And from January 1, 2009, up...

Q. And from January 1, 2009, up through and including the date of the sinking of the DEEPWATER HORIZON on April the 22nd, you were the chief operating officer for BP Exploration & Production; is that right?

A. Yes, that was my title, yes.

Q. Now, as I understand it, since then the chief executive officer of BP, PLC, Tony Hayward, has been replaced; is that right?

A. Tony has left the company, yes.

Q. All right. The chief executive officer of BP Exploration & Production, Andy Inglis, has left the company?

A. That's correct.

Q. And you as the chief operating officer of BP Exploration & Production have left the company?

A. I retired at the end of March, yes.

Q. Okay. And I just wanted to ask you: At the time that you retired, you were the ripe old age of 50 years old; is that right?

A. Yes, I was.

Q. Okay. Now, we'll go back to your time at BP as -- your -- your official title after April 20th was senior representative in the Unified Area Command; is that right? Does that sound right?

A. Well, I was BP's representative on -- on Unified Area Command. I don't know that we gave it a -- I don't recall it having a specific title. I was -- I was just the BP representative at -- the member of the Unified Area Command.

Q. You -- you were the senior-most BP official?

A. I was the senior -- I was the Unified Area commander from BP.

Q. Okay.

A. That was my job.

Q. How were you selected to be the Unified Area representative for BP?

A. Well, before when they -- the -- the spill first happened and I got -- or the accident first happened, I -- I went into the BP office. And on the morning of April 21st, Tony Hayward spoke with me and -- as he and Andy Inglis were in London at the time and asked if I could lead the response. Then after Admiral Landry called me and said that she was -- she was activating Unified Area
Command, I had a discussion, if I recall correctly, with Andy Inglis about who was the best -- at that point I had deployed Dave Rainey before then to New Orleans to Admiral Landry's office here. And at that point we had a discussion would it -- who would be the best person to do that job, and given my experience, the decision was made that I should -- I should take that role.

Yes, it was. ...
answer it except give me the name of a
company is all I need, sir. I'm trying to
get through it. I have a -- I'm limited in
my time.

A. Okay.
Q. I just need the name of a
cOMPANY, please.
A. Well, my paycheck came from, I
believe, BP North America, Inc., but I -- my
role involved -- I reported to the chief
cOMPAIny of Exploration &
Production.
Q. And -- and who was that, sir?
A. Andy Inglis.
Q. Mr. Inglis. Okay.
And are you able to tell us here
today the name of the company that you were
the COO, the chief operating officer, of
prior to the time you retired on -- on
March 31, 2011?

Q. Go ahead, sir.
A. Yes. I -- and I am trying to do
my best to answer your question. I -- the --
the corporate structure of the company
involved a number of subsidiaries around the
world which I had some responsibility and
relationship to, so I -- I actually don't
know how to answer your question other
than --
Q. Okay.
A. -- to tell you --
Q. Okay. Let -- let me rephrase
it, then. I understand the company, BP, is
divided -- the main primary company in London
is divided into companies around the world.
And I'm talking about Doug Suttles who was
the COO for earning -- or E&P earnings --
Exploration & Production.
A. Uh-huh.
Q. I simply want to know the name
of the company that you were the chief
operating officer of. I'm not interested in
sales and marketing or legal or any other
aspect of the company. I want to know the
company that you believe you were the COO of,
if you know.
A. I'm sorry. I -- I -- I can't
answer your question. I -- I just don't know
the --
Q. Okay.
A. -- answer to that.
Q. All right. And -- okay. And I
believe you said that you reported prior to
your retirement while you were the COO in
most recent times to Mr. Andy Inglis,
correct?
A. That's correct, yes.
Q. And -- and tell us, if you will,
please, he was the CEO?
A. He -- his -- his title -- at
least my understanding of his title was the
chief executive officer of Exploration &
Production.
Q. Okay. Of -- of Exploration & Production of which company?

4. PAGE 552:02 TO 552:02 (RUNNING 00:00:00.999)

Q. Is that a company?

5. PAGE 552:05 TO 552:07 (RUNNING 00:00:03.580)

A. It's not -- I mean, I don't know -- I don't know the -- the legal entity status. I'm sorry.

6. PAGE 552:20 TO 556:01 (RUNNING 00:03:24.430)

Q. Okay, sir. Do you know the name of the company that as of April 20, 2010, Mr. Andy Inglis was the CEO of?

A. He -- all -- what I understood was he was the chief executive officer for Exploration & Production and those activities across the company. I do not know -- I do not believe that was structured under one legal entity.

Q. Okay, sir. And -- and as of April 20, 2010, to whom did Mr. Andy Inglis report, if you know?

A. My understanding is his boss was Tony Hayward who is the chief executive officer of the BP Group.

Q. Okay. And did you at any time in the 2010 time frame report direct to Tony Hayward on any matters?

A. Not to my knowledge, no.

Q. Okay. Because after the event on April 20, I understand you were in charge of the response effort?

A. My role was --

Q. Is that correct, sir?

A. Well, there were -- there were two roles I played. Tony Hayward on the 21st of April asked me to lead BP's group crisis response initially because --

Q. Right.

A. -- because he and Andy Inglis were in London at the time. And then a day or two later, I was asked to be BP's member of Unified Area Command, which put me as the senior BP person inside of the Unified Area Command spill response.

Q. Okay. Now, in those two roles that you played that you were requested to do by Mr. Tony Hayward, to whom did you report?

A. Internally within BP I consulted on -- Tony granted me authority -- BP authority to make the decisions I needed to make inside of that role. It's a difficult question to answer because I didn't think of it in that way.

I would consult with Tony Hayward on issues, with Andy Inglis on issues, and with Bob Dudley on issues amongst many others, but I --

Q. Okay.

A. -- I didn't -- I didn't --

they -- they didn't put constraints on me which required me to go back to them to take decisions.
Q. Okay. So in terms of, though, in the corporate hierarchy --
A. Yes.
Q. -- as of April 21, 2010, and up until the -- up until the time when you no longer were involved with the HORIZON --
A. Right.
Q. -- well -- HORIZON matters, I understand you were in charge as -- as delegated to you by Mr. Tony Hayward, correct, with the response effort?
A. Yes, he -- well, he spoke with me about -- he's the person who asked me to lead -- initially lead BP through crisis response. It was Andy Inglis, I believe, who asked me to be the Unified Area commander for BP.
Q. Okay, sir. And -- and as I understand it, during the time that you were in those two roles you've just named, you would consult direct with Tony Hayward from time to time as -- as the necessity arose?
A. Yes, I did on -- on a number of occasions.
Q. And you would also consult direct with Mr. Andy Inglis as needed as the occasion arose after you were put into those two positions as of April 20, 2010?
A. That's correct.

7. PAGE 817:04 TO 817:21 (RUNNING 00:00:39.800)

Is this the company you worked for, BP Exploration & Production, Inc.?
A. As -- as I described earlier, I worked for the organizational entity called BP Exploration & Production. I'm just not familiar with the -- the -- the legal entity structure.
Q. Well, is there an organization called the BP Exploration & Production and a company called BP Exploration & Production, Inc.?
A. The -- the -- the organizational unit that -- that looks after BP's exploration and production activities globally is called BP Exploration & Production. There are a huge number of legal entities, and I would assume this is one of those.