

Deposition Testimony of:

James Ingram

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Page 8:07 to 8:09

00008:07 JAMES INGRAM,
08 having been first duly sworn, testified as
09 follows:

Page 8:12 to 9:17

00008:12 Q. Good morning, Mr. Ingram. I'm
13 Jerry Meunier appearing on behalf of the
14 Plaintiffs' Steering Committee for the
15 plaintiffs in this litigation.
16 Would you state your name and
17 your address, please?
18 A. James Ingram, [REDACTED]
19 [REDACTED].
20 Q. By whom are you employed?
21 A. Transocean.
22 Q. And how long have you worked for
23 Transocean?
24 A. Seven years this September.
25 Q. What is your current job
00009:01 position?
02 A. Senior materials coordinator.
03 Q. And over what period of time
04 have you been a senior materials coordinator
05 for Transocean?
06 A. Three years.
07 Q. So is it true you were employed
08 by Transocean as a senior materials
09 coordinator aboard the DEEPWATER HORIZON as
10 of April 20, 2010?
11 A. I would like to assert my Fifth
12 Amendment right to remain silent.
13 Q. What were the duties and
14 responsibilities of a senior materials
15 coordinator aboard the DEEPWATER HORIZON as
16 of April 20th, 2010?
17 A. Same answer.

Page 9:21 to 9:24

00009:21 Q. Do you hold any licenses --
22 licenses or certificates in addition to any
23 formal educational degrees you may have?
24 A. Same answer.

Page 10:12 to 10:22

00010:12 Q. At tab 1 of the binder of
13 materials that I have given to you and your
14 attorney is a three-page document, Bates
15 numbered TOINV 757342 through 344.

16 And I ask you if, as this
17 document reflects, you gave an interview on
18 or about June 21, 2010, in your capacity as
19 the senior materials coordinator aboard
20 the -- the DEEPWATER HORIZON on April 20,
21 2010?

22 A. Same answer.

Page 11:10 to 11:22

00011:10 Q. During the period of your
11 employment by Transocean, is it true that BP
12 actively evaluated the safety records and
13 performances of Transocean's rigs and rig
14 crews?

15 A. Same answer.

16 Q. For example, in August of 2008,
17 is it true that BP joined with Transocean to
18 conduct an evaluation of the job performance
19 of different Transocean crews and a safety
20 record comparison among the Transocean rigs,
21 which included the DEEPWATER HORIZON?

22 A. Same answer.

Page 12:04 to 12:04

00012:04 (Exhibit Number 4807 marked.)

Page 14:05 to 15:14

00014:05 Q. Next, referring to the materials
06 at tab 3 of the binder, Mr. Ingram, I show
07 you a series of e-mails dating from March and
08 April 2009 and November 2009, in which there
09 was discussion about arrangements to obtain
10 5-1/2 inch drill pipe from the Transocean
11 rig, the DEEPWATER NAUTILUS for use aboard
12 the DEEPWATER HORIZON. The documents are
13 Bates numbered MDL 292748 through 754.

14 Were you involved in these
15 discussions about obtaining 5-1/2 inch drill
16 pipe from the NAUTILUS?

17 A. Same answer.

18 Q. Are you aware that such
19 discussions took place?

20 A. Same answer.

21 Q. The last dated e-mail in this
22 exchange, which was sent on November 11,
23 2009, by John Hamilton, the OIM aboard the
24 NAUTILUS, to James Kent, rig manager asset
25 for the DEEPWATER HORIZON, indicates that the
00015:01 plan was for the NAUTILUS to release this
02 pipe to the HORIZON in the first week of

03 December 2009.
 04 Was this, in fact, done?
 05 A. Same answer.
 06 Q. If it was not done, do you agree
 07 that the HORIZON began drilling at the
 08 Macondo well in late January or early
 09 February 2010 without having obtained the
 10 requested 5-1/2 inch drill pipe from the
 11 NAUTILUS?
 12 A. Same answer.
 13 Q. It's true, isn't it, that BP was
 14 aware of this fact?

Page 15:17 to 15:21

00015:17 Q. But BP, although it had the
 18 authority to do so, never ordered a change in
 19 the well plan or drilling activity schedules
 20 aboard the HORIZON based on needed 5-1/2 inch
 21 drill pipe from the NAUTILUS, correct?

Page 15:23 to 17:03

00015:23 A. Same answer.
 24 Q. I will mark, then, as
 25 exhibit 4809, the series of e-mails we've
 00016:01 referred to between March and April 2009 and
 02 in November 2009. Referring to tab 4 of the
 03 materials in your binder, I show you a series
 04 of e-mails exchanged on February 8th, 2010,
 05 some between you as senior materials
 06 coordinator for the DEEPWATER HORIZON and
 07 James Kent, rig manager asset, DEEPWATER
 08 HORIZON, Bates numbered MDL 992882 through
 09 884.
 10 And I ask you to agree that
 11 these e-mails discussed the Transocean rig,
 12 DISCOVERER INSPIRATION, borrowing a backup
 13 stack pre-charge boost pump from the
 14 DEEPWATER HORIZON.
 15 Do you agree that's what the
 16 e-mails discuss?
 17 A. Same answer.
 18 Q. Is it true that this backup pump
 19 was, in fact, shipped by the DEEPWATER
 20 HORIZON to the DISCOVERER INSPIRATION and for
 21 this reason, was not aboard the DEEPWATER
 22 HORIZON between that same date of shipping in
 23 February and April 20 of 2010?
 24 A. Same answer.
 25 Q. Is it also true that BP never
 00017:01 questioned or raised any concern about the
 02 shipment of this backup equipment from the
 03 DEEPWATER HORIZON to another Transocean rig?

Page 17:05 to 17:05

00017:05 A. Same answer.

Page 17:22 to 17:22

00017:22 (Exhibit Number 4810 marked.)

Page 19:02 to 20:10

00019:02 (Exhibit Number 4811 marked.)

03 Q. Referring to tab 6 of the
04 binder, I show you a series of e-mails
05 between February 1 and February 5, 2010, and
06 on March 10, 2010, between, among others, you
07 and Mayra Neitzke, N-e-i-t-s --
08 N-e-i-t-z-k-e, in the Houston office of
09 Transocean concerning difficulty you were
10 having logging into Transocean's FMS system
11 in order to access and generate MMRs or
12 requests for materials. These e-mails are
13 Bates numbered MDL 991172 through 177.

14 Is it true, Mr. Ingram, you were
15 still having a problem logging into that
16 system as of the last dated e-mail in this
17 series, which is March 10, 2010?

18 A. Same answer.

19 Q. Did this in any way make it more
20 challenging for you to order needed materials
21 and equipment for the DEEPWATER HORIZON as of
22 March 10, 2010?

23 A. Same answer.

24 Q. Did your issue with logging into
25 the system cause delays in ordering needed
00020:01 materials or equipment as of March 10, 2010?

02 A. Same answer.

03 Q. Was BP aware of this issue, that
04 is, the issue of you having difficulty
05 logging in?

06 A. Same answer.

07 Q. Did BP ever take this matter
08 into account in the scheduling or pace of
09 drilling activities aboard the DEEPWATER
10 HORIZON?

Page 20:12 to 20:12

00020:12 A. Same answer.

Page 20:16 to 21:11

00020:16 (Exhibit Number 4812 marked.)
 17 Q. Referring to tab 7 of the
 18 materials, I show you an exchange of e-mails
 19 on March 19, 2010, and on March 22, 2010,
 20 some sent either to or by you as senior
 21 materials coordinator of the DEEPWATER
 22 HORIZON, which, again, like the e-mails from
 23 roughly a year before in March and April of
 24 2009, discuss arrangements to borrow
 25 5-1/2 inch drill pipe from the DEEPWATER
 00021:01 NAUTILUS for the DEEPWATER HORIZON.
 02 The March 19, 2010, e-mails are
 03 Bates numbered MDL 292746 through 747. The
 04 March 22, 2010, e-mails are Bates numbered
 05 MDL 301695 through 697.
 06 Mr. Ingram, why was there still
 07 a discussion about the need to obtain
 08 5-1/2 inch drill pipe from the NAUTILUS a
 09 year after the e-mail discussions of the same
 10 issue in March and April of 2009?
 11 A. Same answer.

Page 21:17 to 21:21

00021:17 Q. Did BP ever change the well plan
 18 or schedule of drilling activities at the
 19 Macondo based on this information about the
 20 need to obtain 5-1/2 inch drill pipe from
 21 another Transocean rig?

Page 21:23 to 22:12

00021:23 A. Same answer.
 24 Q. In a March 22, 2010, e-mail in
 25 this series from Randy Ezell to James Kent --
 00022:01 it's Bates numbered MDL 301696 -- Mr. Ezell
 02 states that the DEEPWATER HORIZON is required
 03 by its contract with BP to maintain
 04 22,000 feet of 5-1/2 inch drill pipe 21.90
 05 and that given the amount of pipe, quote,
 06 under various forms of repair, close quote,
 07 there is a prospect that the total length of
 08 drill pipe aboard the DEEPWATER HORIZON will,
 09 quote, still -- will be, quote, still short
 10 of the contractual amount, close quote.
 11 Was BP made aware of this
 12 shortage?

Page 22:15 to 22:19

00022:15 A. Same answer.
 16 Q. Did BP take any action to delay
 17 activities aboard the DEEPWATER HORIZON in

18 March of 2010 because of the drill pipe
19 shortage discussed by Mr. Ezell?

Page 22:21 to 23:23

00022:21 A. Same answer.
22 Q. In Mr. Kent's reply e-mail of
23 March 22 to Mr. Ezell, he proposes finding
24 out about the available -- finding about
25 available 5-1/2 inch drill pipe in, quote,
00023:01 shared spares, close quote. And you wrote an
02 e-mail later that day to Troy Olivier in
03 Amelia, Louisiana asking about shared spares
04 of 5-1/2 inch drill pipe.
05 What was the outcome of that
06 inquiry about the availability of shared
07 spares?
08 A. Same answer.
09 Q. Was the effort to locate shared
10 spares of 5-1/2 inch drill pipe communicated
11 to BP?
12 A. Same answer.
13 Q. Did these efforts to obtain
14 shared spares cause any change in scheduling
15 or the pace of drilling activities aboard the
16 DEEPWATER HORIZON?
17 A. Same answer.
18 Q. Had shared spares of drill pipe
19 been located and brought to the DEEPWATER
20 HORIZON as of April 20, 2010?
21 A. Same answer.
22 Q. If not, why not?
23 A. Same answer.

Page 24:02 to 25:18

00024:02 (Exhibit Number 4813 marked.)
03 Q. Now, referring to tab 8 of the
04 binder, I show you a series of e-mails all
05 exchanged on March 29, 2010, Bates numbered
06 MDL 6327 through 6329, and previously marked
07 in this case as exhibit 2451, and as
08 reflected in the e-mails, what is discussed
09 is an emergency order for some unplanned
10 casing for the Macondo #1 well project.
11 Did you as Transocean's senior
12 materials coordinator aboard the DEEPWATER
13 HORIZON have any notice of or involvement in
14 the effort by BP to obtain for the Macondo
15 well, quote, an emergency order for some
16 unplanned casing, close quote?
17 A. Same answer.
18 Q. Do you have any dealings with
19 the company identified in these e-mails,

20 namely Nexen, N-e-x-e-n, as the source for
21 obtaining this casing in late March of 2010?

22 A. Same answer.

23 Q. In the last in time of these
24 March 29 e-mails, from Allison Crane,
25 materials management coordinator for BP,
00025:01 Mr. Crane states, quote, we are under a lot
02 of pressure to get this ready to go by the
03 weekend and have already ordered special
04 crossovers to accommodate the Nexen pipe,
05 close quote.

06 Were you ever notified of or
07 involved in this effort to get, quote,
08 special crossovers to accommodate the Nexen
09 casing?

10 A. Same answer.

11 Q. Do you agree that any pressure,
12 such as referred to in Mr. Crane's e-mail, to
13 obtain this casing or the special crossovers
14 for the casing, including any pressure that
15 may have been exerted on the work schedule of
16 those on the DEEPWATER HORIZON who would be
17 expected to handle the casing, was pressure
18 exerted by BP alone and not Transocean?

Page 25:20 to 27:03

00025:20 A. Same answer.

21 Q. And that material has already
22 been labeled and marked as exhibit 2451.
23 Referring to tab 9, I show you an e-mail of
24 April 15, 2010, from BP well team leader,
25 John Guide, to Paul Johnson, stating that he
00026:01 concurs in not changing the annular elements
02 of the DEEPWATER HORIZON blowout preventer
03 prior to starting the Nile well. This is
04 Bates numbered MDL 312134.

05 Were you notified of or involved
06 in the recommendation or decision not to
07 change the annular elements of the BOP once
08 the Macondo well job was completed?

09 A. Same answer.

10 Q. Even though the BOP annular
11 elements are part of equipment belonging to
12 Transocean, was it the custom and practice of
13 Transocean to seek BP's input and concurrence
14 in decisions such as this one?

15 A. Same answer.

16 Q. In fact, was it not the custom
17 and practice of Transocean to change out the
18 annular elements of its rig's blowout
19 preventers between well jobs?

20 A. Same answer.

21 Q. Isn't it true that this practice
22 was and is consistent with safe and

23 prevailing industry practices and standards?
 24 A. Same answer.
 25 Q. Was the plan in this case not to
 00027:01 change out the BOP annular elements after the
 02 Macondo job a result of the preferences and
 03 input of BP?

Page 27:05 to 27:11

00027:05 A. Same answer.
 06 Q. Was it your understanding that
 07 BP's preference not to change the annulars
 08 was an example of BP emphasizing efficiency
 09 and cost saving over safety in the
 10 maintenance repairs and potential replacement
 11 of critical well-control equipment?

Page 27:13 to 27:13

00027:13 A. Same answer.

Page 27:17 to 28:15

00027:17 (Exhibit Number 4814 marked.)
 18 Q. Referring now to tab 10, I show
 19 you a series of e-mails exchanged on
 20 April 16, 2010, including a last in time
 21 e-mail of that date from you to James Kent in
 22 Houston, regarding the ordering of a MUX
 23 cable for the DEEPWATER HORIZON. And
 24 indicating in your e-mail that the MUX cable
 25 will be stored in Amelia, Louisiana until,
 00028:01 quote, required on the rig, close quote.
 02 Bates numbered MDL 992155 through 159.
 03 Given the stage of Macondo well
 04 operations as of April 16, 2010, under what
 05 circumstances would the MUX cable have been
 06 required on that rig?
 07 A. Same answer.
 08 Q. What were the reasons the cable
 09 was not sent out to the DEEPWATER HORIZON
 10 instead of being stored in Amelia, Louisiana?
 11 A. Same answer.
 12 Q. Did BP participate in, approve
 13 of, or concur, in the decision to store the
 14 MUX cable onshore rather than bring it to the
 15 DEEPWATER HORIZON in mid-April of 2010?

Page 28:17 to 28:24

00028:17 A. Same answer.
 18 Q. Was the BP position in this
 19 regard consistent with the BP message to the

20 Transocean rig crew of the DEEPWATER HORIZON
 21 that speed and finishing the Macondo job were
 22 higher priorities than having onboard an
 23 available all safety critical equipment,
 24 including backup equipment?

Page 29:01 to 29:01

00029:01 A. Same answer.

Page 29:04 to 29:23

00029:04 (Exhibit Number 4815 marked.)

05 Q. Referring to tab 11 in the
 06 binder, I show you an e-mail of May 7, 2010,
 07 from Allison Crane, materials manager and
 08 coordinator for BP, to Warren Winters, part
 09 of the BP investigation team for the Macondo
 10 incident. It's Bates numbered BLY 125645,
 11 and it's been previously marked and
 12 identified in this litigation as
 13 exhibit 2456.

14 This e-mail from Mr. Crane
 15 states that there were a total of six
 16 Weatherford centralizers installed on the
 17 7-inch production casing aboard the DEEPWATER
 18 HORIZON as of the time of the blowout.

19 Were you, as Transocean's senior
 20 materials coordinator, made aware of, or were
 21 you in any -- in any way involved in the
 22 decision by BP as part of the Macondo well
 23 operations to use only six centralizers?

Page 29:25 to 30:04

00029:25 A. Same answer.

00030:01 Q. Were you ever advised by BP that
 02 this number of centralizers used was fewer
 03 than the number of centralizers specified in
 04 the BP well plan?

Page 30:06 to 30:06

00030:06 A. Same answer.

Page 30:12 to 31:01

00030:12 Q. Mr. Ingram, as Transocean's
 13 senior materials coordinator, were you ever
 14 made aware of a discrepancy between the pipe
 15 shearing capacities of the DEEPWATER
 16 HORIZON's blowout preventer rams and the

17 shearable characteristics of the drill pipe
18 in the hole at the time of the Macondo well
19 blowout?
20 A. Same answer.
21 Q. Did anyone from BP ever ask you
22 to take shearable characteristics into
23 account in the ordering of drill pipe for the
24 DEEPWATER HORIZON while it was at the Macondo
25 well?

00031:01 A. Same answer.

Page 31:09 to 31:15

00031:09 Q. As of April 20, 2010, did you,
10 as senior materials coordinator for
11 Transocean, ever know the shearable
12 characteristics of the DEEPWATER HORIZON's
13 drill pipe and whether the blowout preventer
14 had sufficient shearing capacity, given those
15 characteristics?

Page 31:17 to 31:22

00031:17 A. Same answer.
18 Q. Was it the responsibility of BP
19 as operator to investigate and assure this
20 consistency between drill pipe shearability
21 and the blowout preventer's shearing
22 capacity?

Page 31:24 to 32:06

00031:24 A. Same answer.
25 Q. Do you agree this responsibility
00032:01 was important to discharge for the sake of
02 the overall safety of the drill -- of the
03 Transocean rig crew and all other personnel
04 aboard the DEEPWATER HORIZON in the event of
05 a well-control emergency requiring the use of
06 blowout preventer rams?

Page 32:08 to 33:01

00032:08 A. Same answer.
09 Q. At tab 12, I show you an e-mail
10 of May 10, 2010, from John Guide regarding
11 shearing capabilities and attaching a
12 document from Cameron calculating the
13 shearing capabilities of Cameron shear rams.
14 It is Bates numbered MBI 143353 through
15 143363.
16 Have you ever been shown or have
17 you ever seen this Cameron document before?

18 A. Same answer.
19 Q. Did you even know this Cameron
20 document existed as of April 20, 2010?
21 A. Same answer.
22 Q. I'll mark -- well, yes, I will
23 mark as exhibit 4816, the May 10, 2010,
24 e-mail from John Guide and the attached
25 document from Cameron.
00033:01 (Exhibit Number 4816 marked.)

Page 33:23 to 34:08

00033:23 One of your duties as senior
24 materials coordinator was to focus on
25 planning to minimize urgent orders; isn't
00034:01 that correct?
02 A. I'd like to assert my Fifth
03 Amendment right to remain silent.
04 Q. One of your duties as senior
05 materials coordinator was to assist
06 department heads in establishing a realistic
07 minimum and maximum warehouse stock of all
08 shutdown or critical items, correct?

Page 34:10 to 34:25

00034:10 A. Same answer.
11 Q. Okay. One of your duties as
12 senior materials coordinator was also to
13 ensure that all hazardous and non-hazardous
14 wastes are correctly labeled and packaged
15 prior to shipment ashore, correct?
16 A. Same answer.
17 Q. As the senior materials
18 coordinator, you were also required to
19 demonstrate commitment to Transocean safety
20 policies, correct?
21 A. Same answer.
22 Q. You were required to actively
23 participate in weekly safety meetings in all
24 Transocean safety management systems,
25 correct?

Page 35:02 to 36:20

00035:02 A. Same answer.
03 Q. You're required to report all
04 incidents, potential hazards, abnormal
05 situations, to a supervisor and other
06 department heads, correct?
07 A. Same answer.
08 Q. You're required to respond to
09 emergency situations as designated on any

10 station bill, correct?
 11 A. Same answer.
 12 Q. All right. Continuing regarding
 13 Transocean safety, you're familiar with
 14 Transocean's health, safety, and
 15 environmental, policies and procedures,
 16 correct?
 17 A. Same answer.
 18 Q. You received training in
 19 connection with these policies and procedures
 20 contained in the manual called Transocean
 21 health, safety, and environmental policies
 22 and procedures, correct?
 23 A. Same answer.
 24 Q. You're aware of your authority
 25 to stop work on any rig that you're working
 00036:01 on, correct?
 02 A. Same answer.
 03 Q. And you would agree that the
 04 safe operation -- safe operations requires
 05 proactive individual involvement, correct?
 06 A. Same answer.
 07 Q. And you would agree that safe
 08 operations also requires individual
 09 involvement, correct?
 10 A. Same answer.
 11 Q. And you would also agree that
 12 safe operations requires personal
 13 accountability, such as yourself, correct?
 14 A. Same answer.
 15 Q. And you understand that each
 16 Transocean employee on the DEEPWATER HORIZON
 17 rig had the obligation to interrupt an
 18 operation that may have caused -- or to
 19 prevent an incident from occurring, correct?
 20 A. Same answer.

Page 36:22 to 37:04

00036:22 Q. And you understood that this was
 23 not simply authority, but an obligation to
 24 stop work, correct?
 25 A. Same answer.
 00037:01 Q. And this obligation is not just
 02 one to stop operation, but also an obligation
 03 and responsibility to take action to correct
 04 any unsafe behavior, correct?

Page 37:06 to 37:15

00037:06 A. Same answer.
 07 Q. And you received training
 08 regarding this from Transocean personnel,
 09 correct?

10 A. Same answer.
11 Q. And you understood that every
12 Transocean employee aboard the DEEPWATER
13 HORIZON had the same obligation and authority
14 as you, correct?
15 A. Same answer.

Page 37:20 to 38:06

00037:20 Q. Mr. Ingram, you're familiar with
21 what a Cyberchair is, correct?
22 A. Same answer.
23 Q. And when you say "same answer,"
24 is that referring to your Fifth Amendment
25 right, sir?
00038:01 A. Yes.
02 Q. I just want to be clear.
03 And isn't it true that
04 Transocean had difficulties with its
05 Cyberchairs in March of 2008 on the DEEPWATER
06 HORIZON?

Page 38:08 to 38:12

00038:08 A. Same answer.
09 Q. And was the crew -- and it was
10 true that the crew was not able to replace
11 hard drives in the C chair of -- the
12 Cyberchair; isn't that correct?

Page 38:14 to 38:25

00038:14 A. Same answer.
15 Q. And isn't it true that a
16 Cyberchair upgrade was part of the 2009
17 DEEPWATER HORIZON budget?
18 A. Same answer.
19 Q. And isn't it true that on
20 October 5th, 2009, Transocean ordered hard
21 drives for the Cyberchairs, correct?
22 A. Same answer.
23 Q. And then on -- then isn't it
24 true that James Kent approved installation of
25 these drives on December 29, 2009?

Page 39:02 to 39:07

00039:02 A. Same answer.
03 Q. And isn't it also true that on
04 January 5th, 2010, the installation of these
05 drives was postponed until well operations
06 permitted?
07 A. Same answer.

Page 40:22 to 41:02

00040:22 Q. And then on the DEEPWATER
23 HORIZON, you knew that under Transocean
24 policies, that every Transocean employee on
25 the rig had the stop-the-job authority on the
00041:01 DEEPWATER HORIZON rig, correct?
02 A. Same answer.

Page 41:22 to 42:20

00041:22 Q. Okay. Two more questions on the
23 Cyberchair, sir.
24 Isn't it true that you requested
25 approval from James Kent to order hard drives
00042:01 for the Cyberchairs for the DEEPWATER HORIZON
02 on March 12, 2010?
03 A. Same answer.
04 Q. Okay. And in that March 12th,
05 2010 request, you stated that the new hard
06 drives were correct -- would correct one of
07 the problems with the chair on the DEEPWATER
08 HORIZON, correct?
09 A. Same answer.
10 Q. And then you made a second
11 request to -- to James Kent to order the hard
12 drives on March 15th, 2010, correct?
13 A. Same answer.
14 Q. And on March 15th, 2010, you
15 stated that you needed to get the hard drives
16 on order on the rig ASAP, correct?
17 A. Same answer.
18 Q. And these Cyberchairs are
19 imperative for the safe functioning of the
20 rig, correct?

Page 42:22 to 43:02

00042:22 A. Same answer.
23 Q. And in the March 15th, 2010,
24 request, you stated that you had problems
25 with both chairs shutting down, both
00043:01 Cyberchairs shutting down, in well control
02 situations on March 14th, 2010, correct?

Page 43:04 to 43:07

00043:04 A. Same answer.
05 Q. And the Cyberchairs that you
06 were referring to are the Cyberchairs that
07 the drillers use, correct?

Page 43:09 to 43:09

00043:09 A. Same answer.

Page 44:10 to 44:19

00044:10 Q. Are you a person of interest in
11 any ongoing criminal investigation?

12 A. I'd like to assert my Fifth
13 Amendment right to remain silent.

14 Q. You understand that in invoking
15 the Fifth Amendment, it may impact your
16 ability to offer testimony and proceed in
17 your personal injury case against BP,
18 Halliburton, or others? You understand that?

19 A. Same answer.

Page 45:22 to 45:25

00045:22 Q. And you agree that the drilling
23 crew on the DEEPWATER HORIZON has a primary
24 responsibility for kick detection; isn't that
25 right?

Page 46:02 to 46:06

00046:02 A. Same answer.
03 Q. And you'd agree with me that the
04 mudloggers are a second set of eyes to the
05 drill crew in monitoring data downhole; isn't
06 that right?

Page 46:08 to 46:15

00046:08 A. Same answer.
09 Q. And you'd agree with me that
10 it's much easier for the drilling crew to
11 detect a kick than it is for a mudlogger,
12 because the drilling crew is aware of all the
13 major events taking place on the rig,
14 whereas, the mudloggers are not; isn't that
15 right?

Page 46:17 to 46:24

00046:17 A. Same answer.
18 Q. And you're familiar with the
19 data available to the mudloggers?
20 A. Same answer.
21 Q. And this data is being
22 monitored -- and the data being monitored by

23 the mudloggers influenced by rig conditions,
24 isn't it?

Page 47:01 to 47:03

00047:01 A. Same answer.
02 Q. And you'd agree with me that
03 crane movement may affect pit volumes?

Page 47:05 to 47:17

00047:05 A. Same answer.
06 Q. And you'd agree with me that rig
07 movement may affect pit volumes?
08 A. Same answer.
09 Q. And you agree with me that it's
10 important for the mudloggers to know what's
11 going on to properly interpret the data and
12 to spot trends on the rig?
13 A. Same answer.
14 Q. And wouldn't you agree with me
15 that simultaneous operations may impede the
16 mudlogger's ability to continuously and
17 accurately monitor data?

Page 47:19 to 47:24

00047:19 A. Same answer.
20 Q. Would you agree with me that one
21 of the responsibilities that you had on the
22 DEEPWATER HORIZON is to see that the well is
23 shut in as quickly as possible if a kick is
24 indicated or suspected?

Page 48:01 to 48:01

00048:01 A. Same answer.

Page 48:12 to 49:02

00048:12 Q. Would you agree with me that
13 early recognition of the warning signals
14 and rapid shut-in are the key to effective
15 well control?
16 A. Same answer.
17 Q. Would you agree with me that a
18 driller should shut in the well as quickly as
19 possible if a kick is suspected or indicated?
20 A. Same answer.
21 Q. Would you agree with me that
22 another key responsibility for the driller is
23 to constantly monitor the speed, pump

24 strokes, pressure, pit volumes, trip tank,
25 penetration, mud weight, and rotary torque,
00049:01 to detect anything unusual or out of the
02 ordinary?

Page 49:04 to 49:06

00049:04 A. Same answer.
05 Q. Would you agree with me that the
06 driller must constantly monitor the well?

Page 49:08 to 49:13

00049:08 A. Same answer.
09 Q. And wouldn't you agree with me,
10 if anything impedes the ability of the
11 driller to monitor the well, the job or the
12 operation should be stopped and the issue
13 should be addressed immediately?

Page 49:15 to 49:20

00049:15 A. Same answer.
16 Q. Would you agree with me that on
17 the day of the blowout during the temporary
18 abandonment procedures, there's a lot of
19 activity going on the rig simultaneously with
20 the temporary abandonment procedures?

Page 49:22 to 49:22

00049:22 A. Same answer.

Page 50:04 to 50:08

00050:04 Q. And you'd agree with me,
05 wouldn't you, that it's not common to perform
06 multiple operations simultaneously with
07 displacement?
08 A. Same answer.

Page 50:13 to 50:16

00050:13 Q. And you never saw anything in
14 writing assessing the possible risks or
15 hazards arriving out of simultaneous
16 operations, did you?

Page 50:18 to 51:01

00050:18 A. Same answer.

19 Q. And as far as you know, no such
20 risk assessment was conducted in this regard,
21 was it?

22 A. Same answer.

23 Q. And you know as well as I do
24 that Halliburton had no involvement with the
25 drafting of the displacement procedure; isn't
00051:01 that right?

Page 51:03 to 51:03

00051:03 A. Same answer.

Page 67:13 to 67:17

00067:13 Q. And you'd agree -- and you'd
14 agree with me that BP sent Schlumberger home
15 rather than have them to do a cement bond log
16 because it saved BP a lot of time; isn't that
17 right?

Page 67:19 to 67:19

00067:19 A. Same --

Page 67:23 to 67:24

00067:23 Q. Oh. I'm sorry.
24 A. Same answer.

Page 68:12 to 68:17

00068:12 Q. You'd agree with me, wouldn't
13 you, Mr. Ingram, that BP made numerous
14 cost-saving decisions that increased the
15 chance of a well blowout without running any
16 formal risk assessment; isn't that true?
17 A. Same answer.

Page 68:19 to 68:24

00068:19 Q. Isn't it true that in the days
20 preceding the blowout, many of the decisions
21 that were made regarding the well were
22 affected by the fact that the well was over
23 budget and it was over-allocated in the time
24 set for its completion?

Page 69:01 to 69:01

00069:01 A. Same answer.

Page 69:08 to 69:11

00069:08 Q. And wouldn't you agree with me
09 that BP made a lot of decisions without -- in
10 this time period without running any formal
11 risk assessments?

Page 69:13 to 69:13

00069:13 A. Same answer.

Page 69:19 to 69:22

00069:19 Q. In fact, you'd agree with me
20 that BP decided not to wait for more
21 centralizers to be delivered to the rig;
22 isn't that true?

Page 69:24 to 70:01

00069:24 A. Same answer.
25 Q. And this saved BP time, didn't
00070:01 it?

Page 70:03 to 70:03

00070:03 A. Same answer.

Page 70:21 to 70:25

00070:21 Q. And you know, as well, that BP
22 decided using -- decided to use spacer made
23 from combined lost-circulation materials to
24 avoid disposal costs and issues; isn't that
25 true?

Page 71:02 to 71:05

00071:02 A. Same answer.
03 Q. And you'd agree with me that
04 that decision saved BP time; isn't that
05 right?

Page 71:07 to 71:09

00071:07 A. Same answer.
08 Q. And you'd agree with me that
09 that decision saved BP money?

Page 71:11 to 71:16

00071:11 A. Same answer.
 12 Q. And you know on the day of the
 13 blowout, that BP decided not to perform
 14 additional tests regarding well integrity,
 15 given dubious negative test results; isn't
 16 that true?

Page 71:18 to 71:20

00071:18 A. Same answer.
 19 Q. And BP's doing so saved BP time;
 20 isn't that right?

Page 71:22 to 71:23

00071:22 A. Same answer.
 23 Q. And it also saved BP money?

Page 71:25 to 71:25

00071:25 A. Same answer.

Page 76:24 to 76:24

00076:24 (Exhibit Number 4819 marked.)

Page 77:12 to 79:03

00077:12 Q. If you would, sir, look at the
 13 middle e-mail. It's an e-mail from you,
 14 dated March 15th, 2010, to James Kent; isn't
 15 that true?
 16 A. Same answer.
 17 Q. It says, James, please advise
 18 that this has been approved on your end --
 19 well, actually let's start at the bottom
 20 e-mail.
 21 It says -- from you to James
 22 Kent, and it says, please see attached req
 23 for your approval. This will correct one of
 24 the problems with the A/D chair.
 25 Did I read that correctly,
 00078:01 Mr. Ingram?
 02 A. Same answer.
 03 Q. And then you follow up with
 04 another e-mail to Mr. Kent where you say,
 05 James, please advise that this has been
 06 approved on your end. We need to get these
 07 on order and the rig ASAP. We had problems
 08 with both chairs shutting down in

09 well-control situations yesterday.
 10 Sincerely, James Ingram.
 11 Did I read that correctly?
 12 A. Same answer.
 13 Q. And if you would -- it says,
 14 this has been approved.
 15 Do you see that?
 16 James Kent says that.
 17 Did I read that correctly?
 18 A. Same answer.
 19 Q. So what well-control situations
 20 were you referring to in this e-mail?
 21 A. Same answer.
 22 Q. What were the issues
 23 specifically with these A/D chairs,
 24 Mr. Ingram?
 25 A. Same answer.
 00079:01 Q. And were these ever fixed prior
 02 to the April 20th blowout?
 03 A. Same answer.

Page 81:09 to 81:22

00081:09 In that capacity as senior
 10 materials coordinator for TO, you would have
 11 had access to any Cameron engineering
 12 bulletins, would you not, sir?
 13 A. I'd like to assert my Fifth
 14 Amendment and the right to remain silent,
 15 please.
 16 Q. Thank you.
 17 And as senior materials
 18 coordinator, you would have had access to
 19 what has previously been marked as 4816,
 20 which includes the Cameron engineering
 21 bulletin 702D; is that correct, Mr. Ingram?
 22 A. Same answer.

Page 81:24 to 82:02

00081:24 Q. In fact, you would have had
 25 access not only to that engineering bulletin,
 00082:01 but any and all updates provided by Cameron
 02 to TO; is that correct?

Page 82:04 to 82:10

00082:04 A. Same answer.
 05 Q. And that's true with respect to
 06 any publication that Cameron would have
 07 provided TO with respect to the BOP that was
 08 onboard the DEEPWATER HORIZON on April 20th;
 09 isn't that correct, you would have had access

10 to that information?

Page 82:12 to 82:22

00082:12 A. Same answer.
13 Q. And the information that you
14 would have had access to would have included
15 the BOP's shearing capabilities as of
16 April 20th, 2010; is that correct?
17 A. Same answer.
18 Q. And as the senior materials
19 coordinator, you would have had knowledge or
20 been knowledgeable about the fact that the
21 BOP has shearing capability limitations;
22 isn't that correct?

Page 82:24 to 83:03

00082:24 A. Same answer.
25 Q. You would have been
00083:01 knowledgeable about the factors that affect
02 the shearing capabilities of the BOP; isn't
03 that correct?

Page 83:05 to 83:12

00083:05 A. Same answer. Excuse me.
06 Q. And in your capacity as senior
07 materials coordinator, you would have had
08 access to Cameron publications furnished to
09 TO that relate to the calculations conducted
10 by Cameron concerning the shearing
11 capabilities of the blowout preventer on the
12 DEEPWATER HORIZON; isn't that correct?

Page 83:14 to 83:22

00083:14 A. Same answer.
15 Q. You would have also had
16 knowledge about the limitations on the
17 maximum allowable work pressures affecting
18 the BOP's capabilities; isn't that correct?
19 A. Same answer.
20 Q. And you would have been aware of
21 Cameron recommendations relative to the use
22 of the BOP; is that correct?

Page 83:24 to 87:18

00083:24 A. Same answer.
25 Q. And you would have been aware of
00084:01 Cameron recommendations made to TO relative

02 to the maintenance of the blowout preventer;
03 isn't that correct?

04 A. Same answer.

05 Q. I want to direct your attention
06 to what's been previously marked. I just
07 want to turn for a minute to 4818, which is
08 the notes of the interview that you gave to
09 certain investigators following the accident.

10 And in particular, Mr. Ingram,
11 I'd like you to turn your attention to the --
12 the page that ends at the back end. It's --
13 it's numbered 8, but it ends in Bates
14 numbers 2137. It's about three pages from
15 the end.

16 Do you see that page, sir?

17 A. Yes.

18 Q. Okay. And I want to direct your
19 attention to the last two lines on that page
20 that say that Andrea Fleytas later told Jim
21 that she was getting ready to push the ESD
22 button, but the captain told her not to push
23 it.

24 Isn't it true, sir, that when
25 you were interviewed on or about June 21st,
00085:01 2010, as is reflected in what's been marked
02 as exhibit 4818, you told the investigators
03 of a conversation you had had with Andrea
04 Fleytas in which she said that she was
05 getting ready to push the ESD button, but the
06 captain told her not to push it; isn't that
07 correct?

08 A. I'd like to assert my Fifth
09 Amendment to remain silent.

10 Q. Okay. And isn't it correct that
11 you told the investigators that Andrea
12 Fleytas had told you that the captain had
13 told her that evening that everything was
14 under control; isn't that correct?

15 A. Same answer.

16 Q. And is it also correct, sir,
17 that you told the investigators on June 21st
18 of 2010, that Andrea Fleytas had told you
19 following the incident, that she pushed the
20 ESD button, notwithstanding the captain's
21 comment?

22 A. Same answer.

23 Q. Thank you.

24 Now, Mr. Ingram, directing your
25 attention to the date of April 20th in
00086:01 particular, you have no personal knowledge,
02 do you, sir, as to what the crew did or did
03 not do with respect to the operation of the
04 blowout preventer?

05 A. Same answer.

06 Q. And you have no personal

07 knowledge, do you, sir, of how the blowout
08 preventer performed on the night of
09 April 20th; isn't that correct?

10 A. Same answer.

11 Q. If I were to continue to ask you
12 questions about any and all well-control
13 activities onboard the DEEPWATER HORIZON on
14 the night of April 20th, would you continue
15 to invoke your right not to answer those
16 questions pursuant to the Fifth Amendment and
17 to refuse to answer the questions?

18 A. Yes.

19 Q. Okay. If I were to continue to
20 ask you questions about your knowledge
21 concerning the blowout preventer that was
22 onboard the DEEPWATER HORIZON on April 20th,
23 2010, would you continue to invoke your right
24 not to answer those questions pursuant to the
25 Fifth Amendment and refuse to answer those
00087:01 questions?

02 A. Yes.

03 Q. Okay. And if I were to continue
04 to ask you questions about your knowledge of
05 Cameron's publications available to TO
06 concerning the blowout preventer, would you
07 continue to invoke your right not to answer
08 those questions pursuant to the Fifth
09 Amendment and refuse to answer the questions?

10 A. Yes.

11 Q. And if I were to continue to ask
12 you questions about the maintenance and
13 condition of the blowout preventer onboard
14 the DEEPWATER HORIZON as of April 20th, would
15 you continue to invoke your right not to
16 answer those questions pursuant to the Fifth
17 Amendment and refuse to answer the questions?

18 A. Yes.

Page 90:03 to 90:11

00090:03 Q. Okay. I just have a few
04 additional questions regarding the testimony
05 that you've given earlier and questions that
06 were asked of you.

07 Isn't it true that as a senior
08 materials coordinator, that you were
09 responsible for the organization of the
10 warehouse onboard the DEEPWATER HORIZON?

11 A. Same answer.

Page 90:15 to 90:20

00090:15 Q. And these supplies would include
16 fittings?

17 A. Same answer.
18 Q. And they would include
19 centralizers?
20 A. Same answer.

Page 91:02 to 91:05

00091:02 Q. And BP coordinated the shipment
03 of supplies to the DEEPWATER HORIZON, didn't
04 they?
05 A. Same answer.

Page 91:17 to 91:20

00091:17 Q. Isn't it true that BP failed to
18 monitor the inventories of certain components
19 critical for the control of the well during
20 abandonment?

Page 91:22 to 92:03

00091:22 A. Same answer.
23 Q. Isn't it true that BP failed to
24 have a sufficient quantity of centralizers
25 onboard the DEEPWATER HORIZON to meet the
00092:01 design requirements of its cementing
02 contractor, Halliburton?
03 A. Same answer.

Page 92:05 to 92:15

00092:05 Q. Isn't it true that the warehouse
06 onboard the DEEPWATER HORIZON held a
07 sufficient quantity of spacer mixes to meet
08 the design requirements specified by its
09 cementing contractor, Halliburton?
10 A. Same answer.
11 Q. Isn't it true that rather than
12 use the spacer mix onboard the DEEPWATER
13 HORIZON, BP directed that lost control
14 materials that had already been mixed be used
15 as a spacer for the Macondo well cement job?

Page 92:17 to 92:22

00092:17 A. Same answer.
18 Q. And isn't it true that if the
19 mixed lost control material had not been used
20 for the well, that it would have needed to be
21 transported and disposed of by BP as
22 hazardous wastes?

Page 92:24 to 93:01

00092:24 A. Same answer.
25 Q. And that would have cost BP
00093:01 money?

Page 93:03 to 93:03

00093:03 A. Same answer.

Page 95:08 to 95:11

00095:08 Q. It's true, isn't it, that BP had
09 its own materials coordinator with authority
10 pertinent to the DEEPWATER HORIZON activities
11 at the Macondo well?

Page 95:13 to 95:19

00095:13 A. Same answer.
14 Q. And it's true, isn't it, that
15 all decisions concerning safety-critical
16 material and equipment for use aboard the
17 DEEPWATER HORIZON at the Macondo well
18 ultimately were subject to being overridden
19 by BP?

Page 95:21 to 95:21

00095:21 A. Same answer.