

Deposition Testimony of:

Bryan Clawson

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Page 11:16 to 11:18

00011:16 BRYAN CLAWSON,
17 having been first duly sworn, testified as
18 follows:

Page 11:21 to 12:11

00011:21 Q. Mr. Clawson, good morning.
22 A. Good morning.
23 Q. I'm Guy Matthews here
24 representing most of the plaintiffs in this
25 matter.
00012:01 For the record, would you
02 state your name?
03 A. Bryan R. Clawson.
04 Q. All right. And where are you
05 employed?
06 A. Weatherford.
07 Q. Weatherford U.S.?
08 A. Weatherford U.S.
09 Q. Okay. And how long have you
10 been with Weatherford?
11 A. It would be 30 years August 1st.

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00012:22 -- in the 30(b)(6) notice.
23 Let me first say that we originally
24 identified four witnesses to cover the
25 topics in the notice. And after discussion
00013:01 with, primarily, Soren, but you and I and
02 Soren along with Mr. Wegmann over the last
03 few weeks, we really identified three
04 witnesses who are testifying as to most, if
05 not all, of the topics.
06 Mr. Clawson is going to
07 testify regarding topics 17, 18, 20, and
08 23. Brent Lirette will follow him. And he
09 will testify regarding items 29, 30, and
10 33. There are 18 topics that Weatherford
11 has no information on. And we've agreed
12 that we'd take Mr. Lirette, Mr. Clawson
13 today. We'd bring Mike Hayes in tomorrow.
14 He'll confirm that those 18 topics
15 Weatherford has no information on. In
16 addition, Mr. Hayes will testify on six
17 topics, items 1, 6, 7, 8, 9, and 34. It
18 leaves only two topics that Mike Gallien
19 was going to testify to, one involves
20 insurance and the other involves the status
21 of the international company. We've agreed
22 to give you an affidavit on the
23 international company, and the policies

24 have all been produced. So by agreement,
25 we're actually not even going to bring
00014:01 Mr. Gallien.
02 Mr. Gallien -- so the lineup
03 will be Mr. Clawson first, Mr. Lirette
04 second, and then we will conclude with
05 Mr. Hayes tomorrow, and that should be the
06 end of the Weatherford 30(b)(6) deposition.
07 MR. BOWMAN:
08 I think we've read in all
09 the notes and -- maybe I'm reading this
10 wrong. I think it was our notice of
11 deposition. And so I don't think we were
12 in any of these discussions.
13 MR. MATTHEWS:
14 It was. If you're
15 Halliburton, it was.
16 MR. BOWMAN:
17 I am Halliburton.
18 MR. RUSSO:
19 We -- we did have some
20 discussions with Alan York earlier, yeah.
21 Over the last week, though, I have to tell
22 you, these have all been with PSC, so.
23 MR. BOWMAN:
24 Right. So I haven't been
25 referred to that. I may not have any
00015:01 problem with that. I'm just saying I'm not
02 familiar with it.
03 MR. RUSSO:
04 And I'm happy to visit with
05 you during the break, and we'll go -- I
06 don't think you're going to have a problem
07 with the --
08 MR. BOWMAN:
09 It doesn't sound like it.
10 MR. RUSSO:
11 Thank you.
12 MR. FITCH:
13 Could I ask, when you were
14 listing the topics for Mr. Hayes, you did
15 not -- I'm Tony Fitch for Anadarko. You
16 did not list number ten, which I thought
17 was also one of his topics.
18 MR. MATTHEWS:
19 And what is number ten?
20 MR. FITCH:
21 Discussion regarding the
22 decision to use the long string as opposed
23 to the liner casing.
24 MR. WEGMANN:
25 Counsel, I'm Edward Wegmann.
00016:01 I did the objection, and that was an error.
02 Mr. Hayes -- that's a negative. It's going
03 to be a negative. We don't have any

04 information.
05 MR. FITCH:
06 Do not know?
07 MR. WEGMANN:
08 Right. And so --
09 MR. RUSSO:
10 That's one of the 18
11 do-not-knows.
12 MR. FITCH:
13 I appreciate it.
14 MR. MATTHEWS:
15 All right.
16 MR. RUSSO:
17 Thanks, Guy.
18 Q. Mr. Clawson, rather than the
19 numbers, what are the areas that you're
20 going to testify about?
21 A. As far as?
22 Q. Today.
23 A. Today?
24 Q. Yes, sir.
25 A. Again, about the Weatherford
00017:01 centralizers.
02 Q. All right. How about the float
03 collar?
04 A. The float equipment also.
05 Q. How about the reamer?
06 A. The reamer shoe, yes, sir.
07 Q. All right. How about -- not the
08 bottomhole assembly, right?
09 A. Right. Right. The Weatherford
10 cementation equipment.
11 Q. That's the BHA?
12 A. Right. I'm -- I'm the salesman
13 that takes care of the Weatherford
14 cementation equipment.
15 Q. How about the production casing?
16 You don't know anything about that?
17 A. No, sir. I'm not involved in
18 any part of it.
19 Q. Do you know anything about
20 running the production casing?
21 A. No, sir. I don't get involved
22 in that.
23 Q. Do you know if Weatherford ran
24 the production casing?
25 A. Yes, sir.
00018:01 Q. They did?
02 A. Yes, sir.
03 Q. All right. And Weatherford did
04 the, as far you're aware of, did the torque
05 work or did the makeup?
06 A. I wasn't involved in any of the
07 casing running or -- or anything like that.
08 Q. All right. You previously said

09 you'd been with Weatherford for 30 years.
10 What are you, about 31? Why don't you give
11 me your -- after high school -- where did
12 you graduate from high school?
13 A. I graduated high school in
14 Barbe, Lake Charles, Louisiana. Went to
15 McNeese for three and a half years. I did
16 not get a degree. I was in business. I
17 left there and got in the oil field back in
18 '81.
19 Q. All right.
20 A. Went --
21 Q. Right about the time the oil
22 field tanked?
23 A. Back in '81, things were still
24 doing pretty well in '81.
25 Q. All right.
00019:01 A. A few -- now, a few years later,
02 they were -- things started tanking, but I
03 got into -- I went to work for Wilson
04 Supply for six months and then got on with
05 Weatherford as a sales and service hand,
06 actually, in Pearland, Texas.
07 Q. And so you went with Weatherford
08 when?
09 A. I started 8-1 of '81.
10 Q. All right. And you were in
11 Sugarland?
12 A. It was -- our office was out of
13 Pearland, Texas at that time.
14 Q. Pearland.
15 And what did you do out of
16 that office?
17 A. I was a sales and service
18 technician.
19 Q. Of what though?
20 A. Of cementation equipment. I'm
21 sorry.
22 Q. What is cementation equipment?
23 A. Well, mainly back then in the
24 '81s, Weatherford was -- all the they had
25 was -- we had centralizers and scratchers
00020:01 and stop collars. And we had a -- and the
02 float equipment. And so what I did was --
03 is, I delivered -- my main job back then
04 was just taking orders and delivering the
05 equipment over to the -- to the rig sites.
06 Q. Did you go to any schools or
07 receive any instructions with respect to
08 how those various pieces of equipment
09 function with respect to cement -- a
10 cement?
11 A. Weatherford put me through quite
12 a few schools back -- when I first started
13 and also over my career. We -- I've gone

14 to -- you know, we call them cementation
15 schools as far as how -- how our equipment
16 works.
17 Q. All right. So Weatherford
18 doesn't provide the cement but provides
19 equipment that does something with respect
20 to the cement?
21 A. The cementation aids is what we
22 call it.
23 Q. The cementation aid with respect
24 to doing what for the cement?
25 A. It doesn't really do anything to
00021:01 the -- for the cement.
02 Q. But doesn't it enable the cement
03 to set, to have a solid plug or a solid
04 body of cement rather than channeling or
05 drifting apart or migration --
06 MR. CHEN:
07 Objection, form.
08 Q. -- if you know?
09 A. It doesn't do anything as far as
10 what -- helping the cement set at all.
11 Q. Well, it -- you don't think
12 centralizers have an important function for
13 cement?
14 A. Centralizers are designed to
15 keep the pipe in the middle of the hole,
16 right.
17 Q. What's this then that I keep
18 reading about in this lawsuit called
19 channeling --
20 MR. RUSSO:
21 Object to form.
22 A. Well --
23 Q. -- relative to centralizers?
24 A. I'm not an expert as far as the
25 channeling, but again, what -- you know,
00022:01 our equipment centralizer, they -- they
02 keep the pipe in the middle of a hole.
03 Q. Doesn't your centralizer -- the
04 function of your centralizer to provide
05 channeling?
06 A. Yes. Yes, it does.
07 Q. And what is that?
08 A. Well, channeling is in -- again,
09 I'm not an expert on the channeling part of
10 it, but my understanding is that when --
11 you want to try to get the cement all the
12 way around the casing and that's what the
13 centralizer's there for. If you start --
14 the centralizer gets off to one side, then
15 you're going to -- your fluid's going to
16 want to go to the -- to the high side of
17 the hole, which is not the middle, and now
18 you're going to have -- some cement on the

19 one side and some mud on the other side.
20 Q. And the function -- the function
21 of centralizers are supposed to be
22 proportionally spaced is to prevent
23 channeling of the cement relative to the
24 bore around the pipe?
25 A. Right.

00023:01 MR. CHEN:
02 Objection, form.
03 A. To keep the pipe in the middle
04 of the hole to -- so they can get a better
05 cement job.
06 Q. Okay. Were you ever on this
07 rig?
08 A. No, sir.
09 Q. Did you interview, in
10 preparation for the deposition, the four
11 Weatherford people who were on the rig on
12 the 20th?
13 MR. LEMOINE:
14 Objection, form.
15 A. Did I interview with them?
16 Q. Did you speak to them? In
17 preparation for your deposition, did you
18 speak to the four Weatherford people that
19 were on the rig when the explosion
20 occurred?
21 MR. LEMOINE:
22 Same objection.
23 A. The only person I had discussion
24 with was Daniel Ofather. He was my service
25 hand.

00024:01 Q. Now, Mr. Ofather is your service
02 hand?
03 A. Right. I mean, he doesn't work
04 for me, but he's a -- he's a service hand
05 for the cementation group.
06 Q. All right. And what were your
07 discussions with Mr. Ofather?
08 A. Well, it was actually -- it was
09 actually after the -- the accident.
10 Q. I understand that.
11 Did you talk to him before?
12 A. No, sir. I don't -- I didn't
13 believe that -- the guys in Houma.
14 MR. RUSSO:
15 Did you talk to him?
16 MR. LEMOINE:
17 Sorry?
18 MR. RUSSO:
19 He just wanted to know if
20 you talked to him before.
21 A. No, I did not talk to him
22 before.
23 Q. In other words, did you talk to

24 him before he went out to the rig on a
 25 helicopter with 15 additional centralizers?
 00025:01 A. No, sir. No, sir, I didn't.
 02 The guys in Houma set him up. You know,
 03 his boss set him up to be on -- on
 04 location. I wasn't involved in that. I
 05 didn't -- I didn't speak with him.
 06 Q. Who is his boss?
 07 A. His boss is Anthony Savoie out
 08 in Houma, Louisiana.
 09 Q. All right. You do know that
 10 Mr. Ofather and a helicopter were to go out
 11 and place an additional 15 centralizers
 12 around the production casing as it was
 13 being cemented in, do you not?
 14 A. Oh, yes, sir. Yes, sir.

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00026:09 Q. The 15 centralizers sent out
 10 were thought to come from the -- be similar
 11 to the centralizers used on the Atlantis,
 12 were they not? Or do you know that?
 13 A. It wasn't the Atlantis. It was
 14 on the -- on the Thunder Horse.
 15 Q. All right. And was there a
 16 problem with those centralizers --
 17 MR. CHEN:
 18 Objection, form.
 19 Q. -- if you know?
 20 A. On -- which problem?
 21 Q. On Thunder Horse.
 22 A. Yes.
 23 Q. What was it?
 24 A. We had a -- this was -- I guess
 25 now it's two and a half, three years ago.
 00027:01 We had -- on this type of design
 02 centralizer, we had a -- the centralizer
 03 slipped up a little bit.
 04 Q. Sir?
 05 A. They slipped on -- when they
 06 were on the pipe --
 07 Q. Well, they were not intervally
 08 formed centralizers, were they --
 09 A. No, sir.
 10 Q. -- on Thunder Horse?
 11 And they were centralizers
 12 that had to be screwed on in effect; in
 13 other words, they weren't an integral part
 14 of the string? They were actually strapped
 15 on to the pipe production casing; isn't
 16 that right?
 17 A. They were not strapped on. They
 18 were slip -- they slip on.
 19 Q. Slip on. All right.

20 And what happened was, they
21 slipped after they were -- when they were
22 in the hole because of some reason or the
23 other? They moved?
24 A. Correct.
25 Q. And that's not acceptable, is
00028:01 it?
02 A. No, sir, that's not a good
03 thing.
04 Q. And that's what -- that's what
05 was thought to be that Mr. Ofather took
06 with him out on the Macondo (sic) rig? It
07 was -- the thing was that those were the
08 type centralizers that were delivered --

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00028:11 Q. -- the 15; isn't that correct?

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00028:14 A. These centralizers were not the
15 same ones. They had been in -- we had --
16 we did some modifications on these
17 particular ones.
18 Q. I know, but that's not my
19 question. The -- those --
20 A. I'm sorry.
21 Q. -- those 15 centralizers were
22 not used and they were sent back to Houma,
23 weren't they?
24 A. No, sir, not all of them.
25 Q. All right. How many
00029:01 centralizers were used with respect to the
02 ones Mr. Ofather brought out with him, if
03 you know?
04 A. The -- we -- they had -- 15 were
05 shipped and we received six back.
06 Q. How many centralizers were used
07 on this production casing?
08 A. To my knowledge, none of the
09 slip-on centralizers that we're -- we're
10 discussing were used.
11 Q. Well, weren't all 15 the slip
12 on?
13 A. No. There was -- there was six
14 centralizer subs is what we call them.
15 Q. But those centralizers, I
16 believe, came from the -- came from Nexen?
17 A. Correct. Correct.
18 Q. So they weren't shipped out by
19 helicopter with Mr. Ofather; isn't that
20 correct?
21 A. Yes, sir.

22 Q. And the -- the centralizers came
 23 out with Mr. Ofather was sent back because
 24 someone thought they were the slip-on type?
 25 MR. CHEN:
 00030:01 Objection to form.
 02 A. Yes. They were -- they were
 03 shipped back. It was -- my knowledge was,
 04 they decided not to use them. I don't know
 05 why or anything --
 06 Q. Well, let's -- did Mr. Ofather
 07 tell you this? He thought he was going to
 08 be working all night, he thought he was
 09 going to put on the six centralizers that
 10 came from Nexen, he thought he'd put on the
 11 other 15 that were delivered by helicopter
 12 out to the rig, and he slept all night and
 13 he was told the job's canceled?
 14 MR. WEGMANN:
 15 Objection, form.
 16 Q. Is that correct?
 17 A. Well, the six centralizers were
 18 already bucked on pipe when they got to the
 19 rig.
 20 Q. I understand that. That's not
 21 my question.
 22 A. Okay. I'm sorry.
 23 Q. Bottom line is, those 15
 24 centralizers were not used and sent off the
 25 Macondo?
 00031:01 A. Yes. To my understanding, yes,
 02 they were not used.
 03 Q. And only six centralizers were
 04 used with the production casing?
 05 A. Yes. To my understanding, yes.
 06 Q. And those were the centralizers
 07 that were bought with the production casing
 08 from Nexen? They were already bucked on?
 09 A. Yes, sir.

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00031:12 Q. We were talking about your
 13 30 years. So let me go back a little bit.
 14 And pardon me. It's just -- I have a
 15 tendency to jump around anyway. I get
 16 bored, okay, so...
 17 Okay. You were in
 18 Pearland, and we were talking about the
 19 cementation equipment.
 20 How long were -- did you
 21 stay in Pearland?
 22 A. I worked there for about --
 23 about two years.
 24 Q. Okay. And then what?
 25 A. Then they -- we -- they

00032:01 relocated the office in Houston, and they
02 were working off of I-10, what was called
03 Portwest Drive.
04 Q. Okay.
05 A. And for about a year, I guess.
06 Q. And then what?
07 A. And then the -- Weatherford
08 decided to consolidate some -- some
09 offices. They moved the cementation office
10 out to Dayton, Texas. So we moved -- we
11 moved to Dayton, Texas.
12 Q. I was born and raised in
13 beautiful downtown --
14 A. Right. And this was -- this was
15 around '84, so --
16 Q. All right. And how long were
17 you in Dayton?
18 A. I was -- again, this is back in
19 the '80s. So probably about six months.
20 And then I got transferred to Palestine,
21 Texas for two years.
22 Q. All right. How long were you
23 there?
24 A. I was there for about two years.
25 Then that's when the oil field did -- you
00033:01 know, went down. And they closed the
02 Palestine office, and they transferred me
03 to Lafayette, Louisiana for two years.
04 Q. All right. And what period of
05 time was this?
06 A. That would have been --
07 Q. In '84?
08 A. Right now we're talking about
09 '86 --
10 Q. All right.
11 A. -- '87.
12 Q. All right. Then what happened?
13 A. Then there was an opening back
14 in Dayton, Texas where they needed a -- a
15 person in sales and service. So
16 Weatherford transferred me back to Dayton,
17 Texas for, I guess, about a year.
18 Q. All right.
19 A. And again, this whole time, I
20 was a sales and service in the field.
21 Q. All right. And so all this
22 period of time you've been sales and
23 service of cementation equipment?
24 A. Yes, sir.
25 Q. Okay. And I think that will
00034:01 take us to '89, something like that?
02 A. Right.
03 Q. And then what happened?
04 A. Then at that point in time, I --
05 I took an inside sales job with Weatherford

06 at their manufacturing facility in -- in
07 Houston. It was -- it was right off of Old
08 Katy Road there. And my -- my main job was
09 just getting in quotations and making
10 quotations. I was, you know, I was
11 out and not in the field anymore at this
12 time.

13 Q. Okay. If you're not in the
14 field and you got an inside sales job, I
15 guess you hear from the Weatherford
16 salesman that XYZ needs a quotation on
17 cementation equipment, here's the
18 parameters and you'd -- you'd put that
19 quotation together?

20 A. Right.

21 Q. And then turn around and send it
22 to the Weatherford salesman?

23 A. Well, no. This was actually --

24 Q. You would -- go ahead.

25 A. Well, actually it was -- it
00035:01 was -- I was support for the Weatherford
02 International Group. You know, back then,
03 they would send us a fax and looking for
04 pricing and just looking information on it,
05 and I would turn around and get the pricing
06 and send it back to the international
07 locations.

08 Q. Is this still cementation
09 equipment?

10 A. It's all -- it's all at the
11 manufacturer facility in -- in Houston.

12 Q. Weatherford doesn't manufacture
13 tubulars, does it?

14 A. No, sir.

15 Q. And Weatherford is not in the
16 business of selling tubulars?

17 A. No, sir.

18 Q. Okay. All right. Go ahead.
19 What did you do next?

20 A. Then as I was inside sales
21 for -- for a year in Houston, I became --
22 became the production control supervisor,
23 which all that entailed was -- was I had a
24 couple of schedulers that would call me and
25 we just scheduled the -- the orders as they
00036:01 came through the -- to the plant.

02 Q. Okay.

03 A. The inside salesperson what I
04 was doing, they were working for me at that
05 time.

06 Q. All right. So --

07 A. I did that for about a year.

08 Q. All right. So you're moving up
09 through the ranks here?

10 A. I'm not sure if you'll call that

11 moving up. It was more lateral than it was
12 moving up, so...

13 Q. All right. And then what?

14 A. In '92, Weatherford purchased
15 GEMOCO out of Houma. And Weatherford
16 decided to move both manufacturing plants
17 in Houston and Weatherford, Texas to Houma
18 and consolidate everything in Houma in
19 1992. And I moved along with the plant.
20 They shut Houston down.

21 Q. You were still in charge of
22 production?

23 A. When I -- when I transferred
24 to -- in '92, I was not. I went back to
25 being an inside sales rep for three years
00037:01 while I was there.

02 Q. All right.

03 A. And then for the next four years
04 after that -- I was in Houma for about a
05 total of nine years. I was -- I was a
06 customer service manager at that point.
07 So --

08 Q. What is -- still in cementation
09 equipment?

10 A. Still in -- it was at the
11 manufacturing level on -- still in
12 cementation.

13 Q. What does that mean? You worked
14 with the salesmen?

15 A. The -- as the customer service
16 manager, the people that took the orders
17 and turned them in to the plant worked for
18 me. The sales and service guys worked for
19 me at that time. I didn't have much in
20 a -- dealings with the -- the actual
21 salespeople either in New Orleans or
22 Houston or anything like that.

23 Q. You would have attempt to
24 coordinate production and manufacturing
25 with the sales and over -- oversee filling
00038:01 an order?

02 A. Right. Just the orders that
03 were coming in from all the Weatherford
04 the -- districts would come into my group,
05 and we would, you know, place them into the
06 demand on the plant. It was strictly into
07 the manufacturing facility is what I was
08 doing.

09 Q. All right. And what period of
10 time was this?

11 A. This was from -- from -- again,
12 from '92 to, I guess, '95. And then from
13 '95 to 2000, I was the -- the customer
14 service manager.

15 Q. In Houma?

16 A. In Houma.
17 Q. All right. And then what?
18 A. 2000, I was -- they were needing
19 some -- some extra support here in
20 Houston -- or I'm sorry. In Houston, not
21 here. And so Weatherford asked me to
22 transfer to Houston to get into the sales
23 group. And I accepted. And I'm doing the
24 same thing I did when I started back in
25 2000.

00039:01 Q. Okay. And that is what?
02 A. I'm a corporate sales rep. I'm
03 a -- they call me technical sales rep is my
04 actual title.
05 Q. All right.
06 A. I call on oil companies to try
07 to sell them cementation equipment now.
08 Q. During drilling operations,
09 right?
10 A. For the -- for the drilling
11 operations, yes.
12 Q. All right. Who at Weatherford
13 was working for you -- was on the Macondo
14 rig -- the HORIZON rig, I'm sorry?
15 A. Well, no one particularly worked
16 direct for me at -- at all.
17 Q. Well, who at Weatherford
18 reported to you or talked to you about
19 cementation equipment for supplying out on
20 the HORIZON rig? In other words, what
21 salesman at Weatherford, as far as you
22 know, was in charge of making the sale for
23 the HORIZON rig of the cementation
24 equipment?
25 A. I was.

00040:01 Q. Okay. And what did you say that
02 Mr. Goforth did? Ofather, not Goforth. I
03 know what Goforth did.
04 A. He was one of our service -- he
05 was one of our service hands out of Houma,
06 Louisiana.
07 Q. All right. Who were the other
08 service hands?
09 A. I don't know them all by name.
10 I know there was -- I know one of the other
11 guys is Kevin Bergeron. And again, I --
12 the Houma -- when I need a -- when they --
13 a service hand -- a rig calls for a service
14 hand out of Houma, whoever's next in line
15 goes out.
16 Q. All right.
17 A. So I don't get involved as far
18 as any of the --
19 Q. Well, who else did you talk to
20 for your deposition or try to find out

21 what's going on? Who else did you have
 22 conversations with at Weatherford with
 23 respect to the HORIZON rig?
 24 A. Well, the -- on the centralizer
 25 part of it?
 00041:01 Q. No. Anything else.
 02 A. Well, the -- the people --
 03 Q. And centralizers.
 04 A. Well, the main people I talked
 05 to, again, was our people in Houston to
 06 where that's where we --
 07 Q. Who?
 08 A. His name was Chris Lopez.
 09 Q. And who is he?
 10 A. He's the -- his actual title is
 11 just a sales coordinator at our operations
 12 office in Houston, Texas.
 13 Q. And why did you talk to him?
 14 A. That's where we store all of
 15 BP's equipment on -- on the float equipment
 16 and centralizers.
 17 Q. Okay. Who else did you talk to?
 18 A. I talked to the guys in Houma.
 19 The -- Anthony Savoie, who is the -- was
 20 the -- the district manager.
 21 Q. Anthony Savoie?
 22 A. Right. And again, we were --
 23 just to line up -- you know, telling him
 24 that I was going to be needing service
 25 hands for the next day. I was having to
 00042:01 ship the centralizers from Houston. That's
 02 where they were.
 03 Q. Were those BP's centralizers?
 04 A. They were actually ordered
 05 for -- for the Thunder Horse BP project.
 06 They were in the BP will call.
 07 Q. Yeah.
 08 A. But they were actually still in
 09 Weatherford's inventory.
 10 Q. I understand.
 11 A. But they were ordered for -- for
 12 the BP.
 13 Q. Everything else, with respect to
 14 the cementation equipment, was in Nexen's
 15 will call --

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00042:18 Q. -- isn't that correct?
 19 A. Yes. Yes, sir.
 20 Q. Okay. Do you recall -- let's
 21 see. Let's go ahead and finish out where
 22 you are. Let me get that done.
 23 We're in 2000 and you're in
 24 Houma. You get back to Houston. I think

25 you told me, didn't you?

00043:01 A. Yes, sir. I transferred back
02 to -- to Houston as a corporate sales rep
03 in 2000.

04 Q. And what do you do today?

05 A. That's -- my current -- my same
06 position.

07 Q. The same thing?

08 A. Yes, sir.

09 Q. In Houston?

10 A. Yes, sir.

11 Q. Where's the office?

12 A. Out at JFK Boulevard.

13 Q. All right. Did Mr. Ofather say
14 anything to you about why the 15
15 centralizers were not run?

16 A. No, sir, not really. We just --
17 I just found out that they -- they decided
18 not -- not to run the centralizers.

19 Q. Who is they?

20 A. The -- BP.

21 Q. Did he tell you anything about
22 why BP decided not to run those
23 centralizers?

24 A. No. All I was -- the
25 understanding was they were -- they were

00044:01 sending them back in that they didn't need.

02 Q. Did he say anything about
03 running a bond log, a cement bond log?

04 A. Oh, no. No, sir.

05 Q. Do you know anything about that?

06 A. Oh, no, sir.

07 Q. Did anyone -- or have you heard
08 anything relative to the type of cement
09 that Halliburton ran adjacent to above the
10 formation or the production zone in the
11 formation with respect to its contents and
12 that it was nitrogen foam cement?

13 A. No, sir, I have no knowledge.

14 Q. You don't know anything about
15 that?

16 A. I didn't get involved in the --
17 anything about the cement itself.

18 Q. Do you know anything about
19 nitrogen foam cement jobs?

20 A. No, sir. I sure don't, no.

21 Q. Do you know anything about
22 testing -- testing nitrogen foam cement
23 jobs to determine if the percentage of
24 nitrogen is present and whether or not the
25 cement was set up?

00045:01 A. No, sir. The only thing I
02 know -- I know is nitrogen is a gas.
03 That's about all I know about the cement.

04 Q. Has Weatherford ever had a float

05 collar on another rig that has operated
06 similarly or had issues similarly to the
07 float collar on the HORIZON rig?
08 MR. RUSSO:
09 Object to form.
10 MR. WEGMANN:
11 Beyond the scope of this
12 witness.
13 A. I -- to my knowledge, I -- I
14 have no knowledge of Weatherford having any
15 issues with that.
16 Q. Has Weatherford ever had a float
17 collar that there were some issue with
18 respect to the -- whether or not -- I'm
19 talking about the dual flapper valve --
20 whether or not the -- an issue with respect
21 to whether or not the valve caps closed?
22 MR. RUSSO:
23 Object to form.
24 MR. LEMOINE:
25 This -- this witness is not
00046:01 being presented for that topic. I'm not
02 going to tell him not to answer, Guy.
03 But -- but you do know we have another
04 witness on that specific topic.
05 MR. MATTHEWS:
06 He said he could testify
07 about the float collar.
08 Q. So I mean if you can, you can.
09 And I realize you're not a technical guy
10 and I'm just asking a question. Here you
11 are in sales and -- okay? You -- and
12 you've been there for 30 years. And you
13 know the dual-flapper valve.
14 Has Weatherford ever had
15 any problem with the dual-flapper valve?
16 A. I mean, I can't say that they
17 have not, no.
18 Q. Has there ever been an issue
19 with respect to whether or not the flapper
20 valve would close during an underbalanced
21 situation?
22 A. To my knowledge, I don't know of
23 any. To my knowledge.
24 Q. What -- what does the U-tube
25 effect mean to you with respect to
00047:01 operation and functioning of the float
02 collar, if you know?
03 A. Right.
04 MR. LEMOINE:
05 Object to form.
06 A. The U-tube effect is when
07 they -- when we have a heavier cement on
08 the outside of the pipe and we have a
09 lighter mud fluid inside the pipe and that

10 the -- the mud's going to want to come back
11 into the pipe. I mean -- I'm sorry.
12 Cement would -- cement's going to want to
13 come back into the pipe.
14 Q. Why?
15 A. Because it's heavier than the
16 mud is.
17 Q. What about that same situation
18 where -- is it typical or normal that the
19 annular pressure is greater than the
20 pressure inside the pipe?
21 A. Now, that I wouldn't -- I
22 wouldn't know about that. I'm not very
23 knowledgeable about the -- the annular
24 pressures and stuff like that on drilling
25 the well. So I --
00048:01 Q. Okay. What about a situation if
02 you're underbalanced? Do you know what
03 that is?
04 A. I -- I know a little bit about
05 it.
06 Q. All right. What is it?
07 A. Again, when you've got -- an
08 underbalance is when you have a lighter --
09 a lighter fluid in a situation with -- with
10 heavier fluid.
11 Q. Well, does it have something to
12 do with the pressure inside the pipe versus
13 the pressure in the annulus?
14 A. Again, I don't know. I'm not an
15 expert at that. I really couldn't give you
16 a definitive answer on that.
17 Q. Did -- did you hear anything
18 about a negative-pressure test that was run
19 on the HORIZON rig?
20 A. This is after the -- after
21 the -- after the accident?
22 Q. No. No. Before it.
23 A. No. No, sir.
24 Q. Do you know what a
25 negative-pressure test is?
00049:01 A. A little bit, yes. Again --
02 again, I'm not a -- I'm not a drilling
03 engineer.
04 Q. What -- the reason that you
05 would run a negative-pressure test, when
06 you're drilling a well, especially when
07 you're going to -- when you've got your
08 production casing in place, is there not?
09 MR. RUSSO:
10 Object to form.
11 A. Yeah.
12 Q. Sir?
13 A. Yes.
14 Q. All right. What is it --

15 MR. RUSSO:
16 Object to form.
17 Q. -- if you know?
18 A. Like if there's one of the -- to
19 make sure that the cement is in place and
20 that the -- the floats have integrity.
21 Q. And what happens if the
22 negative-pressure test comes back that, in
23 fact, the pressure inside the pipe is
24 greater than the pressure outside?
25 MR. RUSSO:
00050:01 Object to form.
02 A. I don't know enough about the
03 negative test to -- to be able to answer
04 that.
05 Q. Well, what would that show?
06 What is that an indication of?
07 MR. RUSSO:
08 Object to form.
09 Q. If you have a, quote, positive,
10 unquote, negative-pressure test?
11 MR. RUSSO:
12 Object to form.
13 A. Again, I don't know enough about
14 the negative-pressure test.
15 Q. Would that indicate that the --
16 in fact, there is an influx of fluids
17 coming into the production casing? In
18 other words, the well is leaking?
19 MR. RUSSO:
20 Object to form.
21 Q. Would that indicate that?
22 A. Again, I -- I'm not an expert on
23 the negative-pressure test so I would hate
24 to --
25 Q. Would that affect the operation
00051:01 of the float collar, the dual-flapper valve
02 float collar?
03 MR. RUSSO:
04 Object to form.
05 A. No, sir. That -- it shouldn't
06 affect the operation of the float collar.
07 Q. But would it affect the ability
08 of a flapper valve to close?
09 MR. RUSSO:
10 Object to form.
11 A. No, sir. To the best of my
12 knowledge, it wouldn't.
13 Q. In other words, if the -- how
14 about if the -- well, wait a minute.
15 What's the function of the
16 flapper valve?
17 A. The -- the flapper valve or --
18 or the float collar themselves? The -- the
19 whole assembly?

20 Q. What is the -- yeah. What --
 21 what is the function of the flapper valve
 22 in the float collar?
 23 A. Right. The -- it's to hold
 24 the -- once the cement is in place, it's to
 25 hold the cement back.

00052:01 Q. How does it do that? How does
 02 it hold the cement back?
 03 A. The flappers -- the flappers
 04 close.
 05 Q. And how do they close?
 06 A. These -- these particular
 07 flappers have -- are spring loaded.
 08 Q. Yes, sir. There's -- but if
 09 they're spring loaded, they'd normally be
 10 closed?
 11 A. Yes, sir.
 12 Q. How do they seal?
 13 A. For these -- this particular
 14 model, you would have to pump through them.
 15 Q. Well, there's a tube, isn't
 16 there? Isn't there a tube inside the float
 17 collar that's positioned such that it holds
 18 the flapper valve open, you pump down a
 19 ball, rupture a disc, the tube drops, the
 20 flapper valve is closed?
 21 A. The tube --
 22 Q. Isn't that the way it operates?
 23 A. Well, the tube is in place as
 24 you're running casing.
 25 Q. Yes, sir. But isn't that the
 00053:01 way it operates?
 02 A. Yes, sir. The -- the only
 03 question I may have is the ruptured disc.
 04 I'm not sure what you're --
 05 Q. Well, you have the ball -- the
 06 ball is such that the function of the ball
 07 is to enable the tubes holding the flapper
 08 valves open to drop past the flapper
 09 valves. And the flapper valves are
 10 supposed to swing closed --
 11 A. Correct.
 12 Q. -- isn't that right?
 13 A. Yes, sir.

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00053:21 But what -- in your
 22 opinion, what would prevent those valves,
 23 spring loaded, what would prevent those
 24 valves from closing?
 25 A. I wouldn't -- there's -- maybe
 00054:01 many things. I wouldn't --
 02 Q. Well, what?
 03 A. I mean there could be debris in

04 the -- in the valve itself.
05 Q. All right. That's one. Okay.
06 Could be an obstruction at
07 or about the valve itself that would
08 prevent the valve from closing?
09 A. Yes, sir.
10 Q. An obstruction in the opening
11 that's supposed to be closed by the flapper
12 valve, right?
13 A. Yes, sir.
14 Q. All right. What else?
15 A. You know, once the -- once the
16 tube is left, I don't have any other
17 opinions for what else -- I mean there's --
18 Q. Well, what about the pressure
19 of -- above or in the area of the valve is
20 greater than the pressure below the
21 choke -- or below the float collar? In
22 other words, if the pressure is sufficient
23 to overcome the spring-loaded valves such
24 that the spring -- the spring doesn't have
25 sufficient pressure or strength to close
00055:01 because there's a pressure greater against
02 it? What about that?
03 A. So if the pressure's on top of
04 the valve is greater?
05 Q. Sure.
06 A. Yes. I mean, I guess -- I guess
07 that could happen.
08 Q. Were these flapper valves
09 supposed to seal?
10 A. These -- this particular
11 equipment is to -- is to hold back the --
12 the cement.
13 Q. Okay. Have you read the Stress
14 Engineering report?
15 A. No, sir. I'm not involved in
16 that.
17 Q. You've never read it? Either
18 one of them?
19 A. No, sir.
20 Q. Tell me how a normal -- what is
21 this thing called, this Weatherford flapper
22 valve? M45 something?
23 A. The model number is M45AP.
24 Q. What does that mean?
25 A. To me, it means it's a double
00056:01 flapper, aluminum-flapper valve. It has
02 the ball -- two-inch ball ran in place,
03 which has float ports on the tubes. And
04 the -- the P at the end of it means it has
05 a -- a non-rotating landing plate for -- to
06 accept the non-rotating landing Weatherford
07 plugs.
08 Q. Okay. Wiper plugs?

09 A. Yes, sir.
 10 Q. What is a wiper plug?
 11 A. The -- the wiper plugs are --
 12 are plugs used to displace mud in -- in
 13 cement.
 14 Q. Did you discuss -- well, let me
 15 ask you a question.
 16 Was there anyone from
 17 Weatherford on the rig when the bottomhole
 18 assembly was run?
 19 A. To the best of my knowledge, I
 20 believe there might have been some of
 21 the -- the Tubular Running Services, but
 22 nobody would --
 23 Q. Who?
 24 A. I'm not sure what their names
 25 are.
 00057:01 Q. I see. The --
 02 A. I'm not sure.
 03 Q. So someone from Weatherford may
 04 have been on the rig running the casing?
 05 A. Correct.
 06 Q. Production casing?
 07 A. Right.
 08 Q. Do you know if that's the case?
 09 A. I don't know for a fact. I
 10 don't know whether they were still on
 11 location or not.
 12 Q. Have you read anything about
 13 running this casing?
 14 A. No, sir. I was not --

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00057:20 A. To convert the float collar,
 21 yes, I have read something.
 22 Q. What have you read?
 23 A. I -- as far as trying to get it
 24 to -- to break circulation?
 25 Q. Sure.
 00058:01 A. Right. I read that they were at
 02 nine or ten to try to break --
 03 Q. What? What did you read?
 04 A. That I just knew that they
 05 had -- one of the things would be the
 06 drilling report. The daily drilling
 07 report.
 08 Q. All right. You read that.
 09 A. And that was -- that was after
 10 the --
 11 Q. And that show --
 12 MR. LEMOINE:
 13 If you could, just maybe let
 14 him finish.
 15 MR. MATTHEWS:

16 I'm sorry.
17 MR. LEMOINE:
18 That's quite all right.
19 Q. I interrupted you.
20 MR. LEMOINE:
21 It's okay. Just --
22 A. No, I'm sorry. I think I was
23 finished.
24 MR. LEMOINE:
25 You were saying that you
00059:01 read the daily report. I think you were --
02 MR. MATTHEWS:
03 You and I get along better
04 than you and your lawyer.
05 A. Yeah. Yeah, I mean, I read the
06 drilling report. After the accident, I
07 read it.
08 Q. And they tried to set it nine
09 times, didn't they?
10 A. They tried to break circulation.
11 Q. What does that mean?
12 A. Circulation is when -- just
13 being able to pump mud through our -- our
14 equipment, to be able to condition the hole
15 to get ready for the cement job.
16 Q. Yes, sir. So what does it mean
17 when they try to, quote, break circulation,
18 unquote?
19 A. They were -- had -- to manning
20 the casing and they were just trying to
21 start circulate through the equipment. And
22 it took nine times to be able to pressure
23 up on the -- the system to break
24 circulation.
25 Q. What pressure does it take --
00060:01 what pressure differential does it take
02 under normal conditions to activate or set
03 the float collar?
04 A. It takes 5' to 700 psi.
05 Q. 500 to 700, right?
06 A. Yes, sir.
07 Q. And as far as you recall from
08 your reading, what pressures were used on
09 the rig when they were trying to set this
10 float collar?
11 A. Well, I --
12 Q. Do you recall?
13 A. I know that they had gone up to
14 2,000, and then finally --
15 Q. They actually went above three,
16 didn't they?
17 A. Yes, sir. They had -- breaking
18 circulation at 3140.
19 Q. And that's when they broke
20 circulation, right?

21 A. Yes, sir.
22 Q. Do you believe there was an
23 obstruction somewhere in the hole that they
24 were trying to pump and remove or get out
25 of the way or shove through the -- the
00061:01 float collar?
02 MR. RUSSO:
03 Object to form.
04 A. Yes, sir. I believe that there
05 was some -- there was some debris in the --
06 in the -- somewhere in the system.
07 Q. Was it below the float collar?
08 MR. RUSSO:
09 Object to form.
10 A. All I know --
11 Q. Do you have an opinion about
12 that?
13 A. I do know that there was -- it
14 was at the shoe track.
15 Q. I'm sorry?
16 A. The -- the -- they were
17 pressuring up at the shoe track. I do have
18 knowledge of that.
19 Q. All right. Explain to me the --
20 the bottomhole assembly from the top down,
21 what was what, what was what, what was
22 what.
23 Anything above the float
24 collar?
25 A. You mind if I went the other
00062:01 way?
02 Q. No.
03 A. I'm just --
04 Q. I often get things backwards.
05 A. Well, just for the -- you know,
06 I usually go from -- from the bottom up.
07 Q. Sure.
08 A. We have a shoe on the bottom.
09 Q. A what on the bottom?
10 A. A shoe. And in this case, it
11 was a -- we have a reamer shoe.
12 Q. It was a reamer shoe.
13 Why was the decision made
14 to use a reamer?
15 MR. RUSSO:
16 Objection to form.
17 A. That was -- that was BP's
18 decision to make.
19 Q. So BP made that?
20 A. Yes, sir.
21 Q. How big was -- how long was the
22 reamer?
23 A. The -- the reamer shoe is -- it
24 has a box connection on it. So it's
25 about -- about three feet.

00063:01 Q. Okay. And it's perforated, is
02 it not?
03 A. There's three ports on the
04 bottom of it, on the aluminum nose.
05 Q. And what comes out of those
06 ports?
07 A. Whatever is pumped through them.
08 Q. Cement in this situation, right?
09 A. Well, whatever's pumped through
10 them.
11 Q. Well, you know what was pumped
12 through this reamer, don't you, this reamer
13 shoe?
14 A. Yeah. It was mud and cement,
15 correct.
16 Q. Okay. Is there anything that
17 extends past the reamer? In other words,
18 you got the reamer, is it the very thing on
19 the bottom or does your production casing
20 extend a little more down?
21 A. No, sir. It is --
22 Q. The very thing on the bottom?
23 A. Yes, sir. It's the --
24 Q. And it's in a -- that pipe is
25 in -- it's just a hole after that, isn't
00064:01 it?
02 A. Yes, sir.
03 Q. All right. And right adjacent
04 to that is where the formation is, isn't
05 it?
06 MR. CHEN:
07 Objection, form.
08 A. Yes, sir.
09 Q. And you've read, have you not,
10 that gas and other things came up through
11 the production casing?
12 A. I'm -- I'm not sure. I have --
13 Q. Have you read that or not?
14 A. Yes, sir. I've read that, yes,
15 sir.
16 Q. Okay. In your opinion, did gas
17 come in through the reamer?
18 MR. RUSSO:
19 Object to form.
20 A. I have really no opinion on
21 that. I don't know --
22 Q. Sir --
23 A. -- what happened on it.
24 Q. -- is there any other opening,
25 if gas came in through the production
00065:01 casing, is there any other opening for gas
02 to come in other than through the
03 perforations of the openings in the reamer?
04 MR. RUSSO:
05 Object to form.

06 A. Through -- through my equipment,
 07 no, sir.
 08 Q. All right. What's above the
 09 reamer?
 10 A. Then we -- we -- I'm not sure
 11 how the -- the centralizers were -- were --
 12 actually were installed.
 13 Q. Okay.
 14 A. I did not see a bucking
 15 schematic of where those centralizers were
 16 placed.
 17 Q. I haven't either.
 18 A. I have -- the float collar is
 19 usually put up either --
 20 Q. Well, wait. Wait a minute.
 21 Let's go back to the centralizers.
 22 We know how many
 23 centralizers there were, don't we?
 24 A. Yes, sir.
 25 Q. Rather than 21, there were how
 00066:01 many?
 02 A. There were six.
 03 Q. Six.
 04 And we've learned that
 05 those came bucked up from the Nexen
 06 seven-inch production casing that was
 07 purchased --
 08 A. Yes, sir.
 09 Q. -- right?
 10 By the way, was that a
 11 production casing used by Nexen?
 12 A. Was it used by Nexen?
 13 Q. Ever used? Do you know?
 14 A. No, sir, I sure don't.
 15 Q. Have you ever seen any documents
 16 from BP that say, we'll take a risk whether
 17 or not it's used or not?
 18 MR. CHEN:
 19 Objection, form.
 20 Q. Sir?
 21 A. No, sir. No, I -- I did not.

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00066:25 Q. There were some piece of
 00067:01 equipment purchased from Nexen that was not
 02 used. Do you remember what that was?
 03 A. Yes, sir. We had a -- we had
 04 shipped out a backup M45AP float collar.
 05 Q. How about a guide shoe?
 06 A. Along with a -- it was actually
 07 a guide shoe that was modified to what we
 08 call a cookie-cutter guide shoe.
 09 Q. Yeah. Why -- why wouldn't BP
 10 use that?

11 MR. LEMOINE:
12 Objection.
13 A. That was -- it was BP's decision
14 to run the -- the reamer shoe.
15 Q. What -- what is the function or
16 purpose of a guide shoe?
17 A. This particular guide shoe that
18 we had -- well, this particular guide shoe
19 was a -- was an M22W guide shoe. It meant
20 that it had an eccentric nose on it at one
21 time. And a guide shoe, all it is, is to
22 help guide the casing down as it's going
23 downhole.
24 Q. Yes, sir.
25 A. On this particular instance,
00068:01 they wanted to make it into a cookie
02 cutter. So what they did is they --
03 Q. No. Nexen did?
04 A. Nexen did.
05 Q. Not -- not BP?
06 A. Not BP.
07 Q. Go ahead.
08 A. Right. And so Nexen, they
09 removed the eccentric nose on it and made
10 it into what we call a cookie-cutter guide
11 shoe.
12 Q. I know.
13 In your opinion, why didn't
14 BP use it?

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00068:16 Objection to form.
17 A. I -- they used -- they had the
18 choice of running the -- the cookie cutter
19 or the reamer shoe, and they decided to run
20 the reamer shoe.
21 Q. All right. Well, you could run
22 a guide shoe and a reamer?
23 A. I'm sorry.
24 Q. You could run a guide shoe and a
25 reamer?
00069:01 MR. LEMOINE:
02 And a reamer, you said?
03 MR. MATTHEWS:
04 No.
05 Q. You could run a guide shoe and
06 you could also run the reamer. You can run
07 them together, could you not?
08 A. I'm -- I'm not understanding
09 that. I mean, the guide shoe -- the reamer
10 shoe has a -- an aluminum eccentric nose on
11 it, which in this case is like -- like a
12 guide shoe, and then you have some reamer
13 stuff on the outside for the reamer portion

14 of it. So it's --
 15 Q. All right. So how many feet was
 16 it from the reamer to the float collar?
 17 A. Like I said earlier, I didn't
 18 see the bucking schematics, so I don't -- I
 19 don't know how many joints.
 20 Q. Does 80 feet sound right?
 21 A. It could have been 80 or it
 22 could have been 120. I'm not sure what
 23 that -- what that distance was.
 24 Q. And -- and this -- let's just
 25 say it's 80 feet. I think I'm right about
 00070:01 that. It could be 90, but I think -- I
 02 think it's 80.
 03 A. Okay.
 04 Q. So let's say it's 80 feet from
 05 the reamer to the float collar --
 06 MR. MATTHEWS:
 07 Do what?
 08 MR. LEMOINE:
 09 It's 189. You asked me.

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00070:19 Q. It's 189 feet. So from the
 20 reamer to the float collar is 189 feet.
 21 That's production casing.
 22 What's in that production
 23 casing, if anything? Is it filled with
 24 anything?
 25 A. At -- as they're running, it's
 00071:01 filled with mud.

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00071:23 Q. We concluded I think -- I think
 24 we were discussing centralizers.
 25 With respect to the
 00072:01 centralizers, I think you said you don't
 02 know what the spacing was of where they
 03 were placed?
 04 A. Correct.
 05 Q. Would they be -- any of them be
 06 placed above the float collar?
 07 A. Yes. They were -- I'm sure they
 08 would have. They had to have been.
 09 Q. Any of them placed below the
 10 float collar?
 11 A. I believe so, yes, sir.
 12 Q. Okay. There's the reamer and
 13 there's 189 feet of production casing and
 14 then there's the float collar, right?
 15 A. Yes, sir, I believe so.
 16 Q. Is that all of the bottomhole

17 assembly?
 18 A. As far as Weatherford -- the
 19 reamer, the collar, and the subs.
 20 Q. That's it?
 21 A. Right. That's what we call the
 22 shoe track, correct.
 23 Q. All right. And you call that,
 24 as you said, the shoe track?
 25 A. Yes.
 00073:01 Q. All right. That combination?
 02 A. Yes, sir.
 03 Q. All right. Can you tell me,
 04 tell this jury, that the float collar
 05 functioned properly?
 06 A. No, sir.
 07 Q. Who is John Lance?
 08 A. John?
 09 Q. Lance, L-a-n-c-e.
 10 A. I'm --
 11 Q. If you don't know, you don't
 12 know.
 13 A. I'm -- I'm not sure who that is.
 14 Q. David Campbell?
 15 A. I'm not sure who David is.
 16 Q. David Fuqua -- Fuqua?
 17 A. No, sir. I'm not sure who he is
 18 either.
 19 Q. John Benoit?
 20 A. No, sir. I'm not sure who that
 21 is.
 22 Q. Those were the four guys from
 23 Weatherford who were on the rig when it
 24 blew out.
 25 You didn't talk to them?
 00074:01 A. No, sir.
 02 MR. WEGMANN:
 03 Object to form.
 04 Q. Don't you think, obviously, they
 05 would know more about what happened, what
 06 the Weatherford equipment on the rig, when
 07 it was being run than you do?
 08 MR. RUSSO:
 09 Object to form.
 10 A. I just --
 11 Q. Is that a yes?
 12 A. I guess they did, yes. But I --
 13 but I wouldn't know that.
 14 Q. All right.
 15 A. They work for a totally
 16 different division than I work for. I
 17 don't --

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00074:20 Did Weatherford design the

21 float collar?
22 A. Yes, sir.
23 Q. Speaking of design, do you know
24 anything about the use on the rig with
25 respect to the casing string design or the
00075:01 production casing design?
02 A. No, sir. I wasn't involved in
03 that.
04 Q. Do you know whether or not the
05 original decision was to use 9-7-inch
06 casing -- 9-7/8-inch casing?
07 A. For their production casing?
08 Q. Yes, sir.
09 A. Yes, sir. I had had a -- I had
10 had a wells schematic at the beginning of
11 the well and that was --
12 Q. It shown originally 9-7/8?
13 A. Yes, sir.
14 Q. And not -- not in combination
15 with seven-inch, right?
16 A. Correct. Yes, sir.
17 Q. Do you know why it got changed
18 from 9-7/8 to 9-7/8 and 7-inch production
19 casing?
20 A. I just -- what I understood that
21 they had -- they couldn't run their 9-7/8
22 as far down as what they wanted due to hole
23 conditions and they had to set it up
24 higher.
25 Q. And the hole conditions were
00076:01 what?
02 A. I just heard hole conditions. I
03 don't -- I didn't hear what type of hole
04 condition.
05 Q. Well, what does that tell
06 about -- what would be the reason you
07 couldn't run 9-7/8 all the way to TD?
08 MR. RUSSO:
09 Object to form.
10 A. Again, the -- there was some
11 kind of hole conditions downhole.
12 Q. Well, I mean good hole
13 conditions or bad?
14 A. No. Bad. I'm sorry, yes. I'm
15 sure.
16 Q. All right. And what --
17 MR. CHEN:
18 Objection, form.
19 Q. -- what are some bad hole
20 conditions?
21 A. I -- I'm not -- again, I'm not a
22 drilling engineer. I just know that there
23 were some bad conditions down --
24 Q. Have you ever been on a rig when
25 it kicked?

00077:01 A. No, sir.
02 Q. You've never heard that rumble,
03 felt that rumble, felt that rig floor
04 shake?
05 A. No, sir.
06 Q. Do you know how many times this
07 well kicked when it was being drilled?
08 A. No, sir.
09 Q. Do you know whether or not in
10 March, when they were drilling this well,
11 the drill -- the drilling pipe got stuck,
12 they had to blow it in two and kick over
13 and keep drilling down?
14 A. Yes, sir, I know they had --
15 Q. I mean that's a catastrophic
16 event, isn't it?
17 MR. CHEN:
18 Objection, form.
19 A. All I knew was --
20 Q. Pretty significant, isn't it?
21 A. I knew they had to sidetrack.
22 That's --
23 Q. Yeah. I mean when you get -- I
24 mean, doesn't that tell you that those hole
25 conditions are dangerous?

00078:01 MR. CHEN:
02 Objection, form.
03 Q. Volatile? Didn't you know that
04 about this rig?
05 A. No, sir, I did not.
06 Q. Did you think that -- have you
07 ever seen the well plan that showed what
08 the total depth would be; in other words,
09 how far this hole would be drilled down?
10 A. Yes, sir. Like I said earlier,
11 I had -- I had saw a schematic of the well
12 at the beginning of the well.
13 Q. All right. Did they stop above
14 of what the total depth was supposed to be
15 and not drill any further?
16 A. I'm not sure what that new total
17 depth was, and I don't recall --
18 Q. That's not my question. My
19 question was, did they.
20 Did they not -- isn't it a
21 fact that they did not drill to the total
22 depth set forth in the well plan?
23 A. I'm not -- I'm not sure. I
24 don't -- I don't know that.
25 Q. Do you know that -- that they
00079:01 didn't drill to total depth and that where
02 they stopped was -- they stopped because
03 they were having a blowout -- a kick. Not
04 a blowout. They were having a kick and
05 they decided that the pressure in the

06 formation and the formation was so fragile
 07 they couldn't drill anymore. Are you aware
 08 of that?
 09 MR. CHEN:
 10 Objection, form.
 11 A. No, sir.
 12 MR. CHEN:
 13 Objection, form.
 14 Q. Well, isn't that the reason that
 15 they couldn't use 9-7/8 casing, production
 16 casing all the way down, that the well was
 17 so dangerous and so volatile that they had
 18 to switch to seven-inch?
 19 A. All I knew is that they couldn't
 20 get their 9-7/8 to where they wanted it.
 21 MR. CHEN:
 22 Objection, form.
 23 Q. Well, what would be the
 24 advantage of using seven-inch production
 25 casing over 9-7/8 production casing, if you
 00080:01 know, if, in fact, your well was volatile,
 02 dangerous?
 03 MR. CHEN:
 04 Objection, form.
 05 A. Could you -- could you repeat
 06 that again?
 07 Q. Sure. Probably confusing.
 08 What would be the
 09 advantage, if you know, of using seven-inch
 10 casing in place of the 9-7/8-inch
 11 production casing if, in fact, the well was
 12 dangerous and volatile?
 13 MR. CHEN:
 14 Objection, form.
 15 Q. Why would you switch to a
 16 smaller production casing?
 17 A. I have no opinion on that.
 18 Again, I'm not --

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00080:21 Q. Do you know whether or not
 22 Weatherford -- do you know what a crossover
 23 sub is?
 24 A. Yes, sir.
 25 Q. What is it?
 00081:01 A. It's a sub that crosses over
 02 from one side to another.
 03 Q. In oil field terms among us
 04 roughnecks, we call that a swedge, don't
 05 we?
 06 A. You could call it a swedge.
 07 Q. Yeah. And the crossover sub in
 08 this instance was what to what, if you
 09 know?

10 A. On which?
 11 Q. On the production casing string.
 12 A. On the production casing, from
 13 9-7/8 to 7-inch.
 14 Q. Yes, sir.
 15 And do you know where that
 16 was placed?
 17 A. No, sir. I'm not sure what
 18 the --
 19 Q. Do you know how long the string
 20 was that was 9-7/8 to 7-inch, how long that
 21 total string was?
 22 A. No, sir. I don't recall the --
 23 the exact footage of the 9-7/8. I don't
 24 recall that. Exact numbers.
 25 Q. Did you have anything to do
 00082:01 relative to Nexen -- BP buying the Nexen
 02 production string?
 03 A. No, sir.
 04 Q. Did anyone at Weatherford have
 05 anything to do with that?
 06 A. No, sir, not to my knowledge.
 07 Q. Was Weatherford responsible for
 08 running the production casing string?
 09 A. As far as the -- the Tubular
 10 Running Services go?
 11 Q. Yes.
 12 A. Yes, sir, I believe so.
 13 Q. Who provided the casing tools,
 14 if you know?
 15 A. I'm -- no, I don't. I'm
 16 assuming Weatherford.
 17 Q. All right. And what -- what are
 18 casing running tools?
 19 A. Again, I'm just a -- a poor
 20 centralizer salesman.
 21 Q. I understand.
 22 A. I'm not an expert in casing.
 23 Q. If you know what they are, tell
 24 me.
 25 A. And they may -- I know they have
 00083:01 some -- some elevators and some slips and
 02 some spiders that -- that helps in running
 03 the casing.

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00083:15 I think my question was:
 16 Do you know anyone from Weatherford who was
 17 on the rig?
 18 A. The only person I knew was --
 19 was Daniel Ofather.
 20 Q. All right. Do you know what
 21 equipment Weatherford had supplied to BP
 22 for the purchase of the seven-inch

23 production casing? Anything other than
24 what we've already discussed? Anything
25 else?

00084:01 A. No, sir.
02 Q. Do you know what the makeup
03 torque was for the 9-7/8 and/or the
04 seven-inch production casing?
05 A. Again, no, sir. I'm just a --
06 Q. Have you ever been told what
07 the -- about the -- whether or not the
08 seven-inch production casing met BP's
09 specs?
10 A. No, sir.
11 Q. Are you aware of the fact that
12 the seven-inch production casing, in fact,
13 did not meet BP's specs?
14 MR. CHEN:
15 Objection, form.
16 A. No, sir.
17 Q. Do you know what a Charpy test
18 is?
19 A. A little bit. Yes, sir.
20 Q. All right. What is that?
21 A. It's some type of a hardness
22 test that they do on pipe.
23 Q. Did the seven-inch production
24 casing meet the BP specs with respect to
25 the Charpy test?

00085:01 A. I have no knowledge of that.
02 MR. CHEN:
03 Objection, form.
04 Q. Assume that it didn't with me,
05 okay? What's -- would that tell you -- if
06 BP says this seven-inch production casing
07 did not meet our Charpy test, what would
08 that tell you that BP's saying?
09 MR. CHEN:
10 Objection, form.
11 A. I don't have enough opinion
12 on -- on what production casing and Charpy
13 test to whether it would meet or wouldn't
14 meet.
15 Q. What does it mean if -- what's
16 the parameters with respect to the
17 brittleness of production casing versus
18 collapse pressure; do you know?
19 A. No, sir.
20 Q. Do you know what the collapse
21 pressure of this seven-inch production
22 casing was?
23 A. No, sir, I do not.
24 Q. Do you know that -- whether or
25 not there was a worry by BP that the
00086:01 seven-inch production casing might be very,
02 very, very brittle?

03 MR. CHEN:
04 Objection, form.
05 A. No, sir.
06 Q. You saw the well plans for this
07 rig. Do you recall seeing the well plan
08 from BP that talked about maximum
09 anticipated surface pressure?
10 A. No, sir, I didn't see that.
11 Q. Do you know what that is?
12 A. To be honest, no, sir.
13 Q. All right. Do you know whether
14 or not BP on this rig presented a
15 worst-case scenario for maximum anticipated
16 surface pressure that intentionally was
17 incorrect?
18 A. No, sir.
19 MR. CHEN:
20 Objection to form.
21 Q. Do you know whether or not the
22 maximum anticipated surface pressure would
23 also drive your design for the well string,
24 design for the casing string, design for
25 the production casing string? And thus, if
00087:01 you've given a figure for your anticipated
02 surface pressure, that it's 50 percent
03 lower than it should be, and the design for
04 your casing string and production casing
05 can be a -- cost would be much lower
06 because you don't have to provide the
07 tubulars that are as strong as you would
08 normally say they should be? Do you know
09 anything about that?
10 MR. CHEN:
11 Objection, form.
12 A. No, sir.
13 Q. Anybody ever expressed that to
14 you, that that's what BP did here?
15 A. No, sir, not at all.
16 Q. What's a tieback design?
17 A. A tieback is when they -- you --
18 you run a liner and then you tie the --
19 that particular liner back up to the -- to
20 the wellhead.
21 Q. You -- you tie -- what you do is
22 you tie the liner back up to the surface,
23 don't you?
24 A. Well, actually you tie it back
25 up to the seafloor where the wellhead is
00088:01 at.
02 Q. All right. All right.
03 A. Surface -- surface to me is the
04 rig floor.
05 Q. Yes, sir. Do you -- was there a
06 liner in the production casing?
07 A. In the production casing? No,

08 sir.
09 Q. Was there a liner in the -- the
10 regular casing that was run in this well?
11 A. Yes, sir. To my knowledge, it
12 was 11-7/8 liner and a 9-7/8 liner.
13 Q. Was it tied back?
14 A. No, sir.
15 Q. It was not, was it?
16 A. Not to my knowledge, it wasn't.
17 Q. In your opinion, if it would
18 have been tied back, would that have been a
19 barrier?
20 MR. RUSSO:
21 Object to form.
22 A. Again, I'm a -- I'm a
23 centralizer salesman. I don't have any
24 opinion on drilling --
25 Q. All right. Bear with me.
00089:01 Have you ever read any of
02 the reports prepared by, basically, under
03 the auspices of the -- some commission or
04 the other authorized by the United States?
05 Have you ever read any of these reports,
06 the president's report, the attorney's
07 report, the Bly report by BP, a report by
08 DNV with respect to the BOP? Have you ever
09 read any of those?
10 A. Yeah, I read the reports, but
11 with respect to the BOP, no.
12 Q. You didn't read the DNV report?
13 A. No. I'm not sure what that --
14 Q. It's the last report that came
15 out, actually. You've read the President's
16 Commission --
17 A. Yes.
18 Q. -- report?
19 And the attorney's for the
20 President Commission report?
21 A. I don't recall that.
22 Q. Have you read just one report?
23 A. The Bly report, I did.
24 Q. And you've read Bly?
25 A. Yes.
00090:01 Q. So you've read two?
02 A. Yes. To my knowledge, I may
03 have...
04 Q. All right.
05 MR. LEMOINE:
06 Finish the sentence. You
07 may have what?
08 A. No. That's -- that's the only
09 two that I can recall that I -- I was --
10 Q. Do you know that when the
11 production casing was being run and what
12 was happening was BP was going through a --

13 was preparing the well for temporary
14 abandonment?
15 A. I'm sorry. Repeat -- could you
16 repeat that?
17 Q. That BP was preparing the well
18 for temporary abandonment?
19 A. Yes, sir.
20 Q. Did you ever see a written
21 procedure for the temporary abandonment?
22 A. No, sir.
23 Q. Did you ever see a written
24 procedure for running the production
25 casing?
00091:01 A. No, sir.
02 Q. Who was in charge of this well?
03 A. I'm not sure.
04 Q. Who was in charge of this rig
05 drilling this well? Were all -- did all
06 instructions come from BP?
07 A. As far as my instructions --
08 Q. No.
09 A. -- or --
10 Q. As far as you're aware of with
11 respect to the function, operation,
12 drilling of this well --
13 MR. CHEN:
14 Objection, form.
15 Q. -- was BP in charge of all of
16 this?
17 A. Yes. BP was -- to my knowledge,
18 BP.
19 Q. They drove the boat?
20 MR. CHEN:
21 Objection, form.
22 A. Yes, sir.
23 Q. With respect to -- do you know
24 anything about the temporary abandonment?
25 Do you know whether or not there were four
00092:01 different decisions made within the last
02 24 hours with respect to the temporary
03 abandonment and a lock down?
04 A. No, sir, I do not.
05 Q. All right. Do you know what a
06 kill line is?
07 A. A little bit, yes.
08 Q. All right. What is it?
09 A. It's one of the lines that --
10 that -- that's coming off the BOP. Again,
11 I'm not -- I'm not that too much familiar
12 with all the equipment on the rig.
13 Q. Well, it's -- a kill line is
14 self-explanatory, is it not? It is only
15 for access to kill the well; isn't that
16 right?
17 A. I would assume so, yes. And

18 again --
19 Q. Have you ever heard -- do you
20 know anything about running or the -- I've
21 asked you this. But do you know anything
22 about, generally, about running a
23 positive- and negative-pressure test with
24 respect to drilling operations?
25 A. No, sir. Very limited.

00093:01 Q. Do you know or have an opinion
02 about using the kill line to run a
03 negative-pressure test?
04 A. No, sir.
05 Q. Do you agree that well
06 conditions at the surface don't lie; they
07 will tell you the condition of the well?
08 A. Again, I'm not a -- I'm not a
09 drilling engineer or anything like that.
10 So --
11 Q. All right.
12 A. -- I wouldn't know what those
13 pressures would mean.
14 Q. Do you agree that physics and
15 chemistry will tell you, dictate to you the
16 conditions of the well?
17 A. The -- I'm sorry?
18 Q. Physics and chemistry will
19 dictate to you and tell you the conditions
20 of the well?
21 A. I wouldn't know that. I'm
22 not --
23 Q. Did you ever see or review any
24 BP written procedures for cementing the
25 production casing?

00094:01 A. No, sir.
02 Q. I asked you a variation of that.
03 Did you ever see any BP
04 written procedures for running the
05 production casing?
06 A. No, sir.
07 Q. You don't know who Lance John
08 (sic) is?
09 A. I have an idea, but I'm not --
10 I'm not positive who he is.
11 Q. But you didn't talk to him or
12 interview him?
13 A. No, sir.
14 Q. Do you know who Bob Kaluza is?
15 A. I believe he was one of the
16 gentleman on the -- worked for BP on -- on
17 the rig as a company rep. I don't -- I
18 don't know him.
19 Q. Look at tab 9. Let's see. We
20 finally get to go to the good stuff.
21 That's a Bob Kaluza interview on the 28th
22 of April, which obviously is after the

23 blowout. Okay? And one, two, three, four,
24 five, six.
25 Do you see where he says, I
00095:01 did the diverter sub? Do you see that?
02 A. Huh-uh. Yes, sir.
03 Q. Read the rest of it out loud, if
04 you would.
05 A. Don did the cement job. We had
06 an Allamon hand on the rig, did not have
07 a -- did not have a Weatherford hand for
08 shearing out the floats.
09 Q. What does that mean to you?
10 MR. CHEN:
11 Objection, form.
12 Q. A shearing out the float collar?
13 A. Right. It's to -- to --
14 Q. That means activating or
15 attempting to activate the flapper valves,
16 right?
17 A. Right. To convert -- to convert
18 the floats from oil field --
19 Q. Yes, sir.
20 And he says, Did not have a
21 Weatherford hand for shearing out the
22 float.
23 Does that -- doesn't that
24 mean, to you, when they were trying to
25 activate the float collar there wasn't a
00096:01 Weatherford hand on the rig?
02 A. Yes, sir.
03 Q. Do you believe that there was
04 ever enough barrels per minute flowing
05 through the float collar to activate the
06 float collar?
07 MR. WEGMANN:
08 Object to form.
09 A. I really don't have an opinion
10 on that. I'm not sure --
11 Q. How many barrels per minute does
12 it take?
13 A. On this particular one, it would
14 take five to eight barrels per minute to
15 convert.
16 Q. Okay. And have you read the
17 reports that say we never got up to a flow
18 rate of five to eight barrels per minute?
19 Have you read those?
20 A. Yes.
21 MR. CHEN:
22 Objection, form.
23 Q. Okay. Have you ever been told
24 that the BP negative-pressure test showed
25 that, in fact, the well was underbalanced
00097:01 and that BP misread the negative-pressure
02 test?

03 MR. CHEN:
 04 Objection, form.
 05 A. No, sir.
 06 Q. Have you ever been told anything
 07 about the bladder effect?
 08 A. No, sir.
 09 Q. That's what I have, the bladder
 10 effect. No.
 11 Have you -- you don't know
 12 what that is with respect to drilling
 13 terms?
 14 A. No, sir, I sure don't.
 15 Q. Okay. That's all right. A lot
 16 of other people don't either.
 17 Look at tab 10. And that's
 18 been marked previously as exhibit 1154.
 19 And that's the transcript of Brian Morel --
 20 MR. CHEN:
 21 Objection, form.
 22 Q. -- interview notes on April the
 23 27th.
 24 And if you'll look -- do
 25 you see where it says pumped emergency lost
 00098:01 circulation material? And then it says
 02 pulled into marine drilling riser, and then
 03 right below that, it says ran new
 04 bottomhole assembly. Do you see that?
 05 A. Yes, sir.
 06 Q. All right. It says logging went
 07 smoothly. And then it says encountered
 08 bridges of 12,272, 12,280 feet.
 09 What does that mean to you,
 10 encountered bridges?
 11 A. Well, the bridge, to me, is --
 12 again, it's -- it's something downhole.
 13 Q. Well, it means if he's run the
 14 bottomhole assembly, what does that mean?
 15 It means the first joint running the hole
 16 for the production casing is the bottomhole
 17 assembly and he's gotten down to 12,272 and
 18 there's an obstruction. Isn't that what
 19 that means?
 20 A. Yes.

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00098:23 A. Yes.
 24 Q. All right. And then it goes on
 25 down and it says, Pumped out of hole and
 00099:01 flow checked at liner top, ran casing,
 02 5800-foot, seven-inch casing crossed over
 03 to 9-7/8.
 04 Well, we know that there is
 05 5800-foot of seven-inch casing that's been
 06 run and now he's crossed over to 9-7/8.

07 Anything above that is
08 going to be 9-7/8, right?
09 A. Yes, sir.
10 Q. All right. Let's see what it
11 says.
12 Bought seven-inch casing
13 from Nexen due to short lead -- lead time.
14 XO, crossover, came from R&M machine.
15 That wasn't from
16 Weatherford, the crossover joint?
17 A. No, sir.
18 Q. This says circulated, converted
19 float equipment. Diverter closed without
20 issue. Difficulty converting Weatherford
21 float equipment but Weatherford rep was not
22 on the rig.
23 Does that -- what --
24 normally would Weatherford have someone on
25 the rig when you're running that float
00100:01 collar?
02 A. When we're just -- just having
03 float collar, no, it's not unusual not to
04 have a Weatherford man on location.
05 Q. So I guess what you're saying is
06 a Weatherford personnel that would normally
07 be on the rig would be the guys that would
08 be running the casing. It wouldn't have
09 anything to do with, necessarily, the
10 cementation equipment?
11 A. Yes, sir.
12 Q. Is that a correct statement?
13 A. In my -- yes, sir. Yes, sir.
14 Q. Okay. Do you know if you ever
15 had any discussions with Brian Morel?
16 A. Did I have discussions with
17 Brian?
18 Q. Yes, sir.
19 A. Yes, sir, I did.
20 Q. And what did you talk about?
21 A. At what particular time?
22 Q. Well, how many times did you
23 talk to him?
24 A. Numerous --
25 Q. You've known him for a while?
00101:01 A. -- numerous, numerous years,
02 yes, sir.
03 Q. Oh, okay. Did you have any
04 discussions with him about the HORIZON
05 rig -- well, the Macondo well?
06 A. The Macondo well?
07 Q. Yes, sir.
08 A. Yes. Numerous conversations.
09 Q. Were you trying to sell him the
10 cementation equipment or what?
11 A. Did I try to sell it to him?

12 Q. Why were you having
13 conversations with him?
14 A. Yeah --
15 Q. Nexen had the cementation
16 equipment.
17 A. I was having numerous
18 conversations on the -- on the whole well
19 with -- with Brian.
20 Q. About what?
21 A. About the cementation equipment.
22 Q. Were you trying to sell it to
23 him separately from the Nexen equipment?
24 A. So you're specifically talking
25 about the seven-inch equipment?
00102:01 Q. I'm trying to find out why in
02 the world you were talking to Brian Morel
03 and what you talked about.
04 A. I'm not understanding. I talked
05 with Brian for -- for months during the
06 whole well on numerous --
07 Q. What did you talk to him about?
08 A. About what centralizers we were
09 going to use, our procedures of -- of float
10 equipment and different --
11 Q. Did you make --
12 A. -- just different things.
13 Q. -- any notes?
14 A. No, sir, not that I recall.
15 Q. You didn't?
16 A. No, sir.
17 Q. When did you first have -- when
18 do you recall your first conversation with
19 him?
20 A. At the beginning of the well.
21 Q. And that was January 2010?
22 A. Yes, sir. Probably even earlier
23 than that.
24 Q. Okay. And your conversation was
25 what?
00103:01 A. Again, I'm -- I'm not
02 understanding. When you -- was it during
03 the beginning or --
04 Q. Well, look. Did you talk about
05 LSU football or University of Texas
06 football? Texas A&M? McNeese?
07 A. We may have talked about that,
08 yeah. But --
09 Q. I understand. But you had some
10 discussions with respect to this -- the
11 HORIZON rig and Weatherford supplying
12 something or you wanted to do something.
13 What did you talk about?
14 A. On the -- on the Macondo? On
15 the seven-inch equipment?
16 Q. Yeah. Not the seven-inch.

17 Anything.
18 A. Yeah, we -- he sent me the well
19 schematic and he was going to be the
20 drilling engineer on the well.
21 Q. All right.
22 A. And so I went by numerous times
23 at their office at BP, and we sat down on
24 with it and went over what type of
25 equipment Weatherford was --
00104:01 Q. And you produced that schematic?
02 A. Have I produced it?

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00104:17 Q. The schematic of the well, how
18 was it laid out?
19 A. It was laid out in an Excel
20 spreadsheet, a typical, you know, BP
21 spreadsheet that I -- that I get on all
22 their wells. And it just shows what the --
23 the pipe they're going to be running, the
24 thread grade and the weight.
25 Q. So it shows the -- what the
00105:01 depth's going to be?
02 A. Yes, sir.
03 Q. Does it show the maximum
04 anticipated pressure at the surface?
05 A. This particular -- it may show
06 that. I don't -- I can't recall.
07 Q. It does, doesn't it?
08 A. I can't -- I'm not sure. It
09 doesn't mean anything to me because I don't
10 deal with that -- that part of it.
11 Q. Well, I understand.
12 A. So I don't -- I don't --
13 Q. But it shows the -- it shows the
14 surface equipment and the rig layout. It
15 shows the strings in place and what size
16 they're going to be?
17 A. Uh-huh.
18 Q. And it shows the total depth of
19 the well that's going to be drilled and
20 everything that's going to go in it; is
21 that right?
22 A. Yes, sir.
23 Q. And it's sent to you to ask you
24 to bid on whatever it is that Weatherford
25 supplies relative to drilling that rig,
00106:01 right?
02 A. Relative to -- to supplying
03 cementation equipment to them, yes, sir.
04 Q. All right. Well, 'cause
05 Weatherford also supplies other stuff other
06 than cementation equipment, right?
07 A. Yeah. Weatherford does, yes,

08 sir.
09 Q. But functionally -- or ideally
10 what Morel is doing with you is getting you
11 to make a bid to him on the cementation
12 equipment?
13 A. Yes, sir.
14 Q. And you did?
15 A. Yes, sir. I came up with an --
16 an equipment list.
17 Q. So what did Weatherford supply?
18 A. We supplied -- on -- do I
19 need -- do you want me to be specific on
20 each string of pipe that we supplied or
21 do --
22 Q. Well, no, not necessarily. But
23 for example, Nexen already had the
24 seven-inch production casing and the
25 bottomhole assembly. And Nexen had bought
00107:01 that from Weatherford?
02 A. Yes, sir.
03 Q. So -- so Nexen sold it to BP,
04 but it didn't directly come from -- there
05 was -- Nexen wasn't involved. It was
06 Weatherford in the purchase by BP of that
07 pipe and bottomhole assembly; isn't that
08 correct?
09 MR. RUSSO:
10 Object -- object to form.
11 A. Yes, sir.
12 Q. All right. So what -- other
13 than that, what did Weatherford supply?
14 A. For the -- the seven-inch
15 string?
16 Q. No. For the rig. For the -- in
17 other words, the bottomhole assembly and
18 the seven-inch are already at Nexen and
19 Nexen -- Nexen sells it to BP. But he's
20 sending you an Excel layout of everything's
21 that's on that rig. So as far as you know,
22 what did you bid on in cementation
23 equipment?
24 MR. LEMOINE:
25 Objection to form.
00108:01 A. The -- of the schematic, all I
02 had was for the 9-7/8 on up. There was --
03 there was no seven-inch on this schematic.
04 So I supplied equipment list --
05 Q. I understand. We've talked
06 about that.
07 A. Right. For all the -- for all
08 the other equipment on the other sizes.
09 Q. Which would mean you weren't
10 going to supply the pipe but you'd supply
11 the service to run it? You didn't do that?
12 You didn't bid on that?

13 A. No, sir.
14 Q. Well, what did you bid on?
15 A. Again, I'm strictly dedicated to
16 cementation equipment.
17 Q. Sure. So what was it?
18 A. On -- on --
19 Q. On the 9-7/8-inch. On the -- on
20 the schematic that you got, what did you
21 bid on?
22 A. We bidded on the -- the float
23 equipment and the centralizers. We also
24 bid on some -- some subsea plugs --
25 Q. All right.
00109:01 A. -- and darts that go along and
02 that they'll -- they'll need for the well.
03 Q. All right. You did supply some
04 darts, didn't you?
05 A. Yes, sir.
06 Q. And what are they used for?
07 A. The darts are -- are used to
08 launch cement wiper plugs.
09 Q. And you supplied the cement
10 wiper plugs?
11 A. On certain strings of -- of
12 casing we did, yes, sir.
13 Q. What's the function of the
14 cement wiper plug with respect to this
15 particular float collar supplied by
16 Weatherford?
17 A. On the seven-inch or on any of
18 the other strings?
19 Q. Seven-inch.
20 A. Again, it's to displace the --
21 the mud and the cement, and it's to land --
22 designed to land how to profile on the plug
23 to land that matches up with the profile on
24 top of the float collar.
25 Q. It's really to separate
00110:01 something from something else, is it not,
02 the wiper?
03 A. The -- to separate the cement
04 from the mud.
05 Q. All right. And there was a
06 wiper plug run with this float collar?
07 A. Yes, sir. It was laying on top
08 of this float collar.
09 Q. And there is some speculation
10 that this wiper plug was actually the
11 obstruction that prevented the function or
12 proper operation of the float collar; isn't
13 that correct?
14 MR. LEMOINE:
15 Objection to form.
16 A. I'd be speculating there. I --
17 Q. Well, have you ever seen that

18 though, that someone says it could have
19 been the wiper plug that was the blockage
20 that prevented -- prevented the
21 circulation?
22 A. The -- it couldn't have been the
23 wiper plug.
24 Q. All right. Why?
25 A. Because the -- the blockage was
00111:01 at the shoe track and the wiper --
02 Q. How do you know that? Do you
03 know what a free-point indicator is? Have
04 you ever heard of that?
05 A. I've heard of it, but I don't
06 know what it is.
07 Q. I'm dating myself. In the oil
08 field there used to be a thing called the
09 free-point indicator that would tell you
10 the free point with respect to stuck pipe.
11 So you'd blow -- you'd blow the pipe apart
12 at the free point and the stuck parts stay
13 in the hole. You didn't have a free-point
14 indicator here. How in the world are you
15 going to tell 18,000 feet below that
16 there's an obstruction where you say it is?
17 A. Well, I knew that there was --
18 on the compressibility factor that they had
19 informed me that there was --
20 Q. They. Who?
21 A. Brian Morel.
22 Q. Ah. Well, let's go into this a
23 little more.
24 Where do you say -- you
25 said it couldn't have been the wiper plug,
00112:01 right, that was the obstruction, right?
02 A. Right. The wiper plugs have --
03 if the wiper plugs have not been launched
04 yet at all, they're -- they're still
05 sitting on the running tool at this time.
06 When they are trying to break circulation.
07 Q. So you think the wiper plugs had
08 not been dropped?
09 A. Yes, sir.
10 Q. They were not? Really? You
11 don't think that wiper plug was landed on
12 top of that float collar?
13 A. Eventually, yes, sir, it was.
14 Q. But you think it happened after
15 there was a -- attempt nine different times
16 to set the float collar?
17 A. Yes. I mean I -- in reviewing
18 the drilling report, that's what the
19 drilling report was -- was saying.
20 Q. It does? Well, we'll get to
21 that in a minute.
22 A. Okay.

23 Q. I'm not aware it said that.
 24 So let's see if I
 25 understand this. You said that after we
 00113:01 attempted nine times to function and
 02 operate the float collar, we then ran the
 03 wiper plug down?
 04 A. Right. Once the circulation was
 05 broken and we went to go cement, well,
 06 then -- then the plug would be launched.
 07 Q. And the function of the wiper
 08 plug is to separate the cement from the
 09 mud?
 10 A. Yes, sir.
 11 Q. Right?
 12 A. Yes, sir.
 13 Q. So what you're saying is --
 14 let's see if I understand this. You're
 15 saying when they were trying to function
 16 and operate the float collar, there was no
 17 cement in the hole at the float collar,
 18 right? Yes?
 19 A. Yes. I mean there was -- there
 20 was cement inside our float collar, but,
 21 no -- no --
 22 Q. Oh, really?
 23 A. -- no other cement that was
 24 pumped.

Page 114:20 to 117:16

00114:20 Q. Uh-huh. Now, what did Brian
 21 Morel talk to you about compressibility?
 22 A. That when they were trying to
 23 break circulation that the compressibility
 24 of six barrels told -- told them that the
 25 obstruction was at the shoe track.
 00115:01 Q. How?
 02 A. The compressibility of fluid.
 03 Q. Fluids won't compress?
 04 A. Of the mud.
 05 Q. Sir? Fluids won't compress.
 06 You know that.
 07 You got that physics
 08 background?
 09 A. No, sir, I don't.
 10 Q. I do.
 11 Fluids won't compress, will
 12 they?
 13 MR. RUSSO:
 14 Object to form.
 15 A. Mud will. Again, I'm not
 16 answering --
 17 Q. All right. So he's telling you
 18 the -- he's telling you the only mud in the
 19 float collar. And what about the

20 compressibility? Only mud in the float
 21 collar because what kind of compression
 22 test?
 23 A. Because they -- they were just
 24 trying to break circulation at that time.
 25 Q. But how can they determine
 00116:01 18,000 foot below that you're compressing a
 02 mud when you've got cement above it?
 03 A. There's -- there's no cement in
 04 the well at this time.
 05 Q. There's no cement in that well?
 06 A. At --
 07 Q. At that time?
 08 A. At the time they were trying to
 09 break circulation, they had -- to the best
 10 of my knowledge, they did not pump cement.
 11 Q. What did they run the
 12 compression test?
 13 A. When they were trying to break
 14 circulation.
 15 Q. During that period when they
 16 made nine attempts?
 17 A. Yes, sir.
 18 Q. Have you seen any daily log or
 19 drilling reports that say that?
 20 A. Yes, sir.
 21 Q. That mention compression?
 22 A. Yes, sir.
 23 Q. Okay. We'll look at it in a
 24 minute.
 25 Did you -- what -- what
 00117:01 other conversations -- when did you have
 02 this conversation with Morel?
 03 A. I had the conversation on -- it
 04 was on the Monday evening. The -- it would
 05 have been the 19th.
 06 Q. On the 19th?
 07 A. Of April, yes, sir.
 08 Q. Did he call you?
 09 A. Yes, sir.
 10 Q. And say what?
 11 A. He explained to me that they
 12 had -- that they had dropped the Allamon
 13 ball and closed the tool, and once they
 14 closed the tool, that they had immediately
 15 started pressuring up. And they were at
 16 about 2,000 psi at that time.

Page 117:23 to 124:11

00117:23 What time at night was
 24 this?
 25 A. This was in -- in the afternoon.
 00118:01 Q. In the afternoon? What time?
 02 A. Around 3 to 4, something like

03 that, the best I can recall.
04 Q. Was he on the rig?
05 A. Yes, sir, he was.
06 Q. On the 19th?
07 A. Yes, sir.
08 Q. Tell me about the whole
09 conversation. The phone rings and then
10 what happens?
11 A. Right. Again, like he explained
12 to me, that the --
13 Q. Well, he says -- he says hello
14 first? Right?
15 MR. LEMOINE:
16 He wants you to be detailed.
17 A. Yes.
18 Q. I want to know sequence by
19 sequence what happened.
20 A. Okay. The best I recall when
21 Brian called, like I said, he had -- he
22 explained that he was on the rig and that
23 he was -- that he had closed -- he had
24 closed the Allamon tool and that --
25 Q. Do you know what -- you knew
00119:01 what that meant?
02 A. Yes, sir.
03 Q. What did it mean?
04 A. That the -- the Allamon tool is
05 a diverter tool in the drill pipe and
06 that --
07 Q. But a diverter for what?
08 A. Diverter for -- for fluid.
09 Q. Why?
10 A. To relieve surge down the well
11 when -- as a --
12 Q. It's a surge protector, isn't
13 it?
14 A. Yes, sir.
15 Q. And that's what the dual-flapper
16 valve is?
17 A. The dual--
18 Q. The dual-flapper valve is to
19 prevent surge by closing the flapper
20 valves, is it not?
21 MR. WEGMANN:
22 Object to form.
23 A. No. I mean --
24 Q. Really?
25 MR. LEMOINE:
00120:01 He's going to explain.
02 A. The -- in this particular case,
03 the -- it's an auto -- auto-fill float
04 collar. It has a tube that's keeping the
05 valve off so we can -- we can accept the
06 fluid up the casing as we're running it.
07 Q. I understand.

08 A. It's a --
09 Q. And it prevents surge?
10 A. Right.
11 Q. Okay.
12 A. But the valve -- this is a
13 tube --
14 Q. I understand that. Go ahead.
15 A. Okay.
16 Q. Your conversation.
17 A. All right.
18 Q. He tells you the Allamon tools,
19 we activated it?
20 A. Right.
21 Q. Okay. Go ahead.
22 A. So then the -- immediately it
23 was pressured up to -- the casing had
24 pressured up to 2,000 --
25 Q. He didn't tell you --
00121:01 A. -- and they cannot break
02 circulation.
03 Q. Okay.
04 A. And he was -- he was wanting to
05 know what -- what the highest pressure we
06 could go on our float collar to be able to
07 blow out what was ever -- debris, what was,
08 you know, ever blocking our float collar.
09 Q. Okay. And?
10 A. So we -- so, I mean, I asked
11 him.
12 I said, Are you -- are you
13 sure it's at the collar of the float -- or
14 the guide shoe or reamer shoe at this time?
15 And he said, Yes.
16 It's because they did the
17 quick -- compressibility shows that it's
18 being the blockage at the shoe track,
19 meaning that it's either the float collar
20 or the reamer shoe.
21 Q. Do you know -- do you know
22 why -- how -- how do you run a
23 compressibility test?
24 A. Well, they're just -- they're
25 shut off.
00122:01 Q. They're shut off.
02 What's shut off?
03 A. Meaning that there's -- the only
04 place for the fluid to go is out at the
05 bottom of the shoe.
06 Q. Which means what?
07 A. They have the running tool and
08 they're on the surface, they've landed
09 their pipe.
10 Q. Okay.
11 A. And now they want to be able to
12 circulate through the bottom to be able to

13 start cementing.
14 Q. All right. How does that show
15 compression?
16 A. When they --
17 Q. It simply shows an increased
18 pressure and fluid responding to an
19 increased pressure moving away from the
20 increasing pressure, doesn't it?
21 A. Right.
22 Q. That's what that is.
23 A. Right.
24 Q. That's not compression.
25 How do you show a
00123:01 compression test at 18,000 feet?
02 A. Again, I'm not an expert.
03 Q. You don't know, do you?
04 A. I'm not an expert.
05 Q. It's okay to say I don't know.
06 A. I'm not an expert at
07 compressibility, no, sir.
08 Q. So you don't know?
09 A. Right. All I knew was that he
10 informed me that -- due to
11 compressibility --
12 Q. That's what he says. That's
13 okay.
14 MR. RUSSO:
15 So I understand. You're
16 just asking him to relay the conversation?
17 I think that's what he's doing.
18 MR. MATTHEWS:
19 Yeah, and I'm -- but I'm
20 trying to figure out also, as you can tell,
21 what he knows about what he was told.
22 Because how in the world could he react to
23 what he was told if he didn't understand
24 it?
25 Q. You got anything else to add
00124:01 about the conversation?
02 A. I'm -- no, sir. Unless you have
03 any other questions, which I'm sure you do.
04 Q. Maybe. Maybe I don't.
05 Did he talk to you -- not
06 necessarily during this conversation, but
07 in any conversation -- that they were
08 extremely careful and worried about the
09 formation pressures or gradient versus the
10 pore pressure?
11 A. No, sir, not at all.

Page 124:14 to 124:16

00124:14 Q. Did he talk to you at all
15 about -- they were very worried about the
16 surge pressures because --

Page 124:19 to 124:24

00124:19 Q. -- that might destroy or upset
20 the formation pressure?
21 A. No, sir.
22 Q. Might cause the formation to
23 come in?
24 A. No, sir.

Page 125:02 to 127:14

00125:02 Q. Did he -- did he discuss with
03 you -- when he calls you on the 19th and
04 said we've run up to 2,000 pounds, how much
05 further can we go, what did you tell him?
06 A. I told him I wasn't sure at that
07 point in time.
08 Q. But you called him back?
09 A. That I would have -- I would
10 check.
11 Q. Who did you check with?
12 A. I checked with our engineering
13 department out of Houma, Louisiana.
14 Q. Who?
15 A. His name is John Hebert.
16 Q. All right. And what did John
17 tell you?
18 A. I relayed all the information to
19 John what -- what Brian had told me and
20 that the -- he confirmed that the -- the
21 bump-pressure rating was 6800 psi.
22 Q. So he -- you told him he could
23 go to 6800?
24 A. That the bump-pressure rating
25 was 6800 psi.
00126:01 Q. Do you know what that means,
02 bump pressure?
03 A. Yes, sir, I do.
04 Q. Aren't you telling him you can
05 go to 6800?
06 A. Yes, sir. Yes, sir, I am.
07 Q. How far did they go?
08 A. Well, he finally broke
09 circulation at 3140, like I mentioned
10 earlier.
11 Q. At what?
12 A. At 3140.
13 Q. Weren't you worried when you
14 were telling him that what that -- whatever
15 that bump is, it's going to create a surge
16 when it clears the blockage?
17 A. I wasn't -- I wasn't worried
18 about surge at that time.

19 Q. The facts are, there was no way
 20 in the world to give any indication of
 21 where this blockage was occurring; isn't
 22 that right?
 23 MR. CHEN:
 24 Objection, form.
 25 A. All the information I had is
 00127:01 what Brian had told me about where he
 02 thought that the blockage was -- was
 03 occurring.
 04 Q. Where he thought it was, right?
 05 A. Yes, sir.
 06 Q. Well, isn't it a fact that at
 07 any point above the blockage, if you think
 08 fluid compresses, then you're showing
 09 compression all the way above where the
 10 blockage is totally; isn't that correct?
 11 A. Again, I'm not --
 12 Q. You understand what I'm asking?
 13 A. No, sir. I'm not an expert on
 14 compressibility, so --

Page 129:02 to 136:04

00129:02 Q. Would you look at tab 30? Can
 03 you tell me what that is?
 04 A. It looks like some type of
 05 pipe --
 06 Q. Sir?
 07 A. It looks like some kind of pipe
 08 tally, but I'm not -- I've never seen this
 09 before.
 10 Q. Well, it's Mississippi Canyon
 11 MC252 well number 1.
 12 Do you know what that well
 13 is?
 14 A. Yes, sir. The Macondo.
 15 Q. All right. It says casing size,
 16 9-7/8 by 7-inch. Do you see that?
 17 A. Yes, sir.
 18 Q. Do you know whether or not
 19 that's a running tally of the joints that
 20 were run that are 7/8 and 9-7/8?
 21 A. I don't -- I do not know for a
 22 fact, no, sir.
 23 Q. You can't identify that?
 24 A. I'm assuming this is, but I
 25 don't know -- I've never seen this before
 00130:01 so I'm -- I'm assuming it's their pipe
 02 running tally.
 03 Q. On the left -- on the left-hand
 04 column where it says joint number, it says
 05 shoe, SJT.
 06 What does that mean?
 07 A. JT?

08 Q. SJT.
09 A. I would assume it means shoe
10 joint.
11 Q. Shoe joint.
12 C joint is casing joint?
13 A. I would think that would mean
14 centralizer joint.
15 Q. Ah. So -- that's right. The
16 centralizers were bucked on, were they not?
17 A. Yes, sir.
18 Q. They were already made up?
19 A. Yes, sir.
20 Q. So what we know is the first
21 thing that went on was the shoe. We know
22 that. Reamer, right?
23 A. Yes, sir.
24 Q. And the next joint is shoe
25 joint, which is the float collar? No?
00131:01 A. No, sir.
02 Q. What is it?
03 A. Again, it's just the -- it's the
04 joint that the shoe is attached to, called
05 the shoe joint.
06 Q. Okay. Does the shoe joint
07 have -- it doesn't have the float collar,
08 does it?
09 A. No, sir.
10 Q. All right. It's -- it's the
11 reamer shoe, right?
12 A. Yes, sir.
13 Q. All right. Then there's two
14 casing joints -- or centralizer joints --
15 A. Yes, sir.
16 Q. -- right?
17 A. Yes, sir.
18 Q. Can you tell how many
19 centralizers were run?
20 A. Again, I don't know for a fact
21 how many were run.
22 Q. Well, you know there was six
23 bucked on?
24 A. Correct.
25 Q. So assume with me there were
00132:01 six. But would you -- you think this would
02 be one centralizer per joint?
03 A. Yes, sir. It had to have been
04 'cause the sub is bucked on. It can only
05 be bucked up to one joint.
06 Q. Ah. Okay. So we got two
07 centralizers that are run above the shoe
08 joint --
09 A. Yes, sir.
10 Q. -- right?
11 A. Yes, sir.
12 Q. Then it says, 75. What does

13 that mean?
14 A. Those are the --
15 Q. That's the number of the next --
16 you start with casing number 75, 74, 73.
17 So that's the first actual nine -- or
18 seven-inch casing joint, right?
19 A. Yes, sir.
20 Q. And then we got FC, float
21 collar? Or is that what that stands for?
22 A. Yes, sir.
23 Q. And next we have float-collar
24 joint with the float collar, right?
25 A. Yes, sir.
00133:01 Q. Then we have two more regular
02 seven-inch casing joints, right?
03 A. Yes, sir.
04 Q. Then we have a centralizer
05 joint, another 9-7/8 joint, and another
06 centralizer joint; isn't that correct?
07 A. Yes, sir.
08 Q. And then we don't say -- we go
09 down to wherever the numbers are.
10 So on the third page we get
11 to XO. Do you see that?
12 A. Yes, sir.
13 Q. And that's crossover. We're
14 crossing over from seven-inch casing to
15 9-7/8 casing, right?
16 A. Yes, sir.
17 Q. Do you agree with me that in all
18 of this tab number 30 -- and I think we
19 ought to mark this.
20 MR. MATTHEWS:
21 Have you got that?
22 MR. LEMOINE:
23 I can help you.
24 Q. I'll tell you what.
25 MR. LEMOINE:
00134:01 Do you have a clip? You
02 need to clip it 'cause it's going to get
03 loose. So that's 2559?
04 Q. Exhibit 2559.
05 (Exhibit Number 2559 marked.)
06 MR. LEMOINE:
07 He can -- he can continue to
08 look at his if you don't mind, Guy.
09 MR. MATTHEWS:
10 Yeah.
11 Q. All right. 2559. There you go.
12 I only see four casing --
13 four centralizer joints. Don't you?
14 A. Yes, sir.
15 Q. Has anyone ever told you that --
16 that BP didn't run six -- six centralizers,
17 they only ran four?

18 A. No, sir.
 19 Q. That's what that shows, doesn't
 20 it?
 21 A. Again --
 22 Q. Sir?
 23 A. -- according to the paperwork.
 24 Q. Yes? Yes?
 25 A. Yes, sir.
 00135:01 Q. With respect to exhibit 2559, do
 02 you know whether or not this is a
 03 Weatherford document or a BP document?
 04 A. I'm sorry?
 05 Q. Do you know if this is a
 06 Weatherford document or a BP document?
 07 A. This should be a BP document.
 08 Q. All right. Let's look at the
 09 next tab, 31. This is a daily report from
 10 OilWell Tubular Consultants out of Crosby,
 11 Texas, right?
 12 A. Yes, sir, it looks like it.
 13 Q. And this shows that six
 14 centralizer subs, six centralizers bow
 15 springs, two 7-inch HCQ-125 Model 45,
 16 your -- your flapper valve and one 7-inch
 17 guide shoe were what? What does this show
 18 with respect to that equipment?
 19 MR. LEMOINE:
 20 Take your time and read it.
 21 Q. It shows, does it not, that they
 22 were magnetically inspected, drifted, and
 23 floated?
 24 A. I'm sorry?
 25 Q. It shows they were magnetically
 00136:01 inspected -- no anomalies found -- drifted
 02 and floated. And it shows that the
 03 equipment was in good shape?
 04 A. Yes.

Page 136:07 to 136:07

00136:07 (Exhibit Number 2560 marked.)

Page 136:19 to 136:22

00136:19 Q. Do you know why the seven-inch
 20 production casing was cleaned five
 21 different times -- or four different times?
 22 A. No, sir.

Page 137:04 to 138:03

00137:04 Q. And the first one at the top is
 05 from Mark Hafle, H-a-f-l-e. It's

06 March 26th, 2010.
 07 And it says, Let's buy the
 08 seven-inch and we'll take our chances on
 09 its actual use.
 10 Do you see that?
 11 A. Yes, sir.
 12 Q. I'll ask you again. Do you know
 13 whether or not this pipe had been used?
 14 A. No, sir.
 15 Q. Why would you clean pipe four
 16 times before you sold it to BP if you were
 17 Nexen --
 18 MR. RUSSO:
 19 Object to the form.
 20 MR. CHEN:
 21 Objection, form.
 22 Q. -- if you know?
 23 A. I don't know.
 24 Q. Don't you normally clean pipe
 25 after it's been run?
 00138:01 A. I don't know. I'm not -- I'm
 02 just a poor centralizer salesman. I don't
 03 know anything about pipe.

Page 138:06 to 138:06

00138:06 (Exhibit Number 2561 marked.)

Page 138:14 to 140:11

00138:14 Q. Did you have anything to do with
 15 the purchase by BP of the Nexen pipe?
 16 A. No, sir.
 17 Q. All right. Let's look at
 18 tab 36. You all about get to the end of
 19 your tab numbers.
 20 Have you seen this?
 21 A. Yes, sir.
 22 Q. And this is -- the second e-mail
 23 is from you to Allison Crane, right?
 24 A. Yes, sir.
 25 Q. And what are you doing there?
 00139:01 A. I was just -- he's asking me
 02 a -- for a complete description of the --
 03 of some items that were highlighted in
 04 yellow, which was on a -- on a spreadsheet.
 05 Q. This is the bottomhole assembly
 06 equipment, isn't it?
 07 A. This is the float equipment,
 08 centralizer for the shoe track, correct.
 09 Q. Yes, sir.
 10 Is that a, yes, it's the
 11 bottomhole assembly equipment?
 12 A. The phrase "bottomhole assembly"

13 you're confusing me there.
14 Q. Ah. I see. Bottomhole
15 assembly. You know what that -- you don't
16 know what that is? Okay. I won't use it.
17 A. Bottomhole assembly, the BHA, we
18 think it's the bottomhole assembly on the
19 drill pipe.
20 Q. I see.
21 A. I didn't mean to point that out,
22 but I didn't want you to think I was not
23 wanting to answer your question.
24 Q. Maybe I don't know what I'm --
25 just point -- maybe I don't know what I'm
00140:01 doing, I guess.
02 A. No. We just -- I'm used to
03 saying shoe track. So I don't think it
04 makes any difference.
05 Q. What I meant was literally the
06 bottomhole assembly --
07 A. For the -- for the casing?
08 Q. -- for this casing.
09 A. Yes, sir.
10 Q. Who was Allison Crane --
11 A. Al Crane --

Page 140:13 to 141:01

00140:13 A. Al Crane is one of the
14 procurement guys over at BP.
15 Q. All right. How would -- how
16 would he know that you would have the
17 technical information -- or this
18 information relative to that assembly,
19 those products?
20 A. 'Cause that's part of my -- my
21 job duty, to -- to provide BP with any
22 information that they need.
23 Q. All right. Had you worked with
24 Brian Morel before?
25 A. No, sir, not until this -- this
00141:01 particular well.

Page 142:18 to 152:11

00142:18 And let's mark that. And I
19 want to mark that as 2562.
20 (Exhibit Number 2562 marked.)
21 MR. LEMOINE:
22 Yes, sir.
23 Q. Do you have it?
24 A. Yes, sir.
25 Q. Can you identify that?
00143:01 A. Yes, sir.
02 Q. What is it?

03 A. It's just one of our tech --
04 tech sheets on the model M45AP oil field
05 float collar.
06 Q. All right.
07 A. Weatherford's tech sheets.
08 Q. On what?
09 A. Weatherford. Not mine. It's
10 Weatherford's.
11 Q. You mean that's not Davis Lynch?
12 No?
13 Is there a -- does this
14 show or disclose a tube to hold the flapper
15 valves open?
16 A. Yes, sir. Not very good but it
17 shows it.
18 Q. I'm going to hand you back the
19 exhibit -- there you go. And what I'd like
20 for you to do on the exhibit that's marked,
21 is draw an arrow to the tube and mark tube
22 on it.
23 Can you do that?
24 A. Yes, sir.
25 Q. Let me see. All right.
00144:01 And it's the tube -- that's
02 a cut-away section, but it's a tube, is it
03 not, that holds those spring-loaded valves
04 open?
05 A. Yes, sir.
06 Q. And those spring-loaded valves
07 are depicted in the lower representation in
08 the picture on the lower right-hand side,
09 are they not?
10 A. Yes, sir.
11 Q. And the -- the caps for the
12 valves, the part that rotates is shown in a
13 white-type color, isn't it?
14 A. Yes, sir.
15 Q. And the spring-loaded portion,
16 the spring is about the pin in each valve
17 that shown sticking out, isn't it?
18 A. Yes, sir.
19 Q. Okay. And that's what the tube
20 holds -- holds open?
21 A. Yes, sir.
22 Q. And it holds it open as it's run
23 in the well?
24 A. Yes, sir.
25 Q. And then the tube, how is the --
00145:01 what does the tube -- does the tube move?
02 A. As it's running in the well?
03 Q. Yes, sir.
04 A. No, sir, it doesn't.
05 Q. How do you move the tube? How
06 do you close the flapper valves?
07 A. You have to -- there's a ball

08 run in place.
09 Q. A what?
10 A. A ball is ran in place, a
11 conversion ball. This --
12 Q. And where is the ball located?
13 A. -- this picture -- this
14 picture -- this doesn't really show it.
15 Q. Look at the picture at the --
16 the front page. Look at the bottom.
17 Does that show the ball at
18 the bottom?
19 A. It doesn't show it, but it's
20 supposed to be there. I mean, I can't see
21 it in this picture, but it's supposed to be
22 there.
23 Q. All right.
24 A. Well, the -- the coloration --
25 Q. Well, look at the page 2. At
00146:01 page 2 it says -- at the bottom it says,
02 High density two-inch OD phenolic ball?
03 A. Correct.
04 Q. Does that show that ball in the
05 right place?
06 A. Yes, sir.
07 Q. And how does that ball -- is the
08 ball holding the tube up?
09 A. No, sir.
10 Q. How does the ball -- how do you
11 remove the tube and the ball from that
12 opening?
13 A. You have to start in flowing
14 through the equipment.
15 Q. Sir?
16 A. You have to start pumping --
17 flowing mud through the equipment.
18 Q. But how does that cause the tube
19 and the ball to move?
20 A. What happens at a certain flow
21 rate, it will eventually put 5' to 700 psi
22 on some shear screws and it will shear the
23 screws in the tube --
24 Q. And the tube drops down, doesn't
25 it?
00147:01 A. Yes, sir.
02 Q. Okay. And we don't know, do we,
03 if that flow rate was ever met?
04 A. No, sir, we don't know.
05 Q. So as far as we know, that valve
06 could have been -- flapper valves could
07 have been opened?
08 A. I have -- I can't tell you that.
09 Q. That's correct though, isn't it?
10 A. I can't tell you whether it was
11 open or closed.
12 Q. And if they were open, if they

13 were open because the valve didn't activate
14 or they were open after the valve did
15 activate, they got back open, where would
16 gas go that came up through the production
17 casing?
18 A. Again, I'm not -- my -- my
19 knowledge about this equipment, it's there
20 to hold the cement back and any type of
21 fluid. Any type of gas or anything, I
22 don't have any knowledge or opinion on
23 that.
24 Q. As far as you know, one of these
25 flapper valves has never failed to close?
00148:01 One of the Weatherford flapper valves never
02 failed to close, double-flapper valve?
03 A. It never failed to close?
04 Q. That's my question.
05 A. I don't know. I don't have that
06 information.
07 Q. You've never heard of that?
08 A. I've heard that there was some
09 incidents on this particular model, but
10 that's --
11 Q. Really? What?
12 A. They -- there's -- I know
13 there's been some -- some studies on the --
14 what we've done in the past.
15 Q. It -- it's --
16 A. There was a couple of issues
17 where -- but I can't get into those. I'm
18 not sure what happened on those.
19 Q. It's failed before, hasn't it?
20 MR. RUSSO:
21 Object to form.
22 Q. It failed to become activated?
23 A. I don't know that. All I know
24 is there was some incidents.
25 Q. You didn't know that it failed
00149:01 to become activated because of the
02 underbalance of the well conditions?
03 A. No, sir, not at all.
04 Q. That there was a terrific
05 differential in pressure above the float
06 collar than below?
07 A. No.
08 Q. You don't know that?
09 A. I don't know, sir, not at all.
10 Not that.
11 Q. Look at tab 14.
12 Can you identify that?
13 A. Yes, sir.
14 Q. What is it?
15 A. It is a -- a sales order
16 acknowledgment.
17 Q. And tab 15, the next tab.

18 What is it?
19 A. It's a -- a Weatherford delivery
20 ticket. Do you want me to show --
21 Q. As a matter of fact, if you
22 would, look at tab -- and you just did.
23 You began with 14. I asked you about 15.
24 Look through tab 19.
25 And aren't those all
00150:01 delivery tickets or sales orders?
02 A. Yes, sir. This is another sales
03 acknowledgment --
04 Q. Yes, sir.
05 A. -- of Weatherford's, yes.
06 Q. All right. Look at tab 20.
07 A. That is --
08 Q. What is that?
09 A. I'm not -- I'm not familiar
10 with this -- this document. I've never
11 seen it before.
12 Q. As a matter of fact, look at
13 the -- tabs 20, 21, 22 -- and 22.
14 A. 21, 22 and which one?
15 Q. 20, 21, and 22.
16 And I'll ask you whether or
17 not they're service tickets in March --
18 A. I'm sorry. Did you say 23 also
19 or no? Just 20, 21, and 22?
20 Q. Not 23.
21 A. Okay.
22 Q. 20, 21, and 22.
23 A. Okay. All right.
24 Q. What is that?
25 A. I'm not familiar with these
00151:01 documents. It's from -- the Weatherford
02 service ticket.
03 Q. I can't tell what it's a service
04 for. Or let me ask you another way.
05 Do you know whether or not
06 these are service tickets for running
07 casing? Is that --
08 A. That's what it looks like to me.
09 MR. MATTHEWS:
10 Well, let's mark tabs 14
11 through 22 as the next exhibits, which
12 would be 2563.
13 (Exhibit Numbers 2563 through
14 2572 marked.)
15 MR. LEMOINE:
16 Each one separately, Guy?
17 MR. MATTHEWS:
18 -- through -- each one
19 separately.
20 MR. LEMOINE:
21 All right. So the first --
22 just give me a minute. So Tab 14 --

23 MR. MATTHEWS:
 24 Yeah, if you would keep
 25 doing that and let me -- can I keep asking
 00152:01 questions?
 02 MR. LEMOINE:
 03 Oh. Absolutely.
 04 MR. MATTHEWS:
 05 All right.
 06 Q. Would you turn to tab 23? Do
 07 you have tab 23?
 08 A. Yes, sir.
 09 Q. Can you identify that?
 10 A. No, sir. I'm not sure what
 11 this -- this is.

Page 152:14 to 153:05

00152:14 Do you know whether or not
 15 Nexen had ever used any of the cementation
 16 equipment?
 17 A. Have they used Weatherford's
 18 cementation equipment? Yes, they have.
 19 Q. Well, let me rephrase that.
 20 The cementation equipment
 21 that was provided with this particular
 22 Nexen seven-inch casing?
 23 A. Oh. No, sir. No, sir.
 24 Q. You don't know?
 25 A. No, sir, I do not know.
 00153:01 Q. Would you agree with me that
 02 the -- the only way you would show wear on
 03 one of the flapper valve hinges was if you
 04 had use?
 05 A. Yes.

Page 154:17 to 155:09

00154:17 Q. Well, I will. I want to order
 18 ones that haven't been used, okay? And not
 19 tested by Stress Engineering.
 20 Let's look at tab 25. I'll
 21 tell you. Look at tabs 25, 26, 27, and 28.
 22 And I'll ask you if they have to do with
 23 providing the equipment to be tested by
 24 Stress Engineering and relate to the Stress
 25 Engineering reports. Is that -- isn't that
 00155:01 what that -- those relate to?
 02 A. I never seen them before and
 03 so --
 04 Q. Well, that's -- that's my next
 05 question.
 06 Isn't it a fact that you
 07 don't -- you didn't have anything to do
 08 with this?

09 A. Right.

Page 157:10 to 158:17

00157:10 Q. Do you know whether or not --
11 whenever you were having conversations with
12 Brian Morel, and he was sending you the
13 Excel spreadsheets with respect to the
14 requirements for the rig and you were
15 having telephone conversations with him
16 that were ongoing when the rig was being
17 drilled, he ever told you out of the
18 80 days this well was being drilled, that
19 for 30 of them, drilling operations had to
20 cease because the well -- the well control
21 was out of control? They had lost well
22 control? In other words, for three-eighths
23 of the time period, that's about
24 40 percent, that this -- about -- that this
25 well was being drilled, they had to stop
00158:01 drilling operations to maintain the well
02 control? Did you ever have any
03 conversation with him about that?
04 MR. CHEN:
05 Objection, form.
06 A. No, sir, not at all.
07 Q. Did he ever express to you in
08 some form, hey, this is a bad well, a tough
09 well?
10 A. No, sir --
11 MR. CHEN:
12 Objection, form.
13 A. -- not -- not at all.
14 Q. Did you know it was a bad well
15 or a tough well?
16 A. No, sir. I have no knowledge at
17 all.

Page 161:07 to 166:20

00161:07 Q. All right. Would you look at
08 Bates number 2476?
09 And that's the casing shoe
10 diagram, right?
11 A. Yes, sir, it looks like it.
12 Q. Did you supply that?
13 A. No, sir.
14 Q. Did Weatherford supply that?
15 A. No, sir.
16 Q. Was that diagram followed?
17 A. I'm not sure.
18 Q. The next page, 2477, shows the
19 9-7/8-inch casing landing string, doesn't
20 it?

21 A. Yes, sir.
22 Q. Do you know if this landing
23 string was used, if this design was used?
24 A. No, sir. In fact, I don't know.
25 Q. Turn to tab 41.
00162:01 What is that?
02 A. A document from Weatherford
03 Tubular Running Services. It looks like
04 it's for the 13-5/8 casing string.
05 Q. Will you agree with me this is a
06 similar type document to the sequence of
07 production casing run that we had seen
08 before, right? Remember that? Remember
09 the -- when we had shoe, shoe joint,
10 centralizer joint, et cetera, floating --
11 float collar, float-collar joint? Remember
12 we took -- went through that? The one
13 where I said it shows four centralizer
14 joints and not six. Do you remember that?
15 A. Yes, sir.
16 Q. This is a similar type document,
17 is it not? Not the same, but similar?
18 A. That was a BP and this is a
19 Weatherford.
20 Q. Yeah. And this shows three
21 centralizers below the float collar,
22 doesn't it?
23 A. Yes, sir.
24 Q. And no centralizers above the
25 float collar?
00163:01 A. Yes, sir. I assume so.
02 Q. Well, you don't see
03 centralizer -- you see --
04 A. Right.
05 Q. -- joints two, three, and four,
06 are centralizer joints TL.
07 What does that mean?
08 A. I'm assuming it means thread
09 loc.
10 Q. All right. All right.
11 A. Like the thread-loc connection.
12 Q. And that's the type of dope
13 used --
14 A. Right.
15 Q. -- isn't that correct?
16 A. It says shoe joint, thread-loc
17 connection --
18 Q. By the way -- I guess we'll have
19 to straighten that up -- what is it -- when
20 I say dope, what do you think I mean with
21 respect to pipe?
22 A. It's pipe dope.
23 Q. We're not smoking dope, are we?
24 No. It's -- thread loc is a material used
25 to ensure the joint connection between the

00164:01 male and female joint?
 02 A. Yes, sir.
 03 Q. All right. Joint 15, what does
 04 that statement mean?
 05 A. Locked rotary and try without
 06 B/U.
 07 Q. Well, what does that mean?
 08 A. I don't know.
 09 Q. You agree with me that this only
 10 shows three centralizers in use, all of
 11 them below the float collar?
 12 A. No, sir.
 13 Q. All right.
 14 A. The --
 15 Q. Do you see the word
 16 "centralizer" used three different times
 17 for joints two, three, and four?
 18 A. I'm going by my history with --
 19 with BP.
 20 Q. I'm sorry. That's not my
 21 question. And I don't mean to cut you off.
 22 First, just tell me about this document.
 23 It shows three centralizer
 24 joints only, right?
 25 A. Yes, sir.
 00165:01 Q. And your history with BP, go
 02 ahead and explain it.
 03 A. The -- the shoe joint, the type
 04 of shoe that we were supplying to BP has a
 05 centralizer sub built into that shoe.
 06 Q. What does?
 07 A. The centralizer -- the shoe
 08 that's -- that we supplied to BP has a -- a
 09 centralizer sub built into the shoe.
 10 Q. Okay. So you're saying this
 11 shows four joints, four centralizers?
 12 A. Also, usually the float-collar
 13 joint when we would send out to get buck
 14 equipment on, we would also built -- buck a
 15 centralizer sub to a float-collar joint.
 16 Q. All right. So you're saying --
 17 although it mentions centralizer three
 18 times, you're saying there's five
 19 centralizers shown here?
 20 A. There's possibility a maximum of
 21 five.
 22 Q. One's for the shoe, one's with
 23 the float collar?
 24 A. That's -- yes.
 25 Q. Isn't that right?
 00166:01 A. Yes.
 02 Q. I wonder why it doesn't say it
 03 when the other document does say it.
 04 A. I don't know.
 05 Q. And this shows -- you're saying

06 there's five centralizers run at or below
 07 the float collar, none above it?
 08 A. Correct.
 09 Q. Does that make sense to you?
 10 A. That's -- that's BP's -- I don't
 11 have an opinion on it.
 12 Q. I know. But don't you have an
 13 opinion about that? You don't have any
 14 centralizers run above the float collar?
 15 A. No, that's -- that's not
 16 unusual.
 17 Q. So it's unusual to run
 18 centralizers above the float collar?
 19 A. No, sir. I'm -- I'm not
 20 understanding your question.

Page 167:06 to 167:17

00167:06 (Exhibit Number 2573 marked.)
 07 Q. Let's look at exhibit -- not
 08 exhibit. Tab 43. And maybe this will
 09 clear this up.
 10 The last exhibit we just
 11 had came from tab 41. It was dated 3-20.
 12 This tab is dated March 25th, five days
 13 later. And why don't you tell us, for
 14 example, whether or not this shows that a
 15 centralizer was run above the float collar.
 16 A. Yes. According to this one, the
 17 centralizer was run above the float collar.

Page 168:09 to 169:22

00168:09 Q. The last one was -- exhibit was
 10 2573 --
 11 MR. MATTHEWS:
 12 Am I right about that?
 13 MR. LEMOINE:
 14 You are.
 15 MR. RUSSO:
 16 That's right.
 17 MR. MATTHEWS:
 18 All right.
 19 Q. -- dated March the 20th. Do you
 20 see that?
 21 A. Yep.
 22 Q. It's got a sequence of running
 23 joints?
 24 A. Yes, sir.
 25 Q. Centralizer joints, et cetera.
 00169:01 And then tab 43 shows a centralizer joint
 02 being run above the float collar. And my
 03 question was: Did they run this production
 04 casing in and take it back out and rerun

05 it?
06 A. No, sir. The -- the one on 3-20
07 was 13-5/8 casing, and the one on 3-25 was
08 11-7/8 casing --
09 Q. All right.
10 A. -- according to this document.
11 Q. All right.
12 A. It's two different strings of
13 pipe.
14 Q. But I thought the float collar
15 in the cementation equipment was run on
16 seven-inch casing?
17 A. Yes, sir, it was.
18 Q. And you're saying this is
19 11-7/8?
20 A. Yes, sir. It says -- the size
21 is on the top. It says 13-5/8 and one says
22 11-7/8.

Page 170:14 to 171:12

00170:14 Q. All right. I placed in front of
15 you what's marked as Exhibit 2574.
16 (Exhibit Number 2574 marked.)
17 Q. Tab 45, dated April the 17th,
18 2010.
19 And the size of the casing
20 is the 7-inch by 9-7/8-inch, right?
21 A. Yes, sir.
22 Q. All right. And indeed, if we
23 count like you say we should where this --
24 at the shoe joint and the float-collar
25 joint there as a centralizer, we come up
00171:01 with six centralizers shown, do we not?
02 A. Yes, sir.
03 Q. All right. That's all we got to
04 say.
05 Do you know whether or not
06 the liner that was run was an expandible
07 liner?
08 A. Whether it was an expandible
09 liner?
10 Q. Yes, sir.
11 A. Not to my knowledge. No, it
12 wasn't.

Page 172:08 to 173:04

00172:08 Q. Can you tell us what they are?
09 A. It looks like information from
10 the Tubular Running Service guys from
11 Weatherford.
12 Q. All right. How can you tell
13 that?

14 A. Just by looking at the daily
15 reports.
16 Q. Well, that's what these are, are
17 they not? They're daily reports --
18 A. From --
19 Q. -- from people that are
20 basically on the rig. I guess if they're
21 on the rig --
22 A. Yeah. I mean I'm recognizing
23 their -- some of the Weatherford names from
24 some of the previous sheets that we just
25 looked at a while ago.
00173:01 Q. Okay. And these are the running
02 tool -- the running pipe guys, right?
03 A. Yeah. The Tubular Running
04 Services guys.

Page 175:04 to 175:06

00175:04 Q. Hi, Mr. Clawson. My name is
05 Jessica Sullivan. I represent the United
06 States. I'd like to ask you some questions

Page 175:23 to 182:08

00175:23 Q. The first document is an e-mail
24 that was sent to you by Allison Crane on
25 March 31st, 2010, and it indicates that BP
00176:01 has purchased seven-inch float equipment
02 on -- on the attached from Nexen and will
03 use it on the Macondo well.
04 Do you recall receiving
05 this e-mail?
06 A. I was -- it was not sent to me.
07 I was copied on it.
08 Q. Okay. Do you -- you did receive
09 a copy of it?
10 A. Yes, I did.
11 Q. Did you read this e-mail?
12 A. Yes, I did.
13 Q. Okay. And behind this e-mail,
14 there are a series of documents that were
15 produced in response to Weatherford's
16 discovery -- request for production that
17 was sent to Weatherford. And I'd like to
18 ask you some questions about some of the
19 delivery tickets and the service tickets
20 that I have that are attached behind that
21 e-mail. I'm not representing that the --
22 this e-mail had these as attachments. But
23 we're going to go through some of the
24 documents that are behind it.
25 If you look at the first --
00177:01 first page that's indicated -- I'm going to

02 go by Bates range, so if you can follow
03 along with me. Weatherford -- it's WFT-MDL
04 0852. Okay.

05 Do you recognize this
06 document?

07 A. Yes.

08 Q. Okay. There's an order date
09 listed in the top left corner here of
10 March 1st, 2010, and it indicates there's a
11 labor charge and a service for visual
12 inspection of seven-inch equipment.

13 Do you know if this was the
14 seven-inch equipment that was used on the
15 Macondo well?

16 A. Yes, it was.

17 Q. Okay. And would you explain to
18 me how it is that BP acquired the
19 seven-inch equipment just so it's clear for
20 the record?

21 How did BP acquire the --
22 the seven-inch equipment that was used on
23 the Macondo well? And I'm referring to the
24 float collar, the reamer shoe, and the -- I
25 think the -- and the centralizers that were
00178:01 acquired for the seven-inch equipment.

02 A. Well, to my understanding, that
03 BP was looking for some seven-inch
04 Hydril 513 equipment for their production
05 string and they had -- they had located
06 their casing and they were looking for
07 accessories for it. And they found it in
08 the -- the Nexen inventory that they had
09 purchased from Weatherford. And they were
10 notified by Nexen that they had inventory
11 at -- at our shop to -- to purchase -- to
12 match that -- their pipe -- the pipe that
13 BP bought from Nexen.

14 Q. Did BP work through you,
15 Mr. Clawson, to acquire that equipment from
16 Nexen for the seven-inch?

17 A. No, ma'am.

18 Q. BP -- did BP -- do you know if
19 BP worked directly with Nexen to acquire
20 that equipment for this seven-inch
21 production casing?

22 A. No. With -- what had happened,
23 the -- the -- Al Crane, the purchasing guy
24 had contacted our guy, Keith Schaff to see
25 if they had any seven-inch 32-pound
00179:01 equipment, and it just so happened we had
02 some of that equipment in BP's will call
03 inventory -- I'm sorry. In the Nexen
04 custom inventory.

05 MR. LEMOINE:

06 Take -- take your time.

07 Q. Right. We're not rushing you.
08 So please --
09 A. Okay.
10 MR. LEMOINE:
11 Take a breath.
12 Q. When -- do you know when BP
13 contacted -- oh, I'm sorry. When BP was
14 looking to acquire this seven-inch
15 equipment, or the dates on which they were
16 trying to obtain this Nexen equipment for
17 the seven-inch?
18 A. I don't recall what the exact
19 date was.
20 Q. Okay. All right. No problem.
21 If you turn -- we're still
22 behind tab 1 -- to what -- what's been
23 labeled as WFT-MDL 0858.
24 Are you familiar with this
25 document?
00180:01 A. Yes.
02 Q. Okay. What is -- can you
03 identify this document for the record?
04 A. This is a -- a Weatherford
05 delivery ticket.
06 Q. Okay. And what equipment is
07 being delivered on this equipment?
08 A. The reamer shoe --
09 Q. Invoice, excuse me.
10 A. -- one.
11 Q. Okay.
12 A. One float collar, an M45AP, and
13 six centralizer subs.
14 Q. Okay. And is this the equipment
15 that was being delivered to BP?
16 A. It was being delivered to
17 Tuboscope in Amelia.
18 Q. Okay. Can you describe to me
19 why this equipment was being -- it says
20 it's -- shipping instructions, ship to
21 Tuboscope Amelia.
22 Why was Tuboscope receiving
23 this equipment?
24 A. Al Crane at BP had -- was
25 shipping this equipment there to get bucked
00181:01 on to BP's pipe.
02 Q. Okay. And that would include
03 the reamer shoe, the float collar, and the
04 six centralizers?
05 A. Correct.
06 Q. Okay. Is that all that
07 Tuboscope does for -- for BP with respect
08 to this equipment?
09 A. Yes.
10 Q. Okay.
11 A. To my knowledge, yes.

12 Q. And once Tuboscope has performed
13 that function -- you're calling it bucked
14 on and, to me, that means you're placing
15 the equipment or installing the equipment?
16 A. Installing the equipment.
17 Q. Is that my -- my understanding
18 you're installing the equipment? Once the
19 equipment is installed, what happens after
20 that?
21 A. Well, it's up to BP after that.
22 Our equipment's on there, and then Al Crane
23 will direct Tuboscope to ship the equipment
24 to the dock, wherever.
25 Q. So Weatherford's not working
00182:01 with BP to make sure -- to ensure that this
02 equipment is sent to the rig. That's
03 Tuboscope at this part of -- of the
04 process?
05 A. Yes. I'm assuming so. No.
06 Weatherford does not -- once we deliver the
07 equipment to -- delivered to Tuboscope,
08 we're done with it.

Page 182:11 to 185:05

00182:11 Can you explain to me
12 what -- what role does Weatherford have in
13 the process of BP acquiring -- when I say
14 acquire, purchasing this equipment and then
15 having it shipped out to the rig for use on
16 the seven-inch casing? Can you explain for
17 me what -- what role Weatherford had in --
18 in that process?
19 A. Right. Well, like I said, the
20 centralizers shaft is sent to Al Crane
21 stating this what -- the equipment that we
22 had in Nexen customer inventory. Then BP
23 then arranged to purchase that equipment
24 from Nexen. Weatherford, according to
25 the -- one of the documents you showed
00183:01 earlier, they did an inspection on the
02 equipment. Hydril came out and inspected
03 the threads to make sure all the threads
04 were good -- were good. Weatherford
05 charged BP to do that because they have to
06 physically take -- uncrate it for the
07 Hydril people to come. Once they finish,
08 they crate it back up ready for shipping.
09 And then on this document here is by
10 instructions avow was shipped to Tuboscope,
11 per Al Crane's instructions.
12 Q. Okay.
13 A. And then once -- once the -- it
14 left our location, it's -- Weatherford's
15 pretty much done with it at that time.

16 Q. Do you follow-up with BP to make
17 sure that they've received the equipment?

18 A. No. Because it's -- it's picked
19 up by a BP truck. And they take it and
20 it's -- and there's -- it's signed for on
21 the -- on the delivery ticket here. And
22 it's -- again, once it's -- once it's been
23 picked up by a BP truck, it's -- it's out
24 of Weatherford's hands after that.

25 Q. If I'm understanding you
00184:01 correctly -- and if I'm not, you let me
02 know -- you said that Weatherford is -- is
03 doing some inspections on the equipment and
04 billing BP for inspections that are done on
05 the equipment?

06 A. No. They're not doing the
07 inspections. The equipment is, again, is
08 sitting in our -- our shop. And it's
09 crated -- wooden crate to protect it and
10 all that good stuff, the threads and
11 everything.

12 When BP purchased it from
13 Nexen, it was common for BP to -- before
14 they shipped it to get bucked on to come
15 inspect the threads, again, because the
16 threads are going to be mated up together
17 with the pipe. So what we have to do is,
18 we have to break everything down so the
19 Hydril inspectors, which were the 513
20 connection, would come to our location and
21 make sure the threads are all in good
22 shape. They -- they did that. And Hydril
23 signed off on it, and then Weatherford
24 crates it back up to get it ready back for
25 shipment after that.

00185:01 Q. Okay. So Weatherford works with
02 Hydril to ensure that the --

03 A. Right. They just work on --
04 they're not doing any type of inspection as
05 far as threading or anything like that.

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00185:19 Q. All right. So Weatherford's got
20 equipment that's crated up and it's -- at
21 its facility. And I'm -- I'm concerned
22 with the equipment that was used on the
23 Macondo well, the seven-inch equipment. So
24 that equipment was -- was at Weatherford,
25 being housed by Weatherford when BP called
00186:01 up Nexen and acquired that equipment for
02 use on its well?

03 A. Yes.

04 Q. Okay. Was there any other
05 company that was involved in inspecting

06 the -- the seven-inch equipment? And
07 again, I'm referring to the centralizers,
08 the float collar, and the reamer shoe that
09 was used on the -- on the Macondo well.

10 A. What type of inspection? There
11 were some manufacturer inspection being
12 done.

13 Q. Any inspections that were
14 performed on the seven-inch equipment prior
15 to it being shipped to the DEEPWATER
16 HORIZON rig and being installed on the
17 production casing where they -- you --
18 you've talked about Hydril. I've seen
19 inspections certificates from Delta
20 Inspections. I don't know what kind of
21 inspections are going on. So if you are
22 aware of any other inspections, I need you
23 to tell me about what those were.

24 A. Yes. Some of those inspections
25 were done during the manufacturing process,
00187:01 according to the Nexen specifications for
02 Weatherford, how to build their float
03 equipment.

04 Q. So Nexen was involved in making
05 sure that their equipment -- that was part
06 of Nexen's -- when Nexen owned that
07 equipment, they had inspections that were
08 done on the equipment prior to BP acquiring
09 the equipment? Is that what you're saying?

10 A. Correct. When they would order
11 equipment with us, they'd have instruct --
12 instructions to Weatherford how to build
13 the equipment to their specifications.

14 Q. Okay. And do you know if
15 there's any indication from any of the
16 inspections that were performed on the
17 seven-inch equipment, if there were any
18 problems with the equipment before it was
19 shipped to the DEEPWATER HORIZON?

20 A. Not to my knowledge, no.

21 Q. Okay. All right. I have a few
22 more questions before we leave tab 1 about
23 some of the -- invoices that I have seen.

24 Before we leave this
25 document that's identified as Weatherford
00188:01 0858, just so it's clear for the record,
02 you said there was one reamer shoe, one
03 float collar, and six sub centralizers; is
04 that right?

05 A. Yes.

06 Q. And -- on this invoice -- I'm
07 sorry. It's a delivery ticket. And it
08 indicates no charge, pulled from Nexen,
09 customer owned. And it refers to a well.
10 The Knotty Head; is that correct?

11 A. Yes.
12 Q. Okay. And just so I -- it's
13 clear on the record, this -- this is an
14 indication that was Nexen-owned equipment
15 that was -- that was going to be used, I
16 guess, for their -- their Knotty Head well?
17 A. Correct.
18 Q. Okay. Great. All right. Let's
19 turn, now -- still behind tab 1 -- to a
20 document with Bates range WFT 0862.
21 Do you recognize this
22 document?
23 A. Yes.
24 Q. Okay. What is this document?
25 A. Again, this is a -- a
00189:01 Weatherford delivery ticket.
02 Q. Okay. And what -- what
03 equipment is being delivered on this
04 ticket?
05 A. This is 15 centralizers and 15
06 stop collars.
07 Q. Okay. And it looks like this
08 equipment on this delivery ticket is being
09 sent to BP America production. It's cut
10 off on our copy here. And it's being
11 shipped to Port Fourchon; is that right?
12 A. It has here it's shipped to the
13 BP heliport in Houma.
14 Q. Okay. Okay. And there's a
15 reference to a BP W/C THUNDER under
16 location lot with the -- the centralizer
17 bow springs. Do you see that?
18 A. Yes.
19 Q. Quantity shipped.
20 Can you tell me what that
21 reference, BP W/C THUNDER is in reference
22 to?
23 A. It stands for BP will call
24 Thunder Horse.
25 Q. And what does that mean?
00190:01 A. These particular centralizers
02 were ordered for the Thunder Horse project
03 and there were -- there were some of them
04 that were leftover from the Thunder Horse
05 project that they didn't use.
06 Q. Okay.
07 A. And they're in -- they're
08 still -- they're still in Weatherford
09 inventory but they're in -- they were
10 ordered specifically for BP.
11 Q. And it -- does this delivery
12 ticket indicate that the 15 centralizers
13 are being shipped to the Macondo well --
14 for the Macondo well? There's a -- there's
15 a reference to Macondo at the top left

16 corner, second line.
 17 A. Yeah. Right. It says
 18 Mississippi Canyon 252.
 19 Q. Okay. So it's your
 20 understanding that this delivery ticket was
 21 for the 15 centralizers that were leftover
 22 from the Thunder Horse to be shipped to the
 23 Macondo well. And this print date is
 24 April 15th, 2010.
 25 Is that an accurate
 00191:01 statement regarding this document?
 02 A. Yes.
 03 Q. Okay. Great. And if you turn
 04 the page to the document marked WFT 0863.
 05 It's another delivery ticket with a print
 06 date of April 15th.
 07 Do you see the -- are you
 08 there? Do you see that document?
 09 A. Uh-huh.
 10 Q. Do you recognize this document?
 11 A. Yes.
 12 Q. What does this document -- this
 13 delivery ticket indicate?
 14 A. Well, what this -- this is the
 15 same document as the previous one.
 16 Q. Well, I'm interested in some of
 17 the -- the entries here about the
 18 centralizer bow springs. It's 15 and there
 19 are tublok kits and materials for. I
 20 wanted to do ask you about the kits, the
 21 tublok kits.
 22 At the beginning of this --
 23 it says Macondo -- and I say this, under
 24 line -- the first line entry. Macondo,
 25 delivered to BP heliport PHI in Houma. And
 00192:01 then there's a list of centralizers, a
 02 quantity shipped, 15. And then another
 03 listing of tublok kits and materials for
 04 installation of stops to pipe, and there's
 05 also a quantity shipped of 15.
 06 Is it your understanding
 07 that both the centralizers and the tublok
 08 kits for installation of the stops to the
 09 pipe were being sent to the BP heliport PHI
 10 in Houma?
 11 A. Yes.
 12 Q. Okay. And do you know if, in
 13 fact, that that occurred, that both -- both
 14 orders were -- were shipped to Houma?
 15 A. Yes.

Page 192:23 to 205:17

00192:23 Q. How were -- how were these items
 24 shipped, the centralizers and then the

25 tublok kits and material for installation,
00193:01 how were they sent to the Macondo well?
02 A. By Hotshot truck.
03 Q. Well, the rig's out in -- in the
04 Gulf of Mexico, so I'm trying to figure out
05 how did you get this equipment --
06 A. Oh, oh. Okay.
07 Q. -- from Houma to the rig.
08 A. I'm sorry. My understanding is
09 that the -- that the centralizers got
10 shipped by the -- on the helicopter, and
11 the thread loc and a box of stop collars
12 that were packaged separately went on a
13 boat.
14 Q. And do you know why the -- the
15 turbo kits -- I'm going to refer to them
16 like that -- why they were shipped on a
17 boat and not with the -- the centralizers
18 on the helicopter?
19 A. These centralizers, there's --
20 there's two pieces to these centralizers.
21 It's a -- the centralizer with -- in
22 themselves and there was also stop collars
23 as one unit that -- that would go to them.
24 They packaged them separately. The stop
25 collars are -- are some special stop
00194:01 collars that were made, and they're wrapped
02 in some plastic. So they had the
03 centralizers in one box, the stop collar
04 and the thread loc in another box. And
05 again, when they got to the -- my
06 understanding, went to the heliport that
07 they -- they could fit the centralizers on
08 there, but the box with the stop collars
09 and the thread loc couldn't fit on the
10 helicopter.
11 Q. And so they didn't -- and it was
12 decided that they would be shipped by -- by
13 boat?
14 A. It would be -- it would be
15 rerouted to the dock in Fourchon.
16 Q. Great. Okay. All right. If
17 you continue to turn to another document in
18 this collection, Weatherford -- WFT 0867.
19 It's a delivery ticket.
20 Do you recognize this
21 document?
22 A. Yes, I do.
23 Q. And what is this delivery ticket
24 in reference to?
25 A. This is in reference to the
00195:01 service hand, Daniel Ofather, going to
02 location.
03 Q. Okay. And there's an indication
04 under a serial number that serviceman labor

05 charge to install seven-inch centralizers,
06 job canceled.

07 Is that your understanding,
08 that it's -- what's your understanding of
09 what this entry means?

10 A. Right. He -- he went and got on
11 location. And once he got to location,
12 they made a decision not to install the
13 centralizers, and they canceled the job and
14 sent him back in.

15 Q. Who made the decision not to
16 install the centralizers?

17 A. BP did.

18 Q. And turn to the next document
19 behind that, WFT 0868. This is something
20 that's called a pick ticket, dated
21 April 15th, 2010.

22 Do you recognize this
23 document?

24 A. Yes.

00196:01 Q. Okay. And can you explain for
02 me the -- the entry, the first entry? The
03 first line entry says labor -- labor for
04 installation Daniel Ofather.

05 What's the difference
06 between this pick ticket and the -- the
07 delivery ticket that said that
08 Mr. Ofather's service was canceled?

09 A. Well -- well, the pick ticket is
10 just the -- the document that he brings
11 with him on location. It's more of a -- of
12 a handwritten copy. He writes down the
13 amount of hours, handwritten. He gets it
14 stamped and signed.

15 Q. Who does he get it stamped and
16 signed by?

17 A. It looks like down here -- I'm
18 not sure who that name is.

19 Q. The approval? Is that the line
20 you referring to?

21 A. Right, the approval. I'm not
22 sure.

23 Q. Is that Donald Vidrine, do you
24 know?

25 A. I'm not -- I -- that's what
26 it -- it looks like it.

00197:01 Q. Do you know who Donald Vidrine
02 is?

03 A. Yes. He was -- he was the
04 company man on the rig.

05 Q. Okay. And it looks like this
06 document was dated on April 18th, 2010?

07 A. Correct.

08 Q. Okay. All right. I'm going to
09 mark tab 1 in globo as Exhibit 2575.

10 (Exhibit Number 2575 marked.)

11 Q. Earlier today when you were
12 speaking to the plaintiff's counsel you
13 indicated that you went over to BP's office
14 to look at some schematics in 2009.

15 Do you recall that
16 testimony?

17 A. I went to BP's office. It
18 wasn't specifically to go look at the
19 schematic, but, yeah, I went to BP office
20 quite a few times.

21 Q. Okay. So you went to BP's
22 office in 2009 to discuss the Macondo well?

23 A. Uh-huh.

24 Q. Okay. And who did you meet with
25 when you were there?

00198:01 A. Brian Morel mostly.

02 Q. Okay. And can you tell me about
03 your conversation with Mr. Morel -- and
04 do -- back up.

05 MS. SULLIVAN:

06 Strike that.

07 Q. Do you recall when -- when in
08 2009 you met with Mr. Morel?

09 A. No, I don't recall.

10 Q. Okay. Okay. When you did meet
11 with Mr. Morel, can you tell me what --
12 what your conversation was with him and --
13 and the information that you -- you
14 gathered from that conversation?

15 A. On which conversation are you
16 talking?

17 Q. When you met with him in 2009 at
18 BP's offices.

19 Did you -- did you meet
20 with him more than one?

21 A. Oh, yes. Yes.

22 Q. You did? Okay.

23 How about your first
24 meeting with him to discuss the Macondo
25 well. Do you recall that --

00199:01 A. Yes.

02 Q. -- meeting?

03 Can you tell me a little
04 bit about that?

05 A. Yes. Again, it's just going
06 over the -- I make out an equipment list
07 according to what's on BP's schematic, and
08 I -- I give that to him. And we go over it
09 to make sure that the quantities that
10 we're -- and what we're going to run, the
11 model numbers and everything, you know,
12 matches their schematic. It's a typical
13 thing that I do with BP.

14 Q. Okay. What does -- does BP

15 provide you with -- with certain documents
16 or information so that you can make -- make
17 your list of the equipment that they may
18 need for their well?
19 A. Right. The schematic has -- has
20 that, has the thread, grade, and weight and
21 sizes of the pipe that they're going to
22 run.
23 Q. Okay. If you turn to tab 8 in
24 your binder.
25 Does BP provide you with
00200:01 what's behind tab 8, which is a document
02 previously marked as Exhibit 841? Do you
03 ever -- does BP present you with this
04 information?
05 A. No.
06 Q. No. Have you ever had the
07 opportunity to review what's marked as
08 document -- I'm sorry, exhibit 841, which
09 is the Macondo Prospect 7-inch by
10 9-7/8-inch Interval?
11 A. I've seen this document. I've
12 looked at it, but I haven't -- I didn't
13 thoroughly review it.
14 Q. When -- when did you see this
15 document?
16 A. I'm not sure whether I received
17 it, before or after the...
18 MR. LEMOINE:
19 Finish the sentence.
20 A. I'm not sure whether I received
21 it or seen it before or after the incident.
22 I can't come to call, but I may have.
23 Q. Is there any reason why you
24 would -- you would want to take a look at
25 this document? What information would you
00201:01 use from this document for -- for your
02 purposes for -- for gathering equipment
03 that BP might need for the well?
04 A. There's no information in this
05 document for that --
06 Q. Okay.
07 A. -- for me.
08 Q. But -- and you're not sure
09 whether or not you received it before or
10 after?
11 A. Right. I may have -- I think I
12 reviewed it, to the best of my knowledge,
13 after the -- I had seen this document.
14 Q. Okay. Can you explain how the
15 conversations that you have with BP
16 regarding the well, does Weatherford make
17 recommendations for certain equipment to be
18 used on the well?
19 A. On certain -- on certain ones.

20 I made -- I made recommendations on them.
21 Q. Well, let's talk about the
22 Macondo -- the Macondo well because
23 that's -- that's why we're here today, is
24 to talk about that well.
25 Do you recall if you made
00202:01 any recommendations to BP regarding -- for
02 the seven-inch equipment that was used on
03 the -- on the well?
04 A. The only -- they called me
05 looking for some -- what type of
06 centralizers that we had available to be
07 able to run.
08 Q. And when you say they, who --
09 who called you regarding centralizers?
10 A. Brett Cocalles.
11 Q. Okay. Did Mr. Morel call you
12 prior to Mr. Cocalles calling you?
13 A. Brian, he had sent me an e-mail
14 looking for some -- some additional
15 centralizer subs at -- at one point.
16 Q. Okay. Did -- does BP also
17 contact you regarding obtaining float
18 equipment and other equipment for the shoe,
19 the shoe equipment that it might need?
20 A. BP? No, they did not.
21 Q. They did not, okay. All right.
22 If you turn to tab 9 in
23 your binder.
24 Do you recognize this
25 document?
00203:01 A. I'm sorry?
02 Q. Do you recognize this document?
03 A. Yes.
04 Q. And what is it?
05 MR. LEMOINE:
06 Take your time and read it.
07 A. Okay.
08 Q. Can you explain what this --
09 what this e-mail -- explain this e-mail for
10 the record, please.
11 A. Well, Brian was -- he had sent
12 me an e-mail. He said, what do you have
13 available for seven-inch pipe, 32 pound,
14 513 connection. I need 7-10.
15 I informed him that he had
16 six centralizers that was coming from the
17 Nexen inventory. He said he was -- meaning
18 that the -- the amount listed below, the
19 Nexen's. So he -- let me know what type of
20 manufacturing. He wanted to know if I had
21 any clamp-ons. I had went back to him, I
22 said it would take about seven to ten days
23 to build subs. And as far as other
24 centralizers, I didn't -- I wouldn't

25 recommend any type of latch-on type
00204:01 centralizer. I would recommend the single
02 bow slip-on type.
03 Q. Okay. Was March 31st -- the
04 date of this e-mail is March 31st, 2010.
05 Was this the first time
06 that BP had contacted you regarding
07 acquiring centralizer equipment for its
08 seven-inch production casing interval?
09 A. Yes.
10 Q. Okay. And how many centralizers
11 did -- did Mr. Morel originally request
12 from you for its production casing
13 interval?
14 A. Well, according to the e-mail,
15 it was seven to ten of them. According to
16 what the e-mail says.
17 Q. Okay. And can you explain
18 for -- to me did -- based on his request,
19 did you recommend a certain type
20 centralizer be used on the seven-inch
21 equipment for the seven-inch -- case.
22 Sorry, for the seven-inch production casing
23 interval?
24 A. Yes. At this point, we were --
25 he was wanting to get -- maybe get some
00205:01 subs built, so I told him it was going take
02 seven to ten days. And I did recommend the
03 single bow slip-on CT centralizers, the max
04 of the 7-3/4.
05 Q. Okay. So I'm not an engineer
06 and I don't know a lot about centralizers,
07 but if you could, help me understand what
08 the difference is between a sub and a slip
09 on. You -- it -- Mr. Morel was
10 indicating -- or there's an indication from
11 this e-mail that he's going to acquire six
12 subs?
13 A. Right. He was going to get six
14 subs, which is a centralizer that's -- it's
15 a little pup joint, the centralizer. It's
16 on a -- on the sub itself, and that sub is
17 actually bucked on to the casing.

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00207:13 Q. Okay. We know that the -- that
14 Macondo well -- there was installation of
15 the six subs on -- on the seven-inch
16 production casing interval; is that -- is
17 that correct?
18 A. Correct.
19 Q. Okay. And from your e-mail on
20 March 31st, there's an indication that you
21 were recommending a slip-on centralizer?

22 A. Correct.

23 Q. Why were you recommending a

24 slip-on centralizer?

25 A. Because a centralizer sub takes

00208:01 quite a while to be able to manufacture.

02 You know, the standard delivery time on

03 this was -- is six to eight weeks. If we

04 rush it, maybe four to five weeks. And

05 with an actual rush, rush, rush, it would

06 be seven to ten days. And that's -- that's

07 if everything worked. If we get the

08 material, if we have the material, if we

09 can get it threaded and all that. So it

10 would have to be -- it's a whole lot bigger

11 issue to build a centralizer sub than it is

12 to build a slip-on centralizer.

13 Q. So my understanding from what

14 you're testifying about today is that you

15 were recommending the slip-on centralizer

16 because you -- because there was a need for

17 more than the six subs that BP had

18 requested?

19 MR. LEMOINE:

20 Objection to the form.

21 Q. Why were you recommending --

22 well, why did you recommend slip-ons when

23 you already had six subs available to BP?

24 A. Because he was asking for more.

25 Q. Right. From this e-mail, it

00209:01 indicates Mr. Morel wanted seven to ten

02 centralizers?

03 A. Correct.

04 Q. And Mr. Morel didn't indicate in

05 this e-mail, did he, that -- whether they

06 were -- whether he wanted subs or slip-ons;

07 is that correct?

08 A. Right.

09 Q. Okay. So were you recommending,

10 in fact, that -- that BP use both subs and

11 slip-on centralizers on its production

12 casing interval?

13 A. Yes. If they -- if they choose

14 to, yes.

15 Q. Okay. Great. I'd like to mark

16 tab 9 as 2576.

17 (Exhibit Number 2576 marked.)

18 Q. Do you know which Weatherford

19 equipment was -- was used on the production

20 casing interval, which seven-inch equipment

21 was actually used on the BP production

22 casing interval?

23 A. Yes.

24 Q. What -- and what equipment was

25 that?

00210:01 A. The -- the reamer shoe, the

02 M45AP float collar and the 541 subs.
03 Q. And how many subs were used?
04 A. I'm not sure.
05 Q. Okay. Do you know if any
06 slip-on centralizers that you recommended
07 in this March 31st e-mail were used?
08 A. No, they were not.
09 Q. Great.

Page 210:19 to 212:15

00210:19 Q. Okay. So you -- you indicated
20 that you only had six subs available when
21 Brian Morel contacted you on March 31st; is
22 that right?
23 A. Correct.
24 Q. Okay. Does Weatherford maintain
25 any type of inventory of sub centralizers
00211:01 for its customers?
02 A. No.
03 Q. And why is that?
04 A. Like I explained earlier, that
05 these subs are -- are special made.
06 Depending on what the thread, grade, and
07 weight of casing it's going to be run on.
08 And they're usually made specifically for
09 that particular well.
10 Q. Okay. And Weatherford did not
11 have any -- any subs available when
12 Mr. Morel called to provide to BP for the
13 Macondo well on March 31st?
14 A. To the best of my knowledge, no.
15 Q. Okay. And you also indicated a
16 few moments ago that -- that, in certain
17 circumstances, you can -- you can have a
18 rush or expedited order; is that right?
19 A. Yes.
20 Q. Okay. And you said that -- and
21 when the stars align, that there's --
22 sometimes you can get these subs
23 manufactured within seven to ten working
24 days; is that correct?
25 A. Right.
00212:01 Q. Okay. Did BP request that subs
02 be manufactured in an expedited manner for
03 the Macondo production casing interval?
04 A. No.
05 Q. Okay. Did you ever offer to
06 Mr. Morel when he contacted you that --
07 that that -- the equipment could be
08 manufactured if he needed it?
09 A. Just what I said in the
10 document, in the e-mail.
11 Q. That -- this March 31st e-mail
12 is the only conversation that -- that you

13 had with Mr. Morel regarding sub
14 centralizers?
15 A. Yes.

Page 213:02 to 213:22

00213:02 It's an e-mail from Donnie
03 Owen to you on April 14th --
04 A. Uh-huh.
05 Q. -- of 2010?
06 And it's attaching the item
07 detail sheet for seven centralizers. And
08 it says sibs, but I'm assuming that's a
09 typo and it should say sub, right?
10 A. Yes. I'm assuming so, yes.
11 Q. Okay. And attached at 12A in
12 your binder is the -- the item detail sheet
13 for the seven centralizers -- seven-inch
14 centralizer sub; is that correct?
15 A. Yes.
16 Q. Okay. And this information,
17 according to this e-mail, was provided to
18 Mr. Morel on -- on April 14th via e-mail,
19 was it not?
20 A. Correct.
21 Q. Okay. I'd like to mark this
22 document as the next exhibit, 2577.

Page 214:05 to 227:21

00214:05 (Exhibit Number 2577 marked.)
06 Q. On the second page -- this is an
07 e-mail string. On the second page, which
08 is BP-HZN-MBI00126906, there's an e-mail to
09 you cc'ing Brian Cotton.
10 Can you take a look at that
11 e-mail?
12 A. Yes.
13 Q. Okay. And beneath it there's --
14 there's another e-mail from you to
15 Mr. Morel on April the 12th.
16 Do you recognize this chain
17 of e-mails?
18 A. Yes.
19 Q. Okay. Can you explain to me
20 what -- what this e-mail is about?
21 A. Okay. The -- the first e-mail
22 is, I'm asking Brian if he's going to need
23 a service hand on the job to run the -- the
24 9-5/8 by 7-inch plugs.
25 Q. And what did Mr. Morel tell you
00215:01 in response in the e-mail that starts -- it
02 starts on the previous page, I apologize --
03 from Mr. Morel on April 12th, 2010, at

04 4:58.
05 What did Mr. Morel respond
06 to you in the e-mail?
07 A. He indicated that the -- the
08 WSLs don't feel like it would be
09 beneficial, and the plugs are already
10 stabbed as well as the darts. And the
11 Blackhawk hand will release the -- the
12 darts as procedure.
13 Q. Okay. Did -- so this was a
14 recommendation to have a service hand on
15 the rig for installation or -- or the
16 running of the plugs into the well?
17 A. Correct.
18 Q. Okay. Did you indicate -- or
19 did you contact Mr. Morel to have a service
20 hand on the rig to -- to assist with any
21 other procedure that would -- that was
22 using the Weatherford equipment?
23 A. No, I'm not -- no, I didn't.
24 Q. Okay. I believe you testified
25 earlier that -- that -- do you know whether
00216:01 or not a Weatherford -- Weatherford hand
02 was on the rig during the -- the
03 float-collar conversion?
04 A. Can you try that again?
05 Q. Do you know whether or not
06 anyone -- anyone from Weatherford was on
07 the rig during the attempts to convert the
08 float collar?
09 A. There was some Tubular Running
10 Services hands from Weatherford on the rig.
11 Q. Okay. Were they assisting with
12 the float-collar conversion?
13 A. No, they were not.
14 Q. What were their responsibilities
15 on the rig?
16 A. They were responsible for the
17 tubular running makeup of the -- of the
18 casing.
19 Q. Okay. So there weren't any
20 Weatherford hands --
21 A. There was not a cementation hand
22 on the location.
23 MR. LEMOINE:
24 Let her finish asking the
25 question, okay?
00217:01 Q. Okay. I'm going to mark this as
02 the next exhibit, which is 2578.
03 (Exhibit Number 2578 marked.)
04 Q. Mr. Clawson, are you aware of
05 any -- or have you seen any of the modeling
06 work that Halliburton performed on the --
07 on the DEEPWATER HORIZON for the -- for the
08 Macondo well?

09 A. No.

10 Q. Okay. Is that something that --
11 that Weatherford typically reviews when
12 it's providing or assisting BP with
13 acquiring equipment for its production
14 casing interval?

15 A. No.

16 Q. Okay. I'd like you to turn to
17 tab 13.

18 Earlier today you testified
19 that you -- you were contacted by Brett
20 Cocalles on April 15th. Do you recall
21 telling me that a few moments ago?

22 A. Yes.

23 Q. Okay. Can you explain for
24 the -- the Judge and jury in the case, the
25 conversation that you had with Mr. Cocalles
00218:01 on April 15th?

02 A. He had called me up and was
03 looking for some -- see what Weatherford
04 had available on some seven-inch
05 centralizers to run on the seven-inch
06 casing for the Macondo.

07 Q. Okay. And the e-mail that's at
08 tab 13, was this an e-mail that was
09 generated following your conversation with
10 Mr. Cocalles?

11 A. Yes, it was.

12 Q. And you tell Cocalles on
13 April 15th at -- April 15th, 2010, at 3:42
14 that you had 31 types of centralizers with
15 new design stop collars with a quarter-inch
16 by four-inch with thread loc ports. And
17 you also tell him that you have another
18 type of centralizer with the three and
19 sixteenth stop -- three and sixteenth-inch
20 stop collar. Is that accurate?

21 A. Yes.

22 Q. Okay. And Mr. Cocalles follows
23 up in an e-mail to you at 5:23 that same
24 day.

25 These are the ones with
00219:01 stop collars that Thunder Horse had tested
02 up to 105,000 pounds, holding force.

03 Correct?

04 A. Yes.

05 Q. Okay. My question to you is:
06 After you advised Mr. Cocalles what type of
07 centralizers you had available, did he
08 express any concern to you about the -- the
09 two types that you had -- you had
10 recommended in this e-mail?

11 A. No. Again, we were just trying
12 to -- it was to see what was available in
13 Weatherford stock to be able to supply him

14 with centralizers.
15 Q. Did Mr. Cocalles mention anything
16 about the problems -- or problems with
17 centralizers that were on the Atlantis rig
18 during this conversation that he had with
19 you on April 15th?
20 A. In the conversation, I had
21 mentioned that this was a particular
22 centralizer that we had run on Thunder
23 Horse.
24 Q. Okay.
25 A. And we had an issue on Thunder
00220:01 Horse, and then we did some additional
02 testing. And that's why the new stop
03 collar design.
04 Q. Okay. What issue did you have
05 on Thunder Horse? And -- and I'd -- and
06 when I say issue, what issue with the
07 centralizers did you have on the Thunder
08 Horse well?
09 A. One of the previous Thunder
10 Horse well with the -- the stop collar, the
11 centralizer's stacked up, they slipped, you
12 know, in a couple of locations on the pipe
13 itself.
14 Q. Okay. In this e-mail on
15 April 15th, you indicate there are two --
16 two different type of centralizers.
17 Which one are we talking
18 about that was on the Thunder Horse that
19 you -- you experienced issues with?
20 A. The Thunder Horse would have
21 been the one with the three-sixteenth stop
22 collar.
23 Q. Okay. And you advised -- and
24 you and Mr. Cocalles discussed this during
25 your conversation on April 15th?
00221:01 A. Yes. The best I can recall.
02 That's why we went with the new type,
03 quarter-inch stop collar.
04 Q. So you -- you -- who decided to
05 go with the quarter-inch type, was it you
06 or BP?
07 A. BP did.
08 Q. Okay. Based on your
09 conversation with Mr. Cocalles on
10 April 15th?
11 A. Right.
12 Q. And what did you tell
13 Mr. Cocalles, if anything, about this new
14 type of centralizer?
15 A. I told him -- I explained to him
16 that we had an issue with the Thunder
17 Horse. We had redesigned this particular
18 stop collar. It's up a little bit better

19 to be able to have more holding force. And
20 I believe I recall I had -- we had --
21 Thunder Horse had run a well since then,
22 and the centralizers worked fine on that
23 particular well. And that this -- this was
24 the stop collar from their application.
25 Q. Okay. I want to back up a
00222:01 little bit so you can tell me a little bit
02 more about Thunder Horse.
03 You said that the
04 centralizers were -- were slipping up
05 and -- or stacking up. Can you explain
06 that a little bit better? Because I -- I
07 don't know if it's clear as to what the --
08 the issue was with -- with the centralizer.
09 A. The centralizer on the -- on the
10 Thunder Horse is where the -- these were
11 installed in the middle of each joint. We
12 got 40-foot joints. The pipe is the flush
13 connection. So what happened was the
14 centralizer got put in a -- in a tighter
15 hole situation. And the -- the tighter
16 hole, I guess, overcame the stopping force
17 and some of them slipped up.
18 The best I can recall,
19 there was, like, three different places to
20 where there was, like, five centralizers
21 bunched up together when they were supposed
22 to be on separate joints. Again, it didn't
23 hinder getting down to -- to TD, you know,
24 total depth with the pipe.
25 Q. On the Thunder Horse?
00223:01 A. On the THUNDER HORSE.
02 But once they did a cement
03 bond log, they had -- and they showed --
04 they showed us that there was a couple of
05 spots on their log where they knew that the
06 centralizers had slipped.
07 Q. What's the effect of a
08 centralizer slipping in a well? What are
09 the possible problems that you -- one can
10 experience with the centralizer that's
11 slipped into a well?
12 A. If the centralizers that get too
13 bunched up, they could get damaged.
14 Q. Can that affect your cementing
15 job?
16 MR. RUSSO:
17 Object to form.
18 A. Possibly.
19 Q. Because the centralizers aren't
20 where they're supposed to be if they're
21 slipping. That's my understanding of what
22 you're telling me. Is that accurate?
23 A. Yes.

24 Q. Okay. Are there any other
25 problems that -- that an operator can
00224:01 experience when centralizers are slipping
02 inside the well?
03 A. I mean, again, if they get
04 bunched up too bad, I mean, they can --
05 they can stick pipe.
06 Q. Did that happen on the Thunder
07 Horse?
08 A. No.
09 Q. Okay. And is that your
10 understanding of what Mr. Clawson's -- I'm
11 sorry. You are Mr. Clawson -- what
12 Mr. Cocales's concerns were when he was
13 discussing what type of centralizer to
14 acquire on April 15th?
15 A. I don't know that. I don't know
16 if -- I don't know if Brett knew the whole
17 story went behind the Thunder Horse
18 situation was. I don't know that.
19 Q. What about the Atlantis -- the
20 Atlantis well? What -- were there any
21 problems with -- did Weatherford provide
22 the centralizers on the Atlantis well?
23 A. Yes, we did.
24 Q. Okay. Were there any problems
25 with the centralizers that were used on the
00225:01 Atlantis well?
02 A. Yes, there was.
03 Q. Okay. Can you explain to the
04 Judge and the jury what problems you had
05 with the centralizer -- I'm sorry. Let
06 me -- let's back up.
07 BP -- BP was the operator
08 on the -- for the Atlantis well, were they?
09 A. Correct, yes.
10 Q. Okay. And there were problems
11 with centralizers that were used on the
12 Atlantis well that Weatherford provided; is
13 that correct?
14 A. On one of the wells, yes, there
15 was.
16 Q. Okay. And can you explain for
17 the record what those problems were?
18 A. These were -- this was a 9-7/8
19 casing. The type of centralizer was a
20 tandem-rise centralizer. It was slip-on.
21 The -- the bows are welded on to the bands.
22 There is a stop collar that's in the middle
23 of it that -- installed. As they slip on
24 the pipe the set crews are tightened,
25 tightened down and into the middle of the
00226:01 joint again.
02 So this -- with this
03 particular situation, there was 9-7/8 goal

04 was going into a 12-1/4 hole. We had ran a
 05 centralizer many a time for the Atlantis
 06 with no issues. On this particular job, it
 07 was -- I believe it was DC 314 well, that
 08 when they ran the -- they couldn't get pipe
 09 down. They -- their pipe was getting
 10 stuck, and they couldn't continue to run
 11 pipe. So the decision -- BP made a
 12 decision to pull the pipe. And -- but
 13 before that they were really trying to ram
 14 the pipe in the hole. And what that did,
 15 it just put that centralizer in its -- in
 16 the wrong kind of condition as far as --
 17 now we're not going into a 12-1/4 hole like
 18 the centralizer is designed for. And when
 19 they pulled it, it -- some of the
 20 centralizers got damaged and the bows
 21 ripped off and the stop collars were all --
 22 were messed up and -- I think it was like
 23 six of them that were damaged.

24 Q. Okay. So if I'm -- if I
 25 misstate what you're telling me, you just
 00227:01 let me know. But it's my understanding,
 02 based on what you just testified to, that
 03 the way that BP was, in fact, running
 04 its -- its -- the casing down, the way that
 05 it was operating to -- may have damaged
 06 the -- the centralizers that were on the
 07 Atlantis well. Is that what you're saying?

08 MR. CHEN:

09 Objection, form.

10 A. Yes. Well, it just -- there was
 11 hole -- it wasn't BP's -- they didn't know
 12 the hole was not a 12-1/4 anymore.

13 Q. Okay. So was there anything
 14 wrong with the centralizers, or was it
 15 because the way BP was running the casing
 16 or running the job at the time?

17 MR. CHEN:

18 Objection, form.

19 A. As far as anything wrong with
 20 the centralizer at that point, to the best
 21 of my knowledge, there wasn't.

Page 228:22 to 231:24

00228:22 Q. Mr. Clawson, I'd like you to
 23 take a look at this e-mail. You're --
 24 you're not on this -- this e-mail chain,
 25 but I'm particularly interested in you
 00229:01 reviewing the third e-mail from the top of
 02 the page from -- from Mr. Guide, John Guide
 03 to Greg Walz on April 16th, 2010, at 12:48.

04 Can you read that e-mail?

05 A. The one from John Guide to Greg

06 Walz?

07 Q. That's correct.

08 A. I just found out the stop

09 collars are not part of the centralizers as

10 you stated. Also, it will take ten hours

11 to install them. We are adding 45 pieces

12 that can come off as a last-minute

13 addition. I do not like this. And as

14 David approved in my absence, I did not

15 question, but now I am very concerned about

16 using them.

17 Q. Did anyone from BP contact you

18 after you had your conversation with

19 Mr. Cocales about concerns that they had

20 regarding these particular centralizers

21 that had been ordered for the Macondo

22 production casing interval?

23 A. No.

24 Q. Okay. And is Mr. Guide accurate

25 in this e-mail to say it would take ten

00230:01 hours to install them? And by them I

02 assume he's referring to the 15

03 centralizers that BP had acquired from --

04 from Weatherford on April 15th?

05 A. Yes.

06 Q. So it would take ten hours to

07 install them?

08 A. It could. It could take ten

09 hours. It could take less.

10 Q. Okay. Why would it take less

11 time than ten hours?

12 A. Well, if you have one person

13 just installing them by himself, if they

14 had help. There could have been things

15 that they could have...

16 Q. Okay. Mr. Guide also says, We

17 are adding 45 pieces that can come off as

18 a -- as a last-minute addition.

19 Do you -- do you have any

20 appreciation or understanding as to what

21 Mr. Guide might be referring to about the

22 45 pieces that can come off?

23 A. I guess he's --

24 MR. RUSSO:

25 She's asking you if you

00231:01 know.

02 A. I do not. I'm not sure what

03 he's talking about.

04 Q. Okay. What would the 45 pieces

05 be? Could that -- could he be referring

06 to -- I mean, I know you may not have

07 personal knowledge, but we're talking about

08 the centralizers here.

09 Were there 45 pieces sent

10 with the -- the 15 -- the 15 centralizers

11 that were acquired by BP on April 15?
 12 A. No. There was only -- the 15
 13 centralizers with the -- and the stop
 14 collar were separate.
 15 Q. How stop collar -- pieces of
 16 stop collars and equipment were sent in
 17 addition to the -- the 15 centralizers?
 18 A. There was -- there was 15
 19 centralizers and 15 stop collars.
 20 Q. Okay. So we don't know what
 21 these 45 pieces are that Mr. Guide's
 22 referring to?
 23 A. I'm not sure what he's referring
 24 to there.

Page 232:03 to 233:05

00232:03 (Exhibit Number 2579 marked.)
 04 Q. Can you turn to tab 15A in your
 05 binder? Again, this is an e-mail. It's
 06 not directed to you, but it's from
 07 Mr. Morel to quite a number of folks on
 08 April 15th at four -- 4:00.
 09 Can you read this e-mail?
 10 A. We have six centralizers. We
 11 can run them in a row, spread out, or any
 12 combination of -- of the two. It's a
 13 vertical hole, so hopefully the pipe stays
 14 centralized due to gravity. As far as
 15 changes, it's too late to get any more
 16 product to the rig. Our only option is to
 17 rearrange placement of these centralizers.
 18 Q. Is Mr. Morel -- is it -- what
 19 Mr. Morel says in this e-mail accurate,
 20 that it was too late to get any more
 21 product to the rig; do you know?
 22 A. I'm not sure what type -- what
 23 he's referring to there.
 24 Q. But it would, in fact, be
 25 inaccurate because you were contacted on
 00233:01 April 15, were you not, by Mr. Cocalles of
 02 BP who asked for 15 additional centralizers
 03 that -- that Weatherford subsequently sent
 04 to the rig; is -- is that correct?
 05 A. Yes.

Page 233:11 to 233:11

00233:11 (Exhibit Number 2580 marked.)

Page 233:14 to 234:14

00233:14 Q. And it's my understanding based

15 on your testimony today that -- that BP
 16 ultimately decided -- based on what you
 17 know, that they ultimately decided not to
 18 use the 15 additional centralizers that
 19 were shipped -- or were ordered on
 20 April 15; is that correct?
 21 A. Correct.
 22 Q. It's also my understanding,
 23 based on your testimony today, that
 24 Mr. Ofather -- Daniel Ofather was sent out
 25 to the DEEPWATER HORIZON rig to install
 00234:01 those 15 centralizers and was told that the
 02 job was canceled and was sent back -- back
 03 onshore; is that correct?
 04 A. Correct.
 05 Q. Okay. Do you know if Mr. -- did
 06 Mr. Ofather have any conversations with you
 07 about the cancellation of the -- the
 08 installation of the 15 centralizers?
 09 A. No, he did not.
 10 Q. Do you know if Mr. Ofather
 11 contacted anyone at Weatherford to express
 12 any concern about the cancellation of the
 13 installation of the 15 centralizers?
 14 A. No, I do not.

Page 234:22 to 238:18

00234:22 Earlier today you were
 23 shown a -- a copy of the same document, but
 24 it was in black and white. So I have a
 25 colored copy in front of you. That
 00235:01 document was marked as Exhibit 2562.
 02 Because it was very difficult to see some
 03 of the equipment, I'm going to -- to mark
 04 this separately.
 05 This -- I believe you had
 06 identified this as a -- as a tech sheet for
 07 the flow activated mid-bore auto-fill float
 08 collar model M45AP; is that correct?
 09 A. Yes.
 10 Q. Okay. And this document looks
 11 like it's dated January 25th, 2011; is that
 12 correct?
 13 A. Yes.
 14 Q. Do you know if this -- this tech
 15 sheet was updated as a result of the
 16 Macondo incident?
 17 A. I don't personally know if it
 18 was -- that's why it was done that way.
 19 Q. Have you seen previous versions
 20 of this tech sheet?
 21 A. The M45AP?
 22 Q. Yes.
 23 A. No.

24 Q. You haven't? Okay.
25 Are you familiar with this
00236:01 document?
02 A. Yes.
03 Q. Okay. I'd like to ask you quite
04 a few questions about it.
05 The first question I have
06 for you is regarding the very first
07 sentence, which states, that the -- I'm
08 going to call -- call it the mid-bore
09 auto-fill float collar if counsel's okay
10 with that -- contains a surge reducing and
11 debris tolerant PDC drillable valve that
12 allows low circulating rates without
13 conversion.
14 What does debris tolerant
15 mean in that statement?
16 A. I'm not -- I didn't write the
17 document so I'm not really sure what
18 they're -- what they were referring to as
19 far as what debris tolerant actually means.
20 Q. Who -- who authored this
21 document? Who puts this together?
22 A. The Weatherford engineering
23 department. I'm not sure who the author
24 is.
25 Q. Okay. So you don't understand
00237:01 what their reference to debris tolerant
02 means with respect to this particular float
03 collar?
04 A. Well, as far as debris tolerant,
05 it's -- it's going to accept a fluid up --
06 up the middle in auto fill. It's my
07 understanding of what debris tolerant
08 means, but why it was put in the
09 document --
10 Q. I don't know if I need to
11 understand why it was put in the document.
12 I'd like to know why this particular model
13 is considered to be debris tolerant and
14 what kind of debris are we talking about
15 and how tolerant is it. That's -- that's
16 more of what my question is, what -- what
17 does debris tolerant mean with respect to
18 this particular piece of equipment?
19 A. Well, it's -- it's auto-fill
20 equipment. So it's -- it's the largest
21 valve that we can put into this type of
22 equipment to accept the largest particles
23 of debris. And --
24 Q. So -- so let -- just so I can
25 make sure I understand what you're saying.
00238:01 Is that this -- this piece of equipment
02 will accept some sort of debris while it's
03 running and still function properly; is

04 that correct?
 05 A. Right. Right. In -- in the
 06 auto fill and pumping through them both,
 07 correct.
 08 Q. And do you have any information
 09 on -- on how -- what type of debris or how
 10 much debris would be too much to have this
 11 equipment operate successfully?
 12 A. No.
 13 Q. Okay. Would there be some sort
 14 of technical document or indication as to
 15 what this equipment can and cannot accept
 16 with respect to what -- with debris?
 17 A. If there is, I'm not aware of
 18 it.

Page 238:22 to 246:23

00238:22 This -- this document
 23 offers some -- some performance
 24 specifications in it. It's -- that's
 25 listed at the bottom of -- of the page. It
 00239:01 gives the back pressure rating and a
 02 pump -- slow down. Plug bump pressure,
 03 temperature ratings, maximum flow rate,
 04 conversion.
 05 Is it your understanding
 06 that this information provided on this
 07 document is accurate?
 08 A. Yes.
 09 Q. Okay. Do you know whether or
 10 not this tech sheet or a previous version
 11 of this tech sheet for auto-fill float
 12 collar model M45AP was provided to BP?
 13 A. This -- this particular tech
 14 sheet?
 15 Q. Well, this one or a previous --
 16 previous iteration of it, a previous
 17 version of it.
 18 Would -- would Weatherford
 19 provide BP with technical literature
 20 regarding the equipment that BP was
 21 considering using on -- on a well?
 22 A. Yes, we -- we do that.
 23 Q. Okay. Do you know if BP, in
 24 fact, had a -- the tech sheet for this
 25 particular piece of equipment?
 00240:01 A. No, I do not know that for fact.
 02 Q. Okay. All right. Do you know
 03 who -- who made the decision to use this
 04 particular float collar on the Macondo
 05 well?
 06 A. BP.
 07 Q. Okay. If you turn to page 5 of
 08 8 in this document. There's a section

09 entitled Make-Up on Casing String. And the
10 first statement says, The flow-activated
11 mid-bore auto-fill float collar should be
12 run with the Weatherford MudMaster filter
13 shoe. A guide shoe that has a minimum
14 3-1/2-inch bore inside diameter may also be
15 run, but at an increased risk of debris
16 settling above the float collar, possibly
17 resulting in plugging or early conversion
18 of the float collar.

19 Did I read that correctly?

20 A. Uh-huh.

21 Q. Okay. Do you know why a
22 MudMaster filter shoe was not run on the
23 Macondo well?

24 A. No, I do not.

25 Q. Okay. Was that -- was the
00241:01 MudMaster filter shoe recommended or
02 discussed with -- did you discuss the
03 MudMaster filter shoe with BP or -- first
04 question.

05 Did you discuss that filter
06 shoe with BP?

07 A. For this well?

08 Q. Yes.

09 A. No, I did not.

10 Q. Okay. Did BP ask you any
11 questions about a MudMaster filter shoe for
12 use on the production casing interval?

13 A. No.

14 Q. Okay. Were there any
15 discussions about using a guide shoe on the
16 production casing interval?

17 A. Yes.

18 Q. Okay. I'd like to -- earlier
19 today we talked -- you talked briefly about
20 a guide shoe and then a cookie-cutter shoe,
21 and then we have a reamer shoe. And I'm
22 trying to understand how that -- how that
23 whole iteration occurred.

24 Was the guide shoe
25 originally recommended for use on the
00242:01 production casing interval by -- by
02 Weatherford?

03 A. No.

04 Q. What was the first shoe
05 equipment, I guess, that was recommended
06 for Weatherford on the production casing
07 interval to BP?

08 MR. LEMOINE:

09 Objection to form.

10 A. Again, BP had contact
11 Weatherford to see what was available in
12 seven-inch Hydril 513 equipment, and
13 Weatherford informed BP that we have the --

14 the reamer shoe, the guide shoe, and the
15 six subs and the float collars. That was
16 the Nexen customer-owned inventory.
17 Q. And just so we can try to clear
18 up the objection.
19 Did you make a
20 recommendation as to -- to which piece of
21 equipment they should or shouldn't use?
22 A. Oh, no.
23 Q. Who made the decision to -- to
24 use the reamer shoe on this particular
25 production casing interval?
00243:01 A. Brian Morel did.
02 Q. Okay. If you turn to tab 19 in
03 your binder. I think this might help us a
04 little with this line of questioning. Turn
05 four pages. And this is in -- three pages
06 in so we can get the beginning of the
07 e-mail. The document's identified as WFT
08 017517 at the very bottom of the page.
09 Are you there? Okay.
10 We'll just start at the bottom.
11 This is an e-mail from
12 Brian Morel to you on March 31st, 2010. If
13 you turn the page.
14 Can you read that -- that
15 entry, from Mr. Morel to you on March 31st?
16 A. Where is the 2.165 coming from?
17 Appears minimum ID is 1-7/8 from the
18 drawings.
19 Q. Continue.
20 A. We won't need the guide shoe.
21 Instead we will run the reamer shoe we
22 purchased from Nexen as a primary and use
23 the cookie cutter as a backup.
24 Q. Okay. So this is an e-mail from
25 Mr. Morel indicating to you which equipment
00244:01 BP has decided to use on the production
02 casing interval, correct?
03 MR. CHEN:
04 Objection, form.
05 A. Correct.
06 Q. And underneath that e-mail it
07 looks like you -- you had an exchange with
08 Mr. Morel at 9:23. You indicate new
09 subject.
10 I can have one each
11 seven-inch M222W guide shoe down jet with
12 composite eccentric nose H513 HC125 32ppf
13 complete by 4/9/2010 if ordered today.
14 So what I'm trying to
15 understand, what I'm asking you about the
16 reamer shoe and the guide shoe, based on
17 your e-mail on March 31, 2010, you
18 indicated to Mr. Morel that you had a guide

19 shoe available as part of the seven-inch
20 equipment, did you not?
21 A. No. This e-mail -- I didn't --
22 I didn't have a guide shoe available.
23 Q. Okay. Well, you're saying you
24 could have one, a guide shoe and --
25 A. Correct.
00245:01 Q. -- you indicate the model. You
02 could have it available for him on
03 April 9th if he ordered it on that you day,
04 March 31st?
05 A. Right. He had -- he had called
06 me one day, and we were discussing whether
07 he -- because the -- the guide shoe that
08 they had was a cookie-cutter guide shoe.
09 Q. What's a cookie-cutter guide
10 shoe?
11 A. The guide shoe that -- this
12 MC222W has a composite eccentric nose to
13 where it has a nose on the end of the pipe.
14 The cookie cutter has -- we had removed the
15 nose completely. And now it's just an open
16 ended piece of pipe. And --
17 Q. What's -- what's a cookie-cutter
18 shoe's function?
19 A. A cookie-cutter shoe's function
20 is, is usually what we use when we're
21 running casing we have to go through tar.
22 Q. Tar?
23 A. Correct.
24 Q. Okay.
25 A. It's -- that's what that -- that
00246:01 particular shoe is designed for, so -- and
02 I'm assuming, again, my -- that was coming
03 from Nexen's inventory.
04 Q. Okay. So in response to your
05 offering to Mr. Morel that there's a guide
06 shoe available if -- if he ordered it by --
07 on March 31st it would be available for
08 April 9th. Mr. Morel advised you that he
09 wouldn't need the guide shoe and that he
10 would run the reamer shoe they purchased
11 from Nexen as the primary and use the
12 cookie-cutter shoe as a backup?
13 A. Correct.
14 Q. And that's the end of -- of the
15 story on what equipment was -- was
16 purchased -- what equipment was used by BP
17 on -- on this production casing interval?
18 A. Uh-huh. Yes.
19 Q. You didn't have any additional
20 discussions with Mr. Morel about which --
21 which shoe would be used at the bottom of
22 the interval, did you?
23 A. No. No, I did not.

Page 247:03 to 247:06

00247:03 And before -- before I
04 forget I want to mark 19 as the next
05 exhibit. 19 will be 2581.
06 (Exhibit Number 2581 marked.)

Page 247:18 to 247:25

00247:18 So my question is: Is
19 there any increased risk using a reamer
20 shoe of debris settling above the float
21 collar possibly resulting in plugging or
22 early conversion of the float collar, if
23 you know?
24 A. I -- I don't know. I mean
25 that's -- that would be hard to say.

Page 248:11 to 250:22

00248:11 If you turn to page 6 of 8
12 in this document. I want to talk to you
13 about the section entitled Activation of
14 the Check Valves.
15 Are you familiar with
16 that --
17 A. Yes.
18 Q. -- that section of the report?
19 Okay. I believe earlier
20 you testified that the -- in order for
21 the -- the float equipment that was used on
22 the production casing interval to convert
23 on the Macondo well, that you had to have a
24 pressure of 500 to 700 psi --
25 A. Yes.
00249:01 Q. -- is that right?
02 And that would be achieved
03 through what -- what flow rate?
04 A. This particular collar would
05 take five to eight barrels per minute.
06 Q. Okay. And do you know whether
07 or not the -- a flow rate of five to eight
08 barrels per minute was ever achieved on the
09 production casing interval when they were
10 trying to convert the float equipment?
11 A. I do not know that.
12 Q. Okay. Have you read anything
13 after the incident which would indicate
14 that it was not?
15 A. Yes.
16 Q. Okay. What was that that you --
17 that you reviewed or read that indicated
18 that five to eight barrels per minute flow

19 rate was not achieved on the Macondo well?
20 A. I -- I reviewed the drilling
21 report.
22 Q. Okay. And what did the drilling
23 report indicate to you?
24 A. That the maximum pump rate was
25 four barrels per minute.
00250:01 Q. It was four barrels per minute?
02 A. Yes.
03 Q. Okay. And again, just so the
04 record's clear and -- and I have a better
05 understanding of this.
06 Converting the float
07 equipment isn't just pressure dependent,
08 right, it's dependent on -- on flow rate,
09 which would cause an increase in
10 differential pressure; is that accurate?
11 A. Yes.
12 MR. CHEN:
13 Objection, form.
14 Q. So you can't just pressure up
15 and expect the float collar to convert?
16 MR. CHEN:
17 Objection, form.
18 A. I'm -- I'm not sure about that.
19 I don't -- I'm not an expert in float
20 collar. There's different ways that you
21 can convert it. To me, pressure could
22 convert it.

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00251:01 problem.
02 Okay. If Weatherford, you,
03 had been contacted by -- and this is -- if
04 you had been contacted. Assume with me
05 hypothetically, if you had been contacted
06 by BP and were advised that they weren't
07 going to establish a flow rate of five to
08 eight barrels per minute and they -- they
09 told you we're only going to get to four
10 barrels per minute on -- on this production
11 casing interval, would you have recommended
12 a different type of float -- float
13 equipment for use on the production casing
14 interval?
15 MR. CHEN:
16 Objection, form.
17 MR. RUSSO:
18 Object to form.
19 A. That would be -- that would be
20 hard to say. I didn't know the -- I didn't
21 know all the well's specification, you
22 know, the depths and everything, at that
23 time, the seven-inch was going to be run.

24 I didn't know all that information, so it
25 would have been hard for me to -- to be
00252:01 able to recommend anything like that at
02 that point in time.
03 Q. But if you -- if you know, if an
04 operator contacts you and -- and advises
05 you that the equipment that it's -- that
06 it's purchased -- or it's considering
07 running isn't going to meet the
08 specifications necessary for -- for
09 converting. And in this case, we know that
10 BP did not -- did not establish a flow rate
11 above four barrels per minute.

12 Is there any other
13 Weatherford equipment that BP could have
14 used or acquired so that they could have
15 converted the float equipment at that -- at
16 a four barrels per minute flow rate?

17 MR. CHEN:

18 Objection, form.

19 A. Yes. Yes, there is.

20 Q. And what equipment was -- was
21 that -- or is that?

22 A. I mean it's -- it's a different
23 model -- I mean it's the same model but
24 different pump rates.

25 Q. Okay. Can you explain to me
00253:01 what -- what -- it's -- all right. Let's
02 back up.

03 It's the same model,
04 different pump rates. And this -- this
05 document that we have in front of us here,
06 which is at tab 17, there are various
07 tables, and there's an indication -- if you
08 turn to page 4 of 8.

09 Second sentence, it says,
10 Conversion pressure and flow rate. The
11 float collar -- and we're talking about the
12 M45AP -- can be ordered with an optional
13 conversion pressure of 300 to 400 psi.

14 Is that what you're
15 referring to?

16 A. No. It's the -- the flow rate.

17 Q. Okay. Well, explain to me if
18 it's the same piece of equipment but it
19 can -- it can be used at a different flow
20 rate, how does that work?

21 A. Well, again, I don't know all
22 the ramification of how BP was going to be
23 running this particular collar, so I'm not
24 sure what -- again, what -- what you're
25 asking.

00254:01 Q. Well, if -- if you knew or if
02 they had -- if BP had contacted you, or
03 someone at Weatherford, and said we are not

04 going to be able to get our flow rate up to
05 five to eight barrels per minute on this
06 production casing interval, is there
07 another piece of equipment that Weatherford
08 could provide that will convert at a lower
09 pump rate?
10 A. Yes, there is.
11 Q. Okay. And that -- that piece of
12 equipment is what?
13 A. It's the same type of M45 float
14 collar with different flow conversion
15 ports --
16 Q. Okay. Can you explain the
17 different flow conversion ports?
18 A. Yes. It would reduce the ID of
19 the flow so it would convert at two to four
20 barrels per minute.
21 Q. Okay.
22 MS. SULLIVAN:
23 I'm going to go ahead and
24 mark the document at 17 as Exhibit 2582.
25 (Exhibit Number 2582 marked.)
00255:01 Q. Earlier today you -- you
02 testified that you were contacted on
03 April 19th by Mr. Morel when BP was making
04 attempts to convert the -- the float
05 collar; is that right?
06 A. Right.
07 Q. Okay. And you advised Mr. Morel
08 regarding the maximum amount of pressure
09 that BP could pressure up on the float
10 collar in order to establish circulation,
11 correct?
12 A. Correct.
13 Q. Okay. And based on this -- this
14 document at tab 17, if you turn to page 1,
15 it looks like there -- there are some
16 pressure ratings here. I believe you
17 stated you called someone at the
18 Weatherford office? I'm sorry. Who did
19 you speak to?
20 A. John Hebert.
21 Q. John Hebert.
22 And John Hebert, what did
23 he advise you again? I can't recall.
24 A. He confirmed again that the --
25 the plug bump pressure was 6800 psi.
00256:01 Q. Okay. And you relayed that
02 information to Mr. Morel?
03 A. Yes, I did.
04 Q. Okay. Do you recall having any
05 conversations with Mr. Morel about when
06 the -- the ball would pass through the
07 bottom of the auto-fill -- auto-fill tube
08 without converting the floats? Did you

09 have any conversation with him about --
10 about that aspect of pressuring up on
11 the -- on the float equipment?
12 A. Yes, I did.
13 Q. Okay. And can you tell me about
14 that -- that part of your conversation?
15 A. The -- there was an Allamon ball
16 into the system, which is to close the
17 Allamon diverter tool. That -- that ball
18 would eventually have to -- to land on top
19 of the float collar.
20 At the time we were
21 discussing -- when they were pressuring up,
22 if the ball happened to be there, which --
23 which it wasn't, but if it happened to be
24 there -- and I didn't -- I didn't know the
25 timing of when the -- all this was going
00257:01 down. But if the ball happened to be on
02 the retainer, that it would take 12' to
03 1300 psi to blow the ball through the
04 retainer, the Allamon ball through the
05 retainer.
06 Q. What's the retainer?
07 A. The retainer is -- is -- is the
08 piece right here that's in the top of the
09 float collar.
10 Q. Is it indicated on -- on tab 17?
11 Can you -- can you --
12 A. It's not indicated, no.
13 Q. No? Okay.
14 I'm wondering if we have a
15 better picture of it in this document.
16 MR. LEMOINE:
17 Do you have the assembly
18 drawing? Do you have a tab of the assembly
19 drawing?
20 MS. SULLIVAN:
21 I do.
22 MR. LEMOINE:
23 If you want, pull it out and
24 show him.
25 MS. SULLIVAN:
00258:01 Yeah.
02 MR. LEMOINE:
03 If not, I can go get you
04 one.
05 MS. SULLIVAN:
06 It's okay. I don't want to
07 waste time. I'm running out of it.
08 MR. LEMOINE:
09 We want you to waste time.
10 MR. RUSSO:
11 Take your time.
12 MS. SULLIVAN:
13 Sure.

14 Q. Okay. 17A. I did put it behind
15 there. Okay. If you turn to WFT 003328.
16 This is a schematic.
17 Can you identify what
18 you're referring to? I'm sorry. What was
19 your reference, the Allamon ball would have
20 fallen onto the retainer, I believe you
21 called it?
22 A. Right. If you --
23 Q. I want you -- I want you to mark
24 on the document, if you can, for me -- with
25 a highlighter would be great -- where the
00259:01 retainer is located. Okay.
02 So again, let's pick up
03 where we left off. So you said the Allamon
04 ball would -- would fall onto the retainer?
05 A. It would fall and sit on top of
06 the retainer, correct.
07 Q. Okay. And what happens after
08 that?
09 A. If everything is okay, we would
10 circulate around the ball.
11 Q. Okay. But -- is it possible for
12 the -- that ball to pass through that
13 retainer? If you pressure up high enough,
14 is it possible that that ball is going to
15 go through the float equipment at a certain
16 pressure?
17 A. Right. If that ball is sitting
18 on top of the retainer, you'd take 12' to
19 1300 psi to shear that retainer and blow
20 through the float equipment.
21 Q. Okay. So at 1300 psi, that ball
22 can shear through the retainer and go
23 through the float equipment?
24 A. Correct. But the ball wasn't
25 there so it was kind of irrelevant.
00260:01 Q. Okay.
02 MS. SULLIVAN:
03 I'm going to mark document
04 behind 17A as the next exhibit, 2583.
05 (Exhibit Number 2583 marked.)
06 Q. Okay. Would you turn to tab 20
07 in your binder? Do you recognize this
08 e-mail chain?
09 A. Yes.
10 Q. Okay. And I believe earlier
11 today you testified that you -- you
12 followed up with Mr. Morel to find out how
13 float -- the float conversion was going on
14 April 19th? You have an e-mail here at
15 5:30 in the afternoon --
16 A. Yes, I --
17 Q. -- and -- and it's from you to
18 Mr. Morel. And you -- you say, Brian, any

19 progress?
20 Brian -- you guys spell
21 your names with an I and a Y so it's easy
22 to distinguish.
23 And in response, Mr. Morel
24 tells you, Yeah, we blew it at 3140. Still
25 not sure what we blew yet.

00261:01 And then in response to
02 that e-mail on April 20th at 8:02 a.m. you
03 ask Mr. Morel how the cement job was going.
04 So was this the only
05 discussion that you had with Mr. Morel
06 concerning the -- the conversion of the
07 float equipment?
08 A. I'm sorry?
09 Q. Was this the only conversation
10 that you had about the progress of the --
11 the float equipment with Mr. Morel via
12 e-mail?
13 A. Yes.
14 Q. Okay. Did you pick up the phone
15 and call Mr. Morel to ask him how the --
16 the float conversion had gone?
17 A. No.
18 Q. Okay. And do you know who
19 declared the float collars converted on
20 the -- the Macondo well on April 19th? Was
21 that a Weatherford decision or a BP
22 decision?

23 MR. CHEN:
24 Objection, form.
25 MR. FITCH:
00262:01 Objection, form.
02 A. I'm sorry. Repeat the question.
03 Q. I'm going to change my question.
04 Did Mr. Morel advise you
05 whether or not BP had decided the float
06 collars had converted on the Macondo well?
07 A. No.
08 Q. He didn't?
09 Did you have any
10 information as -- from anyone else at BP
11 that the float collars had converted on
12 April 19th? Other than this e-mail from
13 Mr. Morel which says, yeah, we blew it at
14 3140, still not sure what we blew yet, did
15 you have any indication that the float
16 collars had converted on the Macondo well
17 on April 19th?
18 MR. CHEN:
19 Objection, form.
20 A. No, I didn't. The only
21 information I had was what was in the
22 e-mail.
23 Q. And based on this e-mail, it was

24 your understanding that the floats had
25 converted?
00263:01 A. Yeah. All -- he had stated
02 floats had converted. Saw indications,
03 landed right on time.
04 Q. Were you concerned with
05 Mr. Morel's comment on April 19th that,
06 yeah, we blew it at 3140 but still -- still
07 not sure what we blew yet?
08 A. No. I had no opinion on that.
09 Q. No red flags? No -- no concerns
10 based on that comment?
11 A. No.

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00263:14 All right. I'd like to mark
15 the document at 20 as the next exhibit,
16 2584.
17 (Exhibit Number 2584 marked.)

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00264:11 Q. Okay. Well, this model M47AO
12 collar, is it more debris tolerant than the
13 M45AP that was run on the Macondo well, if
14 you know?
15 A. I have no opinion on whether
16 it's more or less debris tolerant.

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00264:25 Q. Okay. What do you know, if
00265:01 anything, about the float check that was
02 conducted on the -- the Macondo well after
03 the cement job was complete?
04 A. That it was a good one.
05 Q. Okay. Did Weatherford
06 participate in -- in the float check
07 on the -- on the well after the cement job
08 is completed?
09 A. No.
10 Q. Okay. Does Weatherford assist
11 to BP in determining what -- what to do if
12 the float collar is -- is problematic or
13 there are issues with converting -- I mean,
14 with the float collar operating properly
15 after the cement job?
16 A. No.
17 Q. Is that BP's decision to -- to
18 deal with any -- any problems that they
19 experience after the cement job is -- is
20 pumped and they're determining whether or

21 not the floats are holding?
22 A. Yes.

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00265:25 Q. Okay. Are you familiar with --
00266:01 with float checks?
02 A. A little bit.
03 Q. Okay. What's your understanding
04 of what a float check is?
05 A. Yeah. When they -- they release
06 pressure in the floats and they get back
07 zero, zero pressure. So --
08 Q. Okay.
09 A. -- no indications --
10 MR. LEMOINE:
11 Wait for the question.
12 Q. Do you know if the float check
13 on the Macondo well on -- on April 19th was
14 successful or not?
15 A. Not 100 percent sure, no.
16 Q. Okay. What -- what do you know
17 about the float check on the Macondo well?
18 A. Just saw the drilling report. I
19 know that they checked floats, and they
20 were reporting that the floats were
21 holding --
22 Q. Okay.
23 A. -- off the drilling report.
24 Q. Do you know how much pressure it
25 takes to unseat the plug from -- from the
00267:01 float equipment from underneath? How much
02 pressure it would take to unseat that plug
03 that's sitting on top of the float
04 equipment?
05 A. I'm not really -- I'm not real
06 familiar with that. No, I'm not 100
07 percent sure of what it'll take.
08 Q. Okay. Are you familiar -- or do
09 you know what the differential pressure was
10 that was observed at -- during the float
11 check, do you know what the amount of psi
12 was when they were doing the float check on
13 the Macondo well?
14 A. I'm not sure exactly what that
15 differential pressure was.
16 Q. Does 38 psi sound familiar to
17 you?
18 A. Yeah. I believe I recall it was
19 in the drilling report. I really -- can't
20 recall if that was the exact number.
21 Q. Okay. Is that something that
22 you look at as the -- as the sales --
23 sales -- I'm sorry.
24 What was your title again?

25 A. Technical sales rep.
00268:01 Q. You're -- you're the technical
02 sales rep. Is that something that you look
03 at when you're looking -- do you look at
04 the float check to see what kind of
05 pressures are being observed?
06 A. No. I usually don't -- I
07 usually don't get involved in that at all.
08 As long as -- as long as they say the
09 floats are holding on the drilling report
10 and everything and they bump plugs,
11 that's -- that's the indications that I'm
12 looking for.
13 Q. That's the end of the story for
14 you?
15 A. That's pretty much the end of
16 the story for me.
17 Q. Okay. Do you know whether or --
18 whether or not Weatherford had any -- any
19 information that BP was intending to
20 conduct a casing pressure test, a
21 positive-pressure test after the cement job
22 was completed?
23 A. No.
24 Q. Okay. Do you have any
25 indication as to whether or not the float
00269:01 equipment and plug are strong enough to
02 withstand casing pressure test that -- that
03 BP performed on the Macondo well after the
04 cement job was completed?
05 A. I'm sorry. Repeat the question
06 again.
07 Q. Do you know if the float
08 equipment, the -- the auto -- the float
09 collars, the plugs, the equipment that's
10 down above the cement in the shoe track, if
11 that equipment is strong enough, are
12 rated -- has a pressure rating high enough
13 to withstand a positive-pressure test
14 that -- that can be conducted after the
15 cement job is complete?
16 A. Yes.
17 Q. Okay. And why do you say yes?
18 A. 'Cause like we mentioned before,
19 the bump pressure is 6800 psi.
20 Q. Okay. So if BP pressured up to
21 2700 psi, that -- that equipment, the float
22 collar and the plugs are rated to withstand
23 that -- that amount of pressure?
24 A. Yeah. According to the
25 Weatherford manuals it is, yes.
00270:01 Q. Okay. So it's my understanding
02 based on that -- that technical document
03 that we looked at today, that the -- the
04 pressure rating's going down from top to

05 bottom, on the plugs is 6800 psi?
06 A. Correct.
07 Q. And the back pressure rating is
08 5,000 psi --
09 A. Correct.
10 Q. -- is that correct?

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00270:19 Q. Tab 27 in your binder. This is
20 a figure 4.3.20 from the Chief Counsel's
21 report for the Oil Spill Commission.
22 Have you seen this figure?
23 Are you familiar with this?
24 A. I've seen this before, yes.
25 Q. I have some questions for you
00271:01 about this -- it looks like a screen at the
02 top of the -- the debris in the reamer
03 shoe. And what I wanted to know is whether
04 or not this screen is a piece of
05 Weatherford equipment? Or is -- was this,
06 in fact, part of the reamer shoe that was
07 used on the production casing interval of
08 the Macondo well?
09 A. That -- to the best of my
10 knowledge, that -- that screen is not a
11 part of the Weatherford equipment.
12 Q. Have you ever seen this screen
13 in -- if it's not a -- if it's not
14 Weatherford equipment, are you familiar
15 with the screen being a part of a reamer
16 shoe that's indicated in this diagram?
17 A. I'm not sure what they're
18 recommending here.
19 Q. So you don't know what the
20 purpose of this -- this screen -- let me
21 ask.
22 Do you know why a screen
23 would be placed in --
24 A. There might have -- I don't
25 recall whether there was a baffle installed
00272:01 in the reamer shoe.
02 Q. What's a baffle?
03 A. The baffle would be in there to
04 catch the tube as it leaves the float
05 collar.
06 Q. Okay.
07 A. So it wouldn't block -- block
08 off the -- the ports. I can't recall
09 whether the reamer shoe had the baffle in
10 there or not.
11 Q. Do you recall receiving any --
12 any calls or e-mails from -- from Mr. Morel
13 from BP or Mr. Sepulvado about whether or
14 not the reamer shoe was -- was clogged?

15 A. The only call, again, with Brian
16 Morel whether they knew it was in the shoe
17 track. The shoe could have been clogged in
18 the shoe track.

19 Q. Okay. And subsequent to the
20 accident, are you aware -- you said earlier
21 today you hadn't read through the Stress
22 Engineering report; is that correct?

23 A. Correct.

24 Q. So you're not familiar with the
25 conclusions that were reached by Stress
00273:01 Engineering?

02 A. No, I'm not.

03 Q. And you don't know their
04 determination as to whether -- at what
05 location the blockage may have occurred?

06 A. No.

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00274:08 Q. Good afternoon, Mr. Clawson. My
09 name is Henry Dart. I'm special counsel to
10 the Louisiana Attorney General's office,
11 and I represent the state of Louisiana.

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00274:13 Q. I'm fine. Thank you.
14 I was wondering when BP was
15 trying to size the various equipment that
16 it was buying from you or Nexen or
17 wherever, does the availability of
18 equipment sometimes drive the design of the
19 casing? For example, if BP was trying to
20 decide whether to use a 9-7/8 casing that
21 crossed over to a 7-1/2-inch or a
22 seven-inch or a 7-7/8-inch casing, would
23 that decision be driven by the availability
24 of equipment such as centralizer subs,
25 float collars, reamer shoes?

00275:01 MR. CHEN:

02 Objection, form.

03 A. I wouldn't have any opinion on
04 that. As far as -- I guess it could. I
05 guess it could.

06 Q. Because there was some e-mail
07 traffic that we were looking at this
08 morning that appeared BP was hunting around
09 for certain types of equipment that would
10 meet certain size and specifications,
11 right?

12 A. Right.

13 Q. And if that equipment was not
14 available anywhere, what would BP do? Or

15 what do your customers do normally when
16 faced with an unavailable but critical
17 piece of equipment?
18 A. They would do pretty much like
19 what BP did. They -- they'd call us to see
20 if -- if we have any pipe in anybody's
21 inventory or anywhere that could run on
22 their -- on their pipe.
23 Q. Okay. Now, Nexen had pipe and
24 at least six centralizer subs, right?
25 A. Correct. Yes, sir.
00276:01 Q. Now, was this -- I thought you
02 said this was in Weatherford's will call
03 warehouse; is that right or not?
04 A. The -- the Nexen equipment?
05 Q. Yes.
06 A. It was at -- in Nexen's
07 customer-owned inventory at the Houston
08 operations location.
09 Q. Of Weatherford?
10 A. Of Weatherford, yes.
11 Q. Okay. Does Weatherford
12 routinely store customer's equipment for
13 them?
14 A. Yes, sir.
15 Q. Okay. Did BP have such a
16 storehouse of equipment?
17 A. Yes, sir.
18 Q. They did?
19 Did any of that equipment
20 fit the bill for this particular casing
21 string?
22 A. No, sir.
23 Q. No.
24 Do you know why BP didn't
25 design their casing string to match up with
00277:01 equipment they did have on call with
02 Weatherford?
03 MR. CHEN:
04 Objection, form.
05 A. No, sir.
06 Q. Okay. What sort of equipment
07 did BP have on call with -- with
08 Weatherford back in April of 2010?
09 A. They had a whole lot of
10 equipment. Anything -- anything
11 particular?
12 Q. I'm asking. What -- what types
13 of equipment did they have?
14 A. They had all kind of 11-7/8,
15 13-5/8 --
16 Q. Casing?
17 A. No. No casing. Float equipment
18 and centralizer.
19 Q. Float equipment?

20 A. Yes, sir.
21 Q. Okay. Why would a company like
22 BP have all this float equipment sitting
23 around in your warehouse?
24 MR. CHEN:
25 Objection, form.

00278:01 A. It's just -- it's just typical.
02 All deepwater customers always use the same
03 primary and backup. And the backup
04 equipment comes back loose, and we store it
05 for them until they get ready to use it the
06 next time.
07 Q. Okay. So this is equipment that
08 they had ordered for other jobs but just
09 never got around to using?
10 A. It was ordered for other jobs,
11 backup or jobs that they didn't run.
12 It's just --
13 Q. Okay. I'm trying to figure out
14 whether a company like BP would order
15 equipment for no particular job but just
16 would order it to have available if and
17 when they needed it.
18 A. I couldn't answer that question.
19 I mean they -- they typically don't, no.
20 Q. Okay.
21 A. They order for that per string
22 of pipe.
23 Q. Okay. Now, the particular type
24 of pipe that BP was -- or the particular
25 type of equipment that BP was looking for
00279:01 was seven-inch Hydril 513 connection,
02 right?
03 A. Correct.
04 Q. What is Hydril 513 connection?
05 A. What is it?
06 Q. Yeah. What is it? Tell us what
07 that means.
08 A. It's just a Hydril 513
09 connection.
10 Q. It's a specific type of
11 connection?
12 A. Connection. Right. In this
13 case it was 32-pound.
14 Q. Okay.
15 A. Right.
16 Q. And how does a Hydril 513
17 connection work?
18 A. It's just the -- it's just the
19 casing.
20 Q. It's a type of thread?
21 A. Yeah. It's a type of thread
22 that's on the -- that goes on the casing
23 and the -- the subs and float equipment.
24 Q. Okay. So if you're using Hydril

25 513 equipment, you would need Hydril 513
00280:01 type threads in order to match it up?
02 A. Correct. Yes, sir. Correct.
03 Q. I got you. Okay.
04 Now, you said earlier that
05 15 centralizers were shipped out to the
06 DEEPWATER HORIZON and you had gotten six
07 back. Tell me about that.
08 How -- how did six
09 centralizers end up coming back to you
10 before the rig blew up?
11 A. They -- all I was informed, that
12 there was -- we received six back in a --
13 in a box at our Houston location in
14 Houston.
15 Q. Okay. Do you know when they
16 were shipped back?
17 A. I don't know the exact date.
18 Q. Do you know why only six were
19 sent back and not all 15?
20 A. I do not know that.
21 Q. Okay. Do you know where the
22 other nine of them are --
23 A. No, sir.
24 Q. -- or were?
25 A. No, sir, I don't.
00281:01 Q. Do you know why BP asked for a
02 cookie-cutter guide shoe as a backup to the
03 reamer shoe?
04 A. Again, the cookie cutter was
05 part of the equipment that was in the
06 Nexen -- Nexen customer-owned inventory,
07 which had the seven-inch Hydril 32-pound.
08 Q. All right. So BP didn't
09 specifically ask for that as a backup. It
10 just happened to be there?
11 A. Correct.
12 Q. Okay.
13 A. Correct.
14 Q. Now --

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00281:17 Q. -- tell us about what a reamer
18 shoe does. Why would one use a reamer
19 shoe?
20 A. A reamer shoe is a -- again,
21 typically used to -- to help clear anything
22 blockage anything downhole.
23 Q. Okay. And a reamer shoe
24 actually is a cone-shaped shoe that has
25 cutting edges on it?
00282:01 A. Correct. Yes, sir. It has some
02 corner bite on the outside, yes, sir.
03 Q. Okay. And that's used to sort

04 of trim down the hole as it goes down? Is
05 that in layman's terms a good description?
06 A. It's used to be able to ream
07 down.
08 Q. And in the process of reaming
09 down, it creates a lot of debris, right?
10 A. It possibly could, yes.
11 Q. All right. Because if it's
12 using those cutting edges, it's cutting
13 rock or sandstone, shale, whatever it may
14 be and creating little bits of whatever
15 it's knocking off the edge of the hole,
16 right?
17 A. I guess that's possible, yes.
18 Q. Okay. Now, the reamer shoe has
19 three holes in it? Three ports?
20 A. Correct.
21 Q. The particular reamer shoe
22 that -- that was being used on the Macondo
23 well, how large were the ports?
24 A. I have to refer back to the
25 drawing to verify it again.
00283:01 Q. Okay.
02 A. I can't remember off the top of
03 my head.
04 Q. Can you estimate it? An inch,
05 less than an inch?
06 A. I think an inch. An inch and a
07 quarter. Again, I'd have to look back at
08 the drawing to refresh my memory.
09 Q. Okay. Now, the reason for
10 the -- the ports in the reamer shoe as well
11 as the auto-fill tube is that when you're
12 running the casing downhole, you don't want
13 to create surge pressure, right? You want
14 the -- the mud to flow up through the pipe?
15 A. Yes.
16 Q. True?
17 A. Yes.
18 Q. Okay. And if there's debris or
19 any sort of material in the -- in the mud,
20 as you're running down the hole, that
21 material could come up through the holes,
22 through the ports, through the auto-fill
23 tube and somehow get clogged in that
24 equipment, right?
25 MR. CHEN:
00284:01 Objection, form.
02 A. Yes, sir, it's possible.
03 Q. Okay. Did -- did you say
04 earlier this morning where you thought the
05 blockage was in the shoe track?
06 A. I didn't say where I thought it
07 was.
08 Q. Where did -- where does

09 Weatherford think it was?

10 A. Well, in the conversation
11 with -- with Brian -- he's the one that
12 mentioned that he thought the blockage was
13 in the shoe track and, again, that was due
14 to compressibility of the fluid.

15 Q. Okay. Now, when you say shoe
16 track, anywhere particular in the shoe
17 track? At the reamer shoe? At the -- at
18 the float collar? Did he -- did he
19 specify?

20 A. No, he didn't specify, but
21 that's -- that's what I mean with the shoe
22 track, either the collar or the reamer
23 shoe.

24 Q. Okay. Does -- does Weatherford
25 have any stance or opinion as to, number
00285:01 one, whether there was blockage, and number
02 two, where that blockage might have been?

03 A. I don't know whether Weatherford
04 has a stance on that, no.

05 Q. Okay. Do you personally?

06 A. Well, again, the -- with Brian
07 mentioning that it was the compressibility,
08 it made sense that the -- the blockage
09 was -- was in the shoe track due to his --
10 talking with him.

11 Q. Okay. Now, you're running this

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00286:01 Q. Okay. If debris had clogged the
02 reamer shoe ports on the way down, at that
03 point you would have seen surge pressure,
04 right?

05 A. Yes.

06 Q. Okay. So we can assume that the
07 reamer shoe made it all the way down to the
08 bottom of the hole without clogging?

09 A. Right. I mean the -- the
10 information that I saw was there was no
11 issues running the casing.

12 Q. Okay. Because if -- if the
13 reamer shoe ports had clogged before it
14 reached the bottom, then you would have
15 seen surge pressure and you would have seen
16 mud shooting up out of the drill floor,
17 right, or into the pits, whatever --
18 wherever they measure?

19 A. You mean the -- I'm not
20 understanding the question.

21 Q. As they're running the casing
22 downhole, if the ports in the reamer shoe
23 had clogged before the casing got all the
24 way down to the bottom, at that point, you

25 would see surge pressure, correct?
00287:01 A. Well, you -- you'd have started
02 displacing mud out of the wellbore.
03 Q. Yes.
04 A. I don't know about seeing surge
05 pressure, but you would have displaced --
06 you would have had to displace the casing,
07 and the mud would sort of come on top.
08 Q. Yes. So -- so that would have
09 been a noticeable event, don't you think?
10 A. Yes.

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00288:18 Q. All right. All right. Thank
19 you, sir.
20 You said that centralizer
21 subs are usually designed for a specific
22 well. Did you say that?
23 A. Yes.
24 Q. Okay. How is it that Nexen had
25 the right centralizer subs for presumably a
00289:01 different well than the Macondo?
02 A. I don't know the answer to that
03 question.
04 Q. Okay. Is it because Nexen had
05 the casing as well?
06 A. I would assume so, yes.
07 Q. Okay. So the subs went with the
08 casing, and if -- if BP was buying Nexen's
09 casing, the subs went with them?
10 A. Yes.
11 Q. Okay. Why were Weatherford
12 hands on the rig making up casing? Why --
13 why can't the drill crew, Transocean's
14 drill crew do that?
15 A. I'm not an expert on the -- the
16 Tubular Running Services, but, you know,
17 what I know is they have tongs they have to
18 operate and slips they have to operate.
19 They had the Weatherford equipment on
20 the -- on the rig.
21 Q. Is -- is the casing Weatherford
22 equipment?
23 A. The casing is not Weatherford
24 equipment, no, sir.
25 Q. Okay. What is it about the
00290:01 casing as compared with drill pipe, for
02 example, that requires Weatherford hands to
03 make it up as compared with Transocean's
04 drill crew?
05 A. Again, the -- there's -- there's
06 tongs and slips to handle that seven-inch
07 and 9-7/8 OD pipe.
08 Q. And that's something beyond the

09 capacity of the Transocean drill crew?
 10 A. Yes.
 11 Q. Let's talk about the stop
 12 collars for the -- the centralizers that
 13 were sent out to the rig.
 14 There was some discussion
 15 about the two different types of stop
 16 collars, and you said you were sending out
 17 the newer ones?
 18 A. Yes, sir.
 19 Q. Okay. What is it about the
 20 newer ones that makes them better than the
 21 ones that were used on Thunder Horse?
 22 A. The -- the ones on Thunder Horse
 23 were made out of a three-sixteenth of
 24 material and we increased the material to
 25 quarter-inch. Again, which it gave a
 00291:01 little bit more bite for the set crews.
 02 You can torque them up a little higher.
 03 And we installed some thread loc ports in
 04 the stop collar to where you could -- once
 05 we installed the set screws and tightened
 06 them down, you could inject thread loc into
 07 the -- these ports and that would aid in
 08 keeping the stop collar where it's supposed
 09 to be.
 10 Q. And thread loc is what, some
 11 sort of epoxy resin?
 12 A. Correct.
 13 Q. Basically, it's glue? Epoxy
 14 glue?
 15 A. A really high strength glue,
 16 yeah.
 17 Q. Yeah. Okay. How long does it
 18 take for that thread loc to cure once you
 19 put it in the hole?
 20 A. I'm not the -- exactly sure how
 21 long it would take to -- to harden
 22 completely.

Page 292:04 to 292:07

00292:04 Q. Okay. Was that, perhaps, the
 05 reason why BP was not interested in using
 06 those stop collars?
 07 A. I'm not --

Page 292:10 to 293:10

00292:10 A. -- sure whether that was the
 11 reason or not.
 12 Q. Okay. Weatherford supplied the
 13 wiper plugs too; is that correct?
 14 A. Yes, sir.

15 Q. I read or saw somewhere that
16 when the bottom wiper plug hit the top of
17 the float collar, it was supposed to have
18 converted at 900 to 1100 psi but it didn't.
19 It took 2900 psi to do so.

20 A. Yes. I read that also, yes.

21 Q. Okay. Do you know what that was
22 about, why it took such a high pressure?

23 A. I don't know why, but that is --
24 that is unusual for that to happen.

25 MR. CHEN:

00293:01 Objection, form.

02 Q. Okay. Would that -- would
03 that -- assuming that did happen, would
04 that have any adverse effect on the float
05 collar equipment?

06 MR. CHEN:

07 Objection, form.

08 A. Again, I don't know whether that
09 would have any effect on the float
10 equipment or not.

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00294:03 Q. Good afternoon, Mr. Clawson. My
04 name is Philip Chen and along with David
05 Mitchell, we represent BP. I'd like to
06 start off with some questions about
07 centralizers.

08 Now, we've discussed sort
09 of three types of centralizers today. The
10 old style slip on with the stop collars,
11 the new style slip on with the stop collars
12 with -- with the -- with the area for the
13 tublok -- I believe that's what you called
14 it -- and then the centralizer subs that
15 are welded on.

16 Is that sort of the -- the
17 three types of centralizers that we've been
18 talking about today?

19 A. Yes.

Page 295:03 to 298:03

00295:03 A. Repeat the question again.

04 Q. We discussed a situation at
05 Atlantis where you had run the
06 centralizers, slip-on centralizers and they
07 had bunched up and the casing had been
08 stuck.

09 Am I sort of repeating that
10 correctly?

11 A. Yes.

12 Q. And then we discussed another

13 situation at Thunder Horse with slip-on
14 centralizers where the centralizers had
15 bunched up. And you were able to get the
16 casing down, but, you know, you could
17 observe that the centralizers had bunched
18 up?

19 A. Correct.

20 Q. So that was a situation that a
21 problem could have occurred but,
22 thankfully, did not?

23 A. Correct.

24 Q. Okay. So now -- now -- so you
25 agree that those slip-on centralizers where
00296:01 you just have the screws to hold on the --
02 hold in the stop collars, those types of
03 centralizers have -- are known that
04 sometimes they slide and they move around
05 on the casing?

06 A. Yes.

07 Q. Okay. So now let's talk about
08 the new Thunder Horse, improved Thunder
09 Horse centralizers.

10 Do you understand what I'm
11 talking about when I --

12 A. Yes.

13 Q. Okay. So those -- now, in
14 addition to having a slightly thicker stop
15 collar, they also have little slots for
16 epoxy or some type of glue to hold them in?

17 A. Correct.

18 Q. Okay. And it's -- based on
19 testing by Weatherford, those stop collars
20 resist sliding, to some degree?

21 A. Correct.

22 Q. But do you agree that those stop
23 collars also can slide -- slide if
24 sufficient force is applied to them, that
25 they can be dislocated and moved from where
00297:01 they were originally intended to be placed?

02 A. It's possible.

03 Q. And would you further agree that
04 when you have centralizer subs, those are
05 welded in, those are not going to slide
06 around?

07 A. Correct.

08 Q. So in terms of risk, it is
09 always preferable to have -- to run
10 centralizer subs if you don't want the
11 centralizers to slide around?

12 A. Correct.

13 Q. And whether -- and the ability
14 or tendency of a centralizer to slide
15 around is one factor that would go into a
16 drilling engineer's decision on what type
17 of centralizers to run?

18 A. I'm not -- couldn't answer that
19 question. I mean, that's the drilling
20 engineer's -- you know, that's his decision
21 to make.
22 Q. Do you agree that it's possible
23 that the type of centralizer and whether it
24 could slide around -- it's possible that
25 that factors into a drilling engineer's
00298:01 analysis when deciding what type of
02 centralizers to use?
03 A. Yes. Yes.

Page 298:06 to 326:19

00298:06 Q. And do you agree that that
07 factors into how many centralizers to use?
08 A. Yes.
09 Q. Now, you were -- Ms. Sullivan
10 showed you a document where John Guide was
11 saying that there's going to be 45 pieces
12 that that could come off.
13 Do you remember being asked
14 about that document?
15 A. Yes.
16 Q. And that was document -- let's
17 see if I have the exhibit number -- is
18 exhibit number 2579.
19 And so with 15
20 centralizers, each centralizer has two stop
21 collars, right? One on the top, one on the
22 bottom?
23 A. No.
24 Q. No?
25 A. No.
00299:01 Q. How many pieces does -- how many
02 stop collars does a centralizer come with?
03 A. There's -- there's one stop
04 collar per centralizer.
05 Q. Okay. How is the stop collar
06 restrained from moving in the other
07 direction, downward? I assume you put the
08 stop collar on the top then?
09 A. No. The stop collar goes inside
10 the centralizer.
11 Q. Oh. I see. Okay. Fair enough.
12 Now, you were shown another
13 document describe -- where you were
14 e-mailing with Brian Morel, and you
15 mentioned that it would take seven to ten
16 days to build more sub centralizers. That
17 was exhibit 2576.
18 Do you recall that?
19 A. Yes, sir.
20 Q. And then you testified that it
21 ordinarily takes about ten weeks to build

22 centralizers, correct?

23 A. I thought I'd said six -- it's

24 usually around six to eight weeks is kind

25 of --

00300:01 Q. Okay. Six to eight weeks.

02 And then on -- you could

03 build centralizers on a rush basis in four

04 to five weeks?

05 A. Yeah. Three to four weeks.

06 Right.

07 Q. And then on a very high rush

08 basis, you could build centralizers in

09 seven to ten days?

10 A. Right. If everything was

11 just -- materials available and threading

12 was available, yes.

13 Q. Would you agree with me that

14 when you rush the manufacturer of

15 equipment, there's more chance that

16 something gets wrong in the manufacturer?

17 A. I -- it -- it's possible, yes.

18 Q. And is that something that

19 drilling engineers have told you over the

20 years, that they don't want to rush

21 manufacturing because they don't want

22 anything wrong with the equipment?

23 A. No, not -- not really. Even

24 though some equipment's rushed out,

25 Weatherford has a QC policy they go by and

00301:01 they're not going to waiver from that,

02 so...

03 Q. Are you aware that BP, the

04 standard practice is not to use any -- have

05 any equipment built on a rush basis?

06 A. I'm not aware of that.

07 Q. Okay. You were also shown a

08 document where Brian Morel was saying --

09 this is exhibit 2580 on the record -- that

10 we have six centralizers -- Tab 15A if you

11 wanted to look it up, Mr. Russo -- where he

12 said we have six centralizers. We can run

13 them in any configuration or any spacing,

14 but there's no time to make more.

15 Did you understand

16 Mr. Morel to be referring to centralizer

17 subs when he said there's no more time to

18 get more or -- well, let me rephrase it.

19 Could Mr. Morel be

20 referring to centralizer subs when he said

21 that there's no time to get more?

22 A. Yes.

23 Q. Now I'd like to ask you a few

24 questions on the process of procurement of

25 the seven-inch equipment.

00302:01 BP -- well, I'd like to

02 take a step back.
03 You told us this morning
04 that you've been working in the -- for
05 Weatherford for 30 years, correct?
06 A. In August it will be 30 years,
07 yep.
08 Q. Okay. And you said since
09 2000 -- you know, you did cementation sales
10 previously but -- and then you took a
11 little bit of a break, and then in 2000,
12 you started cementation sales again?
13 A. Right. Before then it was more
14 of a sales and service. We sold and we
15 serviced it -- serviced it.
16 Q. Okay. What is your scope of
17 responsibility geographically for
18 cementation sales?
19 A. Well, geographic -- it's more or
20 less I'm assigned to certain accounts.
21 Q. Okay. What accounts are you
22 assigned?
23 A. It's -- I take care of BP,
24 Chevron, Marathon, and BHP on the deepwater
25 side. And there's -- there's a host of
00303:01 other accounts. Probably 30 or 40 other
02 accounts that -- smaller individual
03 accounts that I handle.
04 Q. Such as Nexen?
05 A. I don't handle Nexen.
06 Q. Oh, okay. And for -- for
07 example, the BP, Chevron, Marathon, and BHP
08 accounts, are you the primary contact for
09 cementation equipment?
10 A. Yes.
11 Q. And as part of your job, do you
12 know what -- earlier you said that
13 Weatherford stores equipment for its
14 customers, correct?
15 A. I'm sorry?
16 Q. Weatherford stores and
17 warehouses --
18 A. Stores, right.
19 Q. -- equipment for its customers?
20 A. Yes.
21 Q. And as part of your job, are you
22 tracking what equipment customers have
23 ordered, correct?
24 A. I have people that -- that take
25 care of that for me on our locations for --
00304:01 for all of the customers. I personally
02 don't handle that part of it.
03 Q. Okay. But -- but you have
04 accessible to you information about what
05 customers, for example, BP, Chevron,
06 Marathon, BHP, have ordered?

07 A. Yes.
08 Q. And you know what Weatherford is
09 holding for them in inventory?
10 A. Yes.
11 Q. And in fact, you can look up
12 what Weatherford is holding for other
13 customers in inventory that -- that fall
14 outside of your responsibility also?
15 A. I can get a hold of people that
16 can look it up for me. I don't know how to
17 look it up on our system.
18 Q. Okay.
19 A. I should but I don't.
20 Q. I see. It's fair enough.
21 And then -- so in addition
22 to knowing the equipment that your
23 customers have in inventory, you also know
24 what equipment they have out at the job
25 site on the rig; isn't that correct?
00305:01 A. Correct.
02 Q. And then if they don't use
03 equipment, you know when they ship back
04 equipment for warehousing again?
05 A. I do know. Not at that
06 particular point, but I know it goes on to
07 a -- a customer inventory list that the
08 people -- you know, my other people keep up
09 with on our --
10 Q. Okay. So you've seen a wide
11 variety of operators ordering different
12 equipment, cementation equipment over your
13 years of work, correct?
14 A. Yes.
15 Q. So I'd like to ask you some
16 questions about what you've seen over the
17 years.
18 Have you ever seen an
19 operator not run all of the centralizers
20 that it ordered?
21 A. Yes.
22 Q. And some -- sometimes the
23 operator will run less than all the
24 centralizers and ship some of -- the rest
25 of the centralizers back for warehousing?
00306:01 A. Sometimes.
02 Q. Have you ever seen an operator
03 reduce the number of centralizers based on
04 its original plan to its later plan, to its
05 final plan?
06 MR. DART:
07 Object to form.
08 Q. In your experience, have you
09 seen someone say, I'll need X number of
10 centralizers and later say, oh, I only need
11 half that amount?

12 A. Most of the time it's -- they're
13 just coming to me needing this many
14 centralizers. Now, if they change the
15 quantities, I don't know. I -- I don't see
16 that information usually.

17 Q. Okay. Okay. But you have seen
18 them change the quantities on the rig and
19 send you back centralizers?

20 A. Yes.

21 Q. Have you ever seen -- have you
22 ever observed an operator ordering
23 centralizers and having it shipped to the
24 work site and then running none of those
25 centralizers and shipping all of them back?

00307:01 A. I can't recall any. I mean,
02 they -- they'll ship them all back if they
03 don't run pipe, you know, for sure.

04 Q. Right.

05 A. I can't recall not running any.

06 Q. Okay. You don't recall one way
07 or the other, right? It's possible, but --

08 MR. BOWMAN:
09 Object to form.

10 A. I guess it's possible, but I
11 don't --

12 Q. Okay. So in your experience,
13 operators -- from what you've seen,
14 operators have run no centralizers for some
15 wells, correct?

16 A. In my experience on most,
17 there's -- there's usually always some
18 centralizing on a casing string.

19 Q. Okay. So have you seen other
20 instances where operators have run six
21 centralizers or less for a string of
22 casing?

23 A. It depends.

24 Q. Well, Nexen was planning on
25 running six centralizers for its well,
00308:01 correct?

02 MR. BOWMAN:
03 Object to the form.

04 A. I don't -- I can't answer
05 whether -- what Nexen was planning on
06 doing.

07 Q. Okay. The equipment that Nexen
08 purchased from Weatherford indicated that
09 it was going to run six or less
10 centralizers.

11 A. Again --

12 Q. It could -- okay. Let's put it
13 this way.

14 Having ordered six
15 centralizers, Nexen could not run more than
16 six on its job?

17 MR. DART:
18 Object to the form.
19 A. I'd be speculating there. I
20 don't know where they -- they may have some
21 of them pipes on -- I don't know.
22 Q. Okay. So in your experience,
23 operators have ordered a variety, a range
24 in number of centralizers for a cement job?
25 A. I'm -- I'm sorry?
00309:01 Q. In your experience, have you
02 found that operators order a range of
03 centralizers from very many to very few for
04 a particular casing job?
05 A. Yes. In my experience, yes.
06 Q. And it depends on what's
07 appropriate, that they've determined is
08 appropriate for the job?
09 A. Correct.
10 Q. And Weatherford doesn't give a
11 recommendation one way or the other if
12 centralizers are an insufficient amount or
13 an excessive amount?
14 A. No. We -- we just supply to
15 whatever the operator's -- how many he
16 wants.
17 Q. And you would agree with me that
18 there is both advantages and disadvantages
19 to running centralizers?
20 A. Yes.
21 Q. Some of the disadvantages we've
22 covered include that the centralizers could
23 bunch up, it could move and bunch up and
24 get the casing stuck?
25 A. Yes.
00310:01 Q. And what are the consequences of
02 a stuck casing?
03 A. There's -- depending on the
04 operator, there's some other options they
05 can -- they'd have to take.
06 Q. Could a stuck casing actually
07 result in a danger to the wellsite, if
08 they're unable to get the casing unstuck?
09 MR. BOWMAN:
10 Objection, form.
11 A. Again, I'm -- I'm not a drilling
12 engineer. I wouldn't know. I couldn't
13 answer that.
14 Q. In your experience, has the
15 casing ever been stuck with centralizers
16 and the well was lost because they could
17 not retrieve the -- couldn't get the pipe
18 either to the bottom or -- or couldn't get
19 it out?
20 A. In my experience, no.
21 Q. Another possible disadvantage of

22 centralizers is that that they can break
23 when you're running them into the hole,
24 correct?
25 A. It's possible.
00311:01 Q. And when they break, they can
02 either get stuck, you know, somewhere or
03 they can scratch important surfaces of the
04 casing, like seal assembly and that type of
05 stuff?
06 A. It's possible.
07 Q. And are you aware that some
08 companies, such as wellhead manufacturers,
09 recommend that no centralizers be used with
10 their equipment because of the possibility
11 of damaging their equipment when you're
12 using centralizers?
13 A. Am I -- am I aware of --
14 Q. Are you aware that, for example,
15 a wellhead manufacturer tell their
16 customers, don't run centralizers through
17 our wellhead 'cause it may damage it?
18 A. I've heard that before from the
19 well -- well companies, yes.
20 Q. Okay. Okay. Now, let's talk
21 about what you've seen operators do with a
22 float collar and also the shoe.
23 Have you seen operators run
24 a float collar without a float shoe before?
25 A. A float collar without a --
00312:01 Q. Without a float shoe?
02 A. Again, depending on what type of
03 float shoe you're talking about.
04 Q. What type of float shoes are
05 there?
06 A. When I'm talking float shoe,
07 means that there's a valve in the float
08 shoe.
09 Q. That's right. That -- that's
10 what I'm talking about too.
11 A. Okay. Now, there's -- and
12 there's two different valves, whether it
13 could be an conventional fill or an
14 auto-fill valve.
15 Q. Okay. Have you -- let me ask it
16 the other way around. Have you ever seen
17 someone run a float collar with a float
18 shoe?
19 A. Yes, I have. Yes.
20 Q. Okay. And now, have you seen
21 someone ever run a float collar without a
22 float shoe?
23 A. Yes.
24 Q. And is one more generally seen
25 than the other?
00313:01 A. I mean the only thing I can say

02 there is -- is auto -- auto-fill collars
03 are usually ran without a float shoe.
04 Q. Okay. And in this case, the
05 M45AP float collar was an auto-fill collar?
06 A. Correct.
07 Q. So those are typically run
08 without a float shoe?
09 A. Correct.
10 Q. Now, was the -- now, was the
11 M45AP float collar an appropriate choice
12 for a deepwater Gulf of Mexico well?
13 A. I mean, again, in my opinion,
14 yes, it was okay.
15 Q. Okay. Was there anything -- so
16 when BP went -- went to try to acquire the
17 seven-inch equipment, they contacted
18 Weatherford and said, do you have
19 seven-inch cementation equipment, correct?
20 A. Correct.
21 Q. And you located this Nexen will
22 call equipment and said, BP, you go see if
23 you can acquire this?
24 A. No. Actually the -- in the
25 documentation, Keith Schaff who was one of
00314:01 my coordinator, he located the equipment
02 for Al Crane.
03 Q. Okay. So someone at Weatherford
04 located it --
05 A. Someone at Weatherford, yes.
06 Q. -- for BP?
07 A. Right.
08 Q. Now, do you recall that
09 Mr. Morel asked you as the, you know, the
10 cementation salesperson for BP whether or
11 not this Nexen equipment would work for BP
12 for the Macondo's needs?
13 A. Yes, he did.
14 Q. And what did you tell him?
15 A. I told him that -- that one of
16 the e-mails was he -- he was asking about
17 the float collar, will it require anything
18 special. And I said it had the -- the
19 non-rotating profile in there -- that's
20 what the P stands for -- to land the
21 Weatherford plugs, and it was -- it was
22 exactly what he needed.
23 Q. And were the plugs the right
24 type to match up with the float collar?
25 A. Correct. They both had the
00315:01 non-rotating profile to match up on the
02 Weatherford.
03 Q. And were the right darts used
04 for the plugs?
05 A. Were -- were they -- were they
06 used?

07 Q. The correct darts used for the
08 plugs?
09 A. Yes.
10 Q. And these were darts that
11 Weatherford specially manufactured for BP's
12 project, right?
13 A. I mean, they weren't special --
14 they were just special manufactured but not
15 particularly for BP.
16 Q. Okay.
17 A. I mean this was -- it was
18 ordered through -- by BP, and we -- we
19 built it for BP.
20 Q. Okay.
21 A. But it's not a special order
22 piece of equipment that only BP would use.
23 Q. Okay. So -- so Weatherford
24 built the appropriate plugs to be used with
25 those wiper -- the appropriate darts to be
00316:01 used with those wiper plugs?
02 A. Yes.
03 Q. Now, was there anything about
04 BP's use of this seven-inch equipment that
05 was out of the ordinary in your opinion?
06 A. No.
07 Q. Now I want to talk to you about
08 the conversion attempts on April 19th.
09 Now, during the attempts to
10 convert -- the multiple attempts to convert
11 the float collar, BP was in contact with
12 Weatherford, correct?
13 A. Yes.
14 Q. In fact, Brian Morel called you,
15 Mr. Clawson, to check on the pressure
16 rating for the float collar?
17 A. Correct.
18 Q. And you assured him that BP
19 could pressure up further in attempts to
20 convert the float collar?
21 A. Correct.
22 Q. Now, when you have a float
23 collar that -- that you're -- that's down
24 in the well and there is a blockage, what
25 are the different options available to you
00317:01 to clear that blockage?
02 MR. LEMOINE:
03 Objection to form.
04 A. One of the things would -- to
05 try to reverse circulating.
06 Q. Okay. Was that something that
07 you suggested to Mr. Morel?
08 A. Yeah. We -- we discussed it.
09 And I really don't recall, but he just --
10 he did mention that -- that they couldn't
11 for some particular reason.

12 Q. Okay. And was -- would that be
13 because it would pressurize up on the
14 formation, or you don't recall?
15 A. I don't -- he didn't -- he
16 didn't mention it at all.
17 Q. Okay. What are the other
18 options available when you have a clog
19 other than pressuring up and what we've
20 discussed about reverse circulation?
21 A. I wouldn't know any -- what the
22 other options would be.
23 Q. Okay. So you would agree that
24 pressuring up and trying to clear the clog
25 is sort of a typical way of dealing with a
00318:01 clog?
02 A. Yes.
03 Q. And then once you have cleared
04 the clog, what is the typical way in which
05 you check whether or not the floats have
06 converted?
07 A. Well, again, you -- you watch
08 for returns, you see the indications of the
09 plugs, if everything left on time, and
10 whether the floats held when you release
11 pressure.
12 Q. A float check, right?
13 A. A float check, right.
14 Q. And that's what BP did here?
15 A. Right.
16 Q. Is there anything else you can
17 do to -- to check for conversion of the
18 float collar?
19 A. To my knowledge, no. That's
20 pretty much --
21 Q. Okay. So were there any steps
22 that BP took in clearing this blockage or
23 checking for conversion that you think are
24 outside the ordinary?
25 A. No.
00319:01 Q. Now, there was some questioning
02 on the well plan and what the planned rate
03 of -- of circulation and displacement was.
04 Do you recall that?
05 A. I have no knowledge of that.
06 Q. Okay. Well, there was some
07 questioning, and you agreed that the well
08 plan showed that they would only pump at
09 four barrels or four and a half barrels per
10 minute.
11 Do -- do you recall that
12 testimony earlier today?
13 A. Oh, yes. Yes.
14 Q. Now, that's the -- that's the
15 surface flow in rate, correct? That's what
16 they're pumping in at the surface?

17 A. Correct.
18 Q. And because the mud is
19 compressible, when you clear a blockage,
20 there is a large flow of mud, of transient
21 fast flow of mud when that pressure is
22 released, would you agree?
23 A. Yes.
24 Q. So the surface pump rate is not
25 necessarily equal to the flow rate at the
00320:01 area where the clog is cleared, would you
02 agree?
03 A. Correct.
04 Q. And you said that you did not
05 look at the Stress Engineering reports,
06 right?
07 A. No. No, I did not.
08 Q. So if the Stress Engineering
09 reports stated that the surge could
10 generate upwards of ten barrels per minute
11 of flow, would that have converted the
12 float collars?
13 A. Yes. Yes, I would -- I would
14 assume so, yes.
15 Q. Now, when BP purchased this
16 equipment, they -- they asked Weatherford
17 to ship it to Amelia for inspection.
18 Do you recall that?
19 Tuboscope in Amelia, Louisiana for
20 inspection?
21 A. No. They -- they shipped it to
22 Tuboscope to get -- to get bucked on their
23 pipe.
24 Q. Okay. Where -- where was it
25 inspected?
00321:01 A. The -- the thread inspection,
02 some of those documents earlier was -- was
03 done at our -- was done at the Houston
04 office.
05 Q. Okay. And you -- and what does
06 a thread inspection entail?
07 A. I'm not familiar with a total
08 thread inspection. I know Hydril comes in
09 and they've got a procedure they do.
10 Q. Is Hydril affiliated with
11 Weatherford?
12 A. No.
13 Q. Okay.
14 A. It's all ordered by BP.
15 Q. Okay. Does Weatherford play any
16 role in the inspection, in disassembling
17 the equipment or unboxing it or unscrewing
18 it for Hydril to inspect the threads and to
19 re-Kendex it and assemble -- reassemble?
20 A. Yes. They -- like I had stated
21 before, they -- it's all in wooden crates.

22 They take all of the equipment out of the
23 wooden crates, and they have it there
24 waiting for Hydril to come do their --
25 their thread inspection on it.

00322:01 Q. And what are the wooden crates
02 for?
03 A. It's to protect the -- protect
04 all the equipment in shipment.
05 Q. To protect the seven-inch
06 equipment?
07 A. Yes.
08 Q. And then why -- why do you check
09 the threads as opposed to re-checking all
10 the equipment?
11 A. Because the -- the thread is the
12 most easy to -- to be damaged. It's --
13 it's typical procedure for BP to -- before
14 they ship anything out to re -- make sure
15 the threads are in good shape.
16 Q. Was that typical for the other
17 operators you work with also?
18 A. No. Some -- some do, some
19 don't.
20 Q. Okay.
21 A. It just varies.
22 Q. Do other operators take further
23 steps to check the equipment before it's
24 shipped out?
25 A. Some do and some don't.

00323:01 Q. Okay. And I'm talking
02 specifically in the case where they've
03 purchased equipment that's already been
04 QC'ed once for Nexen, right?
05 A. Right.
06 Q. And now they are basically
07 disassembling it and checking it again
08 before shipping out?
09 A. Right. They're just checking to
10 make sure the threads are still in good
11 shape.
12 Q. Right. So have you -- so -- in
13 your experience, is that a good practice
14 that BP followed in checking that equipment
15 before shipping it out?
16 A. Oh, yes.
17 Q. And I think you said earlier
18 that in the inspections, nothing of issue
19 was found?
20 A. Correct.
21 Q. And -- and that was what was
22 told to BP, right, there was no issues with
23 this equipment?
24 A. Right. That's document that --
25 that would have been filled out.

00324:01 Q. Right. And the document --

02 let's see. Well, we'll see if we can find
03 that.
04 Now, during the time
05 Weatherford -- now, Weatherford
06 manufactured this equipment for Nexen,
07 correct, the seven-inch equipment?
08 A. Correct.
09 Q. And Weatherford then stored it
10 for Nexen?
11 A. Correct.
12 Q. And also modified one of the --
13 one of the shoes into a cookie-cutter shoe?
14 A. Correct.
15 Q. And then Weatherford transported
16 it to BP's facility -- to Tuboscope to get
17 bucked up?
18 A. Well, Weatherford called the
19 truck for -- for BP to transport it.
20 Q. Okay.
21 A. Right.
22 Q. Okay. And then Weatherford
23 assembled it on the rig? Assembled the
24 casing, including the cementation equipment
25 on the rig?
00325:01 A. Yes. Yes.
02 Q. And throughout all of these
03 activities, did Weatherford find that
04 there -- notice anything wrong with this
05 equipment?
06 A. Not to my knowledge.
07 Q. And that was -- and if there was
08 something wrong -- if Weatherford had found
09 something wrong, they would have told BP,
10 hey, there's something wrong with this
11 equipment?
12 A. Yes, I would assume so.
13 Q. And Weatherford didn't identify
14 any problems to BP?
15 A. No, sir.
16 Q. Now, were you aware that the
17 Macondo well had a dog leg?
18 A. I know that they had to
19 sidetrack.
20 Q. And when you sidetrack, is -- is
21 there -- and when you're running casing in
22 a well that has been previously
23 sidetracked, are you more likely to run
24 less centralizers?
25 A. Again, that's totally up to
00326:01 the -- to the operator.
02 Q. Now, is -- is the fact that the
03 well has a sidetrack a consideration for
04 the number of centralizers that you run?
05 A. Again, that's totally up to the
06 operator whether they -- of how many

07 centralizers they think they need to run.
08 Q. Do you agree that the operator
09 would consider whether or not the well has
10 a sidetrack in deciding the type of
11 centralizers to run?
12 MR. DART:
13 Object to form.
14 A. I guess they -- that would
15 make -- that could make a decision in
16 somebody's mind.
17 Q. Okay. So you've never been told
18 that in your experience?
19 A. No.

Page 326:21 to 328:17

00326:21 (Exhibit Number 2585 marked.)
22 Q. I'm going to hand you a document
23 that's under tab 9, for the people who are
24 following along.
25 Do you recognize this --
00327:01 this grouping of documents? Do you
02 recognize this?
03 A. Yes.
04 Q. And so this starts with a
05 delivery ticket and it includes some
06 different checks that -- that was done, at
07 least the first few pages?
08 A. Correct.
09 Q. Okay. So we'll mark that
10 exhibit 2585.
11 I'd like you to flip to
12 the -- the page with the little number in
13 the corner, 3265.
14 Are you there?
15 A. Yes, sir.
16 Q. Okay. And this is -- it says on
17 the top, this is a Weatherford Enterprise
18 excellence form, correct?
19 A. Correct.
20 Q. And the customer is BP America,
21 date April 1st, 2010, correct?
22 A. Correct.
23 Q. And this -- and the list of
24 Weatherford equipment on job site includes
25 the M222 reamer shoe, two M45AP float
00328:01 collars, and six 541R centralizers,
02 correct?
03 A. Correct.
04 Q. And then under full explanation
05 of all services rendered, I'm going to read
06 it to you.
07 It says, Uncrate and clean
08 threads for Hydril thread inspection.
09 Re -- re-crate and reapply Kendex to

10 threads. All equipment is okay to run.
 11 Did I read that correctly?
 12 A. Correct.
 13 Q. So this was what we were talking
 14 about before when Weatherford had inspected
 15 the equipment and said that it was okay to
 16 run?
 17 A. Correct.

Page 329:01 to 332:06

00329:01 Q. -- whether or not it was debris
 02 tolerant?
 03 Do you know whether or not
 04 a -- a string was used in the -- in the
 05 shoe assembled at the Macondo well?
 06 A. I believe there was a baffle in
 07 the -- in the reamer shoe.
 08 Q. And do you know what the
 09 openings on the baffle are, what types
 10 of -- what size particles it would prevent
 11 from going up?
 12 A. I -- I'd have to refer back to
 13 the drawing to verify exactly what those
 14 ports are in that --
 15 Q. And what drawing would you need
 16 to refer back to? Maybe we have it.
 17 A. I haven't seen that drawing.
 18 I'm not sure where that drawing would be.
 19 It's --
 20 Q. Do -- do you have --
 21 A. -- it's an assembly drawing of
 22 the -- of the reamer shoe.
 23 Q. Okay. Do you have an idea in
 24 your head whether the openings were half an
 25 inch by half an inch, an inch by an inch?
 00330:01 A. It's probably from one inch, and
 02 there's probably five or six one-inch ports
 03 in that -- in that baffle.
 04 Q. Okay. So if you had that
 05 baffle, it would prevent debris larger than
 06 one inch by one inch from passing the
 07 baffle?
 08 A. Yes. I would -- if it's --
 09 Q. If that were the --
 10 A. If it's too big to get through
 11 the ports, you're right.
 12 Q. If -- if that were the
 13 dimensions also?
 14 A. Yes.
 15 Q. Okay. And then further, that
 16 there's a cage on top of the -- on top of
 17 the tube that prevents the ball from
 18 leaving the tube.
 19 Do you know what I'm

20 talking about, or should we look at the
21 schematic?
22 A. No. It's -- it's the retainer,
23 what I had mentioned earlier.
24 Q. Right. The retainer. And so
25 the retainer also -- I mean, the tube is
00331:01 two inches, correct, the -- the auto-fill
02 tube?
03 A. Right.
04 Q. So the retainer retains the ball
05 that is 1.9 inches from leaving the
06 auto-fill tube?
07 A. Again, I'd have to look at that
08 dimension. I'm not -- off the top of my
09 head what that dimension of that retainer
10 is.
11 Q. Okay. Right. But the
12 retainer -- can you describe the retainer
13 to us?
14 A. The retainer does not let the
15 two-inch conversion ball -- it can ride up
16 to the retainer and stop. It can't go any
17 further than that.
18 Q. Is the retainer a series of
19 prongs that come in and prevent the ball
20 from passing upwards?
21 A. Correct. There's three little
22 prongs that are -- that retain that ball.
23 Q. So that would be a -- if debris
24 were able to make it into the -- into
25 the -- past the reamer shoe and then past
00332:01 the baffle, and then into the auto-fill
02 tube, two-inch auto-fill tube, it would
03 also have to make it past the retainer in
04 order to get above the float collar?
05 A. Yes.
06 Q. Okay.

Page 332:22 to 333:02

00332:22 Q. So you would agree that if any
23 debris reached above the float collar, it
24 would have to fit through those various
25 obstructions and travel up the float
00333:01 collar?
02 A. Yes.

Page 333:05 to 333:09

00333:05 Q. And therefore, any debris that
06 would be forced through the float collar
07 and past the float collar and the valves,
08 would be of only the size that traveled up
09 past the float collar in the first place?

Page 333:14 to 334:03

00333:14 A. Yeah. I mean you -- you could
15 have debris coming from other places also,
16 too, so --
17 Q. What other places?
18 A. It just -- just in the -- in the
19 mud system itself.
20 Q. Oh. In the mud that's pumped
21 from the rig down --
22 A. Yeah. Yeah.
23 Q. -- down to the -- okay. And it
24 would be the drilling contractor's
25 responsibility to strain and clean that mud
00334:01 before it's pumped down?
02 A. I'm not sure who's -- who's
03 responsible for that.

Page 334:07 to 334:07

00334:07 (Exhibit Number 2586 marked.)

Page 334:12 to 336:11

00334:12 Q. So this is an e-mail from you to
13 Marcel Budde, Guus Versteeg, and Simone Ell
14 with copy to others, correct?
15 A. Correct.
16 Q. And are all of the recipients
17 Weatherford employees?
18 A. Correct.
19 Q. And this is a document that you
20 prepared in the ordinary course of your
21 work at Weatherford?
22 A. Yes.
23 Q. Okay. And I'd like to read to
24 you the first two sentences.
25 It says, I just wanted to
00335:01 thank everyone again for all of your help
02 to get the 9-5/8 -- and then that should
03 actually say 9-7/8, right?
04 A. No. The -- the plugs are
05 actually called 9-5/8 by 7-inch.
06 Q. Oh, okay. Fair enough. So let
07 me start over from the beginning.
08 I just wanted to thank
09 everyone again for all your help on the
10 9-5/8 by 7-inch combination DWP SSR plug
11 set order for BP. The job went well. I
12 will try to get all the information I can
13 on this job. The 3140 psi with the
14 pressure it took to break circulation

15 through the float equipment. Thanks again.
16 Did I read that correctly?
17 A. Uh-huh. Yes.
18 Q. And should the last sentence
19 actually say the 3140 psi was the pressure
20 it took to break the circulation?
21 A. Right.
22 Q. Okay.
23 A. Sorry about that.
24 Q. And -- it's no problem.
25 And so when you sent this
00336:01 e-mail, did you understand that the float
02 equipment had converted?
03 A. All indications of -- again,
04 the -- that Brian had let us know that we
05 had, again, full returns, we saw the bottom
06 plug, we saw the top plug, and -- and plug
07 landed right on time and the floats held.
08 Q. Okay. And since -- since then
09 up till today, do you have any indication
10 that the float collar did not convert?
11 A. No.

Page 336:15 to 336:15

00336:15 (Exhibit Number 2587 marked.)

Page 336:20 to 339:12

00336:20 Q. This is an e-mail from Brian
21 Morel to you, dated April 22nd, correct?
22 A. Correct.
23 Q. And it says, WTFD. What does
24 that stand for, forward WTFD information
25 for Clawson?
00337:01 A. Again, I'm -- I'm assuming that
02 just means Weatherford information for
03 Clawson.
04 Q. Okay. What does the -- oh.
05 Weatherford with a D. Okay. Fair enough.
06 Can you tell me what --
07 what this e-mail -- well, did you request
08 this information? It says information for
09 Clawson.
10 A. Yes. There was an earlier
11 e-mail that I had sent Brian when we
12 weren't going to send a man on location
13 to -- when we have a man on location, we --
14 we -- he records this information, and
15 since we weren't going to have anybody, I
16 was just trying to get the information from
17 them.
18 Q. Okay. And so why did you -- and
19 is that why you requested it, or did you

20 want it for any other reason?
 21 A. No. That was the only reason
 22 why.
 23 Q. Okay. And so what did you do
 24 with this information once you received it?
 25 A. I mean, I just -- I kept it and
 00338:01 I put it in my -- my well file just for --
 02 just for future reference in case there
 03 was -- to go back to see if we had any
 04 issues.
 05 Q. Okay. And -- and given that
 06 there were issues, did you go back and take
 07 a look at this?
 08 A. Yes, I did.
 09 Q. And did you find anything out of
 10 the ordinary?
 11 A. Again, naturally the 3142 of --
 12 and the other one was the -- one of the
 13 bottom plugs had -- had landed and went to
 14 2932.
 15 Q. Okay. Anything else?
 16 A. No. A lot of pressures of the
 17 balls and stuff that -- everything was
 18 okay.
 19 Q. Okay. And did that change your
 20 opinion -- I think I asked earlier, did --
 21 does this change your opinion as to whether
 22 or not the float collar converted and
 23 operated as intended?
 24 A. No. It just -- it just
 25 reconfirmed that -- that the floats had
 00339:01 held.
 02 Q. Okay. Did you share this
 03 information with others within Weatherford?
 04 A. To be honest, I'm not -- I'm not
 05 really sure if I did or not. I don't -- I
 06 don't think I did. I'm not sure.
 07 Q. Okay. And did you keep this --
 08 is it part of your ordinary course to
 09 request this information and to keep it in
 10 your files?
 11 A. Yes. I just -- I put it in
 12 my -- in my well file.

Page 339:17 to 342:13

00339:17 (Exhibit Number 2588 marked.)
 18 Q. Take a look at this and see if
 19 you recognize this e-mail chain. Tab 19.
 20 I'm sorry. Okay.
 21 Do you -- do you recognize
 22 this document?
 23 A. Yes.
 24 Q. And the topmost e-mail is from a
 25 Jim Hollingsworth to -- to you,

00340:01 Mr. Clawson.
02 Do you remember receiving
03 this e-mail?
04 A. Yes.
05 Q. Okay. And then I want to focus
06 on the second e-mail, which is actually --
07 the second from the last e-mail, which is
08 second from the top, which was drafted by
09 you, Mr. Clawson, to Jim Hollingsworth.
10 And it says, I took as we
11 need to look at all jobs.
12 And what -- what did you
13 mean by -- by writing that? And I think
14 maybe you're missing a word. I took this
15 as we need to look at all jobs; is that
16 correct?
17 A. Right.
18 Q. And so what did you mean by --
19 by writing that?
20 A. This -- this e-mail's about
21 running our darts through the -- the
22 Allamon tool. And we have to -- we have to
23 extrude the Allamon seat that's in his tool
24 with our darts.
25 Q. Uh-huh.
00341:01 A. So it's running -- having to run
02 our darts with another type of person's
03 tool.
04 Q. Okay.
05 A. And we had done some testing
06 on -- on the -- the darts to the Allamon
07 tool.
08 Q. Right. And is that at the top
09 of the second page where you write, Jim,
10 this was run through a Weatherford
11 engineering. It was for the BP Macondo
12 well, which we -- which we had a special
13 9-5/8 by 7-inch SSR plug set built just for
14 this job for a 9-7/8 by 7-inch combination
15 long string?
16 A. Yes.
17 Q. So -- so is this similar to what
18 we were talking about before where
19 Weatherford -- you're saying Weatherford
20 needs to look at all the jobs to make sure
21 the equipment is appropriate for the job?
22 A. Right. We -- we test -- we test
23 all our darts going through his -- his
24 tool, and we did it also on this job. And
25 Jim was voicing a concern. And so if -- I
00342:01 was meaning if we -- we're going to have a
02 concern, we need to make sure we look at
03 all the -- everything again to make sure
04 there's no -- there's no issues.
05 Q. Okay. And so this document was

06 kept in your files in the ordinary course
07 of your work at Weatherford?

08 A. Yes. It would have been on my
09 computer in my -- in my -- my file.

10 Q. And it's related to your
11 cementation sales work that you do for
12 Weatherford?

13 A. Yes.

Page 342:25 to 343:06

00342:25 Q. Mr. Clawson, as I told you, I'm
00343:01 Tony Fitch. What I haven't told you is
02 that in this case I represent two
03 companies. I represent -- I represent
04 Anadarko Petroleum Corporation and I
05 represent Anadarko Exploration & Production
06 Company. And for shorthand purposes in

Page 343:12 to 352:21

00343:12 Q. Okay. Were you -- are you
13 presently aware that Anadarko is one of the
14 non-operating lease holders for the well?

15 A. Yes.

16 Q. Okay. Prior to April 20 in your
17 various involvements, you personally, with
18 the Macondo well, did you have any
19 communications with anyone from Anadarko
20 about the Macondo well?

21 A. No, I did not.

22 Q. Okay. Have you had any
23 communications, you personally, with anyone
24 from Anadarko about the Macondo well or
25 matters related thereto between April 20

00344:01 and today?

02 A. No, I have not.

03 Q. Has anyone at Weatherford -- as
04 to you in your representative capacity, did
05 anyone at Weatherford have any
06 communication with anyone from Anadarko
07 prior to or through April 20, 2010,
08 regarding the Macondo well?

09 MR. WEGMANN:

10 Objection. Outside the
11 scope. This is not the witness that was
12 designated for that topic.

13 MR. FITCH:

14 Fair point. I'll withdraw
15 that question.

16 Q. You mentioned that in preparing
17 for this deposition, you spoke to at least
18 one or two other people to gather
19 information, correct?

20 A. Yes.
21 Q. Did any of them give you any
22 information about any involvement by anyone
23 from Anadarko in the Macondo well?
24 A. No, sir.
25 Q. And I'm correct, am -- am I not,
00345:01 that -- that Weatherford had no contracts
02 with Anadarko with respect to the Macondo
03 well?
04 A. To the best of my knowledge, no.
05 Q. Okay. You -- you testified
06 that -- that you and -- and Morel exchanged
07 e-mails on March 31, 2010, about the
08 possibility of BP acquiring seven to ten
09 additional centralizers, correct?
10 A. Yes, sir.
11 Q. Okay. And Cocalles --
12 Mr. Cocalles had also contacted you about
13 that, correct?
14 A. I didn't speak with Brett on any
15 type of additional centralizers at that
16 point.
17 Q. Did you speak with Mr. Cocalles
18 about additional centralizers at some
19 point?
20 A. Yes, I did.
21 Q. When?
22 A. It was on the -- April the 15th.
23 Q. Okay. So you had no contact
24 from BP with respect to acquiring
25 additional centralizers between March 31
00346:01 and April 15, 2010, correct?
02 A. Correct.
03 Q. Okay. And when you had
04 communications with Mr. Morel on March 31,
05 he did not take the next step and ask you
06 to start preparing the centralizers,
07 correct?
08 A. Correct.
09 Q. Okay. And indeed, when Cocalles
10 spoke with you on -- on April 15, he also
11 did not actually ask you to start
12 manufacturing or preparing or acquiring
13 additional centralizers, correct?
14 A. Not any additional -- the
15 centralizers we discussed, I let him know
16 on the 15th of what Weatherford had.
17 Q. Right. But he didn't ask you
18 to -- to work up or manufacture any
19 centralizers?
20 A. Oh. No, sir. No, sir.
21 Q. You recall that you've testified
22 a little bit about the centralizers that
23 were used at the Thunder Horse well?
24 A. Yes, sir.

25 Q. And you've testified that in
00347:01 light of that situation, those
02 centralizer -- that type of centralizer was
03 modified, correct?
04 A. Yes, sir.
05 Q. And it was modified by becoming
06 thicker, correct?
07 A. That was one of them.
08 Q. And what other ways was it
09 modified?
10 A. Yes. There was some
11 additional -- some thread loc ports
12 installed in the stop collar.
13 Q. Okay. And those thread loc
14 ports were to enable an epoxy to be put in
15 and utilized as part of securing the -- the
16 centralizers, correct?
17 MR. CHEN:
18 Objection, form.
19 A. Correct.
20 Q. Approximately when were those
21 modifications made to that centralizer,
22 that -- that model centralizer?
23 A. The -- I'm trying to remember
24 the -- the dates. Once the Thunder Horse
25 well -- again, you want some timing on when
00348:01 this is --
02 Q. Yeah. And that's a -- a
03 perfectly good place to start.
04 When did this situation at
05 the Thunder Horse well occur,
06 approximately, 2000 and --
07 A. The best I could recall, it was
08 about two years ago.
09 Q. Two years ago from now, or two
10 years ago from last April?
11 A. From -- from -- from today.
12 Q. So it occurred about the spring
13 or late winter of 2009?
14 A. Yes.
15 Q. Is that your best recollection?
16 A. Yeah. In early 2009.
17 Q. And following that, how soon had
18 the -- the slip-on centralizers received
19 the modifications that -- that you
20 mentioned?
21 A. Well, once we have the -- the
22 issue on -- on that particular Thunder
23 Horse well, we -- we went in with a bunch
24 of testing --
25 Q. Uh-huh.
00349:01 A. -- to redesign the -- it was
02 actually redesigning the stop collar that
03 went with the centralizer. And those
04 particular ones were okayed by BP and we

05 ran them on the next Thunder Horse well.
06 MR. CHEN:
07 Objection to form.
08 Q. Okay. When you say you ran them
09 on the next Thunder Horse well, did you do
10 that in some point in 2009?
11 A. Yes.
12 Q. So those modified slip-on
13 centralizers had actually been used in
14 drilling a well?
15 A. Yes, sir, they have.
16 Q. Okay. And when they were
17 used -- when those modified slip-ons were
18 used in drilling the next Thunder Horse
19 well, were any problems encountered with
20 them?
21 A. To the best of my knowledge, no,
22 sir.
23 Q. Okay. And did the utilization
24 of those modified slip-on centralizers
25 include the application through the new
00350:01 port holes of an epoxy?
02 A. Yes, they did.
03 Q. And indeed, they would have to
04 be properly applied based upon the
05 modifications that had been made, correct?
06 A. Yes, sir.
07 Q. Okay. Was that epoxy -- if you
08 know, was that epoxy applied onshore or on
09 the -- whatever rig was drilling Thunder
10 Horse?
11 A. Those were onshore.
12 Q. Okay. And why?
13 A. It just -- you -- it's a special
14 way to have to install them. You've got to
15 buff the pipe, slip them on, tighten the
16 set crews down, and inject the thread loc.
17 It's easier to do it onshore.
18 Q. You have to buff the pipe
19 because -- just as if I want to glue my two
20 hands together, you need a clean surface,
21 right?
22 A. Correct.
23 Q. Okay. Any other steps necessary
24 in preparing the surface for -- or the
25 application of the epoxy?
00351:01 A. No, sir.
02 Q. Okay. How long does that epoxy
03 application stage take?
04 A. I'm sorry?
05 Q. How long does it take to apply
06 the -- the epoxy as you're assembling and
07 applying the centralizers through the pipe?
08 A. I'm not sure of an exact time.
09 They -- they can probably install a couple

10 of the centralizers, stop collars within an
11 hour, and depending on how many guys they
12 have out there doing it.

13 Q. Okay. So if you wanted to use
14 20 centralizers in a given situation, you
15 might take 20 hours to -- for -- for that
16 phase, the application of the epoxy,
17 correct?

18 A. Again, depending on the
19 situation whether they were having to
20 install them and, again, how many people
21 and --

22 Q. Is another reason for -- for
23 assembling the centralizers that include
24 the application of the epoxy onshore to
25 provide adequate time for the epoxy to --
00352:01 to set, to cure?

02 A. I'm not -- no, not really.
03 It's -- it's just -- most of the time these
04 centralizers are just installed on the --
05 on the bank. It's a lot easier.

06 Q. And -- and how long does it take
07 for that epoxy to cure?

08 A. I'm not sure, as we discussed
09 earlier, exactly what the length of time
10 for the thread loc. I mean, I know it
11 does -- it starts hardening once you do
12 apply it at that -- at that point in time,
13 but I don't know the exact time for the
14 hardness.

15 Q. Do you know whether your company
16 recommends a period of 48 hours for the --
17 the setting and curing of the epoxy?

18 A. I -- I do not know that, no.

19 Q. Okay. Is that something that
20 Mr. Lirette might be more likely to know?

21 A. He -- he may. He may know.

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00352:23 When -- when you talked
24 to -- or communicate with Mr. Morel about
25 the additional centralizers, did you and he

00353:01 discuss that one step of using those
02 centralizers would be the use of the epoxy?

03 A. I didn't discuss those -- the
04 slip-on centralizers with -- with Morel. I
05 did with Brett.

06 Q. Okay. Did you include in your
07 discussion with Mr. Coteles the -- the
08 step, the required step of using and
09 applying the epoxy?

10 A. Yes.

11 Q. Okay. So -- so you did -- did
12 he mention that, or did -- did you mention

13 that? What do you know about that?

14 MR. CHEN:

15 Objection, form.

16 A. No, I mentioned it. We would
17 have to have a service -- I recommended a
18 service hand to be able to go on location
19 to buff -- buff the pipe.

20 Q. So it was the buffing leading up
21 to and the injection of the epoxy that was
22 at least a reason for that recommendation
23 that you testified earlier that you made to
24 BP that you have a service person on the
25 rig?

00354:01 A. Right. An experienced
02 service -- Weatherford service hand to
03 install this particular stop collar,
04 correct.

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00354:10 Q. Is there a cost differential
11 between the modified slip-on
12 differential -- centralizer that we've been
13 discussing on the one hand and the -- the
14 centralizer subs on the other hand?

15 A. Yes.

16 Q. Which is the more expensive?

17 A. The sub.

18 Q. Okay. And what kind of
19 differential are we talking about? 100
20 percent? 200 percent? 300 percent?

21 A. It's substantial.

22 Q. Two or three times as much?

23 A. Yes.

24 Q. Okay. In -- in addition to
25 the -- the use of the modified -- or
00355:01 redesign slip-on centralizer at the Thunder
02 Horse well, have others of your customers
03 used that modified design? You mentioned
04 your other customers are Chevron and --
05 your other main customers and all those,
06 BHP and so on, have they used that design?
07 A. In what -- what time frame are
08 you --

09 Q. Since that modification was
10 made.

11 A. Yes. Yes.

12 Q. In -- in roughly 2009 and 2010,
13 in other words?

14 A. You mean after -- after the --
15 this is after the -- the incident?

16 Q. No. I meant after -- from the
17 time in 2009 when that redesign was arrived
18 at and implemented.

19 You told me that that was

20 used at Thunder Horse?
21 A. Correct.
22 Q. And I'm asking you if it's been
23 used at other wells by other customers as
24 well.
25 A. Yes, it has.
00356:01 Q. Okay. And has there been any
02 problems with the use by those other
03 customers?
04 MR. CHEN:
05 Objection, form.
06 A. To my knowledge, no.
07 Q. Okay. Did -- did there come a
08 time when, with respect to the Macondo
09 well, when -- when Weatherford manufactured
10 for BP a special set of cement plugs?
11 A. Yes.
12 Q. Okay. And when was that?
13 A. The date, again, I believe was
14 like at the beginning -- at the beginning
15 of April.
16 Q. Okay. And when did BP request
17 that that be done?
18 A. I can't remember their exact
19 date. I received the e-mail from Brian
20 Morel telling me to go ahead and order two
21 sets.
22 Q. Okay.
23 A. I can't remember what that exact
24 date was.
25 Q. What does it take to manufacture
00357:01 a -- a -- are these the so-called wiper
02 plugs that we're talking about now, or is
03 this something different? You -- you --
04 you did a job that you referred to as a
05 special plug set order?
06 A. Correct.
07 Q. And in fact, that's -- that's
08 why you were congratulating your -- your
09 colleagues in the one that BP showed you,
10 right?
11 A. Correct.
12 Q. You were pleased that they had
13 been able to -- to fill that order on short
14 notice, correct?
15 A. Yes, sir.
16 Q. And BP, in fact, had -- had
17 asked you to manufacture that on a rush
18 basis, correct?
19 A. Yes, sir.
20 Q. Okay. And so there are some
21 instances when BP asked you to manufacture
22 drilling equipment on a rush basis,
23 correct?
24 A. Yes, sir.

25 Q. Okay. Before -- before the BP
00358:01 lawyer mentioned this 30 minutes ago, had
02 you ever heard of a BP policy against
03 purchasing equipment that had been
04 manufactured on a rush basis?
05 MR. CHEN:
06 Objection, form.
07 A. No, sir, I never heard that
08 before.
09 Q. With respect to the -- these
10 float collar issues, does -- does
11 Weatherford consider a float collar to be a
12 barrier to hydrocarbon flow?
13 A. Again, the -- from my knowledge
14 of -- for float collars is to hold the
15 cement back during a cement job.
16 Q. Right. And that -- that is its
17 sole purpose?
18 A. Correct.
19 Q. And am I correct that the
20 American Petroleum Institute also does not
21 consider a float collar to be a barrier?
22 MR. CHEN:
23 Objection, form.
24 A. I'm not familiar, really, with
25 the -- with the Petroleum Institute, what
00359:01 they consider...
02 Q. Do -- do float collars -- those
03 flapper valves, what -- what -- is there
04 a -- a quality assurance process for them
05 once they're manufactured?
06 A. Yes, sir. I'm sure there is.
07 Q. Okay. Do -- do you know what it
08 is?
09 A. No, sir, I do not.

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00359:24 Q. Okay. Do you -- do you -- do
25 you know personally whether the -- the
00360:01 flapper valves, when they work, when
02 they're up creating a seal, is that a gas
03 tight seal?
04 A. No, sir, I do not.
05 Q. Okay. Now, for the -- for the
06 float collar to convert, it has to -- to
07 break through or shear off the pins that
08 are holding it in place, correct?
09 A. Correct. Yes, sir.
10 Q. And how many pins are there that
11 are holding it in place in -- in the model
12 of the -- that we've been talking about?
13 A. I'd have to refer back to the
14 drawing. I believe there's four pins on
15 this particular one.

16 Q. I think I can tell you what that
17 exhibit number was. Give me just a second.
18 I think the color one is 2581. It's been
19 marked twice this morning. 2581. And 2562
20 in black and white. There you go.
21 MR. RUSSO:
22 2582.
23 Q. My -- my question, I think, was
24 how many pins are there that has to be
25 sheared?
00361:01 MR. RUSSO:
02 I may show him 2583, if you
03 don't mind?
04 MR. FITCH:
05 And what's that? Okay.
06 MR. RUSSO:
07 I don't know if it will or
08 not, but --
09 A. To be honest, I'm not sure how
10 many it is. It -- here, it's just the --
11 the valve assembly and -- again, I -- I
12 believe it's -- it's four. It's four shear
13 screws.
14 MR. RUSSO:
15 Okay. We're going to stop
16 you from asking him these questions. But
17 Mr. Lirette, I think, is going to be able
18 to answer these in much quicker --
19 MR. FITCH:
20 Okay.
21 Q. Do you personally know what --
22 what -- what those shear pins are made of?
23 A. No, sir, I do not.
24 Q. Okay. Now, the basic structure
25 of this casing is that there was 9-7/8-inch
00362:01 casing, correct, and then below that they
02 used seven-inch casing, right?
03 A. Correct.
04 Q. And a -- a -- a wiper plug had
05 to be utilized in the running of this
06 casing, correct?
07 A. Correct.
08 Q. And that wiper plug had to -- it
09 basically wipes off the walls of the
10 casing, right?
11 A. Yes, sir.
12 Q. And what's that wiper plug look
13 like? Can you describe it in words, or can
14 you draw it in the air?
15 A. Yes, sir, I can.
16 Q. Okay.
17 A. This particular was --
18 they're -- they have polyurethane fins with
19 a -- a composite core.
20 Q. Okay. So it has a core and it

21 has some fins sticking out from it?
 22 A. Correct.
 23 Q. Okay. And that core has to be
 24 smaller than seven inches, I assume, right?
 25 A. Correct.
 00363:01 Q. Because if the core were
 02 somewhere around nine inches or 8.9 inches,
 03 it wouldn't go down into the seven-inch
 04 casing, right?
 05 A. Correct.
 06 Q. Okay. And then from that --
 07 from that slightly less than seven-inch
 08 core, you've got -- what did you call them
 09 that's sticking out in the side?
 10 A. We call them fins.
 11 Q. Fins. Yeah. Fins. Okay.
 12 And are those fins stiff
 13 fins or floppy pins -- fins? What are
 14 they?
 15 A. They're -- they're pretty stiff
 16 but they're -- they're moveable. I mean,
 17 they're -- you can move them with your
 18 hands.
 19 Q. Okay. And do they -- they
 20 equally clean both the -- the nine-inch --
 21 9-7/8 casing and the seven-inch casing?
 22 A. Are you talking about on this
 23 particular job?
 24 Q. Uh-huh.
 25 A. Yes, because the -- they
 00364:01 informed me that the -- they saw
 02 indications and they -- they bumped top --
 03 top plug and they had full returns, so it's
 04 telling me that the -- the plug did what
 05 they were supposed to do.
 06 Q. Is it -- is it preferable to
 07 have one size casing with respect to the
 08 operation of the wiper plugs?
 09 A. I don't have any opinion on
 10 that. I'm just --
 11 Q. Okay. Was this wiper plug --
 12 this is the wiper plug that -- that you
 13 specially built just for this -- this well,
 14 correct?
 15 A. Correct.
 16 Q. Okay. Was there anything
 17 unusual about the design of the wiper plug?
 18 A. To my knowledge, no, sir.

Page 365:10 to 367:22

00365:10 Q. Well, give me just a minute
 11 here. I'm hoping to find one more --
 12 you -- when you were testifying about
 13 the -- the Allamon ball, you testified, did

14 you not, that at 1300 pounds per square
15 inch it could have been blown out through
16 the retainer, correct?
17 A. Yes.
18 Q. But you said also that -- that
19 that possibility is kind of irrelevant
20 because the ball wasn't there?
21 A. Correct.
22 Q. What did you -- A, what did you
23 mean by that? When you said it wasn't
24 there, what does that mean?
25 A. They -- they would drop the
00366:01 ball from -- from surface to be able to
02 close the Allamon tool.
03 Q. Okay.
04 A. Once they close --
05 Q. And this, of course, is a
06 separate ball from the ball in the -- in
07 the float collar?
08 A. Right. The ball in the float
09 collar is retaining where it can't come
10 out.
11 Q. Okay.
12 A. Once the Allamon ball goes to
13 the -- its tool, it closes its tool. Now
14 you can start circulating down the -- the
15 casing string.
16 Q. Uh-huh.
17 A. And immediately they started to
18 pressure up right then. And that's when
19 they -- and so --
20 Q. Okay. That -- that much I
21 followed you. But then you said that the
22 possibility of it blowing through is -- is
23 kind of irrelevant because the ball wasn't
24 there.
25 A. Right. The ball was -- would
00367:01 still be up, further up the casing string.
02 Q. At the time they started
03 pressuring up; is that what you're saying?
04 A. Right. Because it was already
05 blocked off at that point in time.
06 Q. Okay. And how do you know that?
07 A. I just -- by -- by looking at
08 the drilling report.
09 Q. Okay. And do you recall which
10 drilling report you're referring to?
11 A. It would just -- the BP daily
12 drilling report.
13 Q. Okay. For, presumably,
14 April 19th?
15 A. Yes.
16 Q. Okay. Does -- does Weatherford
17 have a -- if you know personally, a -- a
18 recommendation as to how long, over a

19 period of time, once you circulate to make
20 sure that float collar has converted?
21 A. No, sir. I don't know of any
22 recommendation.

Page 368:15 to 368:16

00368:15 Q. Good afternoon. My name is
16 Bruce Bowman representing Halliburton.

Page 369:03 to 378:16

00369:03 Q. Okay. So now, just to make
04 sure. You sold, what, three products here?
05 As far as the product itself, you sold the
06 reamer shoe and you sold the float collar
07 and you sold centralizers?

08 A. On --

09 Q. On the Macondo well. Right or
10 wrong?

11 MR. LEMOINE:

12 Objection to form.

13 A. Well, it was purchased
14 through -- to Nexen -- through Nexen.

15 Q. Through Nexen. That's what I'm
16 trying to clarify.

17 I -- so y'all manufacture
18 those three products?

19 A. Yes.

20 Q. And what did you then do with
21 them as far as Nexen is concerned?

22 A. As far as Nexen is concerned, it
23 was -- it was billed to Nexen and put in
24 their customer-owned inventory.

25 Q. Okay. So you actually
00370:01 manufactured and sold these to Nexus (sic)?

02 A. Nexen, correct. Yes.

03 Q. Do you know how BP -- did BP
04 come to deal with Nexus directly?

05 A. Yes. We -- Weatherford let BP
06 know that they had some equipment that
07 would match their pipe.

08 Q. And did Weatherford get any
09 money as a result of BP purchasing
10 something through Nexus?

11 A. To my knowledge, no.

12 Q. It was just sort of a gratis
13 deal you did for them?

14 A. Yes, sir.

15 Q. You did it gratis so, I presume,
16 that you would make some money from BP
17 later?

18 MR. RUSSO:

19 Object to the form.

20 A. I'm --
21 Q. I mean, you're a salesman. I
22 mean nothing evil about it.
23 Isn't that the reason you
24 were doing it?
25 A. No. Well, what we do -- it's a
00371:01 typical thing that we'll -- we'll do for
02 any -- any customer and stuff. It's -- we
03 stored it for Nexen and BP bought it from
04 Nexen, so we took care of it and shipped it
05 to where -- wherever BP wanted it.
06 Q. Okay. And you knew that BP
07 needed the equipment because of what we
08 talked about earlier when you had been
09 shown some -- some sort of schematic or
10 something of the well in the fall of 2009?
11 A. No, sir. That was not on the
12 schematic.
13 Q. That was not on the schematic.
14 So when is the first time
15 you found out about the three items that
16 were purchased through Nexus by BP?
17 A. When it was e-mailed to me
18 wanting the -- the actual description, a
19 better description of what exactly what
20 type of equipment was in that inventory.
21 Q. Okay. Okay. Prior to then,
22 what items had you sold to BP for the
23 Macondo well? Anything?
24 A. Oh, yes. Yes --
25 Q. Yeah.
00372:01 A. -- numerous equipment.
02 Q. A lot of stuff.
03 Just give me some examples.
04 A. We sold --
05 Q. On the well itself. On the
06 Macondo.
07 A. Yeah, from 28-inch all the way
08 down to 9-7/8.
09 Q. Okay. Now then, services. Did
10 you have anything to do with the services?
11 Not on equipment but services, such as the
12 casing?
13 A. No, sir.
14 Q. That's somebody else on the way
15 to Weatherford?
16 A. Definitely -- yes, somebody else
17 at Weatherford.
18 Q. That's just not you?
19 A. No, sir.
20 Q. You did know, or did you not
21 know, that someone else at Weatherford was,
22 in fact, selling the services of
23 Weatherford as far as running the
24 production casing?

25 A. Yes. I knew the Weatherford
00373:01 service guys were doing that -- doing that.
02 Q. And how did you find that out?
03 A. I just knew the -- I just knew.
04 I don't know how I found out. I just knew
05 that Weatherford was running the Tubular
06 Running Services on that rig.
07 Q. That's just something you keep
08 up with?
09 A. No, sir. It's just --
10 Q. You just knew it?
11 A. I just knew it. I mean it was,
12 you know...
13 Q. Okay. Tell me the difference in
14 a model M45AP and a M45AO.
15 A. The AO does not have the landing
16 plate. The AP, that P signifies having a
17 Weatherford landing plate installed in it
18 to -- during -- during the manufacturing.
19 Q. Okay. What in the world does
20 that mean?
21 A. The AO doesn't have the plate.
22 Q. I understand. So what does the
23 plate do?
24 A. The plate has -- it's a -- it's
25 a profile for the Weatherford plug to land
00374:01 on.
02 Q. It's where the plug is supposed
03 to land?
04 A. Correct.
05 Q. Okay. Would it have been
06 appropriate in your mind to have used a
07 model M45AO on this well?
08 A. No, because it didn't have the
09 landing plate.
10 Q. Okay. Now, let me show you what
11 has been marked as -- okay -- 21 -- it
12 looks like 2582. Okay. Now then, I want
13 to try to clarify something.
14 Do you know -- well, first
15 of all, what do you call this?
16 A. I mean I just -- I just call it
17 a -- a tech sheet.
18 Q. Okay. So do you know if this
19 tech sheet is the same tech sheet that was
20 in effect or being used on April of 2010?
21 A. That it was being used?
22 Q. Yes, sir. This same tech sheet?
23 A. This -- no. This tech sheet,
24 no, it was not.
25 Q. This tech sheet was not being
00375:01 used.
02 Where is the tech sheet
03 that was being used in 2010?
04 A. To my knowledge, this M45AP

05 tech -- tech sheet didn't exist.
06 Q. This M45AP tech sheet did not
07 exist?
08 A. Correct.
09 Q. Okay. Well, what model was used
10 on the Macondo well?
11 A. The M45AP.
12 Q. Okay. Was there a tech sheet in
13 2010, prior to April 20th, that went with a
14 model M45AP?
15 A. No, sir.
16 Q. No, there was no tech sheet.
17 Okay. But when you sold
18 it, what -- what did you give your
19 customers?
20 A. We supplied them the -- the
21 drawings of the actual pieces of equipment.
22 Q. The drawings.
23 Okay. Do you know if those
24 drawings had been produced in this case?
25 A. Yes.
00376:01 Q. Okay. They have been.
02 What do they look like?
03 A. They're in that pile.
04 Q. They're in that pile?
05 Why don't you grab the
06 pile.
07 A. Well, I'm --
08 Q. Well, go ahead and take your
09 time and grab -- grab them.
10 A. This -- this was the collar
11 right there. Exhibit number 2583.
12 Q. 2583. This one right here?
13 Okay.
14 So 2583 is what was -- was
15 that supplied to somebody in connection
16 with the Macondo well?
17 A. I'm sorry?
18 Q. Was 2583 supplied to someone in
19 connection with the Macondo well?
20 A. Yes. I believe it was, yes,
21 sir.
22 Q. Okay. Did you supply it to
23 somebody?
24 A. Yes, sir. I believe so, yes,
25 sir.
00377:01 Q. Who did you supply it to?
02 A. To Brian Morel.
03 Q. Brian Morel. Okay.
04 Now then, do you know if
05 the model M45AP was changed in any way in
06 this design after April 20th of 2010?
07 A. No. No, sir.
08 Q. No, it wasn't, or, no, you don't
09 know?

10 A. I'm sorry?
 11 Q. I'll try again. I know it's
 12 been a long day.
 13 Do you know if the model
 14 M45AP was changed in its design in any way
 15 after April 20th of 2010?
 16 A. To my knowledge, no, it has not
 17 been changed.
 18 Q. Okay. It hasn't been changed.
 19 So even though the tech
 20 sheet that was 2582 did not exist, as far
 21 as you know, the information on the tech
 22 sheet, 2582, should still be applicable to
 23 the actual model M45AP that was used on the
 24 Macondo well?
 25 A. Yes, sir.
 00378:01 Q. Okay. How come you came out
 02 with a fancy little tech sheet and before
 03 you just had this little drawing?
 04 A. I'm not sure.
 05 Q. Not sure?
 06 A. I can't answer that question.
 07 Q. You didn't have anything to do
 08 with it?
 09 A. No, sir.
 10 Q. How -- when did you first find
 11 out you were coming out with a nice colored
 12 tech sheet?
 13 A. I can't recall exactly when I --
 14 Q. Okay. And how did you find out?
 15 A. I can't recall how -- I got --
 16 that came out. I don't recall.

Page 379:12 to 388:02

00379:12 Q. Now then, do you know what the
 13 reamer shoe was made of?
 14 A. What's the --
 15 Q. Yeah, what was the -- right. I
 16 mean, what was it made of, the reamer shoe?
 17 A. The material?
 18 Q. Yes, sir.
 19 A. Again, to the best of my
 20 knowledge, they -- they make those out of
 21 a -- a 4140 P110 material.
 22 Q. Okay. Now then, does either
 23 2583 or 2582 say what the actual float
 24 collar was composed of, what -- what it was
 25 made of?
 00380:01 A. No, sir. I take that back.
 02 The -- yes, the -- the 2583 has the -- the
 03 HCQ125 material.
 04 Q. Okay. I'm sorry. Repeat that.
 05 The what?
 06 A. The -- it's the HCQ125 material.

07 Q. And what is that material?
08 A. It's HCQ125 material.
09 Q. Okay. Is it metal? Is it a
10 composite --
11 A. It's a --
12 Q. -- is it a fiberglass? Is it a
13 carbon?
14 A. -- it's a -- it's a pipe grade.
15 I'm sorry.
16 Q. It's a pipe grade. Okay.
17 I've seen some sort of
18 reference about the float collar having
19 some sort of composite in it. Do you know
20 about that?
21 A. No, sir, not on the M45.
22 Q. Okay. Let me ask you something
23 else before I forget.
24 I think you said earlier
25 that there was cement in the float collar?
00381:01 A. Yes, sir.
02 Q. Now, where did the cement come
03 from? This -- because this is before the
04 cement job and this is when the float
05 collars come down.
06 What kind of cement would
07 it have come from?
08 A. The -- do you -- would you like
09 me to show?
10 Q. Sure. That would be easier.
11 A. Yes. It's the -- this is --
12 this is the cement part, and it's -- it's
13 put there during manufacturing.
14 Q. Okay. And so Weatherford put
15 that cement in the float collar.
16 What kind of cement, do you
17 know?
18 A. I -- I don't know the
19 specification of that particular cement.
20 Q. Okay. Do you know what the
21 composition of that cement is?
22 A. No, sir, I don't know.
23 Q. Do you know how I would find
24 that out?
25 A. I would have -- I would have to
00382:01 get with my engineering.
02 Q. Okay. How about what's the
03 purpose of the cement being put in there?
04 A. I'm -- the purpose of the cement
05 there is to hold everything -- a place to
06 hold the plate in place.
07 Q. Okay. And how long does that
08 cement, in theory, stay in the float
09 collar? Like forever and ever?
10 A. Yes, sir.
11 Q. Okay. Now, let's talk for a

12 moment about some pressures.
13 Do you know -- obviously,
14 we've been talking about the fact that
15 there was a blockage and somehow there was
16 not a conversion until they pressured up to
17 3100 psi or something. Okay. And I think
18 I understand that your float collar has
19 been pressure tested to, what, over
20 6,000 psi or something, pressure going down
21 from the top; is that fair?
22 A. 6800 psi bump pressure.
23 Q. Okay. And you -- you tested it
24 coming up for almost that much or what,
25 5,000?
00383:01 A. 5,000 differential.
02 Q. Okay. Did anyone do any kind of
03 test to figure out how much pressure in
04 this Macondo well could have come up on the
05 float collar?
06 A. This particular job? Not that
07 I'm aware of.
08 Q. Okay. Now, if, in fact, there
09 was a blockage and pressure's being
10 asserted to the float collar to try to get
11 rid of the blockage, do you have any idea
12 how much pressure would be built up in the
13 shoe track?
14 A. No, sir, I wouldn't -- I
15 wouldn't know that.
16 Q. Okay. Have you ever, like --
17 we've all seen, like, balloons, right? And
18 you have a balloon and you have pressure in
19 it and when it releases or pops it -- it
20 really comes out quickly.
21 Have you ever seen that?
22 A. I'm not sure what you're --
23 Q. Have you ever seen a balloon
24 pop?
25 A. Yes. Yes, sir.
00384:01 Q. Okay. A balloon pop, when it
02 comes out very quickly, could be called a
03 surge.
04 Do you understand that?
05 A. Yes, sir.
06 Q. Okay. So I think the answer is
07 that you're not going to know, but has
08 anyone tried to study and see what amount
09 of surge could have happened in the shoe
10 track once the reamer shoe, if that's where
11 it was stuck, was opened?
12 A. Not to my knowledge.
13 Q. Okay. That's fine. Now, let me
14 slightly switch on a few things right now.
15 On the -- the wiper plug.
16 Now, what did y'all do exactly with the

17 wiper plug? I'm -- I'm confused whether
18 that was specially manufactured for this or
19 not.

20 A. Yes, it was.

21 Q. It was for this. Okay.

22 And why was that? I mean
23 you have other wiper plugs, right? Or
24 wrong? Maybe you don't.

25 A. Yes -- yes, sir.

00385:01 Q. Okay. And so why did you
02 specially manufacture the one for this?

03 A. 'Cause we didn't have this
04 particular one in stock.

05 Q. Okay. And what was unusual
06 about this, the size of it or the way it
07 was manufactured or what?

08 A. The size of it.

09 Q. The size.

10 So it was a fairly standard
11 design, it was just a different size?

12 A. Yes.

13 Q. Okay. So how long did it take
14 you to manufacture?

15 A. I'm not sure the whole -- the
16 time of exactly when it was ordered
17 through the -- the process until when it
18 was shipped. I believe it was around seven
19 to ten days.

20 Q. Okay. And is that something
21 that you actually manufactured and sold
22 directly to BP, or was that something
23 through Nexen?

24 A. That was sold directly to BP.

25 Q. That was to BP. Okay.

00386:01 And that was after they had
02 already decided to purchase the reamer
03 shoe, the centralizers, and the float
04 collar from Nexen?

05 A. Yes, sir.

06 Q. Okay. And where was -- was it
07 one wiper plug or two?

08 A. It was a dual. Dual.

09 Q. Dual.

10 And where were the two
11 wiper plugs manufactured?

12 A. At Weatherford in -- in Holland.

13 Q. In Holland?

14 A. Yes.

15 Q. Holland like Texas or Holland
16 like Holland?

17 A. The Netherlands. I get confused
18 between Holland, the Netherlands.

19 Q. Okay. Over there in the United
20 Kingdom.

21 And so -- actually, how

22 many manufacturing sites does Weatherford
 23 have?
 24 A. How many?
 25 Q. Yeah.
 00387:01 A. I don't know exactly how many.
 02 Q. Well, it must -- must be a lot,
 03 just judging from your answer?
 04 A. Well, there's -- I know there's
 05 at least seven or eight different places --
 06 China, Saudi, Dubai, Italy.
 07 Q. Okay. Got any in Texas?
 08 A. Are you talking about the plugs
 09 or just --
 10 Q. Just manufacturing.
 11 A. Just in Texas?
 12 Q. Okay.
 13 A. Not to my knowledge, no.
 14 Q. Not to your knowledge.
 15 Do you have any in the
 16 United States?
 17 A. Yes. In Houma.
 18 Q. In Houma?
 19 A. Houma, Louisiana.
 20 Q. Houma, Louisiana. Okay.
 21 What's manufactured there?
 22 A. The -- the Weatherford
 23 cementation equipment.
 24 Q. Like float collars?
 25 A. Float collars.
 00388:01 Q. Okay. But not the wiper plugs?
 02 A. Not the wiper plugs.

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00388:12 Q. Okay. So now, I'll try to
 13 establish. Who -- who was it that actually
 14 approached you about the reamer shoe?
 15 A. I got an e-mail from -- from Al
 16 Crane wanting a description about -- of
 17 that particular reamer shoe.
 18 Q. Okay. And Mr. Crane was who?
 19 A. He was one of the procurement
 20 guys at BP.
 21 Q. At BP. Okay.
 22 And you -- there's some
 23 e-mails here that showed that -- I'm not
 24 sure if it's Morel or Cocala decided to go
 25 with the reamer shoe?
 00389:01 A. Yes, sir.
 02 Q. Okay. So it was that period of
 03 time?
 04 A. Yes, sir.
 05 Q. Okay. Did you have any
 06 discussions with Mr. Crane about why a
 07 reamer shoe versus some other shoe?

08 A. No, sir.
09 Q. No? Okay.
10 He just says, I want a
11 reamer shoe, and you -- you found it for
12 him? Is that generally fair?
13 A. Again, we had let what was in
14 Nexen's inventory, let BP know what was in
15 the Nexen inventory.

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00390:04 Q. Actually, why don't you pull out
05 tab 6.
06 I believe you indicated you
07 had read some of the National Commission
08 report?
09 A. I'm sorry?
10 Q. I believe you indicated you'd
11 read some of the National Commission
12 report?
13 A. Yes, sir.
14 Q. Let me just try to hand you --
15 it's bound to have been previously marked
16 some other time. It's in tab 6. And if
17 you could, go to page 87. I'm just going
18 to ask you a few quick questions about
19 that, about the shoe track length and the
20 placement.
21 Do you see that?
22 A. Yes, sir.
23 Q. Okay. Now, the last sentence
24 indicates that tail cement may be
25 contaminated by mud, scraped from the
00391:01 casing by the tight -- top wiper plug.
02 Do you see that sentence?
03 A. No, sir.
04 Q. No, sir? Okay.
05 A. Okay.
06 Q. You find it?
07 A. The purpose of the shoe track,
08 yes, contaminated the tail cement, yes.
09 Q. Now, do you agree that the tail
10 cement may be contaminated by mud scraped
11 from the casing by the top wiper plug?
12 A. I mean, I'm not -- I'm not a
13 cementer. I'm not -- I'm not sure whether
14 it could or not.
15 Q. Okay. Do you know if one
16 purpose of the shoe track is to contain
17 contaminated tail cement?
18 A. Yes.
19 Q. Okay. What's below the reamer
20 shoe?
21 A. I'm sorry?
22 Q. What is below the reamer shoe in

23 the well?
24 A. I'm not -- I don't --
25 Q. I mean what it's called, do you
00392:01 know? Is there anything below a reamer
02 shoe? No?
03 A. No.
04 Q. Have you ever heard of something
05 called a rathole?
06 A. Oh. Yes.
07 Q. Okay. What's a rathole?
08 A. I mean the rathole is just
09 open -- it's open hole below the reamer
10 shoe.
11 Q. Okay. And Weatherford doesn't
12 get involved in how big the rathole is or
13 anything to do with the rathole, does it?
14 A. No, sir.
15 Q. Okay. Now, let's go to the next
16 page, page 88.
17 And does that look like a
18 pretty good representation of the auto-fill
19 float collar?
20 A. Yes, sir.
21 Q. Okay. Now, go down to the last
22 sentence before attempted float conversion
23 at Macondo.
24 Do you see that?
25 A. Yes.
00393:01 Q. Okay. We have a sentence
02 saying, Achieving the requisite flow rate
03 through the two small holes is the only way
04 to convert the collar.
05 First of all, do you agree
06 with that?
07 A. Which -- which sentence again?
08 I'm sorry.
09 Q. Okay. Just look at that whole
10 paragraph. Let me just kind of show you.
11 MR. LEMOINE:
12 He's got this sentence now,
13 Bruce.
14 Q. You see this paragraph on
15 page 88?
16 A. Yes.
17 Q. Just kind of read that to
18 yourself for a minute.
19 A. Okay.
20 Q. Now, here's what I want to ask
21 you. You have that sentence says,
22 Achieving the requisite flow rate through
23 the two small holes is the only way to
24 convert the collar.
25 Do you agree that's the
00394:01 only way to convert the collar?
02 MR. CHEN:

03 Objection, form.
04 A. No.
05 Q. No.
06 How else can you convert
07 the collar?
08 A. I mean it's -- it's -- possibly
09 some type of surge can convert it.
10 Q. Some type of surge. Okay.
11 Could a surge blow out the
12 whole collar? Could you have enough
13 pressure that it destroys it?
14 MR. CHEN:
15 Objection, form.
16 A. No. Again, the -- the bump
17 pressure rating is 68' with a differential
18 of 5,000, so --
19 Q. What if you have 10,000?
20 20,000? I mean could you have enough
21 pressure to just blow the whole thing?
22 A. Yes, you do.
23 Q. Okay. Now, the next sentence,
24 Significantly increasing pump pressure --
25 by the way, if you blew the whole thing,
00395:01 where would it go?
02 MR. RUSSO:
03 Object to the form.
04 Q. Probably go up, probably go
05 down, wouldn't it?
06 A. I don't know where it would go.
07 Q. Okay. Significantly increasing
08 pump pressure above 500 to 700 psi would
09 not push the auto-fill tube through and
10 convert the valves unless the flow through
11 the two side holes exceeds the flow rate
12 recommended by Weatherford.
13 Now, what do you have to
14 say about that? Is that right or wrong?
15 MR. CHEN:
16 Objection, form.
17 A. That's -- it's right.
18 Q. It's right. Okay.

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00396:07 Q. Okay. Well -- well, let's go to
08 the next page, page 89. I think we have a
09 Mr. Clawson mentioned here.
10 You know him, don't you?
11 A. Yes, sir.
12 Q. Okay. Let's kind of just take a
13 minute and just read those two paragraphs
14 right there, the one that says the crew ran
15 into a problem and then one, the rig crew
16 sought advice. Okay?
17 A. Okay.

18 Q. Okay. The last sentence of the
19 first full paragraph there says,
20 Significantly, however, the crew never
21 thereafter achieved sustained flow rates of
22 six, what, barrels per minute, which were
23 required for conversion of the float valves
24 based on calculations using Weatherford's
25 specifications.

00397:01 Okay. From Weatherford's
02 situation, is that sentence true or not?
03 A. Yes.
04 Q. Okay.
05 MR. CHEN:
06 Objection, form.

07 Q. Now, since we know that we never
08 achieved the six barrels per minute, and it
09 was always lower, what does that tell you,
10 if anything?
11 A. It doesn't -- it doesn't tell me
12 anything.
13 Q. It just raises questions?
14 A. I mean, I wasn't -- I wasn't out
15 there so, I mean, I wouldn't -- I'm not
16 sure what the situation was, so I don't
17 have an opinion on that.
18 Q. Well, let me ask you this: Did
19 Mr. Morel or anyone from BP that was out
20 there on the rig, did they know you were
21 supposed to take six barrels per minute to
22 convert the float valve?
23 MR. RUSSO:
24 Object to the form.

25 A. Yes.

00398:01 Q. Okay. And how would they know
02 that?
03 A. It was either one of the -- the
04 tech sheets that we assume. It was in
05 their drilling -- drilling procedures.
06 Q. Okay. Now then, we're getting
07 ready to go into what you were called about
08 and other people later. But did anyone ask
09 you before April 20th whether they needed
10 to have a six barrels per minute sustained
11 flow rate to convert the float collars?
12 A. No, sir.
13 Q. No?
14 That just never came up, as
15 far as you know? Didn't come up?
16 A. Didn't come up, no, sir.
17 Q. Okay. Doesn't that seem sort of
18 important to you?
19 MR. CHEN:
20 Objection, form.

21 A. What?
22 Q. Okay. We'll try that again.

23 If you were out there and
24 if you were a company man or if you were an
25 engineer working for BP and you were trying
00399:01 to ascertain whether the float valve
02 converted, wouldn't you want to know if you
03 sustained six barrels per minute or not?
04 MR. RUSSO:
05 Objection, form.
06 MR. CHEN:
07 Objection, form.
08 A. Again, I have no -- I wasn't out
09 there. I don't --
10 Q. I understand that. That wasn't
11 my question.
12 A. I never --
13 Q. If you were -- okay. If you
14 were out there and you were asked,
15 Mr. Weatherford man, okay, if you never got
16 to six barrels per minute, would these
17 float valves have converted, what would you
18 have said?
19 MR. RUSSO:
20 Object to form.
21 MR. CHEN:
22 Objection, form.
23 A. Again, without -- without
24 knowing all the facts of being out there, I
25 don't know how I can come up with an
00400:01 opinion.
02 Q. What more fact do you need
03 besides the fact that it never got close to
04 six barrels per minute?
05 MR. CHEN:
06 Objection, form.
07 A. Yes, I mean if it was -- if we
08 didn't get five or six barrels per minute,
09 I guess I would question it.
10 Q. Okay. Now then, let's go to the
11 next sentence.
12 A. I'm sorry?
13 Q. Let's go to the next paragraph,
14 the next sentence.
15 It says, Mr. Hafle e-mailed
16 a representative from Allamon and asked for
17 specifications of the auto-fill float
18 equipment.
19 Do you see that?
20 A. Yes, sir.
21 Q. Okay. Now, did Allamon have the
22 specifications of the auto-fill float
23 equipment?
24 MR. RUSSO:
25 Object to form.
00401:01 A. I don't know.
02 Q. You don't know.

03 You certainly had them,
04 right?
05 A. Yes, sir.
06 Q. Do you have any idea why
07 Mr. Hafle would e-mail a representative
08 from Allamon?
09 A. I'm not sure.
10 Q. Doesn't really seem to make much
11 sense, does it?
12 A. I'm not sure why Mr. Hafle would
13 do that.
14 Q. Well, did Allamon have anything
15 to do with the auto-fill float equipment?
16 A. To my knowledge, no.
17 Q. Okay. Have you ever talked to
18 anyone from Allamon?
19 A. Yes.
20 Q. Have you ever talked to anyone
21 from Allamon about this particular question
22 as to whether the float valves converted?
23 A. No.
24 Q. Okay. Have you ever talked to
25 Allamon about whether someone suggested
00402:01 rocking the casing in thousand psi
02 increments to 5,000 psi?
03 MR. CHEN:
04 Objection, form.
05 A. No.
06 Q. Have you ever heard of anyone
07 doing that to try to convert?
08 A. No, sir.
09 Q. Okay. Now, let's go down to
10 Morel called Clawson. Okay.
11 Weatherford reported it
12 couldn't break circulation, asked how much
13 pressure.
14 Now, is -- are these next
15 couple of sentences accurate about you --
16 about -- accurate as far as from the
17 Weatherford standpoint?
18 A. Yes, sir.
19 Q. Okay. Now, let's look at the
20 last two sentences.
21 Morel called Guide onshore
22 and received permission to pressure up
23 2200. Crew pressure 2250 and 2500 but
24 still failed to establish circulation.
25 Were -- were you told that?
00403:01 A. I'm sorry?
02 Q. Were you told that -- were you
03 told that the crew pressured up to 2250 and
04 then 2500 psi but still failed to establish
05 circulation?
06 A. No, sir, I was not.
07 Q. Did you ever speak with John

08 Guide, one way or the other, about the
09 problem about converting the float valve?
10 A. No, sir, I didn't.
11 Q. Okay. And that means before or
12 after, you never have talked to him about
13 it; is that right?
14 A. Correct.
15 Q. Okay. Have you talked to anyone
16 at BP after April 20th about problems on
17 the conversion of the float valve?
18 A. No, sir.
19 Q. Okay. Now then, let's go down
20 to this next thing and just -- about low
21 pressure after circulation.
22 Do you know anything about
23 the low pressure that showed up after the
24 circulation?
25 A. No, sir.
00404:01 Q. Were you told that the pressure
02 was lower than resolved?
03 A. No, sir.
04 Q. I'm sorry. Lower than
05 anticipated?
06 A. No, sir.
07 Q. Well, in fact, after this
08 telephone call to you from Mr. Brian Morel,
09 were there any other discussions at all
10 about the float collar being converted, one
11 way or the other?
12 A. No, sir.
13 Q. Okay. Now, let me ask you this
14 before I forget.
15 Have you -- did you have
16 any discussions with Halliburton personnel
17 about the float collar, one way or the
18 other?
19 A. No, sir.
20 Q. No.
21 Did you ever have any
22 discussions with Halliburton personnel
23 about the cement job, one way or the other?
24 A. No, sir.
25 Q. And sitting here from
00405:01 Weatherford's standpoint, do you have an
02 opinion one way or the other about the
03 cement job done by Halliburton?
04 A. I'm sorry?
05 Q. Yeah. Sitting here today, do
06 you have any opinion, one way or the other,
07 about the cement job that was done by
08 Halliburton on the Macondo well?
09 A. No, sir.

00405:19 A. It's an e-mail from Darrell
20 Cleboski to -- to Brian Morel.
21 Q. Okay. And right below it's one
22 and -- it's from Brian Morel and it has a
23 bunch of people there.
24 Are you there?
25 A. Yes, sir.

00406:01 Q. Okay. And why did you get this?
02 I'm not asking you to read his mind, but, I
03 mean, what's the purpose of you getting
04 this?
05 A. No, he was inviting me to the
06 prespud meeting.
07 Q. Okay. And that was so you could
08 do what?
09 A. Attend the prespud meeting for
10 the Macondo well.
11 Q. And this is dated
12 September 24th, 2009?
13 A. Correct.
14 Q. And is that -- that about the
15 time that you got involved in the well?
16 A. Yes, sir.
17 Q. Had you done any work with
18 Mr. Morel before?
19 A. No, sir.
20 Q. Mark Hafle?
21 A. No, sir.
22 Q. John Guide?
23 A. Well, indirectly. I -- I've
24 taken care of BP for -- so indirectly, yes.
25 Q. Okay. Had you had any direct
00407:01 dealings with Mr. Guide?
02 A. No, sir.
03 Q. No.
04 Did you ever have any
05 direct dealings with Mr. Guide on the
06 Macondo well?
07 A. No, sir.
08 Q. Did you attend this prespud
09 meeting?
10 A. Yes, sir.
11 Q. Okay. Okay. Now I'm going to
12 hand you what has been marked as
13 exhibit 2591.
14 (Exhibit Number 2591 marked.)
15 Q. Which is tab 8.
16 And this is the -- the
17 March 31st date that you were asked about a
18 little bit earlier?
19 A. Yes, sir.
20 Q. Okay. I want to make sure I
21 understand this.
22 If we go to the second
23 page, which is -- the last four digits,

24 7525, we have, Bryan, what do you have
25 available for seven-inch pipe. And then
00408:01 he -- thanks, Brian.
02 Who is that to? Is that to
03 you?
04 A. Yes.
05 Q. Okay. And that's from -- and
06 it's from whom, Brian Morel?
07 A. Yes.
08 Q. Okay. So is this the first time
09 that -- that this had come up?
10 A. Yes, sir.
11 Q. Okay. And if you notice,
12 page 7526, which is the next page, tell me
13 what that is.
14 A. This is the cover letter to the
15 tech sheet for a -- a seven-inch slip-on
16 centralizer.
17 Q. Okay. And the next page, which
18 is 7527, do you see that?
19 A. Yes, sir.
20 Q. What is it?
21 A. That's the drawing of a single
22 bow slip-on centralizer.
23 Q. Okay. Now, were the tech sheets
24 and this drawing sent to you by Mr. Morel?
25 Did you send them to him, or where did they
00409:01 come from?
02 A. I sent it to him.
03 Q. You sent it to him. Okay.
04 Now then, let's go to 7524
05 so I can understand this.
06 This is from you to him
07 saying, Brian, you're getting six each of
08 the attached from Nexen.
09 Okay. What do you mean by
10 attached?
11 A. On that particular e-mail, there
12 may have been -- I may have attached the --
13 the drawing of the sub.
14 Q. Okay. And it would have been
15 this sub attached?
16 A. No.
17 Q. No.
18 You would have attached
19 actually a sub?
20 A. The best I can recall, yes,
21 because there -- that was six ones that
22 they were getting.
23 Q. Because that's where I'm heading
24 on this, to make sure I understand all
25 this. Because what Brian -- with an I --
00410:01 was getting was six subs from Nexen; is
02 that right?
03 A. Correct.

04 Q. And not six bow strings?
05 A. Correct.
06 Q. Okay.
07 A. It might have been the
08 spreadsheet showing the -- the Nexen
09 inventory.
10 Q. Okay.
11 A. I -- I can't recall which one it
12 was.
13 Q. So then he says, okay, let me
14 know how long it takes. And do you have
15 any clamp-ons.
16 And that's when you
17 answered, ten days to get more subs, right?
18 A. Yes, sir.
19 Q. Okay. And that -- that means
20 ten days from what date, March 31st?
21 A. Yes, sir.
22 Q. Okay. So that means more or
23 less had Mr. Morel asked you, you could
24 have gotten these extra subs by the 10th or
25 11th of April?
00411:01 A. If everything would have been
02 okay, like if we had material, we could
03 have equipment threaded on time. There's a
04 lot of variables that go into that, but
05 possibly yes.
06 Q. Okay. Well, being a good
07 salesman you didn't put all that in, but
08 you did say ten days, right?
09 A. I'm sorry?
10 Q. I'll rephrase.
11 You did say ten days?
12 A. Yes, sir.
13 Q. Okay. Okay. Now then, maybe I
14 can figure this out.
15 Also it says, As far as I'm
16 concerned, I would recommend the attached
17 single-bow CT centralizers.
18 Do you see that?
19 A. Yes, sir.
20 Q. And is that the two attachments
21 then?
22 A. Yes, sir.
23 Q. Okay. So you did attach these
24 to the last chain of this e-mail?
25 A. Yes.
00412:01 Q. Okay. And as far as you know,
02 nothing happened about centralizers until
03 April 15th?
04 A. Yes, sir.
05 Q. I mean, did you follow-up? Did
06 you try to call him and say, what's going
07 on or anything like that, or you just leave
08 it sit?

09 A. To the best I recall, I
10 didn't -- I just let it sit.

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00412:13 (Exhibit Number 2592 marked.)
14 Q. Now, let's start at the top.
15 It's from Bryan Clawson to
16 Jesse Gagliano.
17 You see that?
18 A. Yes, sir.
19 Q. Now, had you met Jesse Gagliano?
20 A. I'm sorry?
21 Q. Had -- have you ever met Jesse
22 Gagliano?
23 A. Yes, I have.
24 Q. Okay. And when was that?
25 A. It was in some of the -- I
00413:01 remember we were having a meeting about one
02 of the other strings of pipe.
03 Q. Okay. And as far as you know,
04 in your dealings with Jesse, did he seem to
05 know what he was doing?
06 A. Yes, sir.
07 MR. CHEN:
08 Objection, form.
09 Q. And what was the purpose of this
10 e-mail dated April 15th?
11 A. They were looking for some
12 information on -- on the subs.
13 Q. Okay. Who's Donnie Owen?
14 A. Donnie Owen is -- is our
15 district manager out of -- out of Houston,
16 Texas for the cementation group.
17 Q. Okay. And do you know -- well,
18 let me ask you this: Why were you
19 contacting Jesse Gagliano?
20 A. I was out of the office at the
21 time, and I was -- I was going by my
22 BlackBerry and I didn't have that
23 information with me at that time.
24 Q. Okay. And why did you need the
25 starting force, running force, and
00414:01 resisting (sic) forces for the sub, do you
02 know? Is Jessie asking for that?
03 A. Yes.
04 Q. Okay. So do you know why
05 Mr. Gagliano was asking you for the
06 starting force, running force, and -- and
07 restoring forces of the subs?
08 A. I'm not particularly sure.
09 Q. Okay. Do you know if -- do you
10 know what an OptiCem model is?
11 A. Yes, sir.
12 Q. Okay. Do you know or do you

13 suspect even that he was using,
14 Mr. Gagliano was using a starting force,
15 running force, and restoring forces for the
16 subs in connection with preparing an
17 OptiCem model for the Macondo well?
18 A. Yes, he could have. Yes, sir.

Page 414:22 to 417:16

00414:22 Q. Okay. Tab 10 we've marked as
23 2593. And 2593 is -- is a day before the
24 one we just marked as 2592.
25 Now, Donnie Owen, we've
00415:01 already established who he is. And he --
02 he's attaching the item detail sheet for
03 the seven-inch centralizer -- it says sibs.
04 Does that mean subs, do you
05 think?
06 A. Yes, sir.
07 Q. And why is he sending that to
08 you?
09 A. Well, he was -- he was sending
10 it to -- to me, copying Brian Morel,
11 because I couldn't -- I was -- again, I was
12 working off the BlackBerry and couldn't
13 send attachments.
14 Q. Okay. Where were you that you
15 were on your BlackBerry? Were you out on
16 the road calling on people or what?
17 A. I'm not sure where I was.
18 Q. Okay. Well, I understand. I'm
19 not sure where I was on April 14th last
20 year either.
21 Okay. Now, this e-mail at
22 the bottom from you to -- now who is that,
23 who is VH3?
24 A. That's Vernon Goodman with
25 Allamon tool.
00416:01 Q. Okay. Now -- and then, right
02 behind here, we have something with Allamon
03 Tool, Inc. Explain to me how what you're
04 doing here on the centralizers ties in with
05 the Allamon tool.
06 A. I'm sorry. What was the
07 question again?
08 Q. Yeah. We're talking about the
09 seven-inch centralizers specs, right?
10 A. Right.
11 Q. And right below, you're sending
12 something to Allamon. And so what does
13 Allamon Tool Company, Inc., have to do with
14 the centralizer specs, if anything?
15 A. I believe what -- we were
16 discussing on the e-mail between me, Brian
17 Morel about the ball. And then when Brian

18 responded back to me, he just -- he
19 responded back to me with -- on an e-mail
20 that I had sent him and Vernon.
21 Q. Okay. So you're just kind of
22 mixing e-mails?
23 A. He was -- yeah. I'm assuming he
24 was just responding back to an e-mail that
25 I had just sent him.
00417:01 Q. And the ball that you're talking
02 about is the Allamon ball, not the ball
03 that's in the float collar?
04 A. Correct.
05 Q. Okay. Where's that Allamon ball
06 supposed to end up?
07 A. On this particular job, it --
08 Q. Yes.
09 A. -- it was going to eventually
10 end up on top of the float collar.
11 Q. On top of the float collar.
12 Just sitting just flat on
13 the float collar?
14 A. It could either be on top of the
15 float collar or in the throat of the float
16 collar. I'm not --

Page 417:18 to 417:18

00417:18 (Exhibit Number 2594 marked.)

Page 418:03 to 420:16

00418:03 Q. Okay. Now, let's go to
04 page 8343, about three or four pages over.
05 Do you see that?
06 A. 8343?
07 Q. Yeah. We have 9.2.2, casing
08 procedure, and then down in the middle we
09 have centralizer details. Yeah.
10 Do you see that?
11 A. Okay.
12 Q. Centralizer detail, it says,
13 Weatherford bow springs subs, six;
14 Weatherford slip-on, 15. Right?
15 A. Yes, sir.
16 Q. Okay. So first of all, did you
17 ever receive this exhibit?
18 A. No, sir, I did not.
19 Q. Did not. Okay.
20 Do you know if anyone from
21 Weatherford ever did?
22 A. I don't know.
23 Q. Okay. Was it your understanding
24 after you sold the extra 15 centralizers to
25 BP that there would be a total of 21

00419:01 centralizers utilized on the Macondo well,
 02 that is, the 15 you sold plus the six subs?
 03 MR. CHEN:
 04 Objection, form.
 05 A. All I knew, I was shipping out
 06 15 additional centralizers at the request
 07 of BP.
 08 Q. But you think you were shipping
 09 them out so they could just sit on the rig?
 10 A. No. No, I was --
 11 Q. Okay. So that's my question.
 12 You thought, as of the time
 13 you sold it to them, that you were shipping
 14 them out so they could use those 15 in
 15 addition to the six?
 16 A. Yes, sir.
 17 MR. CHEN:
 18 Objection, form.
 19 Q. Okay. Now then, did anyone from
 20 BP ever call you and say we changed our
 21 mind. We're not going to use them?
 22 A. No, sir.
 23 MR. CHEN:
 24 Objection, form.
 25 Q. Okay. You give refunds?
 00420:01 A. No, sir.
 02 Q. No? Okay. Okay.
 03 How did you get the six
 04 back you got back?
 05 A. I'm not sure how they ended up
 06 back.
 07 Q. Do you know when you got them
 08 back?
 09 A. I don't know that. All I knew
 10 is -- 'cause they -- they got shipped to my
 11 Houston location, and I'm not sure when and
 12 how -- how they got back.
 13 Q. Do you have any records showing
 14 the date of when --
 15 A. They -- they do. We do. But I
 16 didn't -- I have not looked at that.

Page 421:11 to 426:18

00421:11 Q. Okay. I'm going to hand you
 12 what has previously been marked as
 13 exhibit 2450. Excuse me. Which is tab 21.
 14 And I couldn't tell if that
 15 was part of the composite exhibit the
 16 government offered or not, but anyway, what
 17 is exhibit 2450?
 18 A. You're asking me?
 19 Q. Yes. Do you know?
 20 A. No, sir.
 21 Q. You don't know? Okay.

22 So you've never seen it?
23 A. No, sir.
24 Q. Okay. Well, let's go to the
25 second page.
00422:01 Do you see the description
02 of materials?
03 A. Yes, sir.
04 Q. Okay. Do you know what a
05 Weatherford legacy and that number reamer
06 shoe is?
07 A. Yes, sir.
08 Q. Okay. And does that appear to
09 be the same reamer shoe that was ultimately
10 used on the Macondo to you?
11 A. Yes, sir.
12 Q. Okay. And then we have a shoe
13 guide.
14 Do you see that?
15 A. Yes, sir.
16 Q. The shoe guide only cost 5,000
17 and the reamer shoe cost 20,000. That's a
18 different -- whole lot different price.
19 What -- what was that shoe guide? Was that
20 the cookie-cutter shoe guide we've been
21 talking about earlier?
22 A. Yes, sir.
23 Q. It was? Okay.
24 Then we have the actual
25 float collar. That's about 16,000.
00423:01 Do you see that?
02 A. Yes, sir.
03 Q. And what -- what is this last
04 item?
05 A. Centralizer sub.
06 Q. Okay. It says six, is that it?
07 A. Yes, sir.
08 Q. Okay. Well, if you've never
09 seen it, this March 30th date would seem to
10 be about the time that you were being asked
11 about centralizers, right?
12 A. Yes, sir.
13 Q. Okay. Let's go to tab 23. I'm
14 handing you what has been marked as 2595.
15 (Exhibit Number 2595 marked.)
16 Q. A little string of e-mails. And
17 again, if you look at the last page, which
18 is three nines, that appears to be some
19 sort of drawing of what?
20 A. Of the seven-inch M45AP.
21 Q. Okay. Now, Allison Crane, who
22 is that?
23 A. He's a -- one of the procurement
24 guys at -- at BP.
25 Q. At BP. Okay.
00424:01 You mentioned that.

02 A. Actually, materials management
03 coordinator.
04 Q. Okay. So he's sending some
05 e-mail here to Hafle and Morel saying that
06 this is the float equipment that goes with
07 the Nexen pipe.
08 Now, up above at the very
09 to top is this e-mail. Is this from you?
10 A. Yes, sir.
11 Q. And you say -- when you say this
12 is perfect, what -- what is perfect for
13 what?
14 A. It's just -- just letting me
15 know that the -- if they're running the --
16 the M45AP seven-inch 513 32 pounds, this is
17 perfect to match up with the 9-5/8 by
18 7-inch dual wiper Weatherford plugs.
19 Q. Okay. So what you're -- you're
20 telling him that this particular model
21 float collar is perfect for matching the
22 9-5/8 by 7-inch plugs?
23 A. Yes, sir.
24 Q. Okay. And again, where did
25 those plugs come from?
00425:01 A. The Netherlands.
02 Q. And those were manufactured by
03 you -- I'm sorry, Weatherford?
04 A. Yes, sir.
05 Q. And those plugs were sold
06 directly to BP or through Nexen?
07 A. Directly to BP.
08 Q. Direct to BP.
09 And when did you sell the
10 plugs, about this same time?
11 A. No, sir.
12 Q. Earlier?
13 A. It was -- it was later on in
14 April.
15 Q. Later on in April. Okay.
16 A. I -- I don't recall the exact
17 date of that. When we shipped that
18 equipment.
19 Q. Okay. So I guess that's the
20 reason I was a little confused. But take
21 out my confusion.
22 Did you anticipate that by
23 the date of this e-mail, which was
24 3-29-2010, that you would be selling the
25 9-5/8 by 7-inch plug set to BP?
00426:01 A. Yes.
02 Q. Okay. And -- okay. Why was --
03 why was this a perfect match for these
04 wiper plugs?
05 A. Again, because the -- the M45AP
06 has the Weatherford landing plate profile

07 to accept the non-rotating profile from the
08 plugs.
09 Q. And the landing plate is the AP
10 versus the AO?
11 A. Yes, sir.
12 Q. Okay. Okay. These drawings,
13 did you just have those drawings
14 available -- I'm sorry. The drawing that's
15 attached to the exhibit that ends with
16 0999, would you just have that available
17 that you could send to customers?
18 A. Yes, sir.

Page 426:20 to 426:22

00426:20 (Exhibit Number 2596 marked.)
21 Q. Okay. Let's look at tab 24,
22 which is exhibit 2596.

Page 426:24 to 428:14

00426:24 Q. Okay. We haven't talked too
25 much about the darts.
00427:01 What does your company have
02 to do with the darts?
03 A. Weatherford supplies the darts
04 to be able to launch the wiper plugs.
05 Q. Okay. Does it come -- do the
06 darts come as a package, or you -- do you
07 charge separately for them?
08 A. You -- you charge separately.
09 Q. Okay. Now, somewhere you're
10 talking about the size fits better. Why
11 was it better, do you say with the 6-5/8
12 versus going to the 4.78?
13 A. We make sure of -- that the
14 landing string, that the darts match their
15 landing string. The -- the best-case
16 scenario.
17 Q. Uh-huh.
18 A. And that's what we were doing
19 here.
20 Q. Okay. Oh. And what's the dart
21 actually supposed to do?
22 A. To launch the -- the drill pipe
23 wiper plugs.
24 Q. Okay.
25 A. I'm sorry.
00428:01 Q. Yeah, let's kind of go back.
02 A. The casing wiper plugs.
03 Q. Okay. And when is that done?
04 A. During the cement job.
05 Q. Okay. And how many darts are
06 launched?

07 A. Two.
08 Q. Two? Okay.
09 So for the darts to be
10 launched, we would have -- someone would
11 have decided the float collars had
12 converted and the cement job would be
13 proceeding; is that accurate?
14 A. Yes.

Page 428:18 to 429:22

00428:18 (Exhibit Number 2597 marked.)
19 Q. Is this the modification of the
20 cookie-cutter shoe that was never used?
21 A. Yes, sir.
22 Q. Okay. Why was it even
23 considered to be used? I mean, it seems to
24 be a totally different animal than the
25 reamer shoe that was used.
00429:01 A. I don't know that.
02 Q. You weren't asked about it one
03 way or the other?
04 A. No, sir.
05 Q. Okay. We've seen the e-mail
06 earlier where the decision was made to --
07 by BP to go with a reamer shoe. I mean,
08 I'm guessing -- correct me if I'm wrong --
09 you understand the different uses of a
10 reamer shoe versus a cookie-cutter shoe,
11 don't you?
12 A. Yes, sir.
13 Q. Can -- can you see how a
14 cookie-cutter shoe would have worked to
15 accomplish anything on this particular
16 well?
17 A. No, sir.
18 Q. Okay. Did Mr. Morel or -- ever
19 ask you about whether you thought it was
20 even conceivable to even use a
21 cookie-cutter shoe?
22 A. No, sir.

Page 430:04 to 431:09

00430:04 Q. Yeah. Did Mr. Morel ask your
05 opinion about much of anything?
06 MR. CHEN:
07 Objection, form.
08 A. He asked me a few things, yes.
09 Q. Okay. Like what?
10 A. I'm sorry?
11 Q. Well, did he ask you what float
12 collar to run?
13 A. No, sir.

14 Q. Did he ask you what kind of shoe
15 to run?
16 A. No, sir.
17 Q. Did he ask you how many
18 centralizers to run?
19 A. No, sir.
20 Q. Did he ask you if you like your
21 centralizers?
22 A. I'm sorry?
23 Q. Did he -- did he ask you if you
24 like your centralizers?
25 A. No, sir.
00431:01 Q. No? What in the world did he
02 ask you?
03 A. On the -- that particular
04 string, no, he did not.
05 Q. Okay. Did you ever -- yeah, you
06 did meet him in person.
07 About how many times did
08 you meet him?
09 A. A dozen times, I guess.

Page 432:04 to 432:24

00432:04 Q. Let me turn to exhibit -- this
05 has already been marked 2581. Okay. 2581,
06 when we're talking about working on testing
07 a ball seat.
08 What is a ball seat that
09 you're testing, do you know?
10 A. I'm sorry. What the --
11 Q. Yeah, let me show you. It's
12 something like testing on a ball seat.
13 A. So it's something to do --
14 Q. Yeah, just that highlighted
15 thing. No. If you can find it, it's
16 there.
17 A. So what's the question again,
18 I'm sorry?
19 Q. I need my book back to ask the
20 question. I can't remember. Testing a
21 ball seat today.
22 What ball seat are you
23 testing, do you know?
24 A. It's the Allamon ball seat.

Page 433:02 to 434:03

00433:02 The actual float collar,
03 whatever the number is, M45AP, that has not
04 been changed, the way you manufacture it,
05 in any way since April 20th; is that
06 correct?
07 A. To the best of my knowledge.

08 Q. Okay. Did you -- are you
 09 familiar with any other problems converting
 10 a float collar where you've had to have
 11 pressure up to anywhere close to 3100 psi?
 12 A. No, sir.
 13 Q. Okay. Sitting here today,
 14 what's the highest you recall besides this
 15 job having to pressure up?
 16 A. On a -- on an M45AP?
 17 Q. Yes, sir.
 18 A. I don't recall ever having to go
 19 to a high pressure to convert.
 20 Q. By high pressure, you're talking
 21 about higher than the anticipated 700 psi?
 22 A. I'm sorry. Again.
 23 Q. About high pressure, you're
 24 talking about any pressure higher than the
 25 anticipated 500 to 700 psi --
 00434:01 A. Correct.
 02 Q. -- to convert?
 03 A. Correct.

Page 434:12 to 436:06

00434:12 Q. So have you seen any situations
 13 where you have had something stuck in an
 14 Allamon ball that would keep a float collar
 15 from converting?
 16 A. Not to my knowledge.
 17 Q. Not to your knowledge. Okay.
 18 Now, since 2009, has
 19 Weatherford continued to sell bow-spring
 20 centralizers?
 21 A. Yes.
 22 Q. You sell a lot of them, don't
 23 you?
 24 A. Try to.
 25 Q. All you can.
 00435:01 And you sell the ones since
 02 that modification -- what, did you increase
 03 the size about an eighth of an inch or
 04 something?
 05 A. Yes, sir.
 06 Q. Okay. And you've sold -- how
 07 many of those do you think you sold, just
 08 rough number since then?
 09 A. I'm not sure.
 10 Q. Hundreds?
 11 A. All I know is of a -- of a
 12 couple of jobs that I sold some of those
 13 to. I don't know --
 14 Q. Okay.
 15 A. -- I don't know the whole
 16 Weatherford --
 17 Q. Okay. And have you had -- have

18 you had any problems because of those
19 sales?
20 A. On the -- the new -- the new
21 design?
22 Q. Yes, sir.
23 A. No, sir.
24 Q. They seem to be working out real
25 good?
00436:01 A. So far, yes.
02 Q. Okay. Well, if -- if they
03 weren't, don't you think your customers
04 would have come to you and told you about
05 it?
06 A. Yes, sir.