

Deposition Testimony of:

Andy Inglis

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00430:15 Yesterday you said that at the
16 end of your tenure with BP you were the CEO
17 of E&P for BP; is that correct?
18 A. That's correct.
19 Q. And what were the
20 responsibilities as CEO of E&P? What were
21 your responsibilities?
22 A. I was responsible for BP's
23 global operations within the exploration and
24 production portfolio.
25 Q. I believe you said yesterday you
00431:01 were also the highest ranking person for
02 drilling worldwide, just below Tony Hayward;
03 is that correct?
04 A. As I say, covered all operations
05 globally, which drilling would be a part,
06 productions operations would be a part, all
07 of the activities that BP undertook with
08 regard to its exploration and production
09 activities globally.
10 Q. So drilling as far as
11 exploration and production was concerned fell
12 under your sphere of responsibility?
13 A. That's correct.

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00547:23 Q. Thank you, sir. Now, I
24 understood you to say that after the incident
25 that you were involved in a fairly
00548:01 significant way with the relief wells. Did I
02 understand that correctly?
03 A. The relief wells were part of
04 the Unified Command. They were there as --
05 Q. Were you involved, is my
06 question.
07 A. I was involved supporting the
08 teams that were drilling the relief wells.
09 Q. Okay.
10 A. I was involved in the team.

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00548:17 Q. Okay, sir. While you were there
18 on the rig or back onshore did you learn that
19 Halliburton was involved in pumping cement
20 there on the relief well?
21 A. I can't recall.
22 Q. Have you -- are you telling us
23 that while you continued to be the CEO of E&P
24 up through December 31, 2010 you do not know
25 whether or not Halliburton was involved in

00549:01 pumping any cement in the relief well; is
02 that what you're telling us?
03 A. No.

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00549:06 A. (Continuing) What I am saying
07 to you is there was a huge amount going on.
08 Q. (BY MR. GODWIN) My -- did you
09 understand the question?
10 A. I understand the question. I
11 can't recall with absolute certainty whether
12 it was a Halliburton cement or whether it
13 wasn't. I generally can't.
14 Q. Okay. When the relief well --
15 the work was begun, was E&P involved in that
16 in any way?
17 A. Yes, it was.
18 Q. Okay. How was E&P involved in
19 that, in the relief well?
20 A. It was involved in the -- the --
21 the design of the wells. It was involved in
22 the -- you know, which rigs would be used.
23 Q. Yes, sir.
24 A. It was involved in supporting
25 the Unified Command in terms of whether we
00550:01 should drill one relief well, two relief
02 wells. So all of that was part of Unified
03 Command, but there were -- there were BP
04 people work within that structure.
05 Q. Were -- while you were con- --
06 while you were still the CEO certainly up
07 through the end of September, sometime in
08 October on an active basis, were you kept
09 informed regarding what was going on on the
10 relief wells?
11 A. I was kept informed in terms of
12 being able to update Secretary Salazar in
13 terms of progress being made, depth being
14 drilled, those sorts of things.
15 Q. Okay. How many relief wells
16 were drilled?
17 A. There were two relief wells
18 drilled.
19 Q. Okay, sir. Are you aware
20 that -- through any means other than lawyers
21 that on the DDII Halliburton provided
22 cementing services?
23 A. I wasn't aware, no. I'm not
24 aware, no.
25 Q. Are you aware --
00551:01 A. I can't recall.
02 Q. -- on the DDII that Halliburton
03 provided Baroid mud -- mud services?
04 A. No, I'm not. I can't recall.

05 Q. Are you aware that -- that on
06 the DDII that Halliburton provided Sperry
07 services?

08 A. No, I can't recall.

09 Q. On the DD3 are you aware that
10 Halliburton provided services which included
11 cementing, directional work, wireline
12 ranging, as -- as well as Sperry work? Are
13 you aware of that?

14 A. I can't recall.

15 Q. Okay. After the incident on
16 April 20 and at any time while the relief
17 wells were being drilled did you instruct
18 anyone within BP not to engage the services
19 of Halliburton to work on those wells?

20 A. Not that I can recall.

21 Q. Okay, sir. Did anyone within BP
22 say to you at any time after the incident on
23 April 20 that -- that work was -- cementing
24 work with Halliburton should be put on hold
25 until the Bly investigation work was
00552:01 completed?

02 A. Not that I can recall.

03 Q. Thank you, sir. Did anybody
04 tell you within BP after the incident of
05 April 20 and while the relief wells were
06 being drilled that he or she or they were
07 uncomfortable relying upon Halliburton to
08 perform any cementing services for -- for BP?
09 Anybody tell you that?

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00552:20 A. No, I can't recall.

Page 653:09 to 656:07

00653:09 Where were you on April 20,
10 2010, when the Deepwater Horizon blew up?

11 A. I was actually in -- in London.

12 Q. How did you learn about it?

13 A. I learned about the incident
14 with a phone call from my chief of staff. It
15 was around 6:00 o'clock in the morning, 5:30,
16 6:00 o'clock in the morning.

17 Q. And when was it that you went to
18 Houston?

19 A. That was the -- the 20th. I
20 went to Houston that night. So it would have
21 been the night of the --

22 Q. 21st?

23 A. No, it would have been the --
24 the night of the 20th, best of my
25 recollection, arriving in Houston the morning

00654:01 of the 21st.

02 Q. Okay. I was thinking the
03 explosion had occurred about 10:00 o'clock at
04 night.

05 A. Yes, I've got the dates wrong
06 now. So it would be 21st in England, you're
07 right. So it was the 21st in the U.K.,
08 you're right. 6:00 o'clock in the morning on
09 the 21st. And then I would have gone the
10 evening of the 21st, arriving in Houston on
11 the morning of the 22nd.

12 Q. Okay.

13 A. Yeah, thank you.

14 Q. And did you remain in Houston
15 for some period of time?

16 A. I remained in Houston,
17 essentially right away through until the
18 response in -- in Houston was complete, which
19 was sort of the finishing of the -- of the
20 relief wells. I think I did go to London for
21 a couple of board meetings. I think there
22 were two in London. I attended some by video
23 conference, but I think I went twice to
24 London for literally 24 hours.

25 Q. All right. And when was it that
00655:01 Mr. Suttles came to Houston?

02 A. Doug would -- in relation to
03 that April time frame?

04 Q. Yes, sir.

05 A. Doug would have been in -- in
06 Houston. I believe, the day of the incident
07 occurred, Doug was actually in Houston. I
08 believe he was in -- in Houston when I
09 arrived on the 22nd.

10 He then went to -- to Robert,
11 Louisiana, where the Unified Command was set
12 up there. You know, I'm not sure what date
13 that was, but it wasn't long afterwards. It
14 was in the first few days.

15 Q. Okay. As I understood your
16 testimony yesterday, Mr. Suttles was the --
17 the BP representative who was part of the
18 Unified Command; is that correct?

19 A. That's correct, the most senior
20 representative in terms of the Unified
21 Command.

22 Q. All right. You said your role
23 was basically to provide support?

24 A. Was to provide support to the
25 team in Houston. I wasn't formally part of
00656:01 the Unified Command structure. I also spent
02 a lot of time talking to the government, the
03 U.S. Government, in terms of
04 Secretary Salazar, and, you know, he
05 connected in to Secretary Chu. So as the --

06 as the response continued, he was also part
07 of that conversation.

Page 657:21 to 658:08

00657:21 Q. All right. Cameron was out
22 there to provide assistance in the recovery
23 effort, as you understood it?
24 A. Yeah, there was -- the way that
25 it was set up within the Unified Command, it
00658:01 was about bringing in expertise from across
02 all the industry. So there were various
03 contractors working in that group. There
04 were various other operators working in that
05 group. So it was a mixed team.
06 Again, I can't remember any
07 specific names, but I -- I believed that they
08 were part of the -- that group.

Page 661:08 to 665:15

00661:08 Q. Okay. Let me -- let me ask
09 you -- let me return for a minute to the --
10 to the recovery effort. You said yesterday
11 that BP responded to this incident in
12 accordance with its plan; is that correct?
13 A. What I believe I said in the --
14 in the full question announced that it
15 occurred was that there was a spill response
16 plan in place. That was about collecting at
17 the surface, drilling a relief well. The --
18 there were clearly a series of actions taken
19 to not rely on the relief well to be the
20 mechanism to shut in the well and action
21 taken to find other means to do it.
22 Q. But BP's spill response plan did
23 not include a plan for capping the well,
24 correct?
25 A. I believe that's correct.
00662:01 Q. All right. Now, eventually we
02 know the well was capped, correct?
03 A. That's correct.
04 Q. And that was, what, 88 days
05 after the blowout?
06 A. It was 87 or 88 days, yeah.
07 Q. All right. Didn't BP consider
08 trying to cap the well much earlier?
09 A. Again, this was under Unified
10 Command. All decisions were made by the
11 federal on-scene commander. The process, the
12 strategy agreed with the federal on-scene
13 commander was don't make it worse, and, you
14 know, deploy the next available tech- --
15 technology. So that strategy is what guided

16 the work.
17 And, again, we can go through
18 the series of -- of interventions that were
19 made. The -- the decisions were always
20 put -- put forward to the Unified Command,
21 and that was how the -- ultimately each set
22 of actions was actually enacted.
23 Q. Let's look at a couple
24 documents. Let me show you what's previously
25 been marked as Exhibit 3918.

00663:01 A. Thank you.
02 Q. First of all, are you familiar
03 with the company called Wild Well Control?
04 A. Yes, I am.
05 Q. And what sort of company is
06 that?
07 A. They're a -- a well control
08 company. They can, you know, intervene on --
09 on wells that have lost integrity, well --
10 well blowouts.
11 Q. All right. They're based in
12 Houston, correct?
13 A. I believe they have an operating
14 center in Houston, that's correct.
15 Q. Is it true that BP hired Wild
16 Well Control after this blowout to advise it
17 or render assistance in dealing with the
18 blowout?
19 A. They were part of the -- the
20 response team, that's correct.
21 Q. All right. Have you seen this
22 particular document before, Exhibit 3918?
23 A. No, I haven't.
24 Q. All right. It appears to be an
25 e-mail from Kerry Girlinghouse at Wild Well

00664:01 Control to Bob Franklin of BP, dated
02 April 27, 2010, correct?
03 A. That's correct.
04 Q. Do you know who Bob Franklin is?
05 A. No, I don't.
06 Q. All right. April 27 would be
07 one week after the blowout?
08 A. That's correct.
09 Q. And do you see that it's a -- if
10 we look at the second page of the document,
11 it says it's a project memo. The subject is
12 "SS Well Capping." Do you see that?
13 A. Yes, I do.
14 Q. It says, "In the event that
15 current ROV intervention attempts to secure
16 the well by functioning the existing BOP and
17 the well continues to flow. The following
18 options should be considered for review and
19 deployment. It is anticipated that the flow
20 from the well will be restricted to

21 facilitate this operation."
 22 And it says "Well Capping,
 23 Installation of Capping Stack on existing
 24 BOP."
 25 Do you see that?
 00665:01 A. Yes, I do.
 02 Q. If we look at the third page,
 03 there's a summary procedure that someone has
 04 set out there for installation of a capping
 05 stack on the existing BOP, correct?
 06 A. Yeah, that's correct.
 07 Q. Okay. Does this indicate to you
 08 that as of April 27, Wild Well Control was
 09 communicating with BP about a possible plan
 10 for capping the well?
 11 A. Yeah, it -- it was -- it was a
 12 work stream that was started at that time,
 13 that's correct.
 14 Q. Okay. Let me show you also
 15 Exhibit 3919.

Page 665:18 to 669:12

00665:18 Q. (BY MR. REDDEN) Now, this
 19 appears to be a communication back from Bob
 20 Franklin at BP to presumably some people at
 21 Wild Well Control. Is that what it looks
 22 like to you?
 23 A. I don't know James Wellings or
 24 Greg Blome. I think Mark Patterson -- it's
 25 Mark Patterson -- there is a Mark Patterson
 00666:01 in BP.
 02 Q. Okay, so maybe they were BP
 03 people.
 04 In any event, Mr. Franklin said,
 05 "Here is the presentation from today's
 06 efforts.
 07 "Comments, questions, or
 08 suggestions are welcome."
 09 Correct?
 10 A. That's correct.
 11 Q. And Mr. Franklin's title
 12 apparently is "Technical Specialist Wellheads
 13 and Trees" for BP Exploration & Production,
 14 correct?
 15 A. That's correct.
 16 Q. Now, if you look at the second
 17 page of the document, it refers to -- it has
 18 a BP logo on it, and it refers to a "Well
 19 Capping Team," correct?
 20 A. That's correct.
 21 Q. Were you aware that there was a
 22 well capping team within BP as of April 27th,
 23 2010?
 24 A. There was as part of the -- as

25 you go back and talk about the scenarios that
00667:01 were being worked, it was about don't make it
02 worse, deploy the next thing that's
03 available, and have multiple work streams.

04 So I -- my best recollection is
05 that as early as -- as the end of April,
06 there was a team, you know, looking at how
07 you could cap the well with a stack.

08 Q. And if we look at the next page,
09 there is a slide that says, "Major Areas of
10 Operation."

11 Several bullet points under
12 there includes "Capping Stack Design, Capping
13 Stack Deployment, Capping Stack Installation,
14 Capping Stack Operation," correct?

15 A. You read that correct.

16 Q. All right. Okay. Now, I'll
17 also show you a document -- this was marked
18 yesterday as Exhibit 2402. You were shown
19 it. And, I'll tell you what, I just have the
20 one copy of it. Let me just hand it to you
21 and ask you to take a quick look at that.

22 Appears to be a presentation
23 given to the Bureau of Energy Management. Do
24 you recall being asked some questions about
25 that yesterday, Mr. Inglis?

00668:01 A. I do recall, yeah.

02 Q. All right. If you'll turn -- I
03 flagged one page there. If you could just
04 turn to that page, I have a quick question
05 for you. And does that have a page number on
06 it?

07 A. It's Page No. 9.

08 Q. Okay, Page 9. And it talks
09 about -- it says, Containment of a, quote,
10 Future Macondo, close quote, accomplished
11 within one to three weeks.

12 Do you see that?

13 A. I do, uh-huh.

14 Q. All right. Were you ever privy
15 to any discussions that if there were a
16 future Macondo, that Wild Well Control
17 thought that they would be able to cap such a
18 well within one to three weeks?

19 A. I haven't seen this presentation
20 before.

21 Q. I understand that, but did you
22 ever hear from anybody associated with Wild
23 Well Control or anyone within BP that Wild
24 Well Control had presented to the Bureau of
25 Energy Management that in the event of a
00669:01 future Macondo, they would be able to cap
02 this well within one to three weeks?

03 A. No, I have not.

04 Q. All right, sir. Now, you said

05 you have -- you've looked at the Presidential
06 Commission report, correct?
07 A. I've read the Presidential
08 Commission's report, that's correct.
09 Q. All right. I'm going to hand
10 you what I'm going to mark as Exhibit 6326,
11 and I'll represent to you this is a two-page
12 excerpt from Chapter 5 of that report.

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00669:14 Q. (BY MR. REDDEN) And this is
15 pages -- for the record, Pages 157 and 158 of
16 Chapter 5 of the National Commission or
17 Presidential Commission report.
18 And if we look down at the
19 bottom of the first page, do you see the
20 heading where it says, "From Containment to
21 Collection (Late May to Early July)"?
22 A. Yes, I do.

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00670:12 Q. Okay. And then if we go to the
13 second page, the last sentence -- the first
14 full sentence on that page says, "The failure
15 of the top kill marked a turning point for
16 the government science teams, with the
17 government significantly increasing its
18 oversight of the containment effort."
19 Do you see that?
20 A. Yes, I do.
21 Q. Is that a true statement?
22 A. I -- my personal recollection of
23 that, I -- I don't believe there was a sort
24 of step change in the -- in the degree of
25 oversight. I can't recall that.
00671:01 Q. All right. In the next par- --
02 A. There was strong oversight
03 before and after, is the way I would describe
04 it.
05 Q. Okay. The next paragraph says,
06 "The next morning, BP presented its analysis
07 of why the top kill failed to stop the flow
08 of oil. The analysis focused on the well's
09 16-inch casing, the outermost barrier between
10 the well and the surrounding rock for more
11 than a thousand feet. That casing was
12 purposely fabricated with three sets of weak
13 points, called rupture disks."
14 Did I read that correctly?
15 A. You read that correctly.
16 Q. Were you present when that
17 analysis was presented?

18 A. Yes, I was.
19 Q. Okay. And are you familiar with
20 the fact that the 16-inch casing contained
21 three rupture disks?
22 A. Yes, I am.

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00672:01 Q. Now, let's skip down to the next
02 paragraph which starts out, "The disks could
03 rupture in two ways."
04 Do you see that paragraph?
05 A. Yes, I do.
06 Q. And I'd like to focus on the
07 last couple of sentences in that paragraph.
08 It says, "According to BP's
09 top-kill analysis, pressures created by the
10 initial blowout could have caused the rupture
11 disks to collapse inward, compromising the
12 well's integrity. BP believed that the mud
13 it had pumped down the well during the top
14 kill could have gone out into the rock
15 through the rupture disks, instead of staying
16 within the well and pushing oil back down
17 into the reservoir as intended."
18 Do you see that?
19 A. Yeah, could I just read the
20 whole paragraph just to see, make sure I
21 understand it?

Page 673:02 to 673:16

00673:02 Q. Do you recall there being a
03 concern within BP around this time that the
04 rupture disks might have collapsed during the
05 blowout?
06 A. It was one of the scenarios that
07 was examined as part of the potential failure
08 for the -- the top kill, so that concern did
09 exist.
10 Q. Okay. Then continuing on in the
11 next paragraph, the report says, "Collapse of
12 the rupture disks was only one of BP's
13 possible explanations for the unsuccessful
14 top kill. But the company presented it to
15 the Government as the most likely scenario."
16 Do you recall that?

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00673:18 Q. (BY MR. REDDEN) Do you agree
19 that that's a true statement?
20 A. I'm not sure we presented it as

21 the most likely scenario. I think as a --
22 there was a discussion with -- and it was --
23 again, it was within Unified Command, the
24 science team were there, the -- the BP team
25 were there, there were other industry experts
00674:01 there.

02 I think the view -- the common
03 view, I'd say, was that this was probably
04 believed the most likely scenario, but that
05 was as a result of the discussion rather than
06 a presentation.

07 Q. So you disagree with the
08 statement that BP presented collapse of the
09 rup- -- rupture disks to the government as
10 the most likely scenario?

11 A. Again, the best of my
12 recollection, the conversation at the time,
13 there were two possible scenarios, and I
14 can't recollect at the time whether one was
15 push -- push had been the most likely or the
16 less likely. There were two possible
17 scenarios.

18 Q. Uh-huh.

19 A. There may have been -- you know,
20 my sense of the conversation that occurred
21 afterwards, that it was certainly the -- the
22 view that it was more likely than -- the more
23 likely scenario, I'd say. I can't -- you
24 know, I generally can't recollect what the
25 document said going into the meeting.

00675:01 Q. All right. Continuing on, the
02 report says, "Although the government science
03 teams did not fully accept BP's analysis of
04 what happened to the mud, they agreed that
05 the rupture disks could have collapsed during
06 the blowout, and that the integrity of the
07 well had to be considered in future
08 containment efforts."

09 Do you agree with that?

10 A. Again, I'd go back to my
11 previous description, you know, my best
12 recollection of the conversation at the time
13 was under the mantra of not making it worse.

14 Q. Uh-huh.

15 A. There was genuine concern
16 amongst the government science team as to
17 whether or not the rupture disks had
18 worked -- had -- had burst, therefore, it had
19 to be a -- an issue that was deeply
20 considered prior to any other intervention,
21 which was why when the capping stack was
22 used, there was a huge amount of concern as
23 to whether or not the -- the well had
24 attempted.

25 Q. Let's go to the final paragraph.

00676:01 It says, "BP had previously said
02 that, if the top kill failed, its next step
03 might be to install a second BOP on top of
04 the existing one to shut in the well. But
05 now, the company engineers viewed the
06 possibility that the rupture disks had
07 collapsed as a reason to discard capping the
08 well as an option."

09 Do you see that?

10 A. I do, I read that.

11 Q. Is that -- does that comport
12 with your recollection?

13 A. It doesn't. You know, the --
14 this -- this day -- this would have been --
15 this rec- -- this was May 28th. You know, my
16 best recollection is that the work stream on
17 the capping stack continued. Equally well
18 the work stream on finding other ways to
19 contain and process the fluid at the surface
20 continued. So I don't believe it was
21 discarded. The work stream continued, which
22 is why in -- in July, the capping stack had
23 been proven and was available for use.

24 Q. So your recollection is the work
25 to put together a capping stack just

00677:01 continued unabated?

02 A. Unabated, it -- it was one of
03 the work streams that was being pursued.

04 Q. Next sentence says, "If BP shut
05 the well in, oil and gas could flow out the
06 rupture disks and into the rocks surrounding
07 the well in a 'broach' or 'underground
08 blowout.'"

09 Do you see that?

10 A. Yes, I do.

11 Q. And do you recall that being a
12 concern that was expressed at the time?

13 A. That -- that was a concern,
14 that's correct.

15 Q. All right.

16 "From there, the hydrocarbons
17 could rise through the layers of rock and
18 flow into the ocean from many points on the
19 sea floor. This would make containment
20 nearly impossible, at least until the
21 completion of a relief well. Thus, in the
22 aftermath of the top kill, BP and the
23 government focused on trying to collect the
24 oil, with the relief wells still providing
25 the most likely avenue for killing the well

00678:01 altogether."

02 Is that what it indicates?

03 A. You read that correct.

04 Q. And does that comport with your
05 recollection?

06 A. The -- the emphasis -- the
07 emphasis in terms of the response was still
08 around multiple work streams. The emphasis,
09 it was clearly on the work streams to build
10 out surface containment and processing
11 containment as well as continue to figure out
12 could you apply the capping stack, was there
13 a way to do it that actually took account of
14 this potential weakness in the -- in the
15 well.

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00680:14 Q. -- what efforts were made as far
15 as collecting the oil or taking other steps
16 short of trying to cap the well?

17 A. The -- there was a build-out of
18 the -- of the surface containment, the
19 surface collection of the oil at the same
20 time as a series of steps being taken to
21 manufacture the -- the capping stack.

22 And the big issue with the
23 capping stack was there were various designs
24 being undertaken. The issue was -- the
25 big -- the big issue was how would you
00681:01 actually effectively create a seal from the
02 top of the LMRP to the -- the capping stack.

03 The -- one option that was used
04 was do you cut the bolts off of the top riser
05 and -- and put it in place and bolt it up?
06 Was it possible to do that? Another design
07 was could you install it and actually put a
08 clamping ring on the outside.

09 So there were a whole series of
10 tests being done. I -- if I recall
11 correctly, there were about a -- over a
12 hundred setup tests done on various designs
13 until people came up with a conclusion that
14 the design that had the best chance of -- of
15 success was to actually go in and -- and
16 remove the -- and cut into the flange at the
17 top of the MM -- LMRP.

18 Q. Were you part of the well
19 capping team?

20 A. No, I wasn't.