

Deposition Testimony of:

Patrick Campbell

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Page 8:23 to 9:17

00008:23 Q. Okay. Are you familiar with
24 the -- the Marine Well Containment Company?
25 A. Yeah. Oh, yes.
00009:01 Q. And is that an industrywide
02 initiative to put together response, assets
03 for deployment in the Gulf of Mexico?
04 A. It is.
05 Q. Okay. And is that similar to
06 what you were attempting to establish?
07 A. Yes, except the difference being
08 we were doing it in 1973, and this has taken
09 place since the Macondo incident.
10 Q. Okay. So yesterday when you
11 were talking about attempts at a joint
12 collaboration within the industry, that was
13 talking about in the '70s, not in -- in the
14 last --
15 A. Correct.
16 Q. -- couple of years, correct?
17 A. Yes, sir.

Page 10:08 to 10:19

00010:08 Q. You mentioned yesterday or we
09 saw some charts that -- modeling that had
10 been done for flow rate.
11 A. Yes, sir.
12 Q. And that was done by Ole Rygg;
13 is that right?
14 A. Yes, sir.
15 Q. Were you aware that the
16 government had established a flow rate
17 technical group to analyze flow rate during
18 the response?
19 A. I did hear that.

Page 11:03 to 24:20

00011:03 Q. Yesterday you were asked
04 questions about walking off the job for
05 reasons of safety, environment, or loss of
06 assets. Do you recall those --
07 A. Yes.
08 Q. -- conversations?
09 A. Yes, sir.
10 Q. Okay. Have you ever walked off
11 of a job for BP in deepwater drilling for
12 safety concerns?
13 A. No.
14 Q. Have you ever had any concerns
15 with the safety of BP's operations in
16 deepwater drilling?

17 A. No.

18 Q. Yesterday you also mentioned
19 that during the peer assist on the top kill
20 or the junk shot that several of the outside
21 people brought in to provide their opinions
22 did not think it was a good idea because the
23 flow path was likely too large for the junk
24 shot to work; is that right?

25 A. The short answer is yes.

00012:01 Actually, the junk shot was in combination
02 with a momentum kill. And the momentum kill
03 in this instance required injection very near
04 the surface, in other words, not via a long
05 drill string or something of that nature.

06 So it was thought that the
07 combination of the two elements, the size of
08 the flow path and the nature of the technical
09 limitations about a momentum kill -- your
10 words were not a good idea. I think our
11 words were, had a very low likelihood of
12 success.

13 Q. Okay. So it was your
14 understanding coming out of that meeting that
15 there was a chance of success but perhaps not
16 a great chance of success?

17 A. Yes.

18 Q. Okay. In going forward with
19 that operation, the top kill operation, do
20 you believe that that any way delayed the
21 ability to cap the well?

22 A. No.

23 Q. Okay. Would you also agree with
24 me that during the top kill operation, BP
25 Science Team and the others involved in the
00013:01 response were able to learn more about the
02 wellbore pressures and geometry through the
03 injection of that mud?

04 A. Data was collected. Its -- its
05 value would be interpretive.

06 Q. But that was data that was not
07 available prior to the top kill operation?

08 A. Correct.

09 Q. I'd like to go ahead and mark as
10 Exhibit 3922 --

11 (Exhibit No. 3922 marked for
12 identification.)

13 EXAMINATION BY MR. OCCHUIZZO:

14 Q. This is a document we had to
15 have printed out, so we'll pass it around.
16 I'll hand it to you and then -- let me give
17 you the Bates real fast. It's
18 BP-HZN-2179MDL02866346 through -- well, it
19 says 347, but I think that's because the
20 document was either -- the attachment was
21 either native or not Batesed right. But let

22 me hand this to you and one for your counsel.
23 Mr. Campbell, can you just tell
24 us for the record what 3922 is?
25 A. A cover letter to Mark
00014:01 Patteson --
02 Q. And that's from you, correct?
03 A. -- of BP. Yes.
04 Q. And it's on May 14th, the cover
05 letter?
06 A. Yes.
07 Q. And if you flip over to the
08 attachment that we see, is this the letter
09 that you sent to Mr. Patteson?
10 A. Yes.
11 Q. Okay. And it's dated May 12th;
12 is that right?
13 A. Yes, sir.
14 Q. Okay. So if I refer to this as
15 the May 12th letter, you'll understand that
16 this is what I'm talking about, right?
17 A. Yes, sir.
18 Q. Okay. Why did you address this
19 letter to Mark Patteson as opposed to, say,
20 Mark Mazzella or Richard Lynch?
21 A. At this point in time,
22 Mr. Patteson was the manager of this
23 operation.
24 Q. Okay. Are you talking about the
25 top killing operation?
00015:01 A. Yes. Yes, sir.
02 Q. Okay.
03 A. And -- and at that time,
04 Mr. Mazzella -- I -- I say at that time. As
05 close as I recall, Mr. Mazzella had not --
06 not been named to be the head field operator
07 for that operation.
08 Q. And on May 12th would you agree
09 with me that the next planned op -- well,
10 strike that.
11 On May 12th they were running
12 the RIT tool at that point, right?
13 A. Yes, sir.
14 Q. Okay. And -- or at least
15 preparing to run it?
16 A. Preparing to run it.
17 Q. But after the RIT tool, the next
18 major operation that was being planned for
19 was the top kill operation?
20 A. Yes, sir.
21 Q. Okay. And you mentioned several
22 different work streams or initiatives in that
23 first paragraph including relief wells,
24 pollution containment or collection via
25 coffer dam, top hat or hot tapping, junk shot
00016:01 manifold, direct capping BOP on BOP, capping

02 LMRP to BOP, and then you talk about
03 selection, contracting, and rigging vessels,
04 deployment of firefighting spreads and
05 personnel. And these are some of the things
06 that you were involved with personally,
07 correct?

08 A. Yes, sir.

09 Q. And what Wild Well was also
10 involved in?

11 A. Yes, sir.

12 Q. Okay. And we've talked a little
13 bit before about some of these -- these
14 items. But I did want to kind of run through
15 at least one of them.

16 What is hot tapping?

17 A. It is making a safe penetration
18 from the exterior of a pipe -- a pipe being
19 the best example -- to the interior of the
20 pipe but without allowing anything to escape.

21 Q. And the hot tapping or hot tap
22 idea as it related to Macondo was to attach a
23 saddle to the riser that was bent over on the
24 seafloor and then attempt to pull fluids
25 directly out of that tap into the riser,
00017:01 correct?

02 A. Out of that tap into a riser
03 back to the surface, yes.

04 Q. Yes. And to do that, one of the
05 issues or one of the concerns was the
06 erosional rate on the kink to be flowing all
07 that fluid through the riser, through the hot
08 tap up that second riser for collection,
09 correct?

10 A. It's a concern.

11 Q. Were you part of the team that
12 was looking at the riser integrity?

13 A. I was not part of the team that
14 was doing the -- the analysis of the
15 collapsed riser, although I had two members
16 of our group that were part of that.

17 Q. Was it your understanding that
18 that group was led by Paul Tooms?

19 A. Yes.

20 Q. Why did you write this May 12th
21 letter?

22 A. I was just trying to share my
23 opinion about the risk/reward of certain
24 operations that were being planned and --
25 and, mind you, I knew Mark very well from
00018:01 previous --

02 Q. Mark Patteson or Mark Mazzella?

03 A. Mark Patteson.

04 Q. Okay.

05 A. Mark Patteson.

06 -- from previous blowout jobs,

07 et cetera, et cetera, et cetera, over a
08 number of years.

09 And I -- I just wanted to share
10 my thinking about some of these initiatives
11 that were taking place and if BP was
12 considering early implementation of one or
13 more of those initiatives, what I thought
14 about them.

15 Q. Okay. Well, let -- let's go
16 through the letter a little bit in detail and
17 see what some of the comments were about
18 these.

19 First off, I think this sort of
20 goes back to what you just said. If you look
21 on the second page, the third paragraph up,
22 you say, "It's my personal opinion that the
23 risks associated with most of the initiatives
24 is too high and that too little is known with
25 certainty about the wellbore status (the
00019:01 opponent in this case), to attempt to perform
02 the work associated with most of these
03 initiatives. . .

04 Was that your opinion as of
05 May 12th, May 14th?

06 A. Yes.

07 Q. And so let's talk -- you see
08 Attachment 1 lists the different initiatives,
09 correct?

10 A. Yeah -- yes, sir.

11 Q. All right. And these are
12 basically similar to the initiatives that
13 were listed on the first page of your letter
14 by bullet point to show the ones that you
15 had -- you or Wild Well had been involved in,
16 correct?

17 A. Yes, sir.

18 Q. Okay. I wanted to go to the
19 junk shot manifold. What did you say about
20 that in -- in No. 3 as a potential or a
21 reason or an issue to consider with regards
22 to the junk shot manifold?

23 A. What did I say about it?

24 Q. Yes, if you could read No. 3.

25 A. I'll be happy to.

00020:01 Q. Thank you.

02 A. "Junk shot manifold. Objective.
03 Inject bridging agents from a pre-placed ROV
04 controlled manifold directly into the
05 high-pressure choke and kill lines of the
06 DEEPWATER HORIZON's BOP stack. Excellent
07 project. Continue with manifold placement,
08 rigging, preparation of the 3" ID choke and
09 kill valves for cycling and testing. . .

10 No. 3, "Perform diagnostic
11 pumping to learn the flowing pressure at the

12 injection point. See if pumped fluid (with
13 markers of some type) will reveal useful
14 information about the internal well" --
15 "wellbore geometry (i.e., is the injected
16 fluid traveling down the casing by drill pipe
17 annulus and then exiting via the drill pipe,
18 et cetera, et cetera. . .
19 There are many potential
20 configurations there.
21 "Do not inject solid objects
22 (preloaded in the manifold sections) unless
23 the diagnostic pumping results increase BP's
24 confidence about the predictability of
25 successful results of injection of junk. . .
00021:01 Q. Okay. And focusing on -- on
02 No. 3 within that -- that description of the
03 junk shot that you just read, this is what we
04 were talking about before about using the
05 diagnostic pumping in order to attempt to
06 gain useful information about wellbore
07 geometry, correct?
08 A. Yes. Yes, sir.
09 Q. So even setting aside whatever
10 opinions people may have had about the
11 likelihood of success -- success about the
12 top kill operations, there was benefit to
13 moving forward with that, at least in your
14 opinion as of May 12th, in -- in order to
15 determine certain diagnostic characteristics
16 through this pumping?
17 A. Yes.
18 Q. Okay. Let's move on to -- the
19 next item here is capping BOP on BOP,
20 correct?
21 A. Yes, sir.
22 Q. Okay. And this is what we've
23 talked about before. You would remove the
24 LMRP and then use -- I think it was
25 considered the DDII BOP as the second BOP on
00022:01 top of the original DEEPWATER HORIZON stack.
02 A. Well, that -- that was one of
03 several that were all being worked at
04 precisely the same time and precisely the
05 same group.
06 Q. Okay.
07 A. Yeah.
08 Q. And one of the other
09 alternatives was the BOP on the ENTERPRISE;
10 is that right?
11 A. That is correct.
12 Another option was just a
13 customized BOP that would be created -- a
14 capping assembly that would be created and --
15 and not take away either of those other two
16 existing BOP stacks.

17 Q. Okay. Your recommendation to
18 Mark Patteson on May 12th with regard to
19 capping on BOP -- and I'm down on 4 -- is,
20 "Do not initiate this action if the pollution
21 capture system is operating well."
22 Did I read that correctly?
23 A. Yes, sir.
24 Q. Okay. Is it fair to say, then,
25 that as of May 14th or May 12th when you
00023:01 wrote the letter to Mark Patteson that it was
02 your advice to BP that they should not at
03 that point in time cap the well with the
04 second BOP?
05 A. Well, the -- the key words here
06 is do not initiate this action if the
07 pollution capture system is operating well.
08 That means the top hat and the flow-back
09 system to the surface and so on.
10 Operating well is a very short
11 answer and is not very descriptive. But, in
12 other words, they would have to discuss among
13 themselves. If you put that in place and
14 your capture ratio was 80 percent,
15 90 percent, then I would not proceed with
16 trying to cap the well while the relief well
17 was being completed.
18 Q. Okay. So operating well in
19 terms of collection of the pollution for you
20 meant something 80 to 90 percent?
21 A. Well, once again, it would be a
22 joint decision. We would have to evaluate
23 and say what did we think we could deal with,
24 what residual amount that we're not capturing
25 could we actually physically deal with.
00024:01 Q. Okay. On May 12th --
02 A. Yes.
03 Q. -- when you wrote this letter,
04 what was the understanding of the amount of
05 hydrocarbons that could be captured via the
06 planned top hat or flow-back system?
07 A. We -- we thought that it would
08 be just about what it turned out to be,
09 that -- that -- somewhere in the vicinity of
10 25,000 barrels of oil equivalent per day and
11 some, say, 50 million cubic feet of gas.
12 Q. And was there an understanding
13 or did you believe that that would be
14 sufficient to operate well, as you used that
15 term?
16 A. Well, that would be speculation
17 on my part. I was -- I was still looking
18 forward to -- hoping that we would find
19 another vessel that would increase the
20 capacity for flow-back.

Page 25:05 to 25:16

00025:05 Q. Okay. And so it was your
06 opinion on May 14th that the hot tap was
07 probably the best solution in terms of
08 pollution collection in order to capture as
09 much of the hydrocarbon as possible, correct?
10 A. Right, correct.
11 Q. Okay. And you still would have
12 been --
13 A. Combine -- com -- if I may,
14 combined with the device that we'd put on the
15 drill pipe on the end and we were collecting
16 some 6- to 7,000 barrels per day there.

Page 26:13 to 28:25

00026:13 For -- going back to the capping
14 BOP on BOP No. 5, you say, "We should -- that
15 BP should only initiate this action in
16 response to a change in the pollution capture
17 system or circumstances that suggest a
18 deteriorating situation with respect to the
19 flow path, volumes emitted from the wellbore,
20 change in the flow rate velocity from the
21 wellbore."
22 Did I read that right?
23 A. Yet all of that takes into
24 account if the top hat and the collection
25 system are operating efficiently.
00027:01 Q. Okay. So you didn't have any
02 concerns at that point with the installation
03 of a capping mechanism causing more problems
04 than simply going with pollution collection
05 and the relief well?
06 A. Sorry. You'll have to restate
07 that one for me.
08 Q. Okay. Yeah. Well, let me just
09 withdraw it and get back to that point in a
10 moment.
11 If you look at the capping BOP
12 on flex joint, which is the next option.
13 A. Yes, sir.
14 Q. You have -- that is actually
15 what was ultimately done with the three ram
16 capping stack, correct?
17 A. Correct, yeah.
18 Q. They attached that to the flex
19 joint?
20 A. Below the flex joint where the
21 flex joint had been connected by flange.
22 Q. Okay. And if you flip over the
23 page, you'll see you make the same similar
24 recommendations with regard to whether or not
25 that should be a preferential methodology in

00028:01 mid-May as compared to, say, the capping
02 stack -- I'm sorry -- the BOP on BOP or -- or
03 a collection. It's similar recommendations,
04 right?
05 A. Yes, they're similar
06 recommendations.
07 Q. Okay. If you flip over to page
08 6 of your letter, after the bullet points or
09 at least the -- the numbering, there's a
10 first full paragraph there, it says, "Without
11 the ability to gather important data
12 resulting from diagnostic work prior to
13 initiating a capping and/or kill attempt, BP
14 can't determine with certainty that the
15 capping and/or kill attempt won't worsen the
16 flow rate situation."
17 Was that your understanding as
18 of mid-May?
19 A. Yes, sir.
20 Q. And going back to all of these
21 options, you still considered that -- or
22 still suggested that BP should continue to
23 pursue the development of all of these
24 different initiatives, correct?
25 A. Absolutely.

Page 29:11 to 35:19

00029:11 You recall yesterday you were
12 talking about the flex joint having a rating
13 of 5,000 psi?
14 A. Yes, sir.
15 Q. Were you involved with the
16 destructive testing that BP did to determine
17 the actual capacity of the flex joint?
18 A. I -- I was not involved in the
19 process, no.
20 Q. And you understand that they
21 came to a higher psi rating through
22 destructive testing--
23 A. Yes.
24 Q. -- than the rated testing?
25 A. Yes.
00030:01 Q. Do you recall what that was?
02 A. I thought it was 7,500 psi.
03 Q. Okay.
04 A. Is that correct?
05 Q. I think it was a little higher
06 than that --
07 A. Possibly --
08 Q. -- but --
09 A. -- yes.
10 Q. -- the records will reflect
11 that --
12 A. Yeah.

13 Q. -- correct?
14 So as of mid-May if there had
15 been a cap available or a BOP available,
16 would you have recommended that BP proceed
17 with a capping option at that point in time
18 knowing what they knew about the wellbore?
19 A. I'm -- I'm very sorry, but your
20 question just can't be answered that simply.
21 Q. Okay. Why not?
22 A. If you're going to install a
23 capping assembly and just simply shut it,
24 there are a thousand variables that you don't
25 know about the geometry of that wellbore and
00031:01 the potential damage to it. The advantage of
02 installing the capping assembly is that you
03 would be able to shut it, the advantage over
04 the top hat, if the top hat is operating at a
05 high level of efficiency. Fair enough?
06 Q. Sure.
07 A. So if I don't intend to shut it,
08 the -- the primary advantage of installing it
09 just went away. Does -- does that make
10 reasonable --
11 Q. Sure.
12 A. -- sense?
13 Okay. So I -- I would like to
14 get on the record and be clear about this
15 issue. Basically what we do is cap wells.
16 Now, we cap them and divert them. We very
17 often avoid a hard shut-in because of unknown
18 circumstances downhole that we have not yet
19 had the opportunity to do diagnostic work
20 that would reveal the real circumstance or
21 condition of those tubulars.
22 So quite honestly, I'm telling
23 you I don't give -- everybody says you don't
24 know what it's flowing, you don't know how
25 much it's making, you don't know this and
00032:01 that. The truth is don't give a shit. What
02 you see is what you get. So either you know
03 how to install a capping assembly on that or
04 you don't.
05 Q. Uh-huh.
06 A. Now, nobody's done it in
07 5,000-foot water depth, so there are still
08 things to be learned.
09 What is my advantage to
10 installing a capping assembly? None if the
11 top hat and the collection system are working
12 adequately. How much is it flowing? We
13 don't know. Nobody knows. We're going to
14 find out when we start flowing back to the
15 HELIX 4000, when we start flowing back to
16 ENTERPRISE, we'll start to learn more about
17 what the total flow rate is.

18 Other things that we need that
19 could be done in the meantime is the
20 installation of some sort of a gauge -- and I
21 say a gauge, meaning that could be all sorts
22 of different types of devices -- below the
23 BOP stack, below the rams in the BOP stack,
24 so that we can begin to learn something about
25 what is the flowing pressure upstream --
00033:01 upstream of the BOP stack.

02 Q. Okay.

03 A. Just a whole bunch of things
04 like that, without knowing them, I actually
05 stand a -- a greater chance of doing harm.
06 You remember all the discussion
07 about burst disks --

08 Q. Uh-huh.

09 A. -- about possibly ruptured
10 casing, collapsed casing, parted casing, et
11 cetera, et cetera? I have no way to do
12 diagnostic work --

13 Q. Okay.

14 A. -- that will let me determine
15 those things with certainty. So anything
16 that I do to shut in a capping assembly I
17 think is far too high a risk --

18 Q. Okay.

19 A. -- I think is -- that's --
20 that's what I'm expressing to Mark in this
21 letter.

22 Q. Okay. Well, I appreciate --
23 let's -- let's try to break that down a
24 little --

25 A. Yes, sir. Sorry.

00034:01 Q. -- a little bit.

02 So overall you're trying to
03 express to Mark Patteson that at this point
04 given what was known about the well and the
05 wellbore that the risks were too high with
06 going with a capping option; is that right?

07 A. If your intention is to shut the
08 well in.

09 Q. Okay. And if your intention is
10 to use it to divert the flow, you'll need
11 surface processing vessels in order to handle
12 that flow, correct?

13 A. Right.

14 Q. And at that point in time in
15 mid-May, such processing vessels didn't exist
16 anywhere --

17 A. Right.

18 Q. -- in the world, did they?

19 A. Right. Not available.

20 Q. Right. You go on in -- in your
21 letter, if we -- we go back to Exhibit 3922,
22 on the bottom of page 6, you say, "No one

23 wants to wait for a relief well intercept,
 24 but quite often there's no acceptably
 25 low-risk alternative," correct?
 00035:01 A. Why didn't I think of just
 02 saying that a minute ago.
 03 Q. But that's -- that's my point --
 04 A. Yes, sir, yeah.
 05 Q. -- that -- that is essentially
 06 what you're getting at here. It introduces
 07 the capping element in mid-May --
 08 A. Right.
 09 Q. -- without knowing the flow
 10 rate, without doing the flow capture that
 11 they did with the top hat --
 12 A. Right, exactly.
 13 Q. -- and the Q-4000, didn't
 14 know -- BP, others, didn't know what kind of
 15 risk the cap might cause --
 16 A. That's correct.
 17 Q. -- if they were to use it to
 18 shut in the well in mid-May?
 19 A. That's correct.

Page 35:23 to 36:03

00035:23 Q. All right. Let's set that
 24 letter aside, and we'll go to another letter
 25 you wrote, which I think is -- was marked
 00036:01 yesterday.
 02 We'll hand you back what was
 03 marked as 3908 yesterday.

Page 36:05 to 36:07

00036:05 For the folks following, if you
 06 don't have that, it's Tab 8 in my binder.
 07 It's the same thing essentially.

Page 36:09 to 39:21

00036:09 Q. 3908 is a letter you wrote on
 10 July 28th addressed to Richard Lynch,
 11 correct?
 12 A. Yes, sir.
 13 Q. And this is the -- a letter that
 14 you sent with copies to Mark -- Mark
 15 Mazzella, Admiral Allen, and Admiral Cook
 16 regarding your concerns about the proposed
 17 static kill operation, correct?
 18 A. Yes, sir.
 19 Q. And in the first paragraph here,
 20 you run through your background and some of
 21 the work that you and Wild Well Control had

22 been doing as part of the response, correct?
23 A. Yes, sir.
24 Q. Can you read that second
25 paragraph into the record, please?
00037:01 A. The second paragraph?
02 Q. Yep.
03 A. "I wasn't privy to the
04 discussions surrounding the decision to
05 select a bullhead kill, as opposed to the
06 relief well bottom kill. There are no doubt
07 issues about which I am not fully informed.
08 The purpose of this memo is to convey my
09 personal experience and Wild Well Control's
10 experience concerning the technology rather
11 than the smallest details. . .
12 Q. Okay. And is it fair to say,
13 then, that you wrote this letter not based on
14 your personal knowledge of the specific
15 factors of Macondo or --
16 A. Yeah.
17 Q. -- all of the available specific
18 factors of the Macondo but based on your
19 prior experience, correct?
20 A. Right.
21 Q. And you weren't embedded as part
22 of the static kill team, right?
23 A. No, that's correct.
24 Q. Okay. But there were Wild Well
25 Control employees that were on the static
00038:01 kill team; is that right?
02 A. Yes, there were.
03 Q. Okay. At the time of your --
04 that you wrote this letter, do you know if
05 they shared your concerns that you expressed?
06 A. Yes, some did. Perhaps I could
07 say the majority did.
08 Q. Okay. But there were some
09 within Wild Well that wasn't as concerned
10 about this as you were?
11 A. They were pretty happy with it.
12 Q. Okay. At the time of the
13 letter, do you know if those folks from Wild
14 Well Control who were embedded in the project
15 had expressed any of these concerns to the
16 team, the overall team, so that they could
17 deal with them as part of planning for the
18 operation?
19 A. I know that David Barnett had
20 expressed some of the same issues that I
21 raise here.
22 Q. Okay. You raise an interesting
23 point, because it sounds like some of the
24 Wild Well Control team was fine with moving
25 forward with static kill and some had
00039:01 concerns. Is that fair?

02 A. Yes, sir.
03 Q. Okay. And wouldn't call it --
04 would you call that a disagreement?
05 A. No, no, I call it a difference
06 of -- of opinion and a difference of how they
07 view some of the factual data that's been
08 accumulated which, of course, has taken place
09 over time.
10 Q. Okay. And sort of stepping back
11 from just Wild Well, would you agree that in
12 the -- the course of a large response like
13 this, there are going to be, as you would
14 say, differences of opinion on how to
15 interpret the data that's been provided?
16 A. Many, many, many, yes.
17 Q. Okay. And -- and by pursuing
18 one action that some of the group thinks
19 based on their interpretation is the right
20 course, that's not a reckless way to handle
21 the response, is it?

Page 40:02 to 40:11

00040:02 Q. You can answer the question.
03 A. It -- no. In other words, fully
04 evaluating all of the options is part of your
05 responsibility.
06 Q. And so even though there may be
07 some that disagree with the particular
08 approach, that doesn't mean there was --
09 someone was acting irresponsibly by going
10 that direction if there are some facts and
11 data that support their opinion as well?

Page 40:14 to 41:03

00040:14 A. It's -- it kind of would be
15 conjecture on my part, but in the general
16 sense, I would agree with your statement.
17 EXAMINATION BY MR. OCCHUIZZO:
18 Q. Okay. So there are times,
19 though, we've seen some documents, where
20 Wild Well's opinion on the proper course of
21 action was not used by the response. Is that
22 fair?
23 A. Yeah, I quit counting.
24 Q. But that doesn't mean that the
25 response wasn't being conducted
00041:01 professionally and in a responsible manner,
02 was it?
03 A. Oh, not at all.

Page 41:06 to 41:09

00041:06 A. Not at all. I mean, I would be
 07 no different than the other party that -- I
 08 held my opinion and perhaps they held theirs
 09 and . . .

Page 41:11 to 45:19

00041:11 Q. There are a lot of people with a
 12 lot of years of experiences all forming their
 13 own opinions, correct?

 14 A. Very, very many, yes.

 15 Q. Okay. Now, if you flip over to
 16 the second page of 3908, numbered Paragraph 3
 17 talks about why you support a dynamic or
 18 circulated bottom kill -- type kill from the
 19 relief well, correct?

 20 A. I think I skipped a page.
 21 Sorry.

 22 Yes, sir.

 23 Q. All right.

 24 A. Yes, sir.

 25 Q. Okay. And one of the issues or
 00042:01 one of the reasons that you were favoring a
 02 bottom kill is because at that time, in your
 03 opinion, we weren't sure what the flow path
 04 was up the wellbore and out the top of the --
 05 the BOP stack, correct?

 06 A. Yes, sir.

 07 Q. Okay. And if you -- if you look
 08 at what you said, can you just read into the
 09 record after the -- under Paragraph 3 under
 10 the dark bullets that you see the two light
 11 ones, if you could read those first two
 12 starting with "if flowing outside the
 13 casing."

 14 A. "If flowing outside the casing,
 15 what has happened to the open hole gauge of
 16 the wellbore along its length. Is the casing
 17 burst, collapsed, split, parted? No one
 18 knows and, moreover, no one could know at
 19 what elevation that damage exists. . .

 20 Q. Is it fair to say that at this
 21 point in time there was no way to know what
 22 the flow path was of the well?

 23 A. Correct.

 24 Q. Okay. Are you aware that during
 25 the static kill they pumped mud down the
 00043:01 casing in order to determine, in part, the
 02 flow path, correct?

 03 A. Yes.

 04 Q. Okay. And are you aware that it
 05 was BP's opinion that the flow path was down
 06 the casing?

 07 A. Yes.

08 Q. And did Wild Well Control share
09 that opinion based on the data collected from
10 the static kill pumping?
11 A. Well, based on the data
12 collected from the static kill pumping, yes.
13 Based on what was known prior to shutting the
14 well in, no.
15 Q. And one of the reasons why you
16 always wanted to keep in mind that there
17 might be annular flow is that that would
18 include the worst-case scenario of bringing
19 in to play the burst disks?
20 A. Yes, sir.
21 Q. So -- correct?
22 A. Yes, sir.
23 Q. So any of the options considered
24 prior to static kill, if you will, had to
25 take into account these burst disks because
00044:01 of the possibility of annular flow, right?
02 A. Correct.
03 Q. Okay. And so when we see these
04 assumptions -- I think you saw in an earlier
05 document we're going to assume an annular
06 flow -- that was because annular flow was the
07 worst-case scenario that needed to be planned
08 for in terms of flow path; is that right?
09 A. Correct.
10 Q. Now, what happened in response
11 to this letter; do you recall?
12 A. Both Richard Lynch and
13 Mark Mazzella called and asked if we could
14 arrange for a meeting at BP's office the
15 following day.
16 Q. Okay. And did you attend a
17 meeting --
18 A. I did.
19 Q. -- the following day?
20 A. Yes.
21 Q. And what happened at that
22 meeting?
23 A. There was a review of data and a
24 review of certain of the commentary that I
25 made in this letter. And so, as I recall, it
00045:01 was about a two-hour meeting.
02 Q. Was it just BP or were there
03 other folks there?
04 A. There were other folks there.
05 Q. Who -- who else was at the
06 meeting, if you recall?
07 A. Representatives of Admiral Allen
08 from the Coast Guard, local regional
09 representatives from the Coast Guard,
10 Paul Tooms, Richard Lynch, Mark Mazzella, and
11 I believe one other gentleman from BP, but he
12 may not have been an employee. He might have

13 been a contract person. And I'm trying to
14 recall who else. There -- there was someone
15 else, but I don't recall who.

16 Q. Do you recall anybody from
17 the -- from the national labs from the
18 federal Science Team?

19 A. There was one person, yes.

Page 46:03 to 49:01

00046:03 Q. Okay. Based on that meeting,
04 were you made aware of data that you did not
05 know at the time that you wrote your letter
06 on July 28th?

07 A. Some.

08 Q. Some?

09 What did you learn that was new?

10 A. There was great discussion. And
11 it -- it was -- it was clear to me that
12 Paul Tooms, manager of engineering -- a
13 brilliant guy, by the way -- was -- was sold
14 on certain notions, if you -- I'm going to
15 call it a notion. I'm not going to call it a
16 fact -- that -- that he relayed to me and
17 explained that Well, that's where you're
18 wrong, and you just simply didn't have
19 benefit of all of the known data.

20 Q. Okay.

21 A. Okay? And to be sure, Mr. Lynch
22 and Mr. Tooms said to me at that meeting, You
23 are welcome here at any time, and you are
24 welcome here at all times, and if there is
25 something you wish to know, just ask and
00047:01 we'll let you know that.

02 Q. Okay. So -- so BP appreciated
03 your opinions and thoughts and experience --

04 A. Yes.

05 Q. -- as it relates to this
06 project, correct?

07 A. Yeah.

08 Q. And they brought you in and
09 attempted to provide you with additional
10 information they had that they thought you
11 might not have in order to help inform your
12 opinion, correct?

13 A. Correct.

14 Q. At the conclusion of that
15 meeting, what was your -- did that change
16 your opinion at all with regard to whether or
17 not static kill was a less risk -- risky
18 operation at that point?

19 A. They did -- they did not really
20 alter my position much. The -- the -- the
21 one thing that could not be known was if you
22 shut the well in, what is the instant shut-in

23 pressure going to be? And so that was still
 24 a matter of conjecture. The reservoir folks
 25 did lots and lots of work, very hard work,
 00048:01 very good work in trying to determine the
 02 near wellbore drawdown and what one
 03 anticipated that the shut-in pressure would
 04 be.
 05 Q. Okay. All right.
 06 A. But you follow me? There's a
 07 difference between that and a fact.
 08 Q. Right. They had -- BP and
 09 others on the Science Team had certain
 10 interpretations or understanding of the
 11 data --
 12 A. Right.
 13 Q. -- that was somewhat different
 14 than your understanding --
 15 A. Correct.
 16 Q. -- of the data, correct?
 17 And that didn't mean that one
 18 was perfectly correct and the other one was
 19 perfectly wrong.
 20 A. Absolutely not.
 21 Q. This was interpretation in a bit
 22 of gray area, correct?
 23 A. (Moving head up and down.)
 24 Q. And, ultimately, the static kill
 25 was successful?
 00049:01 A. It was.

Page 50:06 to 50:11

00050:06 Q. Okay. As you sit here today as
 07 a representative of Wild Well Control, would
 08 you agree that Wild Well Control has no
 09 incident evidence or opinion that BP acted
 10 recklessly or with gross negligence in how
 11 they conducted the response operations?

Page 50:18 to 50:18

00050:18 A. No.

Page 50:20 to 51:01

00050:20 Q. Okay. Would you agree that
 21 Wild Well Control put forth its best efforts
 22 to support BP during the response?
 23 A. Absolutely.
 24 Q. Is it your opinion that BP put
 25 forth its best efforts during the course of
 00051:01 the response?

Page 51:08 to 51:08

00051:08 A. Yes.

Page 51:10 to 51:13

00051:10 Q. Would you agree with me that
11 Wild Well Control has no formal opinion as to
12 what the flow rate was at any point during
13 the course of the response?

Page 51:16 to 51:16

00051:16 A. It's all conjecture.

Page 60:14 to 61:17

00060:14 Under the master service
15 agreement that you are familiar with between
16 Wild Well and BP, what type of services are
17 provided for -- are -- that are supposed to
18 be provided by Wild Well to BP?
19 A. Well, there are -- sort of split
20 into two categories --
21 Q. Okay.
22 A. -- if you will. And one is what
23 you would call an emergency response work,
24 and the other is what we would call peacetime
25 work.
00061:01 Q. Okay. And let's talk about
02 emergency response work. What do you mean by
03 that?
04 A. Emergency response work would
05 include a very long list of engineering
06 services, for example, and it goes beyond
07 that to say could be conducted from our
08 facility, from the customer's facility, from
09 the rig site, et cetera.
10 Then there are certain hands-on
11 services, so-called well control services.
12 It could be firefighting --
13 Q. Okay.
14 A. -- in conjunction with well
15 capping, well diversion, any number of events
16 that typically fall under the classification
17 of well control operations.

Page 79:18 to 80:16

00079:18 Q. Okay. So you don't have an
19 opinion about whether or not there were any
20 problems in the well design prior to the
21 blowout?

22 A. Are you -- are you asking me
23 personally?
24 Q. Yes.
25 A. I would have said it's a rather
00080:01 unusual design.
02 Q. What do you mean by that?
03 A. Well, goodness. It -- it is a
04 design that -- and I'm not a well designer.
05 Q. Okay.
06 A. Okay? It's a design that has
07 been assembled to accommodate certain
08 limitations about the formations that will be
09 encountered in the wellbore while drilling
10 and while picking a cement seat and while
11 cementing and so on, so on. Actually, the
12 fact that it's -- that I would consider it to
13 be unusual pretty much doesn't mean anything.
14 Q. What about Wild Well Control?
15 Did the company see any problems with the
16 well design?

Page 80:19 to 80:24

00080:19 A. You know, it's never as simple
20 as the way you phrased it.
21 EXAMINATION BY MS. EASTERLING:
22 Q. Are you aware of anyone within
23 Wild Well Control that saw problems with the
24 well design?

Page 81:02 to 81:19

00081:02 A. Saw -- saw problems with it.
03 I -- I'm just -- I'm just going to have to
04 say I can't answer that. I don't --
05 potentially.
06 EXAMINATION BY MS. EASTERLING:
07 Q. Okay.
08 A. Potentially. But that would
09 have to do with if and whether you tied
10 certain strings back to the surface that were
11 run as intermediate liners and so on.
12 Q. Okay. Who --
13 A. And so --
14 Q. Who brought up those concerns?
15 A. Well, all -- all of my well
16 engineers.
17 Q. Okay. So all of your well
18 engineers had concerns about --
19 A. The problem is --

Page 81:22 to 83:01

00081:22 A. -- the concerns that they had
23 are not the concerns that you're talking
24 about.
25 EXAMINATION BY MS. EASTERLING:
00082:01 Q. Okay. Explain that.
02 A. The concerns that they had were
03 that the liner tieback -- a tieback of a
04 liner is always a potential leak path.
05 History says -- history says we've gone on a
06 thousand jobs --
07 Q. Right.
08 A. -- and we have problems because
09 the liner top leaked.
10 So this is not something to
11 indict BP about or anyone else specifically.
12 It's just that this is perhaps a little bit
13 cumbersome, and there -- just that there is
14 potential for issues.
15 Now, I'm talking about
16 post-blowout. I'm -- I'm not talking about
17 during the design phase of the well.
18 Q. Okay.
19 A. I'm saying now I have a wellbore
20 with a lot of pressure on it, and I don't
21 even know how much.
22 Q. So you're talking about issues
23 that arose while trying to plan the killing
24 of the well or the relief efforts; is that
25 right?
00083:01 A. Or the shutoff of the well, yes.

Page 83:24 to 86:05

00083:24 Q. I want to turn your attention to
25 Exhibit 3908, and I believe it's right there
00084:01 in front of you. And it's the letter that
02 you wrote to Mr. Lynch.
03 A. Yeah.
04 Q. On page 2, down at No. 4, and it
05 says, "What's wrong with this picture" -- are
06 you -- are you with me?
07 A. Yes.
08 Q. If you go down in that section
09 about halfway, you're -- you're talking about
10 that "The kill team has established a max
11 surface pump pressure of 8,000 psi during the
12 bullhead kill."
13 Did I read that correctly?
14 A. Yes.
15 Q. And if you go down a couple -- a
16 couple of bullet points, you go on to say,
17 "That's plus or minus 1,000 psi greater than
18 the current shut-in pressure," and in
19 parentheses it says, "and it's very
20 convenient."

21 What did you mean by that?
22 A. 8,000 psi is still below the
23 threshold of failure of numerous components
24 in the wellbore. So -- I'm sorry. I could
25 be sitting here, and I could just pick a
00085:01 number. Based on what?
02 Q. So was it your opinion when you
03 wrote this letter that BP had just picked a
04 number?
05 A. Not necessarily BP.
06 Q. Okay.
07 A. All of the participants in the
08 team that were making this assessment.
09 Q. Okay. And -- and the assessment
10 having to do with the relief efforts; is that
11 right?
12 A. This assessment had to do with
13 the static kill --
14 Q. Okay.
15 A. -- which I called here the
16 bullhead kill. I don't know where somebody
17 came up with static kill.
18 Q. You go on to say, "The only
19 rationale for the 8,000 psi max injection
20 pressure is some derivative from reducing/
21 down" -- "down rating the original casing
22 performance values by some factor."
23 What were you trying to
24 communicate there?
25 A. You don't think I said it?
00086:01 Q. Well, just that you -- that they
02 had picked a number -- everybody involved in
03 the planning had just kind of picked a number
04 based on what the equipment could do, the
05 same thing?

Page 86:08 to 86:08

00086:08 A. Yes.

Page 88:08 to 89:13

00088:08 Q. Okay. Yesterday the BP attorney
09 read a couple of excerpts from the book that
10 you co-authored, the firefighting and blowout
11 control --
12 A. Yes.
13 Q. -- book?
14 A. Yes.
15 Q. I just wanted to go over one --
16 since he pointed out a few sentences within
17 this book, I wanted to look at page 4 with
18 you and -- oh, excuse me. And right there
19 above the bold print where it says "public

20 hazards," that last little paragraph --
 21 A. Uh-huh.
 22 Q. -- you see there?
 23 A. Uh-huh.
 24 Q. You would agree that it states,
 25 "In the end the blowout will generally be
 00089:01 regarded as the operator's problem regardless
 02 of the cause since the operator is in control
 03 of the well and is ultimately responsible for
 04 specifying, directing, and implementing
 05 almost all aspects of the drilling and
 06 production of the well."
 07 Did I read that correctly?
 08 A. Yes, you did.
 09 Q. And you still agree with that
 10 statement; is that right?
 11 A. As a general statement --
 12 Q. Yes.
 13 A. -- yes.

Page 91:25 to 93:07

00091:25 Q. Okay. If I understand what
 00092:01 you've told us already, Wild Well Control is
 02 a company that provides training and
 03 certification for people who work offshore in
 04 the oil and gas industry; is that correct?
 05 A. Actually offshore and onshore.
 06 Q. Okay. So you do onshore as
 07 well?
 08 A. Yes.
 09 Q. Okay. And you certainly provide
 10 those services for BP; is that correct?
 11 A. Yes, we do.
 12 Q. Okay. Now, you personally have
 13 been in the well control business for over 30
 14 years; is that right?
 15 A. Yes, sir.
 16 Q. Okay. Over a thousand wells
 17 you've helped contain?
 18 A. Yes, sir.
 19 Q. Okay. And worked on several
 20 others that you weren't personally involved
 21 in --
 22 A. Right.
 23 Q. -- but helped? Okay.
 24 You personally consider yourself
 25 an expert in well control?
 00093:01 A. I consider myself to be very
 02 knowledgeable.
 03 Q. Okay. And you said yesterday
 04 that others might talk behind your back and
 05 call you an expert, but you haven't really
 06 discussed it with them directly, is that
 07 right?

Page 93:11 to 93:12

00093:11 Discussed it with them directly.

12 A. Yes, sir.

Page 93:14 to 93:20

00093:14 Q. Okay. Just so we're very clear
15 in my mind and the judge's mind, you haven't
16 formed any opinions about either the mud
17 loggers or the cementing operators on board
18 the vessel at the time of the incident or
19 just before; is that correct?

20 A. That's correct.

Page 94:13 to 94:21

00094:13 Q. Okay. You didn't have any
14 discussions with any Halliburton or
15 Sperry-Sun employees prior to the incident,
16 obviously?

17 A. No.

18 Q. Okay. To your knowledge, did
19 you have any discussions with Halliburton
20 employees after the incident?

21 A. No, not -- not about this.

Page 119:06 to 119:12

00119:06 Q. Now, Mr. Campbell, for how many
07 decades has your company, Wild Well Control,
08 been helping operators and drillers with
09 wells that have blown out or which are in a
10 loss of well control situation?

11 A. Wild Well Control has been doing
12 it since their start-up or inception in 1975.

Page 120:09 to 120:15

00120:09 Q. And without question, would you
10 agree, Mr. Campbell, the greatest risk
11 undertaken while drilling and producing an
12 oil and gas -- oil or gas well is the
13 potential for a blowout and complete loss of
14 control?

15 A. I would agree.

Page 120:21 to 121:04

00120:21 Q. And is this risk which -- what
22 you-all call the greatest risk associated

23 with drilling and producing an oil and gas
24 well, is that risk well-known in the
25 industry, to your knowledge?
00121:01 A. Yes.
02 Q. Has it been well-known in the
03 industry for decades?
04 A. Yes.

Page 137:09 to 137:21

00137:09 Q. And do you also recall in that
10 book that you were trying to -- to maybe
11 forget about that another common activity
12 that has frequently led to a blowout is when
13 some sort of bottom kill is underway and
14 complete loss of control occurs?
15 A. Yes.
16 Q. And is the -- are these things
17 well-known in the industry, that many
18 blowouts occur in situations where the drill
19 string is off bottom or some sort of kill
20 operations are underway?
21 A. Yes.

Page 141:21 to 142:25

00141:21 Q. And I -- I -- one follow-up
22 question about what you testified yesterday
23 on ROVs. You testified along the lines of,
24 you know, it was a very quick learning curve
25 on the ROV capabilities. You know, the
00142:01 question was, was it a flying highball? I
02 think that was your language.
03 A. Eyeball.
04 Q. Eyeball?
05 A. Yes.
06 Q. Okay.
07 A. I mean, basically they call --
08 there's what's called a work class ROV.
09 There are many classifications. But one
10 basically is down in the 50 or less
11 horsepower category and is maybe not even
12 fitted with arms or articulated pieces. It
13 really has a light or a bank of lights and
14 video. And that's all it's capable of doing.
15 Q. Okay. And so as part of the
16 learning curve on ROV intervention on the BOP
17 stack, you kind of had to figure out what
18 ROVs were available?
19 A. Yes.
20 Q. And how they were fitted?
21 A. Right.
22 Q. And whether, for example, they
23 had the tools necessary to interface with the

24 panels on the -- on the BOP stack?
25 A. Right.

Page 151:20 to 152:02

00151:20 Q. And did you also put in here
21 that it was your experience that any
22 extremely rare failure to function almost
23 always is traced back to simple hydraulic or
24 air over hydraulic land-based BOP control
25 systems that were not maintained or that lost
00152:01 all fluid or that lost precharge in the
02 stored energy part of the system?

Page 152:05 to 152:09

00152:05 EXAMINATION BY MR. NICHOLS:
06 Q. Did you put that in your -- in
07 your letter?
08 A. I did.
09 Q. And did you believe that then?

Page 152:13 to 153:04

00152:13 EXAMINATION BY MR. NICHOLS:
14 Q. Do you believe it now?
15 A. Yes. But I -- I -- I did say,
16 you know, the fact is you have on the rig a
17 backup system, which is, I believe,
18 electrical or hydraulic or -- or air over
19 hydraulic, whichever it may be, but the basic
20 system is a electrohydraulic multiplex system
21 and -- but I think my point I'm trying to
22 convey here is that those simple mechanical
23 things that occur with what would have been
24 the backup system on this rig versus the very
25 robust and hearty system that was actually
00153:01 being used as a primary means of operating
02 the BOP, it would be extremely unusual that
03 all of these functions just simply don't
04 work.

Page 160:08 to 162:04

00160:08 Q. Now I'm going to ask you to look
09 at what's under Tab 10 of your binder that
10 you have there. And I'm not going to mark
11 this again. It's already been marked as
12 Exhibit 1166.
13 And if you turn over from the
14 first page, just to orient you, this has been
15 identified as a WEST Engineering Services
16 report or evaluation that was done for the

17 MMS. Do you see that on that first page?
18 A. Yes.
19 Q. And I'll ask you first,
20 obviously: Have you -- do you recall ever
21 having a chance to review this report from
22 back in March of 2003?
23 A. No, I -- I don't even know what
24 it's in relation to.
25 Q. Okay. I just want to ask you
00161:01 some questions about some of the language
02 that's in this and just ask you whether or
03 not in your years of experience you agree or
04 disagree with it.
05 A. Okay.
06 Q. So if you would turn first to
07 what's page 27 of 85. And that has the Bates
08 number at the bottom of TRN-MDL-494947.
09 A. Yes, sir.
10 Q. And there is a paragraph that is
11 the second paragraph under the header 4.3.7,
12 Discussion, that I want to ask you about. So
13 I'd ask you to read that last paragraph to
14 yourself, please.
15 Have you had a chance to review
16 that last paragraph?
17 A. Yes, sir.
18 Q. And so the first statement
19 that's made there is that the pumping
20 capacity of all ROVs is extremely limited,
21 usually just a few gallons per minute.
22 Is that consistent with your
23 experience?
24 A. I believe it to be more true in
25 2003 than it is today.
00162:01 Q. Okay. And so to cut to the
02 chase, do you believe that the statements
03 that are made here are applicable to the
04 technology that we had in place in 2010?

Page 162:07 to 164:06

00162:07 A. That the statements that are
08 made here.
09 EXAMINATION BY MR. NICHOLS:
10 Q. About the pumping capacity --
11 A. Yeah.
12 Q. -- of ROVs, for example.
13 A. No, it -- it had increased
14 rather significantly in the intervening
15 period.
16 Q. Okay. If you can get them to
17 pump?
18 A. If you can get it to pump, yes,
19 sir.
20 Q. And we talked about it?

21 A. Yeah.

22 Q. Had some issues on that with
23 respect to the ROV intervention at Macondo?

24 A. Yes, we did.

25 Q. Okay. And then it goes on to
00163:01 say, "Ten to twenty minutes can be required
02 to close a single ram, depending on the
03 particular pump involved."
04 Do you believe that to be the
05 case or is that outdated as well?

06 A. Well, could be. You would have
07 to make an analysis based on the one you're
08 actually going to try to use.

09 Q. Now, the next statement is the
10 one I want to really ask you about, which is,
11 "Closing a ram BOP with low volume hydraulic
12 source while a well is flowing would almost
13 certainly result in damage to the sealing
14 components of the ram and would not be able
15 to seal the wellbore."
16 Did I read that correctly?

17 A. Yes.

18 Q. Now, based on our discussion a
19 minute ago, is that a statement you would
20 agree with?

21 A. I would.

22 Q. And if you turn over to page 66
23 of this same document, which is Exhibit 1166,
24 and I just want to ask you to read for
25 yourself the first paragraph that appears on
00164:01 that page, that is, page 66 of 85.

02 A. Okay.

03 Q. And without me even having to
04 read it over again, would you -- would you
05 basically agree with the sentiment that's
06 expressed there?

Page 164:13 to 165:13

00164:13 EXAMINATION BY MR. NICHOLS:

14 Q. And now -- now I'll have to read
15 it because now they have objected. So I
16 apologize. I was trying to short circuit it.
17 Let's go line by line.
18 It says, "Unfortunately, if an
19 ROV is needed for well control, there is a
20 good chance it will be incapable of closing a
21 ram for one or more reasons."
22 Did I read that correctly?

23 A. Yes.

24 Q. Is that consistent with your
25 experience?

00165:01 A. While it has improved, it's
02 still a problem.

03 Q. And read the next sentence for

04 you. "As a result, reliance on ROV systems
 05 as the sole means" for "securing the well if
 06 the primary system has failed has a high
 07 probability of failure unless the ROV is
 08 docked at the appropriate ROV
 09 panel. . .during drilling."
 10 Did I read that correctly?
 11 A. Yes.
 12 Q. And is that a sentiment that you
 13 would agree with?

Page 165:16 to 165:23

00165:16 A. Well, the hypothesis I would
 17 agree with.
 18 EXAMINATION BY MR. NICHOLS:
 19 Q. Okay. And we know during the
 20 response to the Macondo well that the ROVs
 21 that were attempted to be used were not
 22 docked at the appropriate ROV panel during
 23 drilling, correct?

Page 166:01 to 166:01

00166:01 A. Correct.

Page 166:03 to 167:07

00166:03 Q. If you turn now to page 75 of
 04 85, and there's a statement at the very
 05 bottom of that page -- it's right underneath
 06 the picture --
 07 A. Yeah.
 08 Q. -- that I would just ask you to
 09 read that language that appears right below
 10 that picture there.
 11 A. "Ram preventers are not designed
 12 to close and seal under high rate
 13 conditions," high rate meaning high flow
 14 rate, "if closure rates are slow."
 15 Q. And do you agree with that basic
 16 sentiment --
 17 A. Yes.
 18 Q. -- that's expressed there?
 19 And also -- if we go on, it also
 20 says, "API specification 16A does not require
 21 testing for rams under dynamic flowing
 22 conditions."
 23 Did I read that correctly?
 24 A. Yes.
 25 Q. And you obviously would agree
 00167:01 with that sentiment as well?
 02 A. I would have to review for more

03 recent modifications. But, to my knowledge,
 04 the answer is it's still the same.
 05 Q. Okay. It's still the same as it
 06 was back in 2010?
 07 A. Yes, sir. Yes, sir.

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00183:02 Q. All right. I'd like to talk to
 03 you about your May 12, 2010 letter and your
 04 July 28, 2010 letter, okay?
 05 A. All right, sir.
 06 Q. You testified a few moments ago
 07 that your May 12, 2010 letter, which is
 08 Exhibit 3922 --
 09 A. Yes, sir.
 10 Q. -- that in writing that letter,
 11 you were making no guess as to what is
 12 happening or what was happening within the
 13 Macondo well. Do you recall that?
 14 A. Correct. Oh, I -- I'm trying to
 15 be clear that I do not know what is
 16 happening.
 17 Q. And -- and -- and that was my
 18 next question.
 19 A. Yes.
 20 Q. At that point in time, when you
 21 wrote this letter on May 12th of 2010, you
 22 were unaware of what was going on inside the
 23 Macondo well?
 24 A. That's correct.
 25 Q. You were unaware of the wellbore
 00184:01 geometry and the status of the equipment
 02 within the -- the Macondo well?
 03 A. I was generally familiar with
 04 the wellbore geometry as designed, but I was
 05 not aware of the present condition of that
 06 geometry.
 07 Q. And that would include the fact
 08 that you were unaware of the present status
 09 or position of the casing hanger and the seal
 10 assembly?
 11 A. That's correct.
 12 Q. Turning now to -- well, let me
 13 ask you this: You personally were unaware of
 14 the position of the casing hanger and the
 15 seal assembly. It's also accurate, isn't it,
 16 that no one at Wild Well would have been
 17 aware of the status or position of the casing
 18 hanger and seal assembly as of May 12, 2010?
 19 A. No one could know that.
 20 Q. All right. Turning now to your
 21 July 28, 2010 letter, which is marked as
 22 Exhibit 3908. At the time that you wrote
 23 your July 28, 2010 letter, you were still

24 unaware of the current status or condition of
25 the equipment inside the Macondo well?
00185:01 A. That's correct.
02 Q. And, therefore, you were unaware
03 as of July 28, 2010, as to the condition or
04 position of the casing hanger and the seal
05 assembly?
06 A. That's correct.
07 Q. Likewise, no one at Wild Well
08 could have known of the current position or
09 status of the casing hanger or the seal
10 assembly?
11 A. They could not have known.
12 Q. Right. And -- and you state
13 that clearly, do you not, sir, in your letter
14 of July 28, 2010, that it was not possible
15 for anyone to know the current status of
16 equipment including the casing hanger and
17 seal assembly?
18 A. Right.
19 Q. If one were to look through the
20 Wild Well documents and see in various
21 e-mails or other documents Wild Well
22 employees talking about the position or
23 status of the casing hanger seal assembly, is
24 it fair to assume that those discussions
25 would be either guesses or speculation?
00186:01 A. It could only be --

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00186:04 A. -- speculation.