming into them. They're going to send a 4- to 20-milliamp signal to a computer

that is going to analyze that data and give a percentage readout on a display for whoever wants to look at it.

Those sensors would all be in an active mode at all times. There's no reason they should ever be put in a passive, overridden, or inhibitive state un -- un -- with the exception of two possibilities: Number one, maintenance and, number two, testing, required testing.

Q. All right. So just to make sure I have the terminology correct, if I'm -- if I'm going to ask you about what row -- what mode the ESD was running in in relation to the sensors, the basic connection between the two is that the sensors detect the presence of gas or fire. The ESD is basically a software setting that responds to the detection of those sensors; is that correct?

A. Correct.

00028:01 Q. Okay. Do you know at any time prior -- at any time prior to April 20th what the ESD setting was with respect to any detection of gas by the sensors at the air intakes to the engine room?

A. The ESD specifically, no.

Q. You mentioned that you performed maintenance or testing on the sensors, correct?

A. Yes, sir, as required.

Q. When was the last time prior to April 20th that testing or maintenance was conducted on the sensors, specifically at the air intakes to the engine room?

A. Within the last month.

Q. Were any problems detected with respect to those particular sensors?

A. I -- I'm sure there were.

Q. Why -- why do you say you're sure there were?

A. There -- because of the environment that they're in and that we operate in, these sensors are exposed to the elements 24 hours a day 365 days a year. They get salt in them. They get dust in them. They get barite in them. They get all sorts of nasty things in the filtering

00029:01 elements. They need to be cleaned out periodically, and they need to be tested.

When we test them, our -- our -- our first goal is to see if it responds. Our second objective is to see if it responds at the right percentage of the -- the gas that we're putting to it. And then the third thing is to see if it will come all the way back down and settle out back to zero where we started.

And then the sensors that were exposed to the elements, which we're talking about air

intakes which were exposed to the elements, sometimes would not settle back down. They may show 2, 3, 4, 8 percent gas 30 minutes after the gas had been removed from them.

Now, we would usually leave those sensors in a passive state for a period of three hours or so to let them settle down completely, and if they didn't, we would go back and simply rezero the sensor, so that it now thought that that position it's in, that ambient air that it's seeing is a zero level gas condition.

Q. Were you personally involved in the -- the maintenance that occurred on these sensors approximately a month prior to the blowout?

00030:01 A. Yes, I was.

Q. Okay. Do you recall any specific issues that required replacement or repair to those intake sensors?

A. Yes, I do.

Q. What --

A. The starboard air intake had recently been changed out. I changed out the computer board inside and the sensor itself.

Q. Are -- were there any others?

A. I had replaced one in the Assistant Driller's cabin that I can recall and maybe one by the pipe rack, pipe conveyor up on the drill floor. I mean, there -- it's -- it's an ongoing battle because they're in the elements, they're exposed.

Q. If the ESD is running in active mode and the sensors at the air intakes to the engine room detect a high level of gas, what should happen?

A. My understanding is that they were supposed to close.

Q. And when you say "they were supposed to close," specifically what do you understand would happen?

A. There are very large dampers inside those

00031:01 air intakes. They're pneumatically controlled. My understanding is that when they sense gas in -- in two zones, two sensors in one zone or two adjacent zones, that those should have, in fact, closed.

Q. Is that to shut off air to the -- to the engine so that the gas doesn't cause engine overspeed?

A. My understanding is that it was so that you do not pump gas into a confined space.

Based on -- I base that knowledge on every Saturday, we barbecued on the front lifeboat deck. And they would grill steaks, what have you. The smoke from the fire, when they would initially light the fire, would go to the galley intake vent, which also had a toxic and

combustible sensor on it, and if the wind was just right and the smoke was just thick enough, it would go into that sensor.

And before they could -- they, on the bridge -- could respond to the alarm, it would trip the -- it would trip that damper closed, and it would shut off the air conditioning inside the accommodations on one-half of the accommodations.

That's how that system, when it senses gas, it wants to make sure that gas that it senses in that location does not get pushed inside the rig, that it stays on the outside of the rig.

Q. Do you recall any circumstances in which the ESD to the air intakes for the engine room were ever activated and the dampers did, in fact, close?

A. Yes, I do. And it -- it is secondhand knowledge. I never per -- personally witnessed it. My Supervisor, Tommy Daniels, while training me for my job, explained the risks of dealing with ESDs, and his own personal experience while troubleshooting an ESD, that he had inadvertently touched some wires together, which simulated pushing the button while the system was active.

Well, whether he used a meter or -- or somehow or another he was able to get the signal to go through inadvertently. When it did, the dampers closed. When the dampers closed, there was actually the doors to the spaces to the engine room itself were ripped clean from their hinges.

Q. Did that -- as far as you know, did that prompt any alteration to the settings on the system?

A. It's not entirely clear to me what they changed. I've read the Report. There was a Report filed on that incident. And there was a -- an Engineering document that I've read since then, but it's not real clear what the changes were. All I saw were recommendations.

Q. And just to be clear, when you're testing the -- the sensors around the rig, you're not testing the ESD system, correct?

A. Correct. I'm testing the actual physical sensor.

Q. Okay.

A. Now, if I could add one thing, I have tested an ESD, one, ESD No. 4. We spent about a year investigating what exactly would happen, what the ramifications and implications were of pressing that button. That was the drill floor package. ESD4 controlled everything on the rig floor.

We successfully tested that ESD.

Everything that was supposed to happen, happened. Everything was able to be reset, and -- and right back to work. Within 45 minutes of pressing the button, we were back to normal operations.

00034:01 Q. All right. Are you aware of any malfunction or problems outstanding with respect to the ESD as of April 20th, 2010?

A. Like I -- again, it's not personal knowledge, but there was a -- another ESD test during a BP -- a DP blackout test, where thrusters were damaged and did not restart on their own after an ESD/DP test was conducted.

Q. Aside from that, are you aware -- or personally aware of any --

A. Not personally.

Q. -- issues with the ESD that are outstanding as of April 20th, 2010?

A. None.

Q. Okay. Did you also perform maintenance and testing on the engines themselves?

A. Rarely.

Q. Okay. Who -- who was responsible for that work?

A. That would be the Engineers.

Q. Okay. And if we could just go through, for the record, the chain of supervision above you with respect to the Electronics crew. So who is your boss?

A. My boss would have been Tommy Daniels

00035:01 and/or Stanley Carter. They were both -- their title was Electrical Supervisor.

Q. Okay. And who -- who was above them?

A. They reported to the Maintenance Supervisor.

Q. Do you recall a name?

A. They were -- yes. Steve Bertone. And the new guy -- I mean, that was a revolving door. That job was never constant. I've probably seen five Maintenance Supervisors in a year.

Q. Who did Mr. Bertone report to?

A. He reported to the OIM.

Q. For this particular hitch, is that Jimmy Harrell?

A. Yes, sir, it was.

Q. And just to be clear for the record, when we talk about ESD, that's something different than what we refer to as the EDS, correct?

A. Correct.

Q. ESD is the Emergency Shutdown System.

A. Correct.

Q. And the EDS is the Emergency Disconnect System, which is another thing entirely, correct?

A. Correct.

A. We had a computer program designated RMS, Rig Maintenance System, I believe it was Version 2, that would generate, daily, a work list that would have corrective maintenance and preventative maintenance, as well. It would also have upgrade, what we call upgrade maintenance. There were -- there were several topics that could be involved there. Mostly for my part of it, I saw corrective maintenance and preventative maintenance.

Q. Okay. Is there any reason why -- well, scratch that.

If you conduct maintenance that's listed in the RMS, do you then go in and record an entry identifying completion of the -- that particular item in the RMS?

A. Yes, sir, I did. Along with my time and what steps I took, and what -- sometimes the PMs would ask for specific voltages on batteries, amperage being drawn, the hour meter. They -- they would ask for different things, and I would have to annotate those in that -- in that RMS job.

Q. Okay. Was that an effective system for conducting the preventative maintenance that needed to be done on the rig?

A. Absolutely.

Q. You don't have any criticisms of the -- the preventative maintenance plan through the RMS at all?

A. Criticism, no. We were battling through some growing pains. The system had just come online July of a year -- a year ago July, and that was -- there were some -- a lot of duplicate entries that were some Corporate PMs that we were doing as a local level PM. So it was either they needed to delete one or the other. It's -- it's not that we cared which one. It's just when a -- for like -- for instance, a 14-day PM on -- on OS stations, I didn't need to have three of those come at me on the same day, when it was the exact same job. So we were continuously, or in the process of sending in requests to eliminate the two duplicates.

Q. Okay.

A. Other than that, it was a very effective way for us to track our -- our work.

Q. Did the RMS system assist in keeping the maintenance up to date?

A. You'll have to rephrase that.

Q. All right. Did the RMS system assist with making sure that maintenance was timely conducted in -- in accordance with the level of need that any particular piece of equipment required?

A. I would have to assume that was its intent. However, Operations dictated otherwise.
Q. And what do you mean by that?
A. Say, for instance, a pipe racker PM, we had one that came out every 30 days that required going in a man rider or a basket and going from the very bottom of this thing to the top of it, inspecting every J box, every cable tray, every landing. If we were in the middle of drilling, their -- the drill floor is not going to let you up there to conduct that operation, so it would have to be put off.
Q. All right. Were -- was preventative maintenance on the rig something that was generally behind schedule?
A. Continuously behind schedule.
Q. All right. How far behind schedule?
A. H'm, that's subjective. I mean, it's -- some systems were way behind, others were not behind. I mean, it's -- just depends.
Q. Okay. Was equipment on the rig well maintained?
A. Some equipment, yes. Not all.
Q. What equipment springs to mind that was not well maintained?
A. The pipe rackers.
Q. Okay. Anything else?
A. Yeah, the Driller Chairs, A, B, and C-Chair.
Q. Is that simply a function of the fact that if that equipment's in use for a drilling operation, you can't get in there to do maintenance?
A. Yes and no.
Q. Okay. Why not?
A. They're -- BP wouldn't allow the down time to change out the computers that needed to be -- desperately needed to be changed. We were given opportunities to change out hard drives, you know, internal, which is a 10-minute process, versus changing out entire computer systems, which is what was needed. The computers that we were using were -- were outdated from the day they were installed. The software that was in them was a very outdated Windows NT, and it was very unstable.
And everyone knew this. It would frequently cause the Chairs to lock up or give erroneous data. And -- but we simply weren't ever given the time to shut down long enough to change those computers out, get them back in sync, and get us back to working.
Q. Were there any other systems where that same problem occurred?
A. Yes, the pipe rackers. They were -- they

were garbage.
Q. Okay. Anything other than those two?
A. In -- in my work scope, no, that -- those would be the -- the worst two.
Q. What basis do you have specifically for attributing those deficiencies -- deficiencies to orders given by BP?
A. If they won't shut the rig down, we -- we can't fix it.
Q. Okay. But I'm asking you: What's your basis of knowledge for saying that that was BP's decision?
A. When I asked my Supervisor, you know, "Can I have enough time to repair the Chair the right way," and he says, "No, BP says we're not shutting down that long, because we don't know how long it will take to get back up, we can't give them a definite answer that it's going to take a week, a month, or a year to get, you know, back to 100 percent" -- which I mean, we were not at 100 percent anyway.
But to -- to know that the system would go back through commissioning and -- and be able to safely go back to drilling, we could not give them a -- a -- a direct date.
I was asked on occasion if I could provide a timeline. "How long do you think it would take to change that stuff out and get it all working right?" And there's simply no way to know. It's a brand-new computer and a brand-new software system.
Q. Do you have any personal knowledge of whether other Maintenance Divisions experienced similar problems?
A. Yes, the Engineers had -- had big problems.
Q. Okay. And what specifically do you know that the Engineers have problems getting up to date on maint -- outstanding maintenance?
A. On their saltwater service pumps. There were supposed to be eight saltwater service pumps available. We only had one at one point. It had gotten that bad.
They had sea chest valves that were leaking, which are the -- the valves that lead to the water, 70, 80 feet below the waterline. And we desperately needed to go to the shipyard to get that kind of -- get those types of things repaired and replaced.
Q. Did you discuss the concern about the way that, at least your Division, was behind on maintenance because of the lack of down time with anyone at Transocean?
A. Yes, my Supervisor.
Q. Would that have been Tommy Daniels?

A. Or Stanley Carden.
Q. Okay. And what was their response?
A. Deal with it.
Q. Do you know whether they discussed that problem with anyone else?
A. No, I don't.
Q. So was it common for maintenance tasks to be overdue on the DEEPWATER HORIZON?
A. Yes.

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Q. All right. Which shift did you work on April 20th, 2010?
A. That was my first day tour of that hitch.
Q. Was that an 11:00 a.m. to 11:00 p.m. shift or 12:00 to 12:00?
A. It -- it should have been, but it was a -- what we call a short change day --
Q. Okay.
A. -- where I had worked till midnight the night before and then -- let's see. No, I'd worked from midnight to 11:00, and then I went to sleep for about three hours, and then I was back at work at 4:30.
Q. So on the day of the blowout, you -- your workday actually started at 4:30 p.m.?
A. Correct.

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Q. Okay. So just to be clear for the record, then, what shift did you work on -- what shift were you scheduled to work on April 20th?
A. On April 20th I would have worked 11:00 A.m. to 11:00 p.m., the day shift.
Q. Okay. Did you -- did you attend the Pre-Tour Meeting on --
A. Yes, I did.
Q. -- the 20th? Okay.
Do you recall what tasks were discussed at that meeting?
A. Yes, I do.
Q. What -- what was going to happen on Ap -- what was planned for April 20th that was discussed in the Pre-Tour Meeting?
A. The -- the general day's plan was to displace the riser, set a seal assembly, conduct negative testing, and start offloading mud to the boat.
Q. Okay. What particular tasks that were discussed would you have been involved in?
A. Zero.
Q. Do you recall anything that stood out

about that particular Pre-Tour Meeting?
A. I do. Mr. Kaluza was sitting directly beside me in the -- in the meeting room. Mr. Harrell was going over the steps of the displacement and Temporary Abandonment. In -- in those steps, Mr. Kaluza interjected and said, "Well, I just got a different procedure" from wherever. I don't know where he got it from, but he had a different procedure that didn't line up with Jimmy's.
And Mr. Jimmy said basically, "No, we're doing it this way, because this is what I -- you know, until I see differently, this is the way we're doing it."
Mr. Kaluza said, "Well, I'm telling you I've got the change."
And at some point before the thing got completely out of hand, Mr. Revette stepped up and said, "You know, guys, we'll -- look, we'll go up to the rig floor. We'll work this out. You know, everyone else needs to go to work."
Basically he was defusing the -- the situation. The tension was rising in the room.
Q. What was the -- what was the tone of the conversation overall?
A. Argumentative.
Q. And Mr. Revette suggested that this be resolved outside the scope of the meeting?
A. On the rig floor itself.
Q. Okay. And you weren't present for any further discussions regarding that issue?
A. No, sir, I was not.

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Q. Around this time on April 20th, was there any pressure to speed up operations on the well?
A. Always.
Q. Okay. What do you mean by -- by that?
A. Just a general consensus around the rig was that the -- the bonus was, you know -- the well bonus was out the window. We were way far behind. We had been stuck real bad in the -- in the middle of this well and lost, you know, several million dollars in fluid and equipment. You know, we had already started conducting training for the next wells that we were going to, which was Kaskida. Our Sunday Safety Meetings were already starting to focus on that. So it -- it just seemed like, you know, they were in a real big hurry to get out of here and get to the next one.
Q. You said "general consensus." Is that -- are you referring to all the workers on the rig?
A. The people that I spoke with, yes. I had

interaction with -- with, like I said, everyone, from the Cook to the Maintenance Supervisor and, you know, anyone in between. H'm, a Chief Electronics Technician doesn't have a lot of pull on a rig, but I've got a lot more than most, so people would sometimes voice these things to me.
Q. Where did this pressure gener -- originate from, from your perspective?
A. Just how fast they were drilling, how fast they were moving, how hard they were pushing to -- to get this thing completed and get on to bigger and better things.
Q. Okay. Was there any pressure directly from -- let's start with Transocean folks on the rig?
A. To my knowledge, no. If anything, Mr. Jimmy was trying to slow everything down.
Q. Okay. So did the pressure to speed up come from BP?
A. I believe --
MR. LEEFE: Objection, form.
MR. PENTON: You can answer.
A. In my opinion, yes.
Q. (By Mr. Pfeffer) Okay. And what's the basis for your opinion?
MR. LEEFE: Objection, form.
A. Based on the fact that it's costing them a half a million dollars a day to operate this rig in a well that's completely out of control.
Q. (By Mr. Pfeffer) Did you have any particular discussions with anyone from BP about the speed at which operations on the well were proceeding?
A. Not direct conversations, but I was on the rig floor and witnessed when a Company Man was really pushing the Driller to increase the rate of penetration, to a point that he actually blew the bottom of the well out.
Q. And what did that circumstance lead you to believe about the speed at which operations were proceeding?
A. That's what I based my -- you know, we're trying to hurry, we're -- there was no need to push that bit that hard at that point. The -- the rate of penetration was already, in relative terms, speaking with the Driller -- I mean, we were already drilling at basically maximum rate, and he's trying to push it even harder.

Page 54:16 to 55:10

Q. Prior to the blowout, while you were working on the rig, were you aware of any problems that were created by the speed of -- of the operations that were being conducted on the

rig?
A. Yes. After I left the drill shack during that time where he was instructing the Driller to -- to increase the penetration, when I got off tour and came back on tour the next day, we were stuck.
Q. Anything else?
A. The -- the well had collapsed, and we were completely stuck.
Q. Were there oth -- any other problems that you noted to be a result of the speed of operations?
A. Sure. The pipe rackers were wore out from tripping pipe, as they -- as much as they had to trip pipe based on the speed that we were moving. Everything was going at full tilt.

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Q. Okay. Prior to April 20th, were you on the DEEPWATER HORIZON when -- on the Macondo Well when the rig took a kick?
A. Yes, I was.
Q. Okay. What were you working on when that happened?
A. We were having issues with the -- with the Chairs.
Q. Okay. And where specifically on the rig was -- did this -- did the work you were doing happen?
Str -- strike that. That was a terrible question.
A. Thank you.
Q. When you say you're "working on the Chairs," where -- where were the Chairs?
A. In the Driller's shack, the CyberChairs, A, B, and C.
Q. Okay. So you're in the Driller's shack working on the Chairs. What specific work were you doing?
A. They were having issues with the software locking up and a -- what -- what we termed or coined "the blue screen of death," where the Driller would -- would be looking at two -- two monitors side by side, looking at all of his parameters, and all of a sudden just the screens would turn blue, and he would lose all of his data.
Q. So that had happened, and you had been called to the Driller's shack; is that correct?
A. Yes. Numerous times.
Q. All right. And on that day, they had gotten the blue screen of death, and you're in the Driller's shack working, correct?
A. I -- I have been, yes. And -- and that

day, I -- I would have to look at RMS, I would have took at a calendar to -- to know if it's that exact same day.
Q. Okay. Was the hitch prior to the blowout, or --
A. To --
Q. -- do you recall?
A. To the best of my memory, yes.
Q. What happened while you were working on the Chairs?
A. The Chairs were brought back up, and we thought everything looked right. The trend data at the bottom was frozen. We couldn't get the trends to work. Wasn't exactly sure why. He then switched over to the B-Chair while we continued working on the A-Chair and --
Q. When you say "he," just to interrupt you, who is "he"?
A. It would have been either Brandon or -- or -- Brandon Burgess or Dewey Revette. It could have even been Patrick Morgan, the AD that was filling in for Brandon when some other things had happened. I don't recall exactly who it was. It would have been the Driller, whoever the designated Driller that day was.
Q. Okay. And then what happened next?
A. We were able to dig into the software and find the tag lo -- tag replicator, which was misfiring. It wasn't communicating somehow through the servers, and we were able to re-establish that connection, get the tags to start replicating, and the -- the data then became true again.
Q. And I think you said that this had happened frequently?
A. Yes. All the time.
Q. Okay. And is there a -- a reason why this couldn't be fixed?
A. It was outdated software, no longer supported.
Q. Was there a fix that you are aware of that could have been undertaken, that hadn't been taken yet?
A. Absolutely. We had the computers, the software, and all the hardware necessary, located just below my Shop, in storage.
Q. Okay. And why hadn't that work been conducted?
A. BP wouldn't let us shut down long enough to change them out.
Q. What else -- what happened next on the rig?
A. We took a kick, got stuck, sheared pipe off -- I mean, the -- the whole incident in March.

Q. Okay. Do you reca -- remember -- well, scratch that.
Were you in the Driller's shack when the kick came up?
A. To my knowledge, no.
Q. You weren't. Okay. It was later --
A. I -- I heard about it through other channels, maybe through my Relief or scuttlebutt around the rig.

Page 60:22 to 93:03

00060:22 Q. Okay. I know you said you didn't work directly on the BOP, but are you aware of any problems with the BOP around the time just prior to March -- or just prior to April 20th?
00061:01 A. I recall an incident that -- that I think was a problem with the BOP, when Patrick Morgan, the AD, was subbing in for Brandon Burgess. And I think his name actually might be Michael Burgess. I knew him as "Brandon." He was filling in for someone else who was filling in for someone else. They just shuffled everyone one position up temporarily. While he was conducting a test of the BOP, or the well, eith -- either one, the upper annular was in a closed position. And during this test, there was a block movement detected from 10 to 20 feet, 15, maybe 20 feet, of upward block heave.
I was called about 10:00 o'clock at night by the on-tour Toolpusher, who was John Deshotel, and requested my presence to find out and to investigate whether or not the stick was pushed or whether the computer, this unreliable Chair, moved the block by itself.
Q. Were you able to determine which it was?
A. Yes, we were. Myself and Tommy Daniels, Electrical Supervisor, dug into the data logs of the Chair, from the -- from another Chair -- there's three, and they're all connected via servers. We were able to dig in through the data
00062:01 and find the input that, yes, there was a positive input on one of the sticks. We could not determine which stick, left or right, simply because the tags were not well-defined in the data logger, but we did determine that one stick was, in fact, pushed in a positive direction.
Q. What happened next from -- from that point?
A. We saw the indication in the trends, because we also had the trends pulled up at the same time. We saw a huge spike in hookload, where the -- where the block was going up with the annular, or whatever was closed around the drill pipe was putting enough drag on it that we

saw almost a hundred thousand pounds of block load, whereas there should have been zero. If the block wasn't moving, it would have been zero.

Sometime after that, and it -- it could have been that same hitch, later in that hitch, or the very following hitch. I happened to be in the Drill shack, troubleshooting either a Chair or the BOP panel -- I can't remember which. It was one of the two, because those were my problem children -- when a Sperry-Sun Representative walked in the back door with a double handful of rubber chunks.

Q. And did you learn what those chunks were?

A. My opinion were that they were annular rubber. The -- what else could be down in the hole? The -- the earth is made of, you know, dirt, sand, rock, whatever; it's not made out of rubber. The only thing I know of down there that that could have been was annular rubber.

Q. Did you discuss it with anyone?

A. I did. Mark Hay was present in the shack when this -- when this occurred. And I asked Mark, I was like, "Man, that doesn't look good. You know, it -- it -- it looks excessive."

And he says, "No problem. There's no -- nothing for you to worry about."

Q. Did he identify where it came from?

A. He did not.

Q. I'd like to ask you some questions about the blowout. And, again, as I mentioned before, if at any time you need to take a break, you just let me know.

Let's go to about 9:00 o'clock on the -- on April 20th. Just tell me what you experienced at that time and what was going on.

A. At about 9:00 o'clock, I would have been just finishing up with the crane or in transit back to my Shop. In that time period, a few things occurred that I believe are relevant.

Number one, I was coming down from the crane. I noticed a large hatch open on the Schlumberger deck that I had never seen open before. I didn't even realize there was a hatch there. Walked over to -- just to look in to see where it even went, and what we could observe from up there was about 20 foot above the drawworks drum, which is what pulls the line that pulls the block up and down, we could see that through the hole. We could see the choke and kill manifold, and then we could also see a -- around the back side of the Driller's cabin, the -- the -- the path that leads to the -- the Driller's cabin from the -- what we call the "back way."

Q. And this is an area of the rig that you

hadn't had much experience with before?
A. I'd had lots of experience. I'd just never seen that particular wall opened up. It was a wall similar to the one behind you, that -- that apparently does open. I -- I didn't even know it opened. We had never had a -- an occasion to open it while I was on the rig before.
Q. Okay. So did you go through there?
A. No. It was a -- it was a fall straight down. We simply looked through the hole, and the thing that -- that I remember that is curious was there was a Floorhand on the choke and kill manifold, which would be on the right-hand side as we're looking down into the port, into this hole, and he was up on the catwalk, making an adjustment to the choke and kill line.
I don't know what he was adjusting, what line he was adjusting, which valve he was on. I just know that I seen him turning handles, turning the -- the valves. They're unmistakable. They're huge.
Q. Where did you go from there?
A. From there, I dropped Will Jernigan back off at his Shop, the Chief Mechanic, which was also on the way to the coffee shop. I believe I grabbed a -- a glass of water out of the coffee shop and a bag of chips and proceeded back to -- to my work area in the Chief ET Shop.
Q. Okay. And the Chief ET Shop, is that near the Engine Control Room?
A. It is directly adjacent to it, yes.
Q. Okay. Once you got back to the ET Shop, what did you do?
A. I began -- actually adj -- also prior to that, while we were on the Schlumberger deck, I recall hearing the -- a page over the intercom system by a Sperry-Sun Representative, of gas levels, at whatever part they were. I don't recall the -- the parts per million. I just recalled hearing that and -- and thinking then that was unusual, because mud shouldn't have been flowing, and if there was no mud flowing, there shouldn't be -- getting gas readings.
So that -- that was unusual and -- and stood out in my mind at that time, that, you know, why -- why would they be giving a gas reading now, when we're supposed to be pumping this well down or -- you know, pumping the mud out and doing the Temporary Abandonment Procedure.
Q. Were announcements of gas levels common on this particular hitch?
A. On this particular well, yes, and this hitch, yes.

Q. All right. If we go from there, once you got back to the ET Shop, what -- what did you do next?
A. I completed some Work Orders that I'd worked on. There was a Work Order generated for resetting the boom limits on the crane, which is the reason I was on the crane. I'd finished making those notes and annotations.
I'd also completed some PMs prior to working on that crane, and I was -- was completing that work. Once I got done with that, I'd actually made a phone call home to my wife.
Q. All right. You were on the phone with your wife, and then what happened next?
A. Sometime during our -- our 10 or 15-minute conversation, she asked me if I needed to get off the phone, and I asked her, "What for?"
She said, "Well, I heard the page in the background about the gas levels."
And I told her, you know, that -- that it doesn't normally concern me what the gas levels are until they get above a certain rate. If they get above 200, I know that there's no welding going to be allowed, no cutting, any -- no spark generation, no outside smoking, things of that nature.
I didn't normally concern myself with the gas levels, other than to be aware of them. In my line of work, I didn't normally generate sparks. I would normally go fix things that were sparking, not generate sparks.
Q. Okay. At that -- at that time, did you finish your phone call?
A. I did. I -- I got off the phone with her and -- and continued back into the RMS system to get an overview of my next day's activities, as well as to do what we called a Handover Log.
Every day at the end of my tour, from January -- or July 25th of last year, up until the day this thing exploded -- on every occasion, I completed a Handover Log in the RMS system that explained -- sometimes in detail, sometimes vaguely -- all the things that I completed during that tour, so that my Relief would have a clear picture of what I had done, when I had done it, and, you know, the results of that.
Q. All right. And about what time did you finish your phone call with your wife?
A. Approximately 9:20 to 9:30, somewhere -- somewhere in that range.
Q. All right. Well, while you were working in the RMS, what happened next?
A. I heard a bang, I heard a hiss, and I -- I put the two -- I put them in -- in the context

of the riser skate, which is what fed the material in and out of the rig floor. They had a very common problem of running the riser skate into the metal backstop. And that metal backstop was actually welded to the floor, which is my ceiling. So ev -- every time they would hit that metal backstop, it would shake me in my chair, so I -- it was not uncommon for them to slam that thing into there, just to make sure I'm awake, or that I'm -- you know, whatever. It was -- it was an ongoing thing.

So I associated the boom, the bang with that, and the hissing noise being that they rammed it so hard that they actually blew -- blew some hydraulic lines. That's what -- the two noises that I heard at that point.

Q. And now, what did you do?

A. I -- I thought about it for a second. I thought, oh, here we go again, I'm going to be, you know, working over and up there, I got to go find out what's going on. If there is, in fact, hydraulic fluid going everywhere, someone needs to know. We need to go get the pumps shut down, get the right people involved, get the thing repaired.

So I -- I started to push back away from my desk to -- to get up and go find out what's -- what's hissing, what's leaking, because it sounded like hydraulic fluid under great pressure.

As I'm pushing back away from the shop, I hear the engine, which would be Engine No. 3 on the port side start to increase in speed, and it has a normal tone that it always -- you know, as it's running, you can -- you understand that it's running. It has a normal volume and a normal frequency.

And it started to speed up and was going faster and faster and faster, and I'm thinking, oh, this is -- what the hell is going on in there, are they testing the shutdowns, you know, what are they doing? And -- and -- and all this happened in a very short period of time now.

The lights began to really increase in -- in brightness, the lights similar to the ones in this room, fluorescent lighting, and as I'm pushing back away from my desk, my computer monitor literally pops. The LCD in the monitor pops.

As it's popping, I -- I jump up out of the chair. All the lights in the shop pop. And -- and when I say "pop," I mean, not just go dark. I mean, the bulbs themselves physically exploded. Glass is flying everywhere. The engine is still racing, and it's real obvious

that something bad is going wrong, so I know I need to get out.

While all this is happening, I'm also hearing through the ventilation system of the ECR -- I'm hearing the panel, the local panel beeps, and they're, you know, beep, beep, beep, beep, one behind the other, just as fast as they can hit the acknowledge button, they're steadily beeping. So all this is happening, you know, really fast.

By the time I can grab a hold of the handle, the engine, in -- in my opinion, is maybe three times faster than I had ever heard it run. I mean, it's way up there, like, you know, in your own personal car, imagine, you know, pushing the gas pedal to the floor and just hold it.

00072:01 That's what it sounded like, just racing away.

As soon as I grabbed for the handle, a big whoosh noise, and the -- a huge percussion and explosion that hit me with the door, me and the door ended up on the other side of the shop.

Q. All right. Were you injured at that time?

A. I would say yes.

Q. What did you do next?

A. I had a small pen flashlight in my left shoulder pocket. I took it out, because I couldn't see. I turned it on and put it in my mouth, still couldn't see. Tried to make my way back over to where my desk was. I -- I knew I had just gotten a drink, so I was trying to get the water off the desk and -- and maybe pour it in my eyes and see if I could see what in the world was going on.

I could feel heat, but I couldn't see fire. I could smell smoke, a lot of different things going on really fast. And I went to reach for my desk, and my desk is not there. The -- the floor tiles, I'm -- I'm falling through the floor system, which was a -- an elevated-type false floor with wire trays underneath. So

00073:01 nothing is where it's supposed to be.

I -- I have to get outside. The -- I'm -- I'm having a very hard time breathing. My left leg and ankle are not wanting to work. My left arm is not wanting to work. I can't see. And I -- I've decided I've got to make it outside, I've got to get -- get outside to some oxygen.

Q. All right. Were you able to get out of the ET Shop?

A. I was able to get out of the ET Shop. I crawled down the three steps, made the left-hand turn out of the shop, feeling my way along the wall. I reached up to grab the -- the next door,

next fire door, which would have led me into the ECR, and at the same instant I grabbed that door, a second explosion blowing that door off the hinges and me, and who I believed to be Doug, the Engineer, was on the back side of that door, and we all went down the corridor again.

Q. From there, where did you go?

A. Well, from there, I got really, really pissed off at these doors. They were supposed to protect us from fire, and here they were beating me about the head and face, body, whatever. I made a decision and determination that the rig wasn't going to kill me, and that I was going to get outside to oxygen and get an idea of just exactly what in the world is going on.

I had to go through the ECR to get to this outside door. The floor in -- in the ECR was identical to the one in my shop. There's a false floor with cable trays and the like underneath.

As I'm feeling my way through there, there's no tiles, so I'm having to go across the grid work that's remaining. All of my reference points, computer consoles, trash cans, drinking fountains, desks, none of that stuff is where it should be as I'm feeling my way out. It's -- it's all displaced, fallen in, blown out. I don't know where it's at. It's gone.

But I do see a -- a glim light at the back, and I made my way out towards that light, which was the watertight door leading to the aft lifeboat deck.

Q. Were there other people in this area?

A. At that point, I didn't know, other than the one that was on top of me. Until I made it almost to the door, I did hear someone say that he was hurt, that he was hurt bad, and I -- I responded back, "Look, I'm -- I'm hurt really bad myself, I don't even know if I can get out, but if I can, I'll send for help."

Q. Where did you go from there?

A. From there, I made a right-hand turn out of the -- from the lifeboat deck, and I took about five, maybe 10 steps to the right, and fortunately, by then my eyes were just clear enough to see, because the -- I almost walked off into the water. The handrail walkway, the back wall, the exhaust stacks, all the things associated directly aft of Engine No. 3 were no longer attached to the rig.

Q. Okay. So what did you do next?

A. I had to do a U-turn. I was looking for a ladderway to go up to get to the main deck, which was also directly adjacent to Engine No. 3, and it was -- it was missing. There was no way

for me to get up where I needed to go. So I had turn around and go back the other way.

As I'm going back past the ECR, I see Doug standing in the doorway, and he's -- he's -- he's telling me he's hurt, and there's people inside that are hurt. I let him know, you know, that I was in no condition to help him, but I would send help back, and that if they tried to make it anywhere on their own, they needed to go to the left and not to the right, because if they went to the right, they were going to fall in the water.

Q. Is that Doug Browne?

A. Yes, sir, it was.

Q. So you went back through the ECR?

A. No, sir, I did not go back through the ECR. I went back by the ECR.

Q. All right.

A. And --

Q. Where did you go from there?

A. From there, I went to the starboard side stairwell, and I -- I climbed up the two flights of stairs that it takes to get to the main deck.

On the main deck, I'm -- I'm roughly on centerline, maybe a little bit to the right of it, and I look up, and the first thing I can think of is, oh, my God, I hope those guys got out of there.

Q. Once you're up on the deck, where did you go?

A. I turned back to the left. I could tell that the smoke from the fire and the fire itself that I could see in the derrick was leaning slightly to the right. Everything was going a little bit to the right, so I knew I needed to go left to stay out of the smoke. I went around to the left, made it all the way forward to the bridge.

Q. Okay. Who was on the bridge at that time, as far as you can remember?

A. Andrea Fleytas, Yancy Keplinger, Captain Curt, Steve Bertone, Chris Pleasant, several others. Those are the ones I can think of off the top of my head.

Q. What did you do once you got to the bridge?

A. I reported to the Captain what had happened. He wasn't -- he wasn't listening. He had 10 people trying to talk to him at the same time. I asked one of DPOs, Senior DPO -- I saw him on the panel. I tried to make my way over towards one of the panels. And I asked him, you know, just, you know, "What are you doing," because I -- I could tell he was on the engine pages, and he said, "I'm trying to restart the

engines."
00078:01 I said, "Look, it's -- it's probably not
02 going to happen. At a minimum, No. 3 Engine has
03 exploded, and with the -- the damage that I saw
04 and witnessed on the way out, it probably took
05 out all the engine rooms, and they're probably
06 not going to start."
07 At that point, the Captain did turn and
08 look at me, and I told him, I said, "Sir, we need
09 to go, we need to abandon ship right now, because
10 we're not going to have power. We have no way to
11 get away from the fire, from the fuel source."
12 Q. What was his response?
13 A. His response was, "Sit down and shut the
14 fuck up."
15 Q. What did you do at that point?
16 A. I sat down, and Steve Bertone took a roll
17 of toilet paper and began wrapping my forehead
18 up.
19 Q. You're bleeding at the forehead?
20 A. Yes, I was.
21 Q. All right. What do you remember after
22 that?
23 A. Someone in the room said something about
24 a standby generator. And the Captain started
25 asking out loud, "Does anybody know if the
00079:01 standby generator will help us?"
02 Steve answered, you know, "Yes, it would
03 help get your charge air compressors back online,
04 for the engine rooms to get the air compressed --
05 the air pressure back up so that if an engine is
06 available and will start, that you have to have
07 the air compressor to do that. That standby
08 generator would allow that to happen."
09 And he then asked the Captain, "Do you
10 want me to go attempt to start the generator?"
11 The Captain said, "Yes."
12 So Steve goes to walk out the door. No
13 one was assigned to go with him, and no one
14 wanted to go with him, because he was going to
15 have to go back towards the fire.
16 That -- that wasn't going to work. I --
17 I couldn't allow that man to go by himself
18 towards that generator. I had just came down
19 that same side of the rig where it was. I knew
20 how bad it was over there. I knew how intense
21 the heat was and how much mud was on the deck.
22 All I could think of he was going to slip
23 and fall down in the mud, no one would know where
24 he was at, no one is going to rescue him, and
25 here we go, you know, now we're missing a man.
00080:01 At that point, I didn't know who was
02 missing or -- or if we were missing anyone, but I
03 knew he didn't need to go by his self. So I
04 grabbed him by the shirt tail as he was going out

the door, and he told me, you know, "You don't need to go, you know, you're in no condition to go anywhere."

And I said, "Well, no one else wants to go with you. No one else knows what they're even doing back there, so either I go with you or you don't go at all."

And he said, "Fine," and out the door we went, and then another man grabbed my coat tails, so we went in a train of three, in constant contact all the way to the standby generator room.

Q. Okay. Just prior to the time that you left the bridge, had you seen the OIM at any point?

A. Yes. He had finally managed his way up to the bridge. He was coughing, vomiting, couldn't hardly breathe, complaining about insulation in his eyes and his lungs, but yes, he was -- he was on the bridge.

Q. Okay. Was any decision made at that time to EDS?

A. Yes. There was a -- a request by the Captain to EDS from the well. And the Subsea Supervisor, Chris Pleasant, said that he would not EDS from this well without the express permission from the Cap -- or not the Captain -- the OIM and the BP Company Man.

Q. Okay. Before you left to go work on the backup generator, was there a resolution to questions about whether EDS could be pushed?

A. Yes. When Mr. Jimmy finally made it up and got his breath enough, he was still very dazed about what had just happened to him, but apparently he was in the shower when this thing exploded, and it -- it was a -- a minute or two there where him and the Company Man were having a discussion about what to do, and eventually, the order was given to press the EDS button.

Q. And was the EDS button actually pressed at that time?

A. I physically watched Chris Pleasant push that button.

Q. Okay. From there, you went to work on the backup generator?

A. Correct.

Q. All right. What happened next?

A. It didn't start. We tried everything we knew. We tried to -- we used the procedure exactly to the letter. We tried, you know, omitting a step to if see maybe that would -- would help us. We -- we tried it every which way we knew, and it would not start.

We got the indication that the -- the generator was available, and that the 24 starting

volts were available to be used; however, the generator never started.
Q. Once you realized the generator wasn't going to start, where did you go?
A. Back to the bridge to report to the Captain.
Q. All right. What happened next?
A. As we walk into the bridge, instead of being 20 plus people, there are six or eight people. As we walked into the bridge -- the bridge is surrounded with windows on three sides. You can see the lifeboat deck from the -- from those windows, and I watched one of the lifeboats launch.
Q. Okay.
A. I asked the Captain what was going on.
00083:01 He said, "I've given the order to abandon ship. We need to proceed to the lifeboats immediately."
Q. Prior to that time, had you heard any announcements or anything on the -- on the intercom system?
A. I had heard one announcement prior to that. That was when I very first made it to the main deck after the second explosion. And the announcement I heard was Yancy Keplinger's voice over the PA system. He stated, "fire, fire, fire. This is not a drill. There's a fire on the rig floor. All personnel report to your emergency stations. Lifeboats 1 and 2 will be used."
Q. So once you had the order from the Captain to abandon ship, what did you do?
A. We proceeded down the stairs. Before we even got to the very last landing, the other lifeboat -- the other available lifeboat had deployed.
Q. What happened next?
A. I told the Captain that I had came from the ECR and that Lifeboats 3 and 4 looked functional. They did not look damaged and that it was possible that we could make our way back
00084:01 there and launch one of those lifeboats. That idea was shot down, and a backup plan was to use the deck-mounted davit to launch a life raft, one of three canistered life rafts that were available to us.
Q. Okay. Were you able to get the life raft in a functional state?
A. Fortunately we were. Had it not been for a small pair of wire cutters that I had in my breast pocket, we would probably still all be there waiting to get the shackle undone. The shackle was zip-tied closed to the -- to the post of the davit to keep the little thing from backing out and being lost.

While Transocean maintains a no knife policy, which means no one had anything to cut the zip tie with. People were trying to use their fingers. There was so much mud. It was dark. There was panic. No one could even break the thing with their fingers.

I inter -- intervened. I said, "Look, I've got a pair of cutters," and then I cut it, put them back in my pocket. We were able to get the life laf -- raft launched, at a terrible angle.

It -- they couldn't get the -- the davit to swing far enough over to get the lifeboat to level -- or the life raft to level out.

Q. Who's with you at that point?

A. That would have been myself; Captain Kuchta; Randy Ezell, Toolpusher; Steve Bertone; Andrea; Paul, the Motorman; Chad Murray, Electrician; Wyman Wheeler was on the stretcher; and Yancy Keplinger. I believe there was nine of us.

Q. What happened next?

A. There was confusion as to how we were going to get the injured person on the gurney into the life raft because of the precarious angle that it was sitting at. I told them, "Look, we -- we've got to have one person on each side. Everybody, you know, just kind of, one, two three, and shove him in there. We're wasting too much time worrying about one man. You're going to kill nine to save one. Y'all have got to -- you know, we got to get this moving."

Two people -- I don't know who they were -- got on either side of him. They one, two, three, shoved him in. Fortunately he went in, went to the back of the raft, and then people started to -- to try to load.

Now the issue was, we had now seven or eight people trying to get through one very small opening that was barely big enough for one person. Meanwhile, the -- this inferno behind us is still growing, and there's projectiles and there's, you know, really loud noises. There's lots of bangs, lots of explosions. And my real, worst concern was that the derrick was going to fall over our direction before we could get this lifeboat down. The only protection that we had was a 20-foot bulkhead behind us that would give us enough angle that any projectiles coming this way would actually go past us without, you know, a direct impact.

So I grabbed Paul Meinhart, the Motorman, and Andrea, I grabbed each one of them and started to back up the -- oh, three or four steps towards that bulkhead. There was -- and there

was two reasons: Number one, to protect us from the projectiles. The number two is to give people time to get through this small opening, to get people in the life raft, get them situated, you know, because it's dark and there's, you know, heat, smoke, fire, everything's all around us. So it's very chaotic.

And I told them two when I backed them up, I said, "Look, when the hole opens up, one at a time, Andrea, you're going to go. Paul, you're going to go. I'm going to come in behind you. I'll be the last one in. I'll pull the cord. Everything's great." All right? The hole opens up. Within seconds I grab Andrea, told her to go. She makes a step or two. The life raft deployed without us.

Q. What did you do then?

A. I wanted to cry. I mean, I didn't know what to do then. I explained to Andrea that we're either going to stay here and burn up or we're going to have to jump. I didn't at that time feel comfortable able enough with her and Paul and myself trying to launch one of the other two remaining life rafts. It took nine people all this time to get one launched, and even it wasn't done properly. There was -- in my mind three of us weren't going to get another one of these things launched properly in time to save ourselves.

So I looked at her and said, "Look, we're either going to jump, or we're going to burn up." She said she couldn't jump. I told her she didn't have a choice. By that time Paul, the Motorman, had already cleared the handrail. We seen him go over. And it then became real apparent to me that the life raft is going to be straight down, and I was really concerned with Paul's safety and the people in that life raft that he may, in fact, land on the life raft as he's falling.

So I turned and looked at Andrea, and I said, "Look, we can't jump or we can't just step off the end of the rig here. If we do, we're going to hit the raft. You're going to have to run and jump or we're going to have to go somewhere else and jump. We can't -- we can't land on the raft."

That was the last thing I remember saying to her, the last time I remember seeing her. I went down the -- the walkway a little bit, where I -- I felt like I was clear. I backed myself up. I took three or four steps, and I pushed off the end of the rig as hard as I could push, and I hit the water.

Q. What happened once you were in the water?

A. Instant burning all over. I felt like I was on fire. There -- there was a sludge of something floating on the water that -- that was burning me all over. Once I -- I realized I wasn't actually on fire, I began to try to clear my eyes of the oil and the debris so that I could see what was going on. What little bit that I could see, that I could focus on, was that the fire looked like it was on the surface of the water underneath the rig.

I got real nervous then thinking that, you know, if there's anything flammable on the top of this water -- this oil, this grease, the diesel fuel, whatever it is -- the fire's coming to me and I'm going to burn up anyway. So I -- I -- I did the only thing I knew to do. I just started swimming backwards.

I -- I made a -- a plan in my head that I was going to keep the heat of the fire on my face so that I knew I was pushing the right direction, that I was pushing away from -- from the fire instead of towards it. That -- that was the only thing I could come up with. I couldn't take more than about a quarter of a breath. I had severe pain in my right -- my right side. My left elbow was completely locked up, and my left ankle was, I mean, in excruciating pain the whole time I was kicking.

Q. Then what happened?

A. I -- I thought I died. I remember feeling no pain. I remember feeling no heat, no nothing. And then a big -- another explosion or something brought me out of that, and all the heat and all the pain came back again. I thought, "Well, all right. Got to keep swimming." So I -- I started to back stroke again.

I -- I don't know at that point where a noise came from, but I heard somebody saying, "Come here, over here. Come over here." I didn't know what it was, didn't know who it was. And as I -- I just started to try to -- to swim towards the noise.

And apparently I -- I must have blacked out again, because when the guy grabs me and -- and -- someone grabbed a hold of me, and he said, "I told you to keep swimming." And apparently I -- I thought I was swimming, but I wasn't. Apparently I wasn't moving, or at least not to his satisfaction, but he grabbed my life jacket and flipped me into a -- a small boat.

Q. What happened next?

A. Next, he put the boat in forward and was heading towards the rig instead of a way from it, and I asked him what he was doing. He said, "I

see -- I see people in the water." I -- I told him, you know, "Look, I'm in bad, bad shape. Can you take me to -- away from this thing and dump me off, put me -- or whatever, and then come back?" The last thing I wanted to do now, being covered in oil and grease and whatever, was to go back towards fire.

But he went forward anyway. And the next person that was in the water was Andrea. They grabbed her, flipped her into the boat. We started backing out. Next thing I know, we're going back forward again. And I asked the guy again, you know, "What are you doing?" He said, "Well, I see a life raft, and I see people in the water, strobe lights from their life jackets."

So we pulled back literally under the rig to attach a line to this life raft. There were people outside the raft trying to swim with the raft. They weren't making any progress. If anything, they were going the wrong way because the wind was blowing towards the fire and not away from it. So basically they were in a big sail that was being blown towards the fire.

We managed to get them a rope. They backed out. As we backed out, I noticed that we seemed to be shifting side to side, but it didn't like we were making any -- didn't look like we were making any progress. And we heard people screaming in front of us and we looked and the life raft was tilting at about a 45 degree angle, and it started dumping people out, out of the hull.

The painter line was still attached to the rig. So we were pulling against the painter line instead of making any progress. We yelled at them to cut the line. They said they couldn't find a knife, couldn't find anything to cut it with.

The -- the other gentleman that was in the fast rescue boat produced some type of cutting device -- I don't know what it was -- got it over to them. They cut the line, drug us over to them. We drug them in reverse all the way over to where the BANKSTON was parked.

Q. Okay. So then you reached the BANKSTON?

A. From there we were offloaded. I went into their medical -- designated medical area on the main deck, where I seen people that were in really bad shape. I seen Buddy Trahan. Wyman

Page 94:24 to 94:25

Q. Mr. Williams, good morning. My name is David Leefe, and I represent BP.

Page 101:04 to 101:22

00101:04 DEEPWATER MILLENNIUM. You said you got to the
05 DEEPWATER HORIZON in April of '08, and after
06 three months you became the Chief Electronics
07 Technician, right?
08 A. Incorrect. I became Electronics
09 Technician.
10 Q. Oh, okay. I thought April of '08 was
11 when you became an Electronics Technician
12 Trainee?
13 A. Rolled -- well, and then rolled right
14 into the actual job --
15 Q. Okay.
16 A. From the Trainee and the job, I got paid
17 as an Electronics Technician.
18 Q. Okay.
19 A. As an ET.
20 Q. All right. When did you become Chief
21 Electronics Technician?
22 A. Ab -- about three months later.

Page 102:02 to 105:01

00102:02 Q. July -- okay. So July '08, about three
03 months -- I'm adding three --
04 A. Okay.
05 Q. -- months to April --
06 A. Yes.
07 Q. -- and that gets you to the Chief job,
08 right?
09 A. Yes.
10 Q. All right. And you said that that was --
11 was sort of a forced promotion, I think is the
12 words you used?
13 A. Yes.
14 Q. Because there had been wholesale changes
15 on the -- on the -- the makeup of the crew of the
16 DEEPWATER HORIZON?
17 A. Correct.
18 Q. I think the word you used was "mass
19 exodus"?
20 A. Yes, sir.
21 Q. What did you mean by that?
22 A. People were -- were quitting Transocean
23 to go to work for Seadrill and quitting
24 Transocean to take jobs at other offshore oil and
25 gas companies for more pay.
00103:01 Q. All right. Was it your understanding
02 that it was an issue of -- of pay that was
03 driving them away from Transocean?
04 A. There were two issues. Number one was
05 pay, and number two was the poor condition of the
06 DEEPWATER HORIZON.

Q. Can you explain what you mean by that, the -- the poor condition that was actually causing people to leave employment of Transocean?
A. Yes.
Q. Well, can you explain that a little bit?
A. Sure. They -- they all knew what the maintenance problems were. They all knew what was driving them was lack of time to repair them, and they knew that our workload was going to always increase and never decrease, based on the way the rig was currently operating.
Q. Okay. Back when you were first on the DEEPWATER HORIZON in '08, who was the rig working for?
A. Would be BP.
Q. Was there ever -- were there ever periods of time where you had downtime, back in the shipyard, from the time you start, until the -- till the incident?
A. The shipyard, no.
Q. No? Were there times when you were not drilling?
A. Yes.
Q. Okay. How many occasions was that?
A. Between wells. We weren't drilling in between wells.
Q. M-h'm. How about -- like you -- do you recall when that was?
A. I think I physically made one transit my -- during my time aboard the DEEPWATER HORIZON.
Q. All right.
A. And that -- a transit is considered if we're not latched to a -- to the bottom, we're in motion or floating or whatever, we're not latched up. We call that "in transit." I had been on the rig for one in-transit in my entire career aboard the HORIZON.
Q. All right. Well, are you aware of other in-transits?
A. Yes.
Q. All right. And is -- is it fair to say that the crew uses the in-transit times to do certain repairs and maintenance on the rig?
A. Yes, it is.

Page 105:13 to 106:02

Q. Okay. Let's -- let's talk about your job as -- as Chief Electronics Technician on the DEEPWATER HORIZON.
As I appreciate it, a primary job responsibility that you had was maintaining the fire and gas and the ESD, Emergency Shutdown Safety, systems?

A. Correct.
Q. Now, those -- those systems -- and I'm going to call them collectively "the Safety System," from lack of -- to speed it up. The -- the Safety System on the DEEPWATER HORIZON was sold to Transocean -- and if you don't know, tell me -- by a company called Konesberg?
A. Correct.

Page 106:07 to 106:10

Now, had you ever received any direct training from the Kongsberg people on the Safety System?
A. No, sir I had not.

Page 109:10 to 109:19

Q. Okay. Had you been offered any other types of courses that might help you to understand the workings of the Kongsberg system?
A. Transocean had given me a blank check and said, "Any education outside of what we offer you, if you want it, let us know, get it set up with your RSTC, and we'll take care of it. We'll pay for it and everything." So it was --
Q. Did you take --
A. -- always available.

Page 109:25 to 110:03

Q. All right. So, then, fair to say that -- that the knowledge you had of that system was learned on the job?
A. Yes, sir, it was, and in the Manual.

Page 110:12 to 111:04

Q. Okay. When you say "Manuals," you mean -- what do you mean?
A. There were three sets of Manuals for every system. There was an Operators Manual, there was a Maintenance Manual, and there was a -- an As-Built Manual.
Q. All right.
A. So the -- the first one would have -- or -- or not even the as-built. Some of them had as-built. Some had theoretical -- you know, "In theory, this is how the stuff is supposed to work."
So I made it -- I -- and most of us in the ET Shop made a point to read through the Operations and Maintenance Manuals, because

sometimes we needed to understand how the interfaces worked, how operations would affect maintenance.

Page 111:10 to 111:19

Q. All right. Well, to you, personally, did you feel like it was critical to you to perform your job functions that you understood how the system worked? Fair enough?
A. Fair enough.
Q. Okay. And as of April 20, 2010, did you feel as though you did have a good understanding of how the Safety System worked?
A. I -- I was comfortable in the maintaining and repairing of that system.

Page 114:19 to 122:13

Q. Now, as I -- as I appreciate the system, and -- and I know you'll correct me if -- if I'm -- if I say this wrong, the system was capable of automatically making certain things happen.
A. Correct, the integrated automatic -- integrated automated control systems, yes.
Q. All right. And one of the things that it was capable of automatically -- making automatically happen was activation of -- I think I've seen the term "panel alarm"?
A. Correct.
Q. And that's -- that's a -- that's an alarm that's located on a panel in a -- in a control room?
A. Correct.
Q. All right. And that's a -- that's an audible alarm, beep, beep, beep?
A. Correct.
Q. And also a visual alarm, a light?
A. Not necessarily a light on that -- well, it would be on a separate panel, but the panel I would be per -- referring to would be an OS, an Operator Station, and there wouldn't be a light. There would be a banner that would pop up on their list of issues.
Q. Okay.
A. It would be highlighted.
Q. So that would be the visual component, the banner?
A. Where someone would normally be.
Now, this other panel on the wall, which is stand-alone isolated, it would have a light that would flash, yes.
Q. Right. And where would the beep, beep,

beep, come from?
A. Both places, actually.
Q. Okay. And then the system was also capable of automatically sounding the general alarm on the rig?
A. Correct.
Q. And it was also capable of automatically closing fire dampers?
A. Correct.
Q. Okay. Now, what is a fire damper?
A. A fire damper is a -- a very broad term for any condition that -- where we do not want the atmosphere around the intake to enter the space that that intake is feeding. We want to cut that off. We want to stop that. We're going to, number one, stop the electricity to the fan that's pulling the air down, and we're going to shut the fire damper. The fire damper would be the, you know, a gate, a -- a valve, some way to prevent fire from moving from space to space.
Q. And -- and gas, too?
A. Well, and gas, what -- yeah --
00117:01 Q. Yeah.
A. -- whatever it is. It's just a -- a -- a gate, it's a door.
Q. So -- so the idea is to com -- you -- you -- you all are drilling a well, and -- and there's gas downhole, right?
A. Correct.
Q. Okay. And that -- and that gas is combustible gas?
A. Sometimes.
Q. Well --
A. Sometimes it's toxic.
Q. Okay. Could be -- could be either toxic or combustible?
A. Correct.
Q. All right. And you don't want combustible gas to come into contact with an ignition source, true?
A. Correct.
Q. And that's one of the things the Safety System on the HORIZON is designed to prevent?
A. Correct.
Q. Okay. And -- and -- and the automatic closing of air dampers on in -- intake locations, is designed to prevent combustible gas from
00118:01 coming into contact with ignition sources?
A. Correct.
Q. That -- that automatic closing of the fire damper, that's a part of the -- the Fire and Gas Safety System?
A. Correct.
Q. All right.
A. Fire dampers and another term below decks

would be watertight dampers.
Q. Okay. Now, the system -- the Safety System was also capable of automatically stopping ventilation fans?
A. Correct.
Q. And it was also automatic -- capable of automatically stopping engines?
A. H'm, not to my knowledge. There is no direct link between fire and gas and an engine.
Q. All right. Are you sure of that?
A. To my knowledge, there's no direct link between the engine --
Q. Now --
A. -- and the fire and gas panel.
Q. And -- and what about was the system -- the Safety System automatically capable of stopping -- of -- of shutting down, let's say, other types of equipment?
A. Sure.
Q. What types of equipment?
A. They could have closed the fire dampers, they could have closed doors, there are magnetically held doors that would release.
Q. M-h'm.
A. It would shut down any pumps, any equipment that's operating in that space that's using electricity, it would shut all of that down. The breakers for that equipment would --
Q. Generators?
A. Generators.
Q. Okay.
A. "Generators" is a -- a very broad term, now. Are you talking about main engine generators or other generators?
Q. Are you --
A. There's several different types of --
Q. -- well --
A. -- generators.
Q. -- you -- you tell me in the context of my question, what -- what sorts of generators was the Safety System capab -- capable of automatically stopping?
A. We had fresh water generators, we had salt water generators, we had -- we had several different -- anywhere electrically -- anything electrical in a space where the ESD trips, will be shut down --
Q. Okay.
A. -- electrically.
Now, a generator, a main engine generator, is not electrically -- I mean, it's -- it's feeding on diesel and air.
Q. Okay. Now, I've seen the term, "Engine No. 3"?
A. M-h'm.

Q. Okay. Where was that located?
A. About 30 to 40 feet away from me and down half a level.
Q. Was it in a particular room?
A. The Engine Room No. 3.
Q. Okay. Was there -- were there sensors, ga -- combustible gas sensors at the intake to Engine Room No. 3?
A. Yes, there are.
Q. All right. And were there -- there -- so there were air dampers?
A. Correct.
Q. All right. So then the Safety System was capable of automatically closing the air dampers to Engine Room No. 3?
A. Correct.
Q. But -- but as I understand your testimony, to the best of your knowledge, you don't think that the system -- the Safety System was capable of automatically shutting down Engine No. 3?
A. Correct.
Q. You -- that -- you agree with that?
A. Yes, I do.
Q. Okay.
A. Just because the louvers shut doesn't mean the engine is going to stop.
Q. Right. But the reason that you shut the louvers is to prevent the gas from getting in there, right?
A. Absolutely.
Q. All right. Now, in the -- in the normal operation of the Safety System on the HORIZON, with -- with the system set in active mode, you described that earlier, active mode?
A. Correct, that -- those would be sensors.
Q. And the sensor's set in active mode when you get two high level combustible gas alarms in the -- in the same zone -- or area, excuse me, let me use the term "area" --
A. (Nodding.)
Q. -- that is supposed to automatically trip the -- the fire dampers?
A. You're -- you're mostly right.
Q. Okay. Help me out.
A. Two high high.
Q. Okay.
A. High level will not necessarily trigger anything. There is a high level, and a high high level.

Page 124:02 to 131:06

Q. All right. So -- so for instance, if there were two sensors for the No. 3 Engine Room

that detected high high levels of concentrations of combustible gas, then when the sensors are set in active mode, the system should automatically close the fire dampers to the Engine Room -- to that Engine Room?
A. You're assuming there's two sensors for Engine Room No. 3, and there's not.
Q. There's not?
A. There's only one.
Q. Yeah. Why is that?
A. I don't know. You'll have to ask the Engineer.
Q. So is there -- how -- how would -- how would the system automatically shut the fire dampers for Engine Room No. 3?
A. It's going to have to get another sensor in that zone to go high high with it.
Q. Okay.
A. Engine No. 3 may not be in a zone by itself.
Q. Oh, I see.
A. It's going to have to rely on another sensor from somewhere --
Q. Within a zone --
A. -- before it does anything.
Q. Within --
A. Right.
Q. -- okay.
A. -- before it does anything.
Q. All right. Maybe -- do -- do you have areas in zones --
A. Yes.
Q. -- is it two different terms --
A. Yes.
Q. -- okay. Is -- is the Engine Room No. 3, is that area?
A. Well, like I said, I'd have to get in there into the --
Q. Okay. So --
A. I know there's areas and there are zones.
Q. Where would I find that, where would I find --
A. In the --
Q. -- what is --
A. -- fire and gas --
THE COURT REPORTER: Gentlemen. Remember I'm here.
THE WITNESS: Sorry.
THE COURT REPORTER: That's good. Okay.
Q. (By Mr. Leefe) Where -- where -- where would I -- where would I find the -- the -- the -- a -- a map of the rig or whatever that would tell me what is in Zone No. 1 for the Safety System?

A. An Operator Station would be a great place to start.
Q. Okay. But what about, I don't have an Operator Station, I've just got some manuals and books?
A. Have to go to the manuals, to the fire and gas.
Q. You think it's in there somewhere?
A. Oh, absolutely, it's in there.
Q. All right. So -- so let me back up again. There's only one gas detector at the air intake of Engine Room No. 3, correct?
A. Right.
Q. All right. Are there other gas detectors inside Engine Room No. 3?
A. No.
Q. Okay. Is there any other gas sensors
00127:01 that are sort of protecting, if you will, Engine Room No. 3?
A. I don't recall which all ones -- I would have to get in the literature to see which all sensors are connected to that zone or that area. I -- I don't know recall what they are. I'm sure there are others.
Q. But you know there are others -- other locations within Zone 1? You know --
A. Yes.
Q. You don't know -- you don't know what they are, but you know there's -- there's -- there's other locations?
A. Yeah.
Q. All right.
A. (Nodding.)
Q. So then what it takes is two high high levels -- sensors to -- to detect high high levels of -- of combustible gas within Zone 1, if we're talking about the Engine Room No. 3 being in Zone 1. Do you know that?
A. I don't know.
Q. Okay.
A. I can -- I can find it for you.
Q. All right. All right. You know, let
00128:01 me -- let me start over here. I apologize.
Let's assume -- well, that -- we'll call it Zone 1, okay? Engine Room No. 3 is in Zone 1. It takes -- it takes two high high-level sensors within Zone 1 -- anywhere within Zone 1 to close all the air dampers in Zone 1?
A. Correct.
MR. KOHNKE: David, let me -- let me note my objection only to the fact that this is an assumption, and we're in never-never land. I think I'm reading it, and I don't mean to make a speaking objection, but I -- I wanted to stop you.

MR. LEEFE: But -- but you are.
MR. KOHNKE: I know, but I want you to understand why I'm objecting.
MR. LEEFE: All right. I -- I think I do, but I think it's not really a valid objection, because my -- I'm just assuming -- I could call it -- I could call it Zone A, B, C, if I wanted to. You know, I mean, I just -- whatever --
Q. (By Mr. Leefe) Let me just ask it again to make Mr. Kohnke happy.
Whatever zone Engine Room No. 3 is in, as long as there are two gas sensors detecting high high levels within that zone, all the air dampers in that zone are going to close?
A. Correct.
Q. All right. And theoretically, that should prevent gas from getting to whatever is inside Engine Room No. 3?
A. Correct.
Q. And -- and that -- and that requires that the system -- the sensors be set in the active mode?
A. Correct.
Q. And in your -- it's your belief, as the Chief Electrical Technician -- Electronics Technician --
A. You got it.
Q. You were going to catch me, too -- on the HORIZON, that the -- the gas sensors, apart from maintenance activities, should always be in the active mode?
A. Correct.
Q. Now, another thing that will happen when you have this two -- these two high high levels of sensors in a particular zone activated, is the general alarm will sound?
A. Correct.
Q. If you're in the active mode?
A. Correct.
Q. Okay. And another thing that will happen is the panel alarms will sound?
A. Correct.
Q. And the visual banner, or whatever it is associated with -- with the panels will -- will light up?
A. Correct.
Q. Now, was it -- was it always the case on the HORIZON that -- that all of the gas detection sensors, the combustible gas detect -- detection sensors were -- were maintained in the active mode?
A. Mostly, yes.
Q. All right. Now, I -- had you ever seen that -- situations where gas detection sensors

were in a mode that you -- I think you used the term "inhibited" before as one of the options?
A. Correct.
Q. All right. You've seen -- you've seen the -- in your time on the DEEPWATER HORIZON, had you seen gas detection sensors put in the inhibited mode?
A. Yes, I've seen them put in inhibited mode.
Q. Okay. And had you seen the inhibited mode used, separate and apart from maintenance activities?
A. Yes.

Page 131:14 to 133:11

Q. Okay. Help me out.
A. What I discovered was that the general alarm itself was in an inhibited mode.
Q. Okay.
A. That the response, which would be from the field devices, which were in active mode, that their response would be cut off at that panel, because -- because the -- the general alarm would not sound without a person walking over and physically pushing the button.
Q. Okay. So then -- so then what -- what we're talking about here is not the -- not a particular sensor, but the general alarm itself?
A. Correct. Now we're talking about the alarm system, not the safe -- not the gas sensors. We're talking about a system now.
Q. Okay. So what you found with respect to the general alarm was that it was being kept in the inhibited mode?
A. Correct.
Q. All right. And did you -- did you voice a concern to some Superiors about that?
A. Yes, I did.
Q. What did you say?
A. I told them I thought it was bullshit that this was being done this way.
Q. Who did you tell that to?
A. Tom Fields, the Electrical Supervisor.
Q. Anybody else?
A. Tommy Daniels, the Electrical Supervisor, Stan Carden, the Electrical Supervisor.
Q. Okay. So you weren't happy that they were inhibiting the general alarm?
A. No, I was not.
Q. And -- and what -- what that means is -- to inhibit the general alarm means is if you have a situation where you had two high high sensors go off, it would not sound the general alarm?
A. Correct.

Q. All right. And the -- the purpose, of course, of the general alarm is to -- is to alert everyone on the rig that there's a problem, either fire, smoke, toxic gas, or combustible gas?
A. Correct.
Q. All right. And -- and that's an audible general alarm, in part?
A. Correct.

Page 134:06 to 134:11

Q. The idea is if you hear the general alarm, you -- you go as quickly as possible to your Emergency Station in case you need to evacuate the rig?
A. Go to your Emergency Stations and await further orders.

Page 136:06 to 136:17

Q. Why did you feel like it was -- it was important to have the -- the general alarm set in -- in the active mode as opposed to the inhibited mode?
A. Because it didn't require anyone to watch it.
Q. So who -- so it would -- if -- if there's two sensors that go off, it -- it's going to activate automatically and everybody is going to hear it immediately?
A. Within -- within a two-minute time frame, yes.

Page 137:07 to 137:14

Q. And -- and I'm skipping ahead, but on the -- on the night of the April 20, 2010 blowout, am I correct you never heard the general alarm go off?
A. Not one time, no.
Q. Okay. Does that tell you that it was set on "inhibited"?
A. It tells me no one pressed the button.

Page 137:22 to 138:03

Q. -- the standard way that Transocean kept the general alarm on the rig was in the inhibited mode?
A. Correct.
Q. All right. So any reason to think that on April 20, 2010, it was in something other than

03 the inhibited mode?

Page 138:05 to 141:03

00138:05 A. No.
06 Q. (By Mr. Leefe) And -- and, again, you --
07 you strongly disagreed with that practice that
08 Transocean used of keeping the general alarm in
09 the inhibited mode?
10 A. Initially, yes.
11 Q. And am I correct that the reasons you
12 were given to do that was that -- that they kept
13 it in the inhibited mode was because they didn't
14 want to wake people up at night with false
15 alarms?
16 A. Correct. They listed their
17 justifications.
18 Q. And one of them was they didn't want to
19 wake people up at night?
20 A. Correct.
21 Q. What would cause a false alarm?
22 A. Any number of things. Be more specific.
23 Q. Well, what would cause the general alarm
24 system to go off in a -- in a nonemergency?
25 A. Catastrophic system failure could cause
00139:01 the alarm to go off. I mean, that's --
02 Q. Catastrophic system failure?
03 A. Sure.
04 Q. What does -- I don't know -- what does
05 that mean?
06 A. I mean, if the water pipe burst somewhere
07 and shot water into the electrical panel, you're
08 going to have a catastrophic system failure, and
09 that could cause a general alarm to go off.
10 Q. Well, that's not very often, is it?
11 A. It's not very often that rigs blow up
12 either.
13 Q. I understand. But, you know, I'm trying
14 to seek out -- apparently Transocean had this
15 concern about waking people up due to false
16 alarms. Did -- was -- did they have a lot of
17 false alarms, to your knowledge?
18 A. To my knowledge, on that rig, no, I never
19 had a false alarm.
20 Q. So why -- why would they inhibit, take
21 out of active mode an important safety feature
22 when you don't even have a lot of false alarms on
23 the rig?
24 MR. KOHNKE: Objection, form.
25 A. My -- my understanding and how it was
00140:01 explained to me, and what calmed me down after
02 the -- my initial outrage of seeing it was the
03 fact that the station is manned by two
04 personnel, 24 hours a day, seven days a week.
05 The fact that we were a DP three-class

vessel, and that if these automated functions were allowed to happen, we would go into a -- a real crisis mode if we lost thruster power or if we lost navigation power that we could strain the -- you know, any number of things could go wrong. You could break the BOP, you could break the stack, you could break anything. So those were some of the justifications they were giving to me, other than waking someone up at 3:00 o'clock in the morning.

Q. (By Mr. Leefe) But we're -- right now we're talking about general alarms.

A. Correct.

Q. Right. That's not going to hurt the DP?

A. Absolutely, it will.

Q. Just sounding a general alarm is going to affect the DP?

A. It could. If that -- if the zone that's affected is in the -- the thrusters, then, yes, you're going to affect DP.

Q. How?

A. Because the thrusters are going to shut down.

Page 141:23 to 142:19

Q. So -- okay. So in -- in addition to actually sounding an audible and -- and -- and lighting a visual alarm, apparently there's some shutting down of equipment?

A. Emergency shutdown, ESDs. They're going to want to do their thing.

Q. But I thought earlier you told me that the -- the ESDs were -- would not automatically activate?

A. They weren't.

Q. I understand. But we're talking now about automatic activation in the active mode of the general alarm system. Okay? You with me?

A. Sure.

Q. All right. So the ES -- the ESDs I believe you said are not going to acti -- not going to automatically activate under any circumstance?

A. I never said that.

Q. Okay.

A. They wouldn't up and on that day because the general alarm was inhibited.

Page 143:01 to 144:06

Q. All right. So is the system -- the Safety System capable of automatically activating the ESDs?

A. Absolutely.
Q. All right. And is -- so if in the active mode with two high high combustible sensors being activated, will the ESD -- the ESDs in that particular zone automatically activate?
A. Yes.
Q. All right. And we've already been over that that closes the vent intakes?
A. Shuts down power.
Q. Shuts down power. All right.
Now, one of the -- one of the reasons that Transocean gave you for inhibiting automatic activation was that the Control Stations were manned?
A. Correct.
Q. All right. Now, they're manned by whom, DP -- DP Operators?
A. A DPO and a Senior DPO are always on tour.
Q. All right. So then the system when inhibited relies on the DPO or -- or -- did you say Assistant DPO? No.
A. DPO or a Senior DPO.
Q. Okay. All right. When inhibited, the system relies on the -- either the DPO or the Senior DPO being in the vicinity of, aware of the panel alarm going off?
A. Correct.

Page 145:02 to 146:01

A. Let me help you out here. My ESD sy -- the ESD system onboard our rig, I never physically worked on. It was not broken. It did not have maintenance issues. It just simply ran.
Q. Okay. But you know that it was kept in inhibited mode?
A. Not the ESD system.
Q. All right.
A. The general alarms. See, you're -- you're talking about a lot of different apples in this -- this basket here. They're all different.
Q. Well, but it's the ESD system that would shut down the DP?
A. It -- it could, yes.
Q. All right. And -- and the gen -- but the general alarm could also shut down the DP?
A. The general alarm through the ESD system. The general alarm can't stop anything. It's going to tell the ESD system, or that's part of its cause and effect matrix would be to shut down equipment that's affected.
Q. All right. Wouldn't you agree that -- that it makes sense for the general alarms to sound automatically in the event of an emergency?

00146:01 A. Yes.

Page 146:04 to 146:16

00146:04 Q. (By Mr. Leefe) And so on April the 20th,
05 to the best of your knowledge, a general alarm
06 was inhibited?
07 A. Yes, it was.
08 Q. All right. So on April the 20th, 2010,
09 there would have been -- assuming high high
10 levels were seen by two combustible gas sensors,
11 there would have been no automatic activation of
12 air dampers?
13 A. Based on -- no, there would not have
14 been.
15 Q. You agree?
16 A. I agree.

Page 146:18 to 146:23

00146:18 Q. (By Mr. Leefe) Now, the -- the use of the
19 inhibited mode by Transocean, certainly that was
20 something that was done for -- it was the
21 regular -- it's the regular course of action,
22 right?
23 A. Correct.

Page 148:19 to 149:02

00148:19 Q. (By Mr. Leefe) Take a look, if you would,
20 Mr. Williams, to Tab 3. Tab 3 has previously
21 been identified as Exhibit 1109. And it's
22 entitled "Overview Kongsberg Maritime Safety
23 System."
24 A. Okay.
25 Q. Okay. I want you to turn to Page 12, 12
00149:01 of 16.
02 A. Okay.

Page 149:08 to 151:10

00149:08 Q. (By Mr. Leefe) Do you see the description
09 here in the use of the -- the inhibit function?
10 A. Yes, sir, I do.
11 Q. Okay. What's -- what is it referring to
12 here? Inhibiting what?
13 A. Inhibiting a -- a sensor.
14 Q. And you see in the -- in towards the
15 bottom of the page, where it says: "Purpose/use
16 of function: Inhibit is used by the operator
17 when the detector needs maintenance, is in fault
18 or is not working correct"?
19 A. Yes, sir.

Q. Okay. Do you agree with that?
A. Yes, I do.
Q. And back up at the top of the page, second sentence: "These functions are intended to be used only for a short period of time until the problem has been solved or a test is completed"?
A. Correct.
Q. Do you agree with that?
A. I do.
Q. Okay. Now, flip to Tab 7, if you will. This is the Fire & Gas Operator Manual, ex -- formally -- previously identified as Exhibit 1111, 1111. And if you turn to Page 26.
Do you see where we're talking about 5.6.4, "Inhibit/Override"?
A. Yes, sir.
Q. Okay. What are -- what are we referring to here? What are they referring to here? Inhibiting what? Overriding what?
A. That particular module or -- or sensor.
Q. All right. Is this a reference to the -- to inhibiting the general alarm system?
A. This is in reference to the fire and gas, yes.
Q. So this is -- this is the inhibiting -- this is inhibiting the general alarm?
A. It could be, yes.
Q. All right. And that is what, in fact, was inhibited on a regular basis on the DEEPWATER HORIZON?
A. Correct. The general alarm function.
Q. All right. Now you see under 5.6.4, the second sentence, it says: "Inhibited or overridden function" is a safety system -- "in a safety system should not be allowed for longer periods."
All right. Do you see that?
A. Yes, sir.
Q. All right. Now, am I correct that Transocean, fair to say, didn't follow that rule?

Page 151:12 to 151:14

A. I know that it was inhibited for the entire time that I was the Electronics Technician aboard the HORIZON before it sank.

Page 152:01 to 152:04

Q. -- but I guess the point is: To your knowledge, the alarm system was inhibited all the time?
A. My entire career on the HORIZON as an ET.

Page 155:03 to 155:11

00155:03 Q. (By Mr. Leefe) Mike, when we broke for
04 lunch, I think we were talking about the fact
05 that you kept a logbook of the Safety Systems in
06 terms of what was inhibited and what was --
07 what -- what modes the system was set in.
08 A. Correct.
09 Q. All right. And you said -- is it you
10 that kept the logbook?
11 A. No, sir. The Senior DPOs.

Page 157:12 to 157:17

00157:12 Q. All right. Now, so then from that, I --
13 I gather, it -- it was your expectation that the
14 DPOs and the Senior DPOs would know on -- on a
15 day-to-day basis what systems were overridden,
16 inhibited, active, and so forth?
17 A. Correct.

Page 158:21 to 160:04

00158:21 Q. All right. So you would expect Yancy and
22 Andrea to have been very familiar with the state
23 of -- of the Safety System in terms of what was
24 inhibited and what was not?
25 A. Correct.
00159:01 Q. And you agree that it's very important
02 for the people that are dealing with the Safety
03 System to know what's inhibited and what's not?
04 A. I would hope so.
05 Q. Now, you knew that BP did an audit of the
06 rig back in late 2009?
07 A. Correct.
08 Q. Am I correct, you never saw a copy of the
09 audit?
10 A. Not once.
11 Q. But -- but some work and tasks were
12 assigned to you as a result of it?
13 A. Correct.
14 Q. All right. Now, I'll tell you that one
15 finding of the audit was as follows -- and this
16 is a quote -- "Control of alarms and bypasses
17 were not well managed. In fact, no single person
18 could account for which alarms, etc., were
19 overridden or indeed for what reason."
20 A. Correct.
21 Q. All right. Do you agree with that
22 finding?
23 A. Yes.
24 Q. And is that what caused you to then start

a logbook?
A. That's the birth of the logbook.
Q. All right. So the logbook had only been in existence since the BP Audit?
A. Correct, to my knowledge.

Page 161:19 to 162:13

Q. All right. Let me see if I can ask this correctly: If two sensors in the same zone as Engine Room No. 3 detected a high high combustible gas level and the general alarm was not inhibited, was active, then the system will cause the fire dampers on the air intakes to Engine Room No. 3 to close?
A. That's my understanding of how it worked, yes.
Q. And in theory this will keep combustible gas out of the room where Engine No. 3 is located?
A. In theory, yes.
Q. And a corollary to that would be if the two -- if two sensors in the same zone as Engine Room No. 3 had high high combustible gas levels and the alarm is in the inhibited mode, those same air dampers I just asked you about are not going to automatically close?
A. Correct.

Page 164:03 to 166:08

Q. I thought that I read someplace that -- that there was frustration amongst the folks that had to carry out the Maintenance System with the amount of paperwork, and -- and it was hard to get things accomplished?
A. Correct. That has no correlation to RMS.
Q. Okay. Well, what is that? What -- what -- what am I missing there?
A. RMS is simply the database that we used to log everything, all the maintenance required preventive or corrective. That's how we order our parts. That's how we track inventory. That's how we do a lot of things. It was simply a list that I could go by that says these are the order and the priorities of things that need to be repaired. From there, the paperwork would start.
If I picked a job off the list that requires whatever, shutting down an operation, then I'm going have to go pull a permit. That's where all the paperwork starts.
Q. Well, what is it that caused you to have to get involved with all the paperwork? Is --

00165:01 was there a Policy Manual or was it an order from
02 above or was it Transocean Policy that you have
03 to do paperwork?
04 A. All of the above.
05 Q. And -- and in your view, way too much
06 paperwork?
07 A. I believe my statement was we were
08 becoming more secretaries than we were
09 maintenance men.
10 Q. All right. And the paperwork didn't
11 allow you time to do what you needed to do?
12 A. In some cases, no.
13 Q. Was that -- that feeling that you've
14 expressed, was it shared amongst others on the
15 rig?
16 A. All maintenance personnel that I spoke
17 with.
18 Q. Were there complaints to Transocean
19 Superiors about that situation?
20 A. Yes, there were.
21 Q. You in particular made complaints?
22 A. Yes, I did.
23 Q. To who?
24 A. To the Lloyd's of London Auditors.
25 Q. All right.
00166:01 A. And to my Supervisors.
02 Q. And to your Transocean Supervisors?
03 A. Correct.
04 Q. Any -- anything done to resolve the
05 situation?
06 A. Yes. Prior to the accident, there was a
07 drastic reduction in the amount of paperwork
08 required to get things done.

Page 166:24 to 167:21

00166:24 Q. Okay. And it's fair to say that
25 you had -- you had had a -- a backlog of things
00167:01 on your to-do list at that point in time when the
02 paperwork was alleviated?
03 A. There -- there was always a backlog. We
04 were never caught up.
05 Q. You -- and on -- on the date of the April
06 2010 blowout, did you have a -- a long "To Do
07 List"?
08 A. "Long" is relative. Long -- relative to
09 what?
10 Q. Did you have as many as 50 items on your
11 "To Do List"?
12 A. I probably had between 50 and 75 items on
13 my "To Do List" --
14 Q. All right.
15 A. -- active.
16 Q. And -- and based on your knowledge of
17 others who did maintenance work on the -- on the

rig, would you expect that they had similar "To Do Lists"?
A. Most of the others' lists were longer than mine.

Page 175:07 to 176:05

Q. Well, is it some -- you -- you -- you know of some reason somebody would put the -- put the wrong date for out of service?
A. Sure.
Q. Why?
A. It's a constant battle.
Q. A constant battle --
A. The DP --
Q. -- with what?
A. -- the DPOs didn't -- it -- it was a constant battle with keeping fire and gas alive and working properly.
Q. Because there was plenty of malfunctions with that system; plenty of malfunctions with sensors?
A. With sensors, yes.
Q. All right.
A. Exposed to the elements.
Q. All right. And sometimes it would take as much as four months to get one fixed?
A. In -- not in -- not in my experience, it didn't take that long to get --
Q. Well --
A. -- anything fixed.

Page 177:20 to 178:03

Q. Let me ask you: Did you have anything to do with -- with maintenance for batteries on the Control Pod?
A. I never have, no.
Q. No? Did you -- was that a -- some -- a -- a -- a task that was within the Electronics Group?
A. I've heard occasions for ETs aboard the HORIZON of changing batteries on Pods, yes.

Page 179:10 to 179:25

Q. All right. Are you aware that the batteries had been replaced anytime since arriving at -- at the Macondo location?
A. Since arriving, no, I'm not aware of any --
Q. Okay.
A. -- battery changes.

Q. And are you aware of the -- the changing take -- a -- a battery change taking place during the rig move to Macondo?
A. No.
Q. Are the bat -- are battery changes, to your knowledge, addressed in an electronic checklist used during rig moves?
A. I've never seen a checklist referring to changing batteries, no.

Page 180:12 to 182:01

Q. Are you able to tell me when the last time the Blue Pod batteries were changed?
A. No, I couldn't.
Q. Are you aware of a Cameron Engineering Bulletin regarding battery replacement that requires replacement of the batteries after 33 cycles, or at most, one year?
A. No, I'm not.
Q. Did Transocean have any sort of policy that you're aware of about changing Control Pod batteries?
A. No, not to my knowledge.
Q. Okay. Is that -- as Chief Electronics Technician, that's not something you would have knowledge of?
A. No. We had a SWAT Team that we relied on to maintain those.
Q. All right. SWAT --
A. Most item -- most of the things that would come up with Subsea, which obviously is anything below the waterline, we had a Subsea SWAT Team that included electronics personnel that would come out and either change batteries or make up connections to the MUX reels or what have you.
Q. So that's a designated team of people that -- that would come from onshore?
A. Correct.
Q. And they would come to a particular rig and do subsea work?
A. Yes. Almost every rig move, we had Subsea SWAT Team onboard.
Q. Thank you. Do you know whether the Subsea SWAT Team was onboard during the rig move to Macondo?
A. I recall seeing a gentleman that worked actually with me that was on the SWAT Team, and he was there.
Q. Who was that?
A. That would have been Ron Guidry.

Page 182:14 to 183:08

00182:14 Q. Would you expect the change of a Control
15 Pod battery to be listed in the -- in the RMS
16 System?
17 A. I -- I would -- yes, I would have had to
18 have a job -- if they expected me to do it, there
19 should have been a job created and a battery
20 ordered, because this is also how we get our
21 parts.
22 Q. Would you be the one to actually place
23 the order for the battery?
24 A. Normally, yes.
25 Q. Do you recall ever placing an or -- an
00183:01 order for -- for Control Pod batteries at any
02 time in connection with the rig move?
03 A. No.
04 Q. No? And -- and so you -- you would
05 expect that if -- if an order for batteries was
06 placed at any time, it would show up in the RMS
07 System?
08 A. Correct.

Page 183:23 to 184:02

00183:23 Q. And are you -- you're not able to say --
24 and I apologize if I've already asked this, but
25 you're not able to say when, if ever, Control Pod
00184:01 batteries for the DEEPWATER HORIZON were changed?
02 A. No, I have no idea.

Page 184:04 to 184:11

00184:04 Q. (By Mr. Leefe) Was there anybody from
05 Cameron typically on the SWAT Team?
06 A. Not my knowledge, no. It was all
07 Transocean --
08 Q. Was it strictly --
09 A. -- personnel.
10 Q. -- Transocean's SWAT Team?
11 A. Correct.

Page 184:16 to 185:07

00184:16 Q. (By Mr. Leefe) I want to talk a little
17 bit about the night of the -- of the blowout.
18 And you -- you already told us a good bit, but
19 you were in your shop when you were talking to
20 your wife on the telephone, right?
21 A. Correct.
22 Q. And your shop is -- is right next to the
23 Engine Control Room?
24 A. Correct, adjacent.
25 Q. You've got a common ventilation system, I
00185:01 think?

A. Yes, sir, we do.
Q. Okay. Am I correct that before any explosion -- before you heard any explosion, you heard panel alarms beeping in the Engine Control Room?
A. Yes, I did.

Page 187:21 to 188:17

Q. (By Mr. Leefe) I gotcha. So if -- if you have the -- you got one beep for -- if -- if it was one sensor, and if you have 10 sensors detecting high high levels of gas, you're going to have 10 different beeps?
A. They're going to keep overlapping each other, yes.
Q. All right. And did you -- when you heard the beeps from the panel alarms in the Engine Control Room initially on the night of April 20th, did you hear a lot of beeps?
A. Yes.
Q. All right. Could you -- could you estimate how many different beeps you were hearing?
A. Lots. I mean, it -- it started slow, and then just -- until they were all on top of each other.
Q. All right. That's a pretty good indication, based on your knowledge of the system, that there's a problem going on?
A. Yes, a huge problem.

Page 188:25 to 190:15

Q. Now, you said Engine No. 3 started to rev up. Is that what you described?
A. (Nodding.)
Q. Did you -- did you have an indication at that time what was causing it to rev up? Did you --
A. No.
Q. Do you know what kinds of things make an engine like Engine No. 3 rev up?
A. Sure.
Q. What?
A. A governor could have broke.
Q. What about the influx of -- of combustible gas, would that cause the engine to rev up?
A. Sure.
Q. All right. In hindsight, is that what you think was going on?
A. No doubt in my mind that's what was going on.

Q. All right. Now, you said it revved up to just an -- just an unbelievable speed?
A. Correct.
Q. You could tell that from the noise it was making?
A. Yes.
Q. Okay. And then you heard an explosion?
A. Violent explosion, yes.
Q. Okay. Is it your belief, based on all your observations and your knowledge of -- of the system out there, that that was Engine No. 3 exploding?
A. Yes.
Q. And is it your belief, based on your -- your knowledge of the -- the -- the way the rig is set up and your -- and -- and what you heard and know, that combustible gas was getting in through the air intakes, getting to Engine No. 3, causing it to rev up to the point that it exploded?
A. Yes.

Page 191:01 to 193:10

Q. All right. When you got to the door, you had a second explosion go off?
A. Second, equally violent explosion, yes.
Q. Any idea where that was coming from?
A. The only thing I can think of was No. 6 engine.
Q. Okay. Why No. 6?
A. Because it was also online.
Q. So the two engines that were online were 3 and 6?
A. Correct.
Q. And I -- I guess this is a little redundant, but at that point, you had not heard a general alarm?
A. No, I did not.
Q. And, in fact, you never heard a general alarm the entire night?
A. No, I did not.
Q. And when you got outside, did you see any visual light column alarms for the combustible gas?
A. I looked at -- at least two different light standards, and neither one of them were blinking.
Q. Okay. And, of course, the general alarm wouldn't sound, and the lights -- the light alarms wouldn't activate automatically because it -- or if the fire and gas system alarms was inhibited?
A. Correct.
Q. Okay. And it's your belief that the

system was inhibited?
A. Yes, it was.
Q. You know it was?
A. I had no reason to believe they had ever taken it out.
Q. I think you said you next managed to get your -- to get to the bridge. You made your way to the bridge after you left your shop, right?
A. Yes, sir.
Q. All right. And -- and then in the bridge, you encountered the Captain?
A. I did.
Q. His name is?
A. Captain -- I called him Captain Curt.
Q. All right. And I've seen where you've described the Captain as having a "deer in the headlights" look?
A. Yes, he did.
Q. Would that be accurate?
A. Yes.
Q. What -- what do you mean by that description?
A. He was overwhelmed.
Q. All right. I've also seen -- I think you said he was dazed and confused?
A. Yes.
Q. Would that -- that be accurate?
A. Yes. He didn't know what was happening and why.

Page 193:14 to 197:07

A. I don't really have anything to compare it to. I've never been in a situation like this before.
Q. (By Mr. Leefe) All right. Well, if he's a deer in the headlights, and he's dazed and confused, I wouldn't think that would impress you.
A. Well, that was the first --
Q. Fair to say?
MR. KOHNKE: Objection, form.
A. That's the first impression. Some time passed while I was in the bridge.
Q. (By Mr. Leefe) And then you said that your -- your comments to him were that "We've lost -- lost Engine No. 3"?
A. Correct.
Q. "And we need to abandon ship"?
A. Correct.
Q. And I've seen where you were -- you said previously that you were told to calm down, but I heard you today say something different?
A. That's what he -- what he asked me to do. He told me to "Sit down and shut the fuck up."

Q. Were other people present when he -- when he made --
A. Yes.
Q. -- that comment?
A. Yes.
Q. Okay.
A. At that -- I mean, there's a reason he spoke to me the way I did, because I was adamantly screaming at him that we needed to leave. I wasn't asking him. I was telling him.
Q. And, of course, in hindsight, you were -- you were on the money, you needed to abandon ship --
A. I knew what --
00195:01 Q. -- right then and there?
A. I knew what the -- I knew what had happened. He didn't, and he didn't believe what had happened yet.
Q. He -- he didn't take your word for it?
A. No.
Q. You -- and I don't want to go over everything you said happened, but as I recall, you said you and Steve Bertone and another gentleman went to try and start the standby generator?
A. Correct.
Q. Is the standby generator something that should -- should automatically activate when other generators have gone down?
A. There is a timer function on the generator that, given a period of time, it should have started on its own.
Q. All right. But it didn't?
A. No.
Q. All right. H'm --
A. All of that equipment was apparently damaged, the timer or the switch.
Q. Either that or it malfunctioned?
A. I don't know. It didn't start.
00196:01 Q. Now, was -- was the standby generator -- was that the emergency generator?
A. No, it was not.
Q. So tell me about that, is you have -- you have regular generators, and then you have emergency generators, and then you have a standby in addition?
A. Correct.
Q. All right. Well, what happened to the emergency generators?
A. It exploded.
Q. So is that No. 3?
A. Correct.
Q. Well -- well, why was the emergency generator operating at the time on the evening of -- of April 20, 2010, when it's an emergency

generator?
A. Engines 3 and 4 were designated emergency generators.
Q. All right.
A. It was not uncommon for them to be used as normal generators.
Q. Well, what were the normal generators?
A. One, two, five, and six.
Q. All right. Do you -- do you know why Transocean had chosen to run what was designated as the emergency generator prior to there ha -- prior to there being an emergency?
A. No.
Q. Was there a problem with the normal generators?
A. Not to my knowledge, no.

Page 197:21 to 197:25

Q. Is there a difference between the normal generator and the emergency generator?
A. No.
Q. It's just --
A. Just a designation.

Page 200:05 to 200:15

Q. But in -- in any event, the night of April 20, 2010, 6 and 3 are running. We know 3 goes down.
A. Correct.
Q. You assume 6 blows up, the second time?
A. Correct.
Q. And none of the other generators cranked up?
A. Ever came online. No, not my knowledge.
Q. And you don't know why?
A. No.

Page 201:03 to 201:10

Q. When you got to the standby generator, was it intact?
A. Yes, it was.
Q. But it still wouldn't start?
A. No. But it had a little green light said it was Ready.
Q. But it still wouldn't start?
A. But it wouldn't start.

Page 201:18 to 202:16

Q. Right? So who is it, in -- in your --

based on your training on the DEEPWATER HORIZON, in -- in the context of an emergency, a fire and an emergency, who is it in overall charge of the rig?
A. The OIM. If we're latched to the bottom --
Q. Is --
A. -- OIM.
Q. Is there a point in time when the Captain overtakes the OIM and he is in charge?
A. In my mind, no.
Q. All right. That's -- you've never been trained to that effect?
A. Never been trained either way.
Q. Okay. Did you -- have you been to some Safety Training?
A. Yes, I have.
Q. And -- and fire drills, I'm sure, are common?
A. Yes.
Q. Never any discussion about who would be in overall charge, as between the OIM and the Captain, in the event of a serious emergency?

Page 202:18 to 205:05

A. No.
Q. (By Mr. Leefe) All right. And -- and as far as you knew that night, the night of the blowout, the OIM was still in charge?
A. Correct.
Q. Now, when -- you said that the Captain made a direct request to a -- a gentleman by the name of Chris Pleasant to activate the EDS?
A. Yes, he did.
Q. All right. Was the OIM in the room at the time?
A. I -- I don't think he was there the first time. I'm a little fuzzy right there. I don't know if he was there at that exact moment, but at some point later, yes, he was there.
Q. Well, but -- but Chr -- as I -- as I heard you testify earlier, Chris Pleasant's response -- you -- you tell me. What was his response?
A. That, no, he would not EDS without the -- the OIM and the Company Man present.
Q. And then what happened? No EDS?
A. The EDS wasn't pressed at that point, no.
Q. Okay. And this -- some time goes by?
A. Some time, yes. Three minutes, five minutes, fifty minutes, I don't know how -- some -- some time passed, and Mr. Jimmy finally staggered in, and the Company Man was already present, which I believe was Mr. Vidrine. And

they both started talking about -- they were trying to get Mr. Jimmy to talk. First of all, he couldn't barely talk because he was vomiting -- lungs were full of insulation and smoke. And he finally got the words out, "Yes, EDS. Yes, EDS."

Q. All right. But that -- the -- the decision to EDS a Transocean rig is a Transocean decision?

MR. PENTON: Objection, form.
MR. KOHNKE: Object as to form.
MR. DILLS: Object to the form.

A. It's a -- no. It's a dual decision.
Q. (By Mr. Leefe) Whose --
A. Got to have both.
Q. It's Transocean's rig.
A. Got to have a BP Company Man, according to Chris --
Q. Where --
A. -- Pleasant.
Q. Where did you learn -- according to Chris Pleasant. What --
A. He worked with me.
Q. -- is Chris Pleasant?
A. Chris Pleasant is a Subsea Engineer.
Q. All right. Do you know where he got that information?
A. No idea.
Q. So you don't think that the -- that the Transocean people have the authority to emergency disconnect their drilling rig if they think there's an emergency and -- and a dire situation and lives are at stake. You think they have to sit around and wait for a BP person to say "Yes"?

Page 205:23 to 208:04

Q. All right. And eventually Harrell makes the call and says "Go ahead and EDS"?
A. Right. And an even greater point of time after he gives the okay was Mr. Vidrine, with the door open, staring at all the buttons, for some three to -- what I felt like was three to five minutes, staring at all the indications, before he ever told Chris to press the button.
Q. Harrell?
A. No.
Q. Who tells Chris to press the button?
A. Don Vidrine was the final --
Q. All right. Well, would Ha -- Harrell didn't -- when did -- when did the OIM, Mr. Harrell, say, "Press the button"?
A. As soon as he could get words out of his mouth upon arriving on the dri -- on the bridge.
Q. All right. And --

A. A coherent word.
Q. And did Chris not activate the button at that point?
A. Well, he was waiting on Mr. Vidrine.
Q. All right. And is it -- and -- so the whole room -- the Captain has already told you to do it long ago. You were --
A. He had requested to be disconnected from this fuel source, yes.
Q. He told -- he told Chris to hit the button?
A. Yes, he did.
Q. All right.
A. Chris told him "No."
Q. And -- and then Harrell says, "Okay. Do it," and Chris still says, "No. I'm waiting for Mr. Vidrine"?
A. Correct.
Q. Okay. Let me switch gears and ask you about the -- the Driller's Chair. You referred to something called the blue screen of death, but I didn't really hear an explanation today as to what was meant by that. Can you explain that?
A. Sure. Any time -- any of these PCs in here, if I disconnect your video feed, it's going to turn blue.
Q. Why the term "blue screen of death"?
A. Because that essentially means that that PC is now dead. It is off.
Q. All right.
A. "Off" and "death" are synonymous.
Q. So is that a term that was used for the Driller's Chair?
A. Yes.
Q. So I -- I take it from that, that there were -- there were occasions when the entire screen on the Driller's Chair would go blank, and there would be no information conveyed?
A. Correct.

Page 208:09 to 208:13

Q. (By Mr. Leefe) Is it fair to say that there were significant problems with the Driller's Chair in the months and weeks leading up to the blowout?
A. Correct.

Page 208:15 to 208:17

Q. (By Mr. Leefe) And that those problems would lead to the Driller either getting erroneous or no info?

Page 208:19 to 209:20

00208:19 A. Correct.
00208:20 Q. (By Mr. Leefe) And that, I believe, new
00208:21 equipment had been ordered?
00208:22 A. And received.
00208:23 Q. And received. Okay. New hardware?
00208:24 A. Yes, sir.
00208:25 Q. And new software?
00209:01 A. Yes, sir.
00209:02 Q. All right. And am I correct that you
00209:03 understood from your Superiors that you were not
00209:04 going to install the hardware and the software
00209:05 until another Transocean rig, who was using a
00209:06 sister rig -- I believe, the NAUTILUS, who was
00209:07 also installing new hardware and software --
00209:08 could try it out and get the bugs out of the
00209:09 system?
00209:10 A. We were trying to learn from their
00209:11 mistakes, yes.
00209:12 Q. Right. And you had been told that you
00209:13 weren't going to install the hardware and
00209:14 software on the HORIZON until the NAUTILUS had
00209:15 tried it out and gotten the bugs out of the
00209:16 system and you could learn from them?
00209:17 A. I was not told that was the reason we
00209:18 weren't installing it. I was told that, "While
00209:19 we are not able to install it, we are going to
00209:20 learn from them."

Page 211:04 to 211:13

00211:04 Q. (By Mr. Leefe) And that problem with the
00211:05 Driller's Chair, it goes way back, doesn't it?
00211:06 A. Years.
00211:07 Q. Yeah. I mean, way ba -- back into -- way
00211:08 back into -- to 2008, maybe, even?
00211:09 A. Before that.
00211:10 Q. Okay. So that's been a continuous
00211:11 problem that you -- you've been unable to solve
00211:12 on that Driller's Chair?
00211:13 A. Correct.

Page 216:21 to 218:19

00216:21 Q. Am I correct that that was a continuous
00216:22 source of maintenance and repair?
00216:23 A. Yes, it was.
00216:24 Q. It was your job to maintain it?
00216:25 A. Yes, it was.
00217:01 Q. And was that -- is that a system that was
00217:02 utilized during Drilling Operations?
00217:03 A. Yes, it was.

Q. It's actually -- I -- I -- I take it from the -- from its name, pipe racking system, that it's -- it's where the drill pipe is racked?
A. Correct. Not where it's racked. How it's racked.
Q. How it's racked. Okay.
Would it be fair to say that in your belief it -- the pipe racking system on the DEEPWATER HORIZON was junk?
A. Yes, it would.
Q. Frequently malfunctioned?
A. Yes, it did.
Q. The con -- the -- the conversation you alluded to earlier about hearing someone say "bump up the drilling speed"?
A. Correct.
Q. That was back -- that wasn't in April of 2010, was it?
A. I -- I believe it was in February or March.
Q. All right. Well --
A. The end of February, first of March.
Q. Yeah. I think I've seen somewhere where you saw -- thought it was in February, right?
A. Sounds about right.
Q. Now, it's the Driller who's in charge on the drill floor?
A. The Driller is in charge of?
Q. The drilling -- the crew on the drill floor.
A. Kind of, yes.
Q. All right. And -- and the Driller is the guy who's operating the controls?
A. Operating the controls, yes.
Q. All right. And in terms of the speed at which the drilling takes place, he's actually the man at the switch?
A. Correct.
Q. And, of course, he's got responsibilities that -- to everyone on the rig for safety?
A. Sure.

Page 222:09 to 222:10

Q. Good afternoon, sir. My name is Sean Fleming. I represent Halliburton. How are you

Page 222:16 to 222:23

Q. One question that I do have for you that I don't think has actually been asked so far is: Obviously, at the time of the Macondo incident, you were employed by Transocean, correct?
A. Correct.

Q. Are you still employed by Transocean today?
A. Yes, I am.

Page 223:19 to 224:17

Q. Mr. Williams, let me ask you a question that, in retrospect, may seem like an odd question, but up until the time of the incident, did you actually like working on the HORIZON rig?
A. Yes, I did.
Q. Okay. Why was that? Why did you like working on the rig?
A. It was challenging.
Q. Okay. How so?
A. Every time I went to fix something, I would find layers of repairs and Band-aids, and it was a -- sort of a mystery novel to get to the bottom and find the real underlying issues.
Q. Okay. Did you ever think about transferring?
A. I did, yes.
Q. Did you put in a Transfer Form?
A. No, I did not.
Q. Why did you decide to stick with the HORIZON?
A. I needed the experience.
Q. On the HORIZON?
A. Yes. What better way to learn, than fix everyone else's mistakes.

Page 229:06 to 229:12

Q. Okay. Do you know, really, anything about mud logging?
A. Very little.
Q. Okay. And so do you have any cause to criticize anything that any of the Sperry-Sun mud loggers did on April 20th?
A. No.

Page 230:19 to 232:11

Q. When did Mr. Harrell give the order to EDS? Was that before or after you and Mr. Bertone -- is it Mr. Bertone or --
A. Mr. "Ber-tone-ee."
Q. Bertone -- you and Mr. Bertone left to try to activate the standby generator?
A. He gave the order prior to us going to activate the generator.
Q. Okay. Was there any effect of that order, from your observation?

A. Any effect. Any change?
Q. In terms of any change on the rig itself.
A. No changes.
Q. Would you expect -- let me back up.
Do you know anything about the EDS system?
A. I do.
Q. Would you expect there to be some type of physical change if the EDS system had been activated?
A. I would expect the roar to come down considerably, yes.
Q. Okay. Was there anything like that when the EDS system was act -- was --
A. No.
Q. -- activated?
A. No.
Q. Were you there after the EDS order was given and then activated, or did you leave immediately thereafter?
A. Sometime after, within a short time frame.
Q. Were you there -- well, here's all I'm trying to get at: Were there any discussions on the bridge while you were still there, about the EDS system not activating?
A. Not that I recall, no.
Q. Okay. So as far as you're aware, they just pressed a button, and they said, "Okay. EDS is fine," or you don't remember anything like that?
A. Correct. While -- while I was there, no. Nothing else was said about it.

Page 233:20 to 234:07

Q. Do you recall the Captain reprimanding someone for suggesting to EDS?
A. No.
Q. Was it --
A. It wa --
Q. -- the Captain's --
A. It wa --
Q. I'm sorry. Go ahead.
A. It was his order. He's --
Q. So --
A. -- the one that requested it.
Q. And he requested it from Mr. Pleasant?
A. Yes.

Page 234:20 to 236:09

What is your understanding of the hierarchy compared in -- with -- with respect to

the Captain's position on the ship versus Mr. Pleasant's position on the ship?
A. The Captain is a Marine side of the vessel. He's in control of whatever it takes to keep the vessel floating, balanced, ballasted, underway, you know, those sorts of things.
Chris Pleasant's job becomes foremost and -- and centered when the BOP stack hits the water.
Q. When you're latched up?
A. When it hits the water. From the time it hits the water, till it hits the bottom, his operation, his craft subsea, are pretty much in control of everything.
Q. Okay. Was it your understanding, as the Chief Electrics -- Electronics Technician, that while you were latched up, Chris Pleasant had authority over Captain Kuchta?
A. Authority, no.
Q. Okay. What term would you use?
A. He's not res -- he simply didn't respond to his request.
Q. So they weren't in the same Chain of Command?
A. Correct.
Q. Okay.
A. The Captain should have asked Jimmy, not Chris.
Q. "Jimmy" being the OIM?
A. Correct.
Q. Okay. And Mr. Pleasant reported to Jimmy Harrell, the OIM?
A. He deferred and then reported when he arrived, yes.
Q. Okay. And the OIM was in charge of all operations while the rig was latched up; is that correct?
A. Correct.

Page 241:03 to 242:05

On the engine revving, you previously testified that you believe Engine No. 3 began revving at a very high speed?
A. Correct.
Q. And this may be outside your area of knowledge and, if so, that's fine, just tell me, but to your knowledge, is -- once an engine starts revving like that, is there any way to stop it?
A. To my knowledge, yes.
Q. Okay. And what is that?
A. To cut off the fuel source.
Q. Okay. Do you know, was that done on April 20th, when the engine started revving?

A. No.
Q. Was any attempt made to cut off the fuel source?
A. Not to my knowledge.
Q. Could there have been at that time?
A. I don't know. I wasn't there. I was in my shop.
Q. How would you cut off the fuel source to Engine No. 3?
A. Close the fuel rail, close off the air intakes.
Q. Could you do that from the bridge?
A. By pressing the EDS button, yes. Did I say "EDS"? I'm sorry, I meant "ESD."

Page 242:16 to 243:21

Q. Okay. So just to clarify, you're talking about the Emergency Shutdown System --
A. Correct.
Q. -- not the Emergency Disconnect System?
A. Correct.
Q. Okay. While you were on the HORIZON while they were drilling at the Macondo, did you hear from conversations you had with any of the Transocean crew the Macondo being referred to as the "well from hell"?
A. Yes, I did.
Q. Tell me about those. How did you hear about that term?
A. A lot of the conditions of that well were similar to the conditions of the previous well we had drilled, which was in the vicinity of Devil's Tower. That well exhibited a lot of the same nasty habits. It had a lot of gas in it, we got stuck, it had -- we had issues. We did not receive a -- a well bonus from the one near Devil's Tower, nor were we going to receive a bonus from this well. The other well was dubbed the "well from hell." This became the new "well from hell."
Q. Okay. Was the previous "well from hell" that -- was it, I'm sorry, Devil's Tower?
A. It was close to Devil's Tower. I don't know the exact block or -- or name of it.
Q. That well, was -- was that well successfully completed?
A. No, it was abandoned.

Page 245:08 to 247:11

Q. Okay. And I believe you previously testified about this, but I just want to clarify: Was it your opinion, based in your role as a

member of the Transocean crew, that BP was in a hurry to finish up the drilling on the Macondo?
A. Yes.
Q. Did you have any knowledge as to why BP actually wanted to finish drilling of the Macondo so quickly?
MR. LEEFE: Objection, form.
A. The -- the only thing I can attribute to was they talked about how we needed to get out of here and get to the next one because the lease was coming due or something to that effect.
Q. (By Mr. Fleming) Okay. Where did you get -- learn that knowledge?
A. Things get talked about on the rig.
Q. Did you hear that directly from someone at BP?
A. I -- I don't recall who I heard it from.
Q. Okay. Does the Nile Well mean anything to you?
A. Very little.
Q. Had you -- had you heard that term being discussed while you were on the HORIZON?
A. I had.
Q. Do you have any understanding about whether the HORIZON was going to the Nile Well after it was going to be finished with the Macondo?
A. If the Nile is a 21-day well, or planned 21-day well, then, yes, that's where I thought we were going next.
Q. Okay. And are you aware of any discussions about that specific well while you were onboard of the HORIZON about the reason why the HORIZON was being sent to that?
A. Something to do with permitting.
Q. Something to do with permitting?
A. Yes.
Q. What specifically do you recall?
A. Nothing -- that there -- there was an issue with the timing, that we had to go get started or something before the permit ran out --
Q. "Something" being --
A. Lease.
Q. -- BP's permit ran out?
A. Correct.
Q. Okay. Was that something -- based upon your conversations with the TO crew, is that something that was well-known --
A. Yes.
Q. -- on the TO crew?
A. Yes, I would say so.

Page 251:21 to 252:12

Q. Okay. Fair enough. I believe you

previously testified that there was a rumor on the rig that the crashing of the Chairs may have had something to do with the kick that was experienced in March. Did I understand that correctly?
A. Yeah. It's not really a rumor.
Q. Okay. It's not really a rum -- okay. Explain that to me.
A. The -- the kick they took in March, the Chair went down, the tag replicator did not function properly. When the Chair was brought back up, the data that the Driller was looking at was erroneous. The Assistant Driller sitting over on the B-Chair or someone else said, "Hey, you know, look, something is going on." They discovered there we had, in fact, taken a kick.

Page 252:18 to 252:23

Q. Is there -- to your knowledge, based upon your familiarity with these systems, is there any way, sitting here today, to determine whether the A and B and C-Chairs were functioning correctly as of the time of the blowout on April 20th?
A. No way to know.

Page 253:13 to 254:24

Q. Okay. Were there still problems, say -- let's -- let's broaden it out. A month before the blowout, were there still problems with the Chair?
A. Yes.
Q. To your knowledge, were the Chairs actually fixed and in working order as of the time of the blowout?
A. We had changed the hard drives about a week prior to the blowout, the physical hard drive.
Q. On Chair A or -- or --
A. Of Chair A, B, and C.
Q. Okay.
A. We changed all three hard drives, with the same -- put the same image that was on the previous hard drive onto the new hard drive, and installed those. From the time we installed those until the time of the blowout, yes, I have had to restart A-Chair again, because it locked up.
Q. Okay. I believe you previously testified that, in your opinion, the problem was the outdated software; is that correct?
A. Correct.
Q. Okay. So why would the switching out of

a hard drive have any impact, if you're still using the same software?
A. Because I didn't know what else to do. I had to do something.
Q. Okay. If you would turn with me to -- you know what, you don't even need to turn with me. I'm just going to read it from [sic] you. This is from the Chief's Counsel's Report, it's a publicly available document, I don't need to introduce it as an exhibit. I just want to ask you one question.

Page 255:05 to 256:18

Q. (By Mr. Fleming) The question that I have for you is this: And those -- you can take my word for it. This -- there's a statement in the Chief Counsel's Report concerning the Chairs. And it says that: "The crew had expressed some complaints of the driller's and assistant driller's control chairs, known as the 'A-chair' and 'B-chair' respectively. The computer system powering the chairs' controls and displays had 'locked up' or crashed on several occasions. When this happened to the A-chair, the driller's screens would either freeze or revert to a blank blue screen, disabling the real-time data display on the screen and requiring the driller to move to the adjacent B-chair. In response, Transocean replaced the chairs' hard drives."
So far, so good; is that correct?
A. Correct.
Q. "This appears to have corrected the problem."
That's my question to you: Is, in your opinion, and as your role as the Chief Electronics Technician -- did I get that right again?
A. You did.
Q. -- onboard the HORIZON, to your -- the best of your knowledge, is that a correct statement?
A. No, it's not.
Q. It states that "The April 12 assessment found that the software on all of the chairs was 'stable and had not shown (excessive) crashes."
I'm not going to ask you about the 12th assessment. My question is more substantive. And that is: In your opinion, and in your role as the Chief Electronics Tech -- Technician, onboard the HORIZON, were those Chairs stable and had they shown excessive crashes?
A. They --

Page 256:20 to 256:23

00256:20 A. -- they were not stable, no.
21 Q. (By Mr. Fleming) Okay. Had they shown
22 excessive crashes?
23 A. Yeah.

Page 257:02 to 257:08

00257:02 Q. Were you ever interviewed by anyone for
03 that Report?
04 A. No.
05 Q. Did anyone from Transocean contact you
06 and ask you any questions in preparation for that
07 Report, to your knowledge?
08 A. No.

Page 258:03 to 258:06

00258:03 Q. (By Mr. Fleming) And we'll hand you what
04 we will mark -- what's been previously marked as
05 Exhibit 1887. And this is the "Deepwater Horizon
06 Follow Up Rig Audit" from September of 2009.

Page 259:24 to 261:22

00259:24 Q. Okay. If you could turn with me to
25 Page 7, and I'm going to bleed over to Page 8 a
00260:01 little bit. And this actually touches upon
02 something that you talked about earlier,
03 specifically, the mass exodus of people from the
04 HORIZON.
05 This statement is under "Training and
06 Competency." It states that: "The turnover of
07 personnel on the rig has been high over the last
08 two years with personnel either being attracted
09 to other contractors or moved to new builds
10 within the Transocean Fleet."
11 Let me stop right there. Is that in
12 accordance with your understanding about what was
13 going on on the HORIZON, as well?
14 A. Yes.
15 Q. Okay. And then turning the page, on
16 the -- the last sentence of that paragraph there
17 it reads: "Any further dilution of experienced
18 personnel may be detrimental to the performance
19 of the rig."
20 Do you see that?
21 A. Yes, I do.
22 Q. My question is whether you agree with
23 that statement.
24 A. Absolutely.
25 Q. Okay. And you're basing that in your

00261:01 role as the Chief Electrics Technician onboard
02 the --
03 A. You missed it.
04 Q. Ah, I knew I was going to -- it was Chief
05 Electronics Technician. Did I get it --
06 A. Right.
07 Q. -- right that time? Chief Electronics
08 Technician on board the HORIZON. In your role as
09 Chief Electronics Technician on the HORIZON, do
10 you agree or disagree with that statement?
11 A. I would agree with that statement.
12 Q. Okay. How did this impact your job
13 specifically, with the loss of some of these
14 experienced personnel?
15 A. Made my job a little harder.
16 Q. Okay.
17 A. I didn't have the experience to rely on.
18 Some of the more experienced hands that had moved
19 on.
20 Q. Do you believe that the dilution of
21 experienced personnel had an impact on the safety
22 of the HORIZON?

Page 261:24 to 262:01

00261:24 A. I'm sure to some extent it did.
25 Q. (By Mr. Fleming) Okay. And what extent,
00262:01 to your knowledge?

Page 262:03 to 264:05

00262:03 A. The lack of experience could lead to
04 being in the wrong place at the --
05 Q. (By Mr. Fleming) Let me --
06 A. -- wrong time.
07 Q. -- let me see if I can clear this up to
08 address the objection.
09 Are you personally aware of any
10 instances, during your time on the HORIZON, in
11 which you personally experienced a situation that
12 could have led to a safety issue that was due in
13 part to the lack of an experienced personnel
14 staff?
15 A. That's so broad. There's so many crafts
16 onboard the rig.
17 Q. Right. I'm just asking for what you
18 personally observed and what you know.
19 A. Well --
20 Q. And if you don't know, that's fine.
21 A. I -- I mean, it -- when you're -- when
22 I'm troubleshooting a fire and gas system, if I
23 don't have the experience or the knowledge to
24 rely upon even during troubleshooting, I can
25 inadvertently cause some other system to do

something automatically that people in that area may not be aware that are -- that it's getting ready to happen, I could injure someone.

So, yes, the -- the lack of experience to know the quirks or the in's and out's of the system and what its effects are to other areas and other crafts, made my job more dangerous for everyone onboard.

Q. Okay. I -- I believe you previously testified that you were force-promoted, is that the phrase --

A. Correct.

Q. -- you used? What does that mean?

A. I told them I didn't want the job.

Q. Okay. And why did you tell them you -- that it -- that you didn't want the job?

A. I wasn't ready.

Q. Okay. And what was their response?

A. Take the job or hit the street.

Q. And so you took the job?

A. Yes.

Q. Did you feel that you were ready for that job?

A. No.

Q. On April 20th, did you feel that you were ready for that job?

A. Yes.

Q. So you felt that you grew into the job, then?

A. Very quickly.

Page 264:20 to 265:16

Q. Okay. To your knowledge, did BP ever request a rig shutdown for safety for any of the items that were identified in the September 2009 Audit -- Audit?

A. I re -- I recall a very short safety standdown.

Q. Do you recall what that was for?

A. Not exactly. I can't remember if we dropped something, or a crane smashed into something. I -- I don't recall exactly what it was for.

Q. Okay. How long were you down for?

A. Less than 12 hours.

Q. Okay. Did you re -- well, strike that.

Who would you have requested additional time to take care of some of these maintenance issues if you had wanted to do so?

A. My direct Supervisor.

Q. Okay. Did you, in fact, do that?

A. Yes, all the time.

Q. And what was the response?

A. "I'll buy you as much time as I can."

Page 266:17 to 267:01

00266:17 Q. (By Mr. Fleming) Okay. Let's talk about
18 specifically in your area. Is there anything
19 that you personally were responsible for, from a
20 Maintenance perspective, that you feel that had
21 you had the time and the resources, could have
22 had an impact on any aspect of what happened on
23 April 20th?
24 A. No. Not on --
25 MR. KOHNKE: Objection, form.
00267:01 A. -- not on my -- not in my craft, no.

Page 267:17 to 268:21

00267:17 Can I ask you to turn -- this will be Tab
18 9, and this has been previously marked as Exhibit
19 929. This is the Lloyd's Register Survey. Are
20 you familiar with the -- with this document, sir?
21 A. I've never seen this document before.
22 Q. Were you aware that Lloyd's Register was
23 conducting a survey in 2010?
24 A. Yes, I participated in that survey.
25 Q. Okay. How did you participate?
00268:01 A. We had a verbal meeting.
02 Q. Who is "we"?
03 A. Myself and three other people.
04 Q. Three other people from Lloyd's?
05 A. From Transocean.
06 Q. Okay. Who was actually doing the
07 interviewing?
08 A. Two Lloyd's people.
09 Q. Okay. What was the purpose of the survey
10 as it was -- as it was explained to you?
11 A. To get a feel and a handle of the safety
12 culture on the rig.
13 Q. Okay. When you spoke with the two people
14 from Lloyd's, did you report some of your
15 concerns about the -- the Driller's Chairs?
16 A. I did.
17 Q. Okay. And what was their response?
18 A. You know, they couldn't fix them. I -- I
19 don't know how they could have responded. I just
20 reported that -- they're ongoing Maintenance
21 nightmares.

Page 269:25 to 270:21

00269:25 Q. Under the section marked "Key findings
00270:01 from the perception survey," it states that:
02 "...46.3% of participants felt...workforce was
03 uncomfortable with calling a Time-Out For

Safety..."
Do you see that? It's the second bullet point.
A. I do.
Q. Were you personally -- when they say "TOFS," just to clarify for the record, "TOFS" stands for "Time-Out For Safety," right?
A. Yes, it does.
Q. Were you one of the parcip -- strike that.
Were you one of the participants that felt some of the workplace was uncomfortable with calling a time-out for safety when unsafe conditions occurred?
A. Never.
Q. Okay. So you always felt comfortable calling a time-out for safety?
A. Yes.

Page 271:01 to 273:21

Q. (By Mr. Fleming) At least according to this survey, 46.3 percent of the Trans -- of the HORIZON crew were uncomfortable calling a time-out for safety. My question to you is whether you had any personal knowledge of that based on your conversations with the Transocean crew?
MR. KOHNKE: Objection, form.
A. No, I didn't.
Q. (By Mr. Fleming) Okay. Also, it says in the first bullet point: "46.3 percent of participants felt that, if their actions led to a potentially risky situation (e.g. forgetting to do something, damaging equipment, dropping an object from height), they could report it without" fear of any repri -- "without any fear of reprisal." Do you see that?
A. I do.
Q. My question to you is similar to the one I asked before. Were you one of these participants that felt that if your actions led to a potentially risky situation you can report it without any fear of reprisal?
A. (Reviewing document.) Yes.
Q. You were one of those participants?
A. Yes.
Q. Okay. Explain that to me. How were you concerned that if you had reported a potentially risky situation you could do so without any fear of reprisal?
A. If I was on, say, a pipe racker in a basket a hundred feet off the deck and I dropped a screwdriver, I knew pretty much I was going to be on the helicopter the next morning.

Q. Helicopter being -- what does that mean, being fired?
A. Being fired, going home.
Q. Okay. Were there any other concerns specific to your job that you were concerned about with respect to this issue?
A. I -- I really wasn't concerned with damaging equipment. I mean, it wasn't -- no. Mainly dropping things, worried about dropping things out of the basket on the rig floor.
Q. Okay. Why were you concerned about dropping things on the floor specifically?
A. Because we had to use big, heavy tools, and we were way up in the air and in a very greasy, nasty environment, and grip and traction's at a premium up there.
Q. Okay. If you turn to Bates No. 90585, do you see that? There's a box up -- and it says "Weaknesses." There's a statement down at the bottom there that says: "Run it, break it, fix it, that's how they work and the Drilling Department should" have held more -- "should be held more accountable than what they (currently) are." Do you see that?
A. M-h'm.
Q. First of all, my -- my first question to you is: Did you say that statement to the Lloyd's interviewers?
A. No, I didn't.
Q. Okay. Do you agree with that statement?
A. In the Drilling Department, yes.
Q. Okay. If you could, turn with me to -- this is going to be Tab 15, and this does not have a Bates number.
MR. FLEMING: We're going to mark this as Exhibit --
MR. SILVAS: 4143.

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(Exhibit No. 4143 marked.)

Page 277:23 to 279:20

Q. Okay. It says: "With the schedule slipping, Williams says a BP manager ordered a faster pace." First of all, is that a correct statement?
A. Yes.
Q. Which BP Manager are you referring to there?
A. Don Vidrine.
Q. Okay. Were you physically -- were you actually there when Don Vidrine made such a

statement?
A. Yes, I was.
Q. Okay. And tell me about that. What specifically did he say and to whom?
A. Dewey Revette, I think, was the Driller. It could have been Brandon Burgess. One of the two was on the console, and I was up there for another purpose. I don't even remember what now, but as we were -- we were drilling ahead, we were going at pretty much wide open. It was very early on in the well, kind of eas -- what they call "easy drilling." And the Company Man looked at him and said, "Hey, bump it up. Bump it up," and he was referring to the rate of penetration. I watched Dewey enter his value in.
Q. I'm sorry. Just to clarify, when you say "the Company Man," are you referring to Mr. Vidrine?
A. Mr. Vidrine, yes.
Q. Okay. I'm sorry. I didn't mean to interrupt.
A. And told him to bump it up. And what he's talking about is his rate of penetration, whether it be drill -- you know, the speed of the drill or the -- the weight on the bit. Whichever one he was talking about, he was talking about bumping it up, meaning he wants to go faster.
Q. Okay. And did they, in fact, go faster?
A. Yes.
Q. What happened, if anything, after that?
A. I left shortly after that. The next day when I came on tour, we were in Well Control.
Q. Okay. When you say you "were in Well Control," was there a kick?
A. No. We had lost returns.
Q. Okay. So was the well shut down at that point?
A. Yes, it was.

Page 284:10 to 284:24

Q. (By Mr. Fleming) Are you aware of a phrase called "condition-based maintenance"?
A. I've heard it thrown around, yes.
Q. Okay. How have you heard that term?
A. It -- conditions dictate when you can work and when you can't.
Q. Okay. Is that some -- is that something that you heard within the context of the Transocean maintenance philosophy?
A. Not -- not directly, no.
Q. Okay. Were you ever told by anyone at Transocean that Transocean preferred to use something called "condition-based maintenance" for some of its equipment?

A. No, I have not.

Page 286:23 to 286:25

Q. Mike, I -- I know we've met several times. I'm Ned Kohnke, for the record, and I represent Transocean. And I'll say for the

Page 287:14 to 288:21

Q. I want to talk to you about some of the things -- some of the questions you were asked, and I'm just going to follow up perhaps in reverse order; that is, starting with the most recent things you were asked.
And one of the questions dealt with the -- what was going on on the bridge after you made your way up there.
A. (Nodding.)
Q. And there were some questions that dealt with the delay in the -- receiving the approval to EDS, the delay being the question by the Captain to Chris Pleasant, Chris Pleasant's statement that "I don't have approval" from the various people.
A. (Nodding.)
Q. Did any of those delays, however long it may have been, cause this rig to catch fire and explode and to be -- ultimately to sink?
A. No, sir.
Q. Did -- based on your involvement and -- and being there, would it be fair to say that the events that lo -- led to the loss of the rig, they had already been completed, and none of these delays, none of the conversations, had anything to do with why we're here today?
A. None whatsoever.
Q. No -- nothing having to do with the loss of life --
A. None whatsoever.
Q. -- or injuries, for that matter?
A. My opinion, those folks were already dead.

Page 293:03 to 293:17

Let's -- let me now focus on the Emergency Shutdown. I do understand that the alarms themselves were inhibited. But it is my -- it is my understanding, and I want to know whether you agree or disagree, that the Emergency Shutdown was not an inhibited or bypassed system, that that was part of an automatic system and

that the shutdown would occur in the absence of human intervention?
A. It should, yes.
Q. Okay. Do you have any reason to believe that the ESD, Emergency Shutdown, was not working on the night in question, April 20th?
A. No, I have no reason to believe it was not. I believe it was functioning properly.

Page 296:25 to 303:20

Q. Okay. You were asked a question about -- by BP about whether there was -- I think it was BP -- by -- whether there was a means for shutting off the fuel supply at the bridge.
Now, the fuel is electronically pumped and -- and monitored. That's part of the engine itself. There's an electronic fuel pump, is there not?
A. Correct.
Q. Do you know of any switch on the bridge that would allow the bridge to shut off fuel?
A. Just the fuel? No.
Q. In fact, when fuel is shut down on a diesel engine, you just don't start it up. You've got to reprime it, don't you?
A. Correct.
Q. You got to bleed injectors, get all the air out of the system?
A. Correct.
Q. That's not something you would typically do from a bridge, is it?
A. No.
Q. Based on your knowledge and background, is it more likely than not that there is no such thing as an emergency fuel shut-off for these engines?
A. Not that I'm aware of, no.
Q. That's what the governor is supposed to do?
A. All engines, in theory, are runaway engines. A carburetor or injector or throttle body is used to restrict the flow of air to the engine.
Q. If the fuel had been shut off, but there is combustible air in the environment being sucked into the -- into the breather, it's going to run on that combustible gas?
A. At a much different ratio than what was intended for the engine.
Q. So the -- the shutting off of diesel wouldn't have mattered, it wouldn't shut the engine down?
A. No.
Q. In fact, it would speed it up with that

combustible gas?
A. Correct.
Q. Okay.
A. It's a far stretch for three safety systems for that engine to fail and it still run away.
Q. Do you know whether -- do you know how
00299:01 the sensors in the No. 3 Engine Room or sensor is calibrated? How much -- you know, when does it -- when does it send the signal that there's combustible gas, at what level relative to the upper and lower explosive limits of -- of a combustible gas? That's a pretty tough question, and I'm not sure there's an answer, but I wanted to ask it.
A. I'll break your question down into a couple of parts.
Number one, the sensor is not in the space. It is on the intake to the space, so we get that clear.
The second thing is it takes the gas concentration in relation to the atmosphere, there's a heater element inside the -- inside the -- the head that heats that oxygen and -- and mixture up. It then uses that with a small computer inside there to determine what is -- what is the saturation level of gas in the air at that time. It converts that to an electronic signal, which it sends out to a computer on LEL, and toxic, as well, I believe they both use a 4 to 20 milliamp signal, 4 being 0, no gas present --
00300:01 Q. M-h'm.
A. -- but a constant 4 milliamps so that we have a continuous circuit constantly that's being checked. And then as you go up in milliamps, you're going up in percentage. Now, at what percentage for LEL, the lower level or upper level is predetermined, and I believe is governed by MMS, as to when we have to start setting off alarms at -- at what percentage, high or high high, or lower explosive level, upper explosive level is -- is reached.
Q. All right. You understand there's a basic concept in -- in science, for lack of a better way of saying it, that gas will combust if it's between the upper and lower explosive limits, not below the explosive limit, and certainly it can be too rich, the environment can be too rich if the LEL is reached and you have a greater saturation --
A. That's correct.
Q. -- you will not have explosion?
A. Yes, I'm fully aware of that.
Q. Pure gas, in other words, wouldn't

explode. There has to be a proper mixture between those two limits?
A. (Nodding.)
Q. And these -- these sensors don't -- they operate at some level, but there may be a great deal of gas coming in. In other words, there may be a limit that is above the upper explosive limits of gas, that kind of concentration being sucked into that room, and a sensor will go off, but until a second sensor goes off in some other location, as you've described, that process continues?
A. Correct.
Q. Based on what you said, I sort of reached a conclusion -- I want to see if you agree with it -- that what you heard, that first door that blew in on you was the result of an explosion when the No. 3 Engine oversped and exploded?
A. Correct.
Q. But that there was a second explosion at another location. Obviously the No. 3 Engine wasn't the source of the second ignition. There was another ignition source for the second explosion when the second door blew in on you?
A. Correct.
Q. And in between the first and second, you had an opportunity, if you want to call it that, you went back to your -- I think you -- you got the light, you put the light in your mouth, you went back to your desk, realized the desk, the floor, everything was gone, you crawled out, you made a left, you went down a passageway, and some -- you know, you described all of those events. And eventually you approached a second door --
A. Yes, sir.
Q. -- that blew in on you?
A. (Nodding.)
Q. Some -- some passage of time between those two explosions occurred?
A. Yes, it did.
Q. All of the questions about sensors may be relative or relevant to the first explosion, but they have no relevance to the second, because by then, there's obviously gas, and those engines, the No. 3 Engine or any other engines running has already been eliminated as an ignition source, correct?
MR. LEEFE: Objection, form.
A. Yes.
Q. (By Mr. Kohnke) So -- now, there are numerous ignition sources on the rig, and if there's enough gas, those ignition sources are going to be reached?
A. Absolutely.

Q. You indicated earlier that there was a barbecuing of steaks at certain time of the week on, I think you said the lifeboat deck?
A. Correct.
Q. Was there -- was that also the smoking deck area of the rig?
A. It was just about the smoking deck.
Q. So just those kinds of events alone would have provided an ignition source, provided there's enough gas?
A. Correct.
Q. And then, of course, within the various living quarters, the galley, these are not explosion-proof environments, are they? They're not designed as that?
A. No, sir, they're not intrinsically safe areas.

Page 305:15 to 306:06

00305:15 Based upon your knowledge as a Chief Electronics Engineer -- got me going now -- Chief Electronics Technician, and the after-acquired knowledge you have from being in the three Hearings, on this deposition, and the two prior Hearings, can you tell me of those things that you were asked about, the purging, the pipe rack system, the -- the Driller's Chair, the failure to have an uninhibited alarm, which of those caused this rig to explode and catch fire?
A. None of them.
00306:01 Q. So all of the questions you were asked about all of the different problems may have been problems on a day-to-day basis, but in your judgment, based upon your experience, none of them caused this particular incident?
A. No.

Page 307:16 to 307:16

00307:16 Exhibit 1887. In September of 2009, as one of

Page 308:03 to 308:21

00308:03 Q. Sure? Well, I just -- one of the things -- exhibits you were provided and you were questioned about was the -- the BP Rig Audit dated September 2009, which is in front of you now.
A. Yes, sir, it is.
Q. Okay. And that is something that BP itself commissioned, and commissioned for purposes of determining, a number of things,

including whether bilge pumps worked, do you remember sitting and asked that question?
A. Yes, sir, I do.
Q. And overall, what was the condition of the rig and what maintenance is required.
A. Correct.
Q. BP was fully aware of whatever needed to be done to this rig, and had the means to shut it down and do it.
A. Correct.

Page 308:23 to 309:03

Q. (By Mr. Kohnke) Okay. But it was the general practice that BP followed to defer some of that maintenance, particularly as it respects the BOP, not to pull it up, but rather wait until we're on a rig move to go -- we're finished with this well and we're going to go to the next well?

Page 309:05 to 309:07

A. That was the normal course of business was to put off major or time consuming repairs until a rig move, if possible.

Page 309:22 to 316:04

Q. (By Mr. Kohnke) You were asked some questions about the conditions on the bridge. And I'm -- I'm now -- I -- I know Mr. Jimmy -- I know you know Mr. Jimmy, and I think we both have a high regard for him, and lest someone try to -- someone with the Coast Guard try to take any of your testimony out of context as it relates to both Mr. Jimmy and Captain Curt, let me ask you a couple of questions about that.
MR. LEEFE: Objection to the preamble to the question.
MR. KOHNKE: That's putting it charitably.
Q. (By Mr. Kohnke) You described that there was a great deal of confusion on the bridge when -- when you got up there?
A. Correct.
Q. And I think some of the words that were used were words that you used in previous testimony, and they were served back up to you today, and you agreed that that's what you saw?
A. Correct.
Q. But you also said that, when you got there, there were approximately -- a number of people, I won't give you a number, but there were

a number of people all talking to Captain Curt.
A. Correct.
Q. And he is charged with trying to assess whatever was going on, and he didn't have a clear picture of what was going on, apparently.
A. He didn't have a clue.
Q. For example, you were the one who alerted him to the fact that "You're not going to get the engines restarted."
A. Correct.
Q. And when they had told him that, that impacted the ability to EDS, because without engines, if you EDS, you're a drifting vessel, aren't you?
MR. LEEFE: Objection, form.
A. That's a stretch.
Q. (By Mr. Kohnke) All right. How -- how do you -- if you EDS, and you -- and you have no ability to maintain position or to move off position, how does that -- how do you accomplish getting away from the source of the fire?
MR. LEEFE: Objection, form.
A. If you EDS, the current or wind can take you away.
Q. (By Mr. Kohnke) All right. And that night you -- you weren't on the bridge, I think you were in your -- your Technician's Room, your Electronics Technician's Office, but there was no wind that night?
A. Very little. I was on the crane at --
Q. Okay.
A. -- 9:00 o'clock.
Q. But his main concern was trying to start engines?
A. Correct.
Q. And there are a number of people talking, and you came up and you've said some things to him, and you've repeated it, and he told you what he told you, and I need -- don't need to go into that.
A. (Nodding.)
Q. But under the circumstances, this is hopefully a once in several lifetime event, do you understand his response?
A. Yes. Absolutely.
Q. Did you mean to be critical of him in any way when you said -- when you repeated what he said to you?
A. No.
Q. Okay. Eventually, did you agree with Captain Curt's decision to EDS, or his request to Mr. Pleasant to EDS?
A. Yes, absolutely, I agree.
Q. That's something you did agree with?
A. (Nodding.)

Q. And ultimately, the decision to abandon ship, which you had offered earlier, he eventually agreed that was the only option, as well?
A. Correct. He just cost me, you know, an extra ten or fifteen minutes onboard the vessel.
Q. And some of those ten or fifteen minutes was spent trying to start back the backup generator?
A. Correct.
Q. Now, let me ask you a little bit about that backup generator. That backup generator would have provided lights and fire suppression ability?
A. I -- I don't think it would have supplied fire pumps.
Q. Okay.
A. It was a 480-volt generator, which is very small compared to a 11,000-volt generator, which the rig normally ran on.
Q. When you say "volt," I'm thinking -- I usually think in terms of watts, KWs. Can you translate that into KWs?
A. No, I couldn't.
00314:01 Q. Okay.
A. It's -- it's 110 in the wall versus, you know, 220 at the dryer, you know, they're -- they're two different voltages.
Q. Okay.
A. So the -- yeah, one is obviously double the other. Well, same thing here. 480 volts versus 11,000 volts. It's just a big difference. A little small generator is not going to do much.
Q. All right.
A. It had a purpose.
Q. Would it be fair to say that the delays that were occasioned by your efforts, along with Mr. Bertone -- Bertone's and the third gentleman whose name I can't recall -- who was that third gentleman?
A. Paul Meinhart.
Q. -- Paul Meinhart, that those were perhaps a futile, but certainly a hopeful effort to maybe save the rig?
A. Yes, or I wouldn't have went.
Q. Okay. And the delays were not reckless as much as they were perhaps overly optimistic?
A. Yes.
Q. And when you came back and it was clear
00315:01 that the generator or the backup generator could not be started, essentially, the DEEPWATER HORIZON crew was out of options?
A. Yeah, we -- we were done.
Q. And at that point, Captain Curt gave the order to abandon ship?

A. Apparently before we got back, he had already given the order.
Q. Okay. And unfortunately for the group of -- that were in the -- in the -- on the bridge, the two lifeboats were pulling away, or well, had -- one of them had already pulled away and the second was leaving at that point in time?
A. Correct.
Q. So you guys, and I include Captain Curt and yourself, you were the last to leave the rig?
A. Yes.
Q. You were second to the last?
A. We were in the last group, yes.
Q. Okay. Would it be fair to say that you had done everything you could to save life and to save the -- the vessel?
A. Personally for me to save lives, no, I -- I didn't assist in any lifesaving, other than my own. I did --
Q. There was nothing more to be done.
A. -- what I could to the -- I helped with what I had available to me, what physical abilities I had left.

Page 319:19 to 321:12

Q. Okay. The Chairs. Let's focus on the Chairs.
You indicated that the hardware -- and we saw on one of the documents that -- one of the exhibits that you saw, that the hardware was changed out some hitch or two before --
A. It was --
Q. -- this accident.
A. -- the week before.
Q. The week before. Okay. And you were asked a question about the -- about whether the problem continued.
How many -- what is the right term? I had it -- I have too many notes, and I can't find it now. But how many times did the -- did the Driller's Chair shut down after the hardware was changed out?
A. That I personally responded to?
Q. That you personally, yes.
A. One.
Q. One. All right. So this wasn't an epidemic of the Chair simply failing every time anyone tried to use it; once it happened, and it got fixed by you, and then it worked thereafter?
A. It was moody.
Q. It was moody. All right. Was this the A-Chair? B-Chair? C-Chair?
A. A-Chair --
Q. Okay.

A. -- mostly.
Q. But -- but then there was the B-Chair and the C-Chair that could have been used?
A. Right. B-Chair would get corrupted by A-Chair sometimes.
Q. Okay.
A. Because they shared communication on the servers.
Q. Based upon everything that you've -- you've learned about this case, both before the accident, and after the accident, watching Hearings, from any source, have you heard that this explosion and fire was a result of the Driller's Chair being down?
A. No, sir.

Page 324:14 to 327:18

Anything that you can think of that you were asked today about problems with the maintenance of the DEEPWATER HORIZON prior to April 20th that caused or -- or created the condition that resulted in this rig fire and explosion?
A. No, not my knowledge. I think I --
Q. Okay.
A. No.
Q. Certainly nothing that you are familiar with would have prevented the failures within the wellbore? You're not involved in that?
A. Not involved in that at all.
Q. So the flow of -- of gas from this -- from this well, coming up through the -- through the drill floor, would not have been in any way impeded or mitigated by some maintenance process that you failed to do?
A. Correct.
Q. Okay. Can you think of anything that Captain Curt could have done differently to prevent this catastrophe?
MR. LEEFE: Object to the form.
A. To prevent it, no. He -- he doesn't control drilling operations.
Q. (By Mr. Kohnke) All right. Now, I want to go back to Mr. Jimmy and the conversation that you heard between Mr. Jimmy, and I think you said it was Mr. Kaluza, who was sitting next to you in the Pre-Tour Meeting?
A. Correct.
Q. Okay. Take me back to that. That was -- these Pre-Tour Meetings are typically attended not only by the -- the crew coming on tour and -- and the Senior Leadership of Transocean, but also by the BP Senior Leadership, which in this case are the Company Men?

00326:01 A. Correct.
02 Q. Okay. And these Company Men do more than
03 simply listen; they have input, they --
04 A. Correct.
05 Q. And in this case, as Mr. Jimmy was
06 talking about what was going to be done,
07 Mr. Kaluza essentially overrode him?
08 A. Correct, tried to.
09 Q. What was Mr. Jimmy talking about? Was he
10 talking about negative testing?
11 A. Yes. And the timing of the procedure.
12 He was reading off the procedure so that people
13 would know, in their job scope, where they needed
14 to be or where they needed to be -- or where they
15 needed to not be, to be in harm's way.
16 Q. Okay. So this is something that the OIM
17 thought was important enough to lay out there for
18 the crew, and whatever he was laying out there
19 was then contradicted or disagreed with by
20 Mr. Kaluza?
21 A. Correct.
22 Q. And Jimmy comes back to him with a
23 statement of some sort. What -- what was it that
24 Jimmy answered after Kaluza spoke up?
25 A. Jimmy's position was, "This is what I've
00327:01 got that's approved from MMS and through BP, and
02 until I see something different, this is what
03 we're going by."
04 Q. And then was it after Kaluza spoke up a
05 second time that Dewey Revette, or whoever it
06 was, said, "Well, we'll deal with it on the floor
07 as we go"?
08 A. As Mr. Kaluza started to speak again, it
09 went Mr. Jimmy first at one tone, one Kaluza at
10 one tone. Mr. Jimmy's tone started going way up,
11 and then here comes Mr. Kaluza's tone coming up.
12 And it was obvious where the conversation was
13 going.
14 Q. Okay.
15 A. And Dewey spoke up to calm the situation
16 and remove these men that needed to have this
17 discussion to away from all the men that didn't
18 need to hear the discussion.

Page 329:09 to 329:10

00329:09 Q. Mr. Williams, my name is Alex Roberts. I
10 represent Cameron. Do you know who Cameron is?

Page 329:20 to 330:12

00329:20 the DEEPWATER HORIZON Rig.
21 A. Okay.
22 Q. Can you give us a general statement of

your experience with the blowout preventer on the DEEPWATER HORIZON?
A. It was our protection from the well below. That's how we conducted operations, controlled the pressures, delivered the fluids, delivered the drill pipe, what have you. Our connection to the seabed.
Q. And -- and what was your responsibility in connection with the blowout preventer?
A. I had none.
Q. Let's break that down a little bit.
A blowout preventer is -- is made up of components that sit at the bottom on the wellhead, true?
A. Correct.

Page 333:20 to 334:11

Q. I'm going to jump around a little bit and talk briefly about the -- this purge problem on the BOP control panel. I think that earlier in your testimony today you called that and the Driller's Chair, your "trouble children"?
A. Yes.
Q. And just so you're clear, you were not referring to the control panel itself when you called it a "trouble child," but referring to the purge system --
A. Correct.
Q. -- on the control panel?
A. And it's also testified that Cameron was not the manufacturer of the purge panel.
Q. That was my next question. Thank you very much.
A. Sorry.

Page 337:02 to 337:06

Q. You said on April 20th, when you were up on the bridge, you were engaged in this conversation in which Mr. Pleasant eventually functioned the EDS?
A. Correct.

Page 337:14 to 338:19

Q. You -- you don't have any knowledge, any personal knowledge about whether EDS functioned properly at that time or, if it didn't, why it didn't?
A. No. I -- No. I just know nothing changed. After they pressed the button, nothing changed.

Q. And -- and you weren't involved in any testing of the EDS systems prior to April 20th?
A. No.
Q. And you weren't involved in any testing that went on in connection with the -- with the Joint Investigation Team Investigation post-blowout?
A. No. I do know of -- never mind. Go ahead.
Q. You -- you also testified previously that the EDS system was functioned after two explosions had already occurred on the rig, true?
A. Correct.
Q. And you would agree, then, that the EDS system, because it wasn't functioned until after the explosions, could have had -- could have done nothing to prevent those explosions?
A. Correct.
Q. In other words, the EDS system required human interaction to function it?
A. Correct.
Q. And that didn't take place until after the explosions had occurred?
A. Correct.

Page 339:06 to 339:10

Q. Okay. Would you agree that if oil and gas are in the riser above the BOP stack, before the BOP is functioned, that there is nothing that the blowout preventer can do to -- to prevent the explosion?

Page 339:12 to 339:18

A. I have -- I have no idea.
Q. (By Mr. Roberts) You -- you have no idea of that?
A. I -- I -- if your question is, if gas is above the BOP before its function, can it explode? I don't see why not, if it gets into the right atmosphere and gets a spark.

Page 341:20 to 343:10

Q. Let's speak real briefly about the annular elements you said you -- that were brought in by -- was it a Sperry-Sun --
A. Correct.
Q. -- Representative? Do you recall exactly when that occurred?
A. Not exactly, no.
Q. It was in the hitch previous to -- to the

April, mid-April hitch --
A. Correct.
Q. -- that you were on? So it would have put you 21 days prior to --
A. Somewhere in March.
Q. Okay.
A. Early March.
Q. And you testified that you're not a Subsea Engineer, but Mr. Mark -- is it Mark Hay?
A. Correct.
Q. He -- he is a Senior Subsea Engineer?
A. Yes.
Q. And he's the one that you spoke with about this incident?
A. Yes, he was.
Q. And do you have any personal knowledge whether or not it's a regular occurrence to see packing elements or packer elements in drilling mud?
A. I've never seen them before, no.
Q. Do you have occasion to witness drilling mud being returned to the -- to the rig on a frequent occasion?
A. Yes.
Q. And do you think that Mr. Hay might have a more frequent opportunity to view that than you do?
A. Opportunity, yes. But you ain't getting him out of his office long enough to go see it, so -- huh -- nuh-uh.
Q. So you had some trouble taking his word at it, this -- this was not an issue?
A. Yes.

Page 343:16 to 344:11

Q. Well, you said that there were packing elements that concerned you and the large amount that were sitting on Mr. Hay's desk?
A. Not on his desk. They were brought into the drill shack.
Q. You saw them in a cup at some point?
A. Yeah, in a -- in a cup, double handful.
Q. My question to you is: You've been talking about this as an issue that was raised on the rig to Mr. Hay.
A. Correct.
Q. And Mr. Hay put it to rest. True?
A. Mr. Hay made a statement about it, yes.
Q. And you raised it to -- did you raise it to anybody else after that?
A. Yes, my Supervisor.
Q. And what was your Supervisor's response?
A. He didn't give me a response.
Q. He just said nothing? He just looked --

looked at you blankly?
A. Yes.

Page 346:16 to 346:18

Q. Good afternoon, Mr. Williams. My name is Marilee Allan, representing Anadarko, and my colleague, Jenny Rosen, is sitting next to me,

Page 346:25 to 350:01

When you had testified earlier, you talked about the HiTec Drilling Chairs in the Driller's shack; is that correct?
A. Yes, ma'am.
Q. And from those HiTec Chairs, they could see certain mud levels or influx of various liquids on the rig; is that right?
A. Yes, ma'am, they could see several hundred parameters.
Q. And in a different area where the mud loggers are, Sperry-Sun can see certain things through their electronics equipment; is that correct about --
A. Correct. They could also see what was happening on the drill floor.
Q. Okay. Do you know from your own knowledge could BP also see certain of the same sort of influx and information electronically?
A. Yes, ma'am. They're -- I personally put in a remote HiTec feed into the Company Man's office. I also installed two 31-inch flat screen TVs into his closed-circuit television system so that he could have a dedicated camera looking at the flow line and also one looking directly at well center. So he actually could see more video feeds than a Driller could sitting in a Driller's Chair.
Q. So he in a sense could see more than both Transocean in its HiTec Chairs and Sperry-Sun and its Drillers -- and its mud logger shack could see; is that correct?
A. Yes, ma'am. He could see all of their data --
Q. Okay. When did you in --
A. Plus more.
Q. When did you input that electronic system for BP?
A. The HiTec System had been in there for several months. The two flat screen TVs I would have to refer back to RMS to -- to tell exactly when I installed them. It -- it could have been the hitch before or one before that. I don't remember which. But we had mounted two 31-inch

flat screens and set one to the -- like I said, the -- the flow line so that he could see the flow -- the flow of the mud coming back from the well, and the other directly on well center.
Q. Okay.
A. Those two channels were never -- those two televisions were never changed channels. They were frozen --
Q. Okay.
A. -- on the wall. Just a video feed constantly coming in.
Q. And if there were any problems with those electronics, you or your other Chief Electrical Technicians would be the ones to repair those; is that correct?
A. Electronics.
Q. I was close.
That is correct?
A. Yes, ma'am.
Q. Okay. As far as you know, all of the systems were working on April 20th?
A. Yes, ma'am. Ronnie Sepulvado, the Company Man, made the last call to me personally when he had lost one feed. And what it was is he was actually cleaning his floor, and he unplugged one.
Q. Okay. And when did he make that call to you?
A. I believe it was a hitch or two prior. It all happened there at the same time.
Q. Okay. So to your knowledge, the Company Man could see any of those screens if he wanted to?
A. He demanded it, yes.