

Deposition Testimony of:

Bryan Clawson

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00446:09 Q. Mr. Clawson, my name is Danny
10 Goforth, and I represent Transocean, okay?

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00446:12 Q. Did you deal any with Transocean
13 people?
14 A. No, sir.
15 Q. Did you in the time building up
16 to the incident that occurred on the -- on
17 April the 20th at -- on the Macondo well?
18 A. No, sir.
19 Q. Have you ever deal -- dealt with
20 Transocean people?
21 A. No, sir, I sure haven't.
22 Q. They don't deal in your
23 products; is that correct?
24 A. No, sir, we didn't.
25 Q. You got anything bad to say
00447:01 about Transocean?
02 A. No, sir.
03 Q. Got anything good to say about
04 Transocean?
05 A. Yes.

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00447:16 Q. I was reading in the Chief
17 Counsel's report -- have you read that?
18 A. Yes, sir. Parts of it.
19 Q. I was reading in there that they
20 were talking about how the integrity of --
21 of the connections of a number of pieces of
22 equipment, the casing and that sort of
23 thing were confirmed by Weatherford but
24 some that were made up onshore were not.
25 And so I wanted to ask you about those, for
00448:01 example, the reamer shoe.
02 Are you familiar with the
03 integrity of the connection of the reamer
04 shoe?
05 A. No, sir.
06 Q. Yeah. I'm not either. And I'm
07 not sure what the Chief Counsel was talking
08 about when he talked about that. I think
09 it was just the connection to the -- to
10 the -- to the drill pipe and to the floats.
11 Have you -- has
12 Weatherford, to your knowledge, ever had
13 any problem with any of the connections for
14 any of the cementing equipment that you
15 sell, that -- that you're aware of?

16 A. No, sir.
 17 Q. The centralizer subs, have there
 18 been complaints about -- about the
 19 connection of the centralizer -- of the
 20 subs to the casing? Have you received any
 21 complaints about that, that you know of?
 22 A. No, sir, that I'm aware.
 23 Q. Same with float collars?
 24 A. Right.
 25 Q. Crossover joints, ever have any
 00449:01 problems there?
 02 A. The crossover joints --
 03 Q. They're not Weatherford's?
 04 A. -- they were not Weatherford's.
 05 Q. Does Weatherford maintain a
 06 daily log or inspection report that would
 07 verify that all the connections for the
 08 cementing equipment were made up to
 09 standard?
 10 A. This particular cementing
 11 equipment was -- was delivered to Tuboscope
 12 in Amelia and -- and instructions through
 13 BP. And, you know, the connections that
 14 are cut on the equipment is -- is cut by
 15 Hydril. So -- any -- any makeup of the
 16 equipment was by Tuboscope and directions
 17 of BP. Weatherford, to my knowledge,
 18 wouldn't have that information.
 19 Q. All right. Do you main -- does
 20 Weatherford maintain a daily log or
 21 inspection report, however?
 22 A. On inspections we do at our
 23 locations, we -- we retain that
 24 information. Yes, sir.
 25 Q. All right. But you did not make
 00450:01 these particular inspections?
 02 A. No, sir, we don't do -- no, sir.

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00451:05 Q. All right. Maybe I'll go about
 06 this a little different way. Let's kind of
 07 start from the bottom up.
 08 The shoe -- the reamer
 09 shoe, as I understand it, is at the bottom?
 10 A. Yes.
 11 Q. It's the last piece of equipment
 12 or casing that -- that there is. Above
 13 that is the float collar.
 14 Is the float collar
 15 considered or advertised by -- by
 16 Weatherford as a primary barrier to the
 17 flow of hydrocarbon?
 18 A. To my knowledge, no, sir.
 19 Q. To your knowledge. Well, you

20 would know.
21 You ever tell anybody that
22 this is a barrier?
23 A. No, sir.
24 Q. Never do?
25 A. No, sir. Just to hold back the
00452:01 cement.
02 Q. Is that the way you refer to it
03 when you're talking to prospective
04 customers, as this is a device that will
05 hold back the cement?
06 A. Yes, sir.
07 Q. What about mud?
08 A. If it -- if it needs to hold
09 back mud, yes, sir.
10 Q. What about other drilling
11 fluids?
12 A. I don't have any knowledge of
13 what other fluids it -- it could hold back.
14 Those are the two that I'm familiar with.
15 Q. Hold back water?
16 A. Again, I'm -- I don't have any
17 knowledge about whether it would hold back
18 water or not.
19 Q. Have you looked at any of the
20 Stress Engineering testing that they --
21 that they did on the Weatherford float
22 collars?
23 A. No, sir, I sure haven't.
24 Q. Have you been told about any
25 other than by the lawyers?
00453:01 A. No, sir, not --
02 Q. Does it serve as -- as a barrier
03 to hydrocarbons?
04 A. Again, I'm not familiar with
05 that information, whether it would -- it is
06 or it is not.
07 MR. RUSSO:
08 Danny, just -- just to be
09 clear, we do have a witness coming who will
10 be a Weatherford -- Weatherford designated
11 witness on those issues, but I'm not --
12 continue with the questions. But he's not
13 the Weatherford designated witness on -- on
14 those issues.
15 MR. GOFORTH:
16 All right.
17 Q. Do you tell people, prospective
18 customers, that it will hold back
19 hydrocarbons?
20 A. No, sir.
21 Q. So the only thing that you,
22 Bryan Clawson, head salesman, whatever, the
23 only thing that you tell people that this
24 will do is it will hold back cement and mud

25 if it has to. Isn't that the way you put
00454:01 it?

02 A. Yes, sir.

03 Q. Have you ever been asked if it
04 would hold back hydrocarbons?

05 A. To my knowledge, no, sir.

06 Q. Do you know whether or not there
07 have been incidents in which the float
08 collar was asked to hold back
09 hydrocarbons -- oil, for example? Liquid
10 hydrocarbons?

11 A. To my knowledge, no, sir.

12 Q. Is it tested by Weatherford with
13 regard to holding back hydrocarbons?

14 A. I -- I don't have that
15 information.

16 Q. Let me ask you some questions
17 about the Allamon diverter. It's my
18 understanding that after the -- the final
19 production casing is run and it's landed --
20 well, rather than give you my -- ask you my
21 understanding. Tell me, what happens in
22 the well after the -- the casing is run.
23 The production casing is -- has landed.
24 What happens next?

25 A. Again, the -- they have to drop
00455:01 a ball to the --

02 Q. All right.

03 A. The ball may have been dropped a
04 little earlier before they land the casing
05 to close the diverter tool.

06 Q. All right. You say it might
07 have been dropped a little earlier. Why
08 would it be dropped before the casing, the
09 production casing is -- is landed?

10 A. They may -- they may drop it
11 like when they have 16 in the drill pipe
12 left. That way once they land the casing,
13 the ball would be on the Allamon seat to be
14 able to convert it.

15 Q. All right. And that Allamon
16 seat is on the float collar?

17 A. I'm sorry?

18 Q. Is it on the -- it sits on top
19 of the float collar, or are you talking
20 about up at the --

21 A. No, sir. The Allamon tool is
22 way above the running tool.

23 Q. Okay.

24 A. It's on drill pipe.

25 Q. All right. So you -- you drop
00456:01 the ball, it sits at some point, whether at
02 the time of landing. And so it sits on
03 the -- on the diverter, some sort of cage
04 that's -- that's there; is that correct?

05 A. Yes, sir.
06 Q. And when you -- when you get to
07 the bottom with the production casing, you
08 close the diverter is my understanding; is
09 that right?
10 A. Yes, sir.
11 Q. What's the purpose of the
12 diverter?
13 MR. RUSSO:
14 Object to form.
15 A. To reduce surge. I'm not an
16 expert on that tool, but I -- I know it --
17 Q. Do you -- do you make a similar
18 tool?
19 A. Yes, sir.
20 Q. Do you sell it? You personally?
21 A. I try to.
22 Q. I guess in this instance Allamon
23 tried harder?
24 A. Yes, sir, I guess he did.
25 Q. All right. Yours does the same
00457:01 thing? It serves the same purpose?
02 MR. RUSSO:
03 Object to form.
04 A. Yes, sir.
05 Q. All right. What is the purpose,
06 then, of -- of the diverter?
07 A. To reduce surge.
08 MR. RUSSO:
09 Just object to form. You're
10 talking about his or the -- Weatherford's?
11 Q. Well, you say it serves the same
12 purpose. So I'm talking, really, about
13 either one.
14 Did you say protect or
15 reduce the surge?
16 A. Reduce.
17 Q. All right. Then the -- is the
18 ball dropped at that point, once you close
19 the diverter?
20 A. I'm sorry? What's the question
21 again?
22 Q. This is the part where I'm
23 confused about. It's my understanding that
24 you close the -- the diverter immediately
25 after the production casing is run, or
00458:01 about then. Now, at what point does the
02 Allamon ball, when is it dropped?
03 A. Again, I wasn't on the -- I
04 wasn't on the location and I'm not an
05 expert on it. But they either drop it when
06 they land the casing or a few stands before
07 the landing casing.
08 Q. All right. Is it -- when it is
09 dropped, the diverter's closed, the ball's

10 dropped, is it expected to find its way to
11 the top of the float collar?
12 A. I'm not sure what you mean by
13 expected.
14 Q. Well, does it? Does this
15 Allamon ball, does it get to the top of the
16 float collar and rest there?
17 A. Eventually it will, yes, sir.
18 Q. Eventually.
19 It's my understanding that,
20 according to the Chief Counsel, that the --
21 that it took from 2:08 in the afternoon on
22 the 19th until 2:18 to close the diverter
23 and to drop the ball?
24 A. I don't -- I'm not familiar with
25 the --
00459:01 Q. With the timing. I understand.
02 But that took a total of about ten minutes.
03 And is it correct, or am I
04 correct that from that point in time until
05 it -- this ball comes to rest on top of the
06 float collar happens eventually, some
07 period of time?
08 A. Yes, sir.
09 Q. After this ball was dropped,
10 what happens next? The diverter's closed,
11 ball's dropped, what happens next in -- in
12 a -- in a well?
13 A. I'm -- I'm not familiar what --
14 on this particular job, I'm not familiar
15 with what they had --
16 Q. Did they attempt to -- to
17 establish circulation at that point?
18 A. Yes, sir.
19 Q. To convert?
20 A. It's possible that would be the
21 next step.
22 Q. I mean -- excuse me. You know
23 more about this than I do. Is that the
24 next step?
25 A. Possibly, yes. That can be the
00460:01 next step.
02 Q. It's my understanding that it
03 took them nine times to establish
04 circulation; is that right? Is that your
05 understanding?
06 A. Yes, sir. From the information
07 I read, yes, sir.
08 Q. It wasn't until about 4:20 that
09 circulation was established, which --
10 according to my calculation, from 2:18 to
11 4:20 is a little over two hours. Is that
12 ball dropped, is it -- is it resting on top
13 of that float collar in two hours?
14 A. I couldn't tell you that.

15 Q. What time did Brian Morel call
16 you to ask you how much pressure can be
17 applied?

18 A. Again, the best I can recall, it
19 was that afternoon, 3:00, something like
20 that.

21 Q. And what time did you call him
22 back to inform him that he could increase
23 the pressure up to 6800 psi?

24 A. Well, we had -- we had a couple
25 of conversations. I had to call Houma,
00461:01 but -- and he had to hang up a couple of
02 times and -- because he was getting calls
03 from people. And so this was all taking
04 place within at least about 30 minutes.

05 Q. Okay.

06 A. 20 minutes.

07 Q. Well, when you called him back,
08 you told him that he could increase the
09 pressure to 6800, but you also told him
10 that at 1300 psi, the ball could pass
11 through the bottom of the auto-fill tube
12 without converting the floats, correct?

13 MR. LEMOINE:

14 Objection to form.

15 A. The 6800 was the bump pressure
16 for the float collar.

17 Q. Right. Well, did you tell him
18 that at that point in time -- when you
19 called him back, Chief Counsel's report
20 says that you told him that at 1300 psi the
21 ball could pass through the bottom of the
22 auto-fill tube; is that correct?

23 A. Yes, sir. I told him if the
24 ball happened to be on the retainer inside
25 the float collar, that it would take 12' to
00462:01 1300 psi to blow that ball through that
02 retainer.

03 Q. You were talking about the
04 Allamon ball?

05 A. I'm talking about the Allamon
06 ball, yes, sir.

07 Q. So the Allamon ball has had two
08 hours to get from -- from top to bottom.
09 So let's assume that it made it. So it's
10 resting on the -- on the float collar --

11 A. I --

12 Q. -- and they're asking you what
13 sort of pressure can you put on this and
14 you said, well, you can put 6800 psi. You
15 said, but -- but then you said, but at
16 1300 psi you can blow it out of the bottom
17 of that auto-fill tube?

18 MR. LEMOINE:

19 Objection to form.

20 Q. That's essentially what you told
21 him, wasn't it?
22 A. That the bump pressure was 6800.
23 Q. Right?
24 A. But the 12' to 1300, with the
25 ball sitting on the retainer and it -- if
00463:01 they needed to blow the ball through that
02 retainer, it would take 12' to 1300 psi.
03 Q. All right. Who was it within
04 Weatherford's engineering department that
05 told you the Allamon ball could pass
06 through the end of the float equipment at
07 1300?
08 A. John Hebert.
09 Q. All right. How did he determine
10 that, do you know?
11 A. No, sir, I don't.
12 Q. When he was telling you that,
13 did he -- did he reference some document or
14 some test or something that -- that would
15 show that?
16 A. No, sir. I don't recall, no,
17 sir.
18 Q. Did he tell you to tell Morel
19 that it would pass through the float
20 equipment at 1300 psi?
21 MR. RUSSO:
22 Object to form.
23 A. No, sir. He did not tell me to
24 tell him -- Brian that.
25 Q. Did he tell you on that phone
00464:01 call that it would pass through at 1300
02 psi?
03 A. Yes, he did.
04 Q. Do you know why he told you
05 that?
06 A. Because I asked him.
07 Q. What did you ask him?
08 A. I just asked him if the -- if
09 the Allamon ball just happened to be
10 sitting inside the retainer, you know, what
11 was -- what was our options to do.
12 Q. And -- and exactly what did he
13 tell you when you told him that, when you
14 asked him that?
15 A. Again, he said that he -- he
16 confirmed that -- believed that the -- it
17 would take 12' to 1300 psi to be able to
18 blow through that retainer, the Allamon
19 ball through that retainer.
20 Q. All right. So you got Morel
21 over here on one side and he's trying to --
22 to build up enough pressure to -- to
23 convert his float collar. So we're
24 assuming at that point that the auto-fill

25 tube is -- is still in the float collar,
00465:01 right?

02 A. Yes, sir.

03 Q. We're assuming that it hadn't
04 been converted. So that's -- the Allamon
05 tube is sitting there in the float collar
06 with the -- the -- the auto-fill ball is
07 inside the auto-fill tube --

08 A. Correct.

09 Q. -- right?

10 The Allamon ball has had a
11 couple of hours to -- to get down to the --
12 to rest on the -- on the retainer there at
13 the float collar?

14 A. We don't -- I don't know where
15 that Allamon ball was.

16 Q. Well, you know, that --

17 A. It could -- it could have been
18 on top of the -- whatever was blocking the
19 collar, it could have been different
20 places.

21 Q. Yeah. In fact, I think
22 yesterday you said something about it being
23 irrelevant, that it would blow it through
24 at 1300 psi, didn't you?

25 A. Yes, sir.

00466:01 Q. I want to know why you said
02 that.

03 A. Because when the -- after the --
04 after looking at the information, that when
05 they closed that Allamon tool, they
06 automatically pressured up to -- they went
07 right up to 2000. Because as soon as they
08 dropped the ball, they went up to break the
09 circulation and the pressure went up so the
10 ball's still up -- way up in the -- in the
11 string of pipe.

12 Q. How do you know that?

13 A. 'Cause as soon as the -- as soon
14 as they closed the tool and that's the -- I
15 don't know the -- all the -- were at
16 18,000 feet, and the water depth around the
17 running tool, where the running tool was
18 being landed was around 5,000 feet. So the
19 ball has to travel all the way from where
20 the running tool -- after they close the
21 tool, all the way down to the top of the
22 collar.

23 Q. And it's got two hours to do
24 that?

25 A. Yes, sir. But as soon as they
00467:01 pressured up -- as soon as they closed the
02 Allamon tool, now all your fluid has to go
03 down from the drill pipe through the
04 casing, and they started pressuring up

05 immediately at that point. So the, yes,
06 the ball eventually could have gotten
07 there, but at that point in time, the ball
08 wasn't there.
09 Q. And so it's interesting to me
10 that you're taking such a strong position
11 on that, and I haven't heard you take a
12 strong position in two days.
13 Have you tested that since
14 then?
15 A. No, sir.
16 Q. Do you know anybody -- whether
17 anybody has?
18 A. No, sir.
19 Q. You had never tested it before,
20 right?
21 A. I'm sorry? Tested what? I'm
22 sorry.
23 Q. Whether that Allamon ball is
24 going to stay suspended up there somewhere
25 when you're putting a lot of pressure down
00468:01 on the -- on the float collar.
02 A. No, sir.
03 Q. Uh-huh. Do you believe that
04 it -- if the -- if the pressure had been
05 somewhere 5', 700, 900, 1,000, something
06 like that, that that ball would have gotten
07 down?
08 A. I'm sorry? What's the question
09 again?
10 Q. That the ball would have dropped
11 down to the retainer on the float collar,
12 if it had been 500 to 700 in two hours? In
13 other words, how fast is that ball dropped?
14 A. I don't know that.
15 Q. And do you know that that
16 pressure holds it up there, or are you
17 just -- is this something somebody told
18 you?
19 A. The pressure holds it up where?
20 Q. The ball. You're saying that
21 the pressure -- when they pressured up --
22 it sounds like to me what you're saying is
23 that when they pressured up, that the ball
24 as a result of the pressure stayed up
25 somewhere around the -- the diverter,
00469:01 5,000 feet or so above. Or are you saying
02 that it was slowly dropping but it didn't
03 get there in two hours?
04 A. I can't say that for sure.
05 Q. You don't know either -- you
06 don't know whether it was there or not, do
07 you, Mr. Clawson?
08 A. No, sir. All I know is that
09 when they -- the diverter tool was closed,

10 they immediately pressure -- started
11 pressuring up.
12 Q. And they pressured up nine
13 times?
14 A. Yes, sir.
15 Q. And all the time this ball --
16 what's it made out of?
17 A. I'm not sure what the Allamon
18 ball is made out of.
19 Q. Does it float?
20 A. No, sir.
21 Q. So all this period of time where
22 there -- while they're trying to open
23 circulation nine times, this ball is
24 closing down 5,000 feet. And you seemed a
25 while ago to be pretty sure that it -- that
00470:01 it didn't make it.
02 Where was it?
03 A. It was -- it was in -- it was
04 from where the 5,000-foot to the
05 18,000 feet.
06 Q. Why is -- and I'm just curious.
07 Why is that important to you?
08 A. It's -- it's not really that
09 important to me.
10 Q. Why is that important to
11 Weatherford?
12 MR. RUSSO:
13 Object to form.
14 A. It's not that important to
15 Weatherford. Because once the circulation
16 was broke, we -- we ended up breaking
17 circulation and launching plugs, bumping
18 plugs, and -- and floats were holding so it
19 wasn't a concern after that.
20 Q. Okay. So why do you think --
21 why is -- does it seem important to you
22 that that ball, that Allamon ball didn't
23 make it?
24 A. It wasn't -- it's not really
25 important if it didn't make it or not.
00471:01 I -- it was just --
02 Q. Well, the fact is they certainly
03 were putting enough pressure in there to
04 blow that Allamon ball. If it happened to
05 be sitting on that retainer at the float
06 collar, they were certainly putting more
07 than 12' or 1300 psi pressure on it so it
08 would have blown right through that -- that
09 auto fill, correct?
10 A. It could have, yes, sir.
11 Possibly.
12 Q. And what effect would that have?

00471:15 A. I -- I'm not sure what effect
16 that would have.

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00472:19 Q. Well, you did testify yesterday
20 that it was irrelevant 'cause the ball
21 wasn't there, didn't you?
22 A. Yes, sir, I did say that.
23 Q. Okay. Now, what I want to know
24 is, today, are you changing that testimony
25 a little bit to say -- to admit that you
00473:01 don't know whether the ball was there or
02 not?
03 A. Yes. I do not know exactly
04 where that ball was.
05 Q. Okay. All right. And you don't
06 know what effect it would have had, had it
07 been blown through?
08 A. Yes, sir.
09 Q. You're sure of that?
10 A. Yes, sir.

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00476:13 Q. The -- the cement job began
14 about 9:30, which is 7:30.
15 Where were the wiper plugs
16 and darts at this point in time?
17 A. I'm not sure. I wasn't on the
18 job.
19 Q. What is -- what is the normal
20 sequence of events is what I'm asking you.
21 A. At what -- at what point?
22 Q. Yeah. At the -- at the point
23 that the cement job begins -- begins.
24 They begin to pump?
25 A. They'll -- they'll launch the
00477:01 bottom dart.
02 Q. Okay. And what is the purpose
03 of the bottom dart?
04 A. To separate the mud and cement.
05 Q. Okay.
06 A. I'm sorry. The bottom dart?
07 Q. Yeah.
08 A. The bottom dart is to launch the
09 bottom plug.
10 Q. Okay. Explain to me how that
11 works.
12 A. It -- how much detail do you
13 want on that?
14 Q. Well, I just -- I want an
15 understanding of how that -- how that

16 function works.
17 A. Could you get more specific on
18 what the question would be there?
19 Q. Well, let me see if I can.
20 How -- how is the dart, the
21 bottom dart set in motion?
22 A. It's launched by a cementing
23 head.
24 Q. Where? Where is it, on the
25 tool?
00478:01 A. The cementing head on the rig
02 floor.
03 Q. Okay. Did the darts go through
04 the Allamon surge tool?
05 A. Yes, sir.

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00478:09 Q. Let me show you documents marked
10 Bates -- Bates numbered WFT-MDL 00017571
11 through 17574. Look at the page ending
12 17573, please, sir.
13 Look at the -- look at
14 the -- the e-mail from Mike Bock to Jim
15 Hollingsworth and Brent Emerson.
16 In this first paragraph he
17 says in -- in the last two sentences, he
18 says, Engineering actually went and tested
19 pumping our darts through Allamon's surge
20 tool.
21 This was on April the 9th.
22 The O-ring seals was damaged/pulled out of
23 groove when it was pumped through the
24 expandible ball seat.
25 Can you explain the purpose
00479:01 of that testing and the equipment involved
02 in the testing?
03 A. We had -- we test all our darts
04 going through the -- the Allamon seats.
05 We -- we run a lot of darts through their
06 tools. And this particular dart had -- had
07 not been run through there. So we -- we
08 tested it just like we do everything else.
09 Q. Okay. Do you test everything
10 else like this?
11 A. Darts --
12 Q. Or was that just sort of a
13 throwaway comment?
14 A. Darts through -- through the
15 Allamon tool.
16 Q. All right. Okay. Who asked or
17 requested that that testing be done?
18 A. BP. And a combination with
19 Allamon.
20 Q. Allamon also requested it?

21 A. It was -- it was all mutual
22 agreement between all of us.
23 Q. All right. Well, he says that
24 the O-ring seal was damaged/pulled out of
25 groove when it was pumped through the
00480:01 expendable -- expandible ball seat.
02 Do you see that?
03 A. Yes, sir.
04 Q. What does the expandible ball
05 seat refer to? What is that?
06 A. It's a seat in the Allamon tool.
07 Q. Do you know how the -- how the
08 dart was damaged other than the O-ring seal
09 was damaged? I mean, is that -- what does
10 that mean to you? Is the O-ring on the --
11 on the -- on the dart?
12 A. Yes, sir.
13 Q. What's the purpose of that
14 O-ring?
15 A. The -- the O-ring seals inside
16 the -- the plugs.
17 Q. When?
18 A. When the dart lands into the
19 plug.
20 Q. Now let's go to the front --
21 first page of this, 17571. The -- the
22 last -- well, the -- the next to the last
23 e-mail, I suppose. The one from Gary
24 Bordelon to Jim Hollingsworth.
25 Who is Jim Hollingsworth?
00481:01 A. Jim Hollingsworth, he is -- I'm
02 not exact -- his -- his title. But he's,
03 like, the general manager over cementation
04 on hangers and --

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00482:06 Q. Did you run any more tests to
07 make sure that this modification on the
08 O-ring resulted in a functional non --
09 non -- or non-damaged O-ring once it's sent
10 through the Allamon tool?
11 A. No, sir.
12 Q. Why not?
13 A. I can't answer -- I can't answer
14 that question.
15 Q. Okay. How do you know that it
16 worked properly and that at the Macondo
17 well this dart wasn't damaged?
18 A. Because we had in an e-mail
19 from -- from Brian Morel stating that
20 the -- that the -- all the plugs -- saw all
21 the indications, all the plugs launching on
22 time. They saw the bottom plug hit. It
23 did go at 2932, but -- but the bottom plug

24 hit on time and then the -- they bumped the
25 top plug also.

00483:01 Q. Okay. They didn't -- they
02 didn't see any of this, did they?
03 A. I'm sorry?
04 Q. They didn't see any of this,
05 like this? They didn't see it happen --
06 happen?
07 A. No, sir.
08 Q. They just felt from the
09 evidence, I guess, that it did bump on
10 time?
11 A. They sent -- they sent an e-mail
12 with all the pressure ratings.
13 Q. Okay. Was the -- were the --
14 were the darts involved in the testing the
15 same type of darts that was eventually run
16 in the Macondo well?
17 A. Yes, sir.
18 Q. Same model?
19 A. Yes, sir.
20 Q. Was the modification made to the
21 dart that was actually run in the -- or the
22 darts that were run in the -- in the
23 Macondo well?
24 A. To the best of my knowledge,
25 yes, sir.

00484:01 Q. What's the best of your
02 knowledge based on?
03 A. I -- these darts were -- were
04 shipped out of Houma.
05 Q. When were they shipped?
06 A. I -- I can't remember the -- the
07 actual date. I can get that paperwork if I
08 need to.
09 Q. Well, he told you that it was on
10 the 14th that -- I mean I told you that
11 Bordelon wrote this e-mail on the -- on the
12 evening of the 14th of April. And this --
13 this incident occurred on the 20th, of
14 course. And sometime after the 14th, these
15 darts, I guess, were shipped out to the
16 rig, or do you know?
17 A. I'd have to verify with the --
18 with the delivery ticket on when they
19 actually shipped. I don't know exactly
20 what that date is.

21 MR. GOFORTH:
22 Do we have that, do you
23 know?
24 Q. You sent over a lot of documents
25 and I -- and so perhaps the delivery ticket

00485:01 was in the documents that you produced.
02 But if it wasn't, would you try to find it
03 and give it to Mr. Russo?

04 A. Yes, sir.

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00485:25 kind of shifting a little bit here. With
00486:01 respect to the ruptured disc and the bottom
02 wiper plug, do you know what pressure it
03 was designed to rupture?
04 A. Yes, sir.
05 Q. What was that?
06 A. About 9' and 1100.
07 Q. Have you -- has Weatherford or
08 anyone on behalf of Weatherford performed
09 any testing, analysis, or evaluation to
10 determine why it took 2900 psi pressure to
11 rupture the bottom plug disc?
12 A. To my knowledge, I -- I don't
13 know.
14 Q. If it was designed to rupture at
15 900 to 1100 psi, what would prevent it
16 from -- from rupturing if the pressure are
17 more than was exerted on it?
18 MR. RUSSO:
19 Object to form.
20 A. I'm not sure.
21 Q. Do you think it would be -- that
22 there was solid debris that accumulated on
23 top of the float collar that would impede
24 the ability of the bottom plug disc to
25 rupture?
00487:01 A. I'm not sure.
02 Q. Could that've been one of the --
03 could that be one thing that would,
04 perhaps, impede the ability to rupture?
05 MR. RUSSO:
06 Object to form.
07 A. Possibly.

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00487:23 Q. That bottom plug, the rupture
24 disc should have -- should have ruptured it
25 somewhere between 9' and 1100 psi. And it
00488:01 was a lot more pressure exerted against it,
02 apparently, and it didn't rupture. And we
03 don't know why, correct?
04 A. Correct.

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00488:18 BY MR. MATTHEWS:

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00488:23 Yesterday, you were asked
24 some questions by BP about what you may
25 have seen before, or what you knew about.
00489:01 And some of the questions were, had you
02 people -- had you seen or heard of
03 companies ordering a number of centralizers
04 and then reducing that number and using the
05 reduced number.
06 Do you recall something
07 like that, the questions like that?
08 A. Yes, sir.
09 Q. Have you ever seen a situation
10 where the centralizers were reduced, where
11 the operator said, I want to have 21
12 centralizers; Halliburton said, you ought
13 to have 21 centralizers; the wellsite
14 leader said, you ought to have 21
15 centralizers, and then you use six? Have
16 you ever heard of that situation?
17 MR. CHEN:
18 Objection, form.
19 A. No, sir.

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00490:09 Q. Well, I'm really wondering
10 post-blowup if you talked to anyone about
11 what happened that caused the blowup or you
12 had talked to anyone about cleaning up the
13 spill?
14 A. The only thing that -- that
15 happened after the blowout, I got a call
16 from a BP engineer on a Saturday afternoon.
17 I believe it was that -- that following
18 Saturday. He was -- he told me he was part
19 of the -- the Wyoming Group and he was
20 helping in starting the investigation. And
21 he was trying to get some information. And
22 at that time, I -- I told him, I said I --
23 I really need to check with the Weatherford
24 management before I can give you any
25 information.
00491:01 Q. Okay. What did he want to know?
02 A. He -- he didn't get into
03 specifics. He was just -- just said
04 information, and then I just -- I told him
05 what -- once I told him --
06 Q. Did you ever get back with him?
07 A. No, sir. And also -- also after
08 that -- I'm -- I can't recall exact time,
09 about 45 minutes to an hour, I got a call
10 from a -- a BP lawyer. And he had asked --
11 they asked me the same information that
12 they were looking -- they were wanting to

13 ask me some questions about some things.
14 And again, I told him the same thing. And
15 in the meantime, I contacted the -- the
16 Weatherford lawyers to let them know that I
17 had been contacted by BP.
18 Q. So BP personnel had contacted
19 you twice.
20 Have you ever had a
21 discussion with them on what they wanted to
22 ask you?
23 A. No, sir, I did not have a
24 discussion with them.
25 Q. Do you know what they wanted to
00492:01 ask you?
02 A. No, sir, I do not.
03 Q. Do you have any global idea
04 about what the area might be?
05 A. No, sir, I do not.
06 Q. All right. Isn't it a fact --
07 and I think we covered this yesterday. You
08 don't know if the float collar converted or
09 not?
10 A. No, sir.
11 Q. And I think it's a fact -- I
12 think we said this yesterday. All the
13 figures show on the barrels per minute flow
14 that there weren't enough barrels per
15 minute to convert the float collar?
16 MR. CHEN:
17 Objection, form.
18 A. Correct. All I know is that I
19 was informed by BP --
20 Q. Well, we're going to get to
21 that.
22 A. Okay.
23 Q. BP told you it converted, Brian
24 Morel, right?
25 A. He told me the information in
00493:01 the e-mail, correct.
02 Q. He told you the fluid compressed
03 between the float collar and the reamer?
04 MR. CHEN:
05 Objection, form.
06 Q. He told you the blockage was in
07 the -- somewhere between the float collar
08 and the reamer; is that correct?
09 A. He -- he told me that the
10 blockage was -- was in the shoe track,
11 correct.
12 Q. And that's between the float
13 collar -- it could be in the float collar
14 and the reamer, right?
15 A. Yes, sir.
16 Q. Could it be in the production
17 casing between the float collar and the

18 reamer?
 19 A. Yes, it could have been. Yes,
 20 sir.
 21 Q. And I think we said yesterday
 22 that you thought the compressive figures or
 23 some such or conversation about compression
 24 was in the daily rig report?
 25 A. Yes, sir.
 00494:01 Q. Let me show you exhibit 2598.
 02 MR. RUSSO:
 03 This is a BP number
 04 MB100136940?
 05 MR. MATTHEWS:
 06 Yes, sir.
 07 Q. And that's the daily drilling
 08 report for April the 19th, right.
 09 A. Yes, sir.
 10 Q. Have you seen that before?
 11 A. No, sir, I have not seen this
 12 document before.
 13 Q. Look at the next page, Bates
 14 Number 941 at the bottom.
 15 From 14:30 to 17:35, he
 16 goes through the nine attempts to convert
 17 the float collar, does he not?
 18 A. It's -- I can't -- it's kind of
 19 small.
 20 Q. I know it is.
 21 MR. RUSSO:
 22 That's why I was asking you.
 23 Q. But you'll see --
 24 A. Yes, sir. Yes, sir, it is.
 25 Q. It does. And it doesn't say
 00495:01 anything about compressive fluid, does it?
 02 A. No, sir.

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00495:16 Q. And yesterday we -- or
 17 exhibit 2584 was introduced in an e-mail
 18 chain from you to Brian Morel and then
 19 Morel to you.
 20 Where you asked, how did
 21 the cement job go, Brian?
 22 And he responds, Yeah, we
 23 blew it at 3140 psi, presumably.
 24 Correct?
 25 A. (Moves head up and down.)
 00496:01 Q. Yes?
 02 A. Yes, sir.
 03 Q. Yeah, we blew it at 3140. Still
 04 not sure what we blew yet.
 05 He didn't say anything
 06 about any blockage or anything being
 07 between the float collar and the reamer,

08 did he?
09 A. No, sir.
10 Q. What he could well have been
11 speaking of was the wiper plug that landed
12 on the top of the float collar?
13 MR. RUSSO:
14 Object to the form.
15 A. Again, as I explained yesterday,
16 the -- the wiper plug wouldn't have been
17 there at this point in time.
18 Q. The wiper plug wouldn't have
19 been there? Don't you -- if you're -- are
20 you saying that the wiper plug is not
21 landed before you convert? Yes or no?
22 A. No, sir.
23 Q. No?
24 A. No.
25 Q. Have you ever seen anything that
00497:01 raises the question of whether or not the
02 wiper plug was, in fact, the obstruction?
03 A. No, sir.
04 Q. Are you saying that this wiper
05 plug would not have landed after nine
06 attempts --
07 MR. RUSSO:
08 Object to form.
09 Q. -- to set -- to set this float
10 collar?
11 MR. RUSSO:
12 Sorry. Object to form.
13 A. Again, I'm not -- I'm not
14 understanding your question in here.
15 You --
16 Q. Well, let me ask you this.
17 Let's see. Let's go at it again.
18 What's the function of the
19 wiper plug?
20 A. The function of the -- the
21 cement wiper plug is to displace the
22 cement.
23 Q. All right. And it's also a
24 separator --
25 A. It's to separate the mud from
00498:01 the cement.
02 Q. Mud from what?
03 A. Mud from the cement.
04 Q. And the cement's above the mud?
05 A. Yes, sir.
06 Q. Okay. And the wiper plug is
07 between them?
08 A. Yes, sir.
09 Q. And why are you trying to
10 convert the float collar?
11 A. To -- to -- the float collar is
12 trying to convert it to -- to go back to a

13 conventional field, to be able to hold the
 14 cement back when the cement is in place.
 15 Q. That's correct. So you're
 16 trying to convert it.
 17 The mud is below you, you
 18 got the wiper plug, you're trying to
 19 convert to prevent the cement from going
 20 out the end, right?
 21 A. Right.
 22 Q. So the -- it could have been the
 23 wiper plug 'cause it's been pumped down?
 24 MR. RUSSO:
 25 Object to form.
 00499:01 A. No, sir. No, sir. The -- let
 02 me -- when the -- they were trying to break
 03 circulation. At this point in time, the
 04 plugs are supposed to be -- I'm not going
 05 to say they're -- I'm guaranteeing the
 06 plugs are still on the running tool. But
 07 the plugs are still on the -- on the
 08 Dril-Quip running tool. And we're -- and
 09 all we have -- all we were trying to pump
 10 is mud at this point. I say we, all BP is
 11 trying to do is -- is to pump the mud.
 12 Q. So the cement's not been put in
 13 the pipe?
 14 A. To my knowledge, no, sir.
 15 The -- the -- usually, the procedure is --
 16 it's a standard procedure is that when
 17 we -- once they break circulation, then
 18 they circulate and then we begin to pump
 19 cement. And once -- then we launch plugs.
 20 Q. All right. Let me ask you
 21 another question.
 22 When -- during these nine
 23 attempts you pressured up to over -- or you
 24 didn't. But the pressure when pumped over
 25 3,000 pounds -- over 3,000 psi, right?
 00500:01 A. Yes, sir, according to these --
 02 Q. And somehow, whatever the
 03 obstruction is, wherever it is, it gets
 04 blown out. It gets -- something happens to
 05 it, right?
 06 A. Yes, sir.
 07 Q. What happened to it?
 08 A. I don't know.
 09 Q. Where is the only place for it
 10 to go?
 11 A. Down.
 12 Q. Out, right? Out the bottom
 13 through the float collar --

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00500:16 Q. -- right?

17 A. Yes. Possibly.