

Deposition Testimony of:

Douglas Brown

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Page 23:09 to 23:20

00023:09 From the time that the DEEPWATER
10 HORIZON was in the shipyard in Korea until
11 the time it sank, sometime after
12 April -- whoa -- up until April 20th, 2010,
13 were you always assigned to the DEEPWATER
14 HORIZON?
15 A. Yes.
16 Q. All right. And during that time
17 period, did your job title change from
18 chief mechanic to anything else?
19 A. Chief mechanic to slash acting
20 second engineer.

Page 24:13 to 24:17

00024:13 Q. All right. So since
14 approximately 2004 until April of 2010, you
15 served in the mechanic position and/or
16 acting second engineer; is that fair?
17 A. Yes.

Page 49:24 to 50:02

00049:24 When you were onboard-- you were
25 onboard the DEEPWATER HORIZON on April
00050:01 20th, 2010, correct?
02 A. Yes.

Page 70:08 to 70:15

00070:08 Q. All right. When the power went
09 off, did anything occur with the power
10 going off?
11 A. To us in the ECR, the power just
12 went off. From what I heard later, lights
13 were exploding, TV screens and computer
14 screens were blowing, and by blowing I
15 means exploding. That's basically it.

Page 72:03 to 73:24

00072:03 Q. Did the -- to your understanding
04 either then or now, did the power go off
05 rig-wide at that point?
06 A. Yes, from my training and what I
07 know about the functions of the rig, I was
08 pretty sure the whole rig was black.
09 Q. Then what happens?
10 A. I remember saying to the other
11 guys, We are in big trouble. I still don't
12 know what kind of trouble, but I just knew

13 something out of the ordinary was taking
14 place and then the first explosion hit.
15 Q. How long between the time the
16 power goes out and the first explosion goes
17 by?
18 A. Five to ten seconds.
19 Q. When the first explosion occurs,
20 what happens?
21 A. The whole -- as far as I could
22 say, the whole world erupted around us.
23 The ECR just blew in, blew inward on us.
24 Q. When you say the ECR blew in,
25 the walls blew in --
00073:01 A. Yes.
02 Q. -- the doors blew in?
03 A. All of the above. The roof
04 caved in, the doors blew in. The walls,
05 some of the walls did come down. Me, I was
06 literally picked up and propelled into the
07 SVC panel and from there I fell to the
08 floor, and the floor -- the floor --
09 there's a flooring in there on the
10 framework, and underneath that, about two
11 feet below that is the whole flooring with
12 wire trays running through it for the
13 panels and computers and everything.
14 Q. So you essentially have a fake
15 floor that you can lift up?
16 A. Correct.
17 Q. And then you have all the wiring
18 and components that go -- that feed into
19 the ECR underneath it?
20 A. Yes.
21 Q. Okay.
22 A. And this -- this flooring
23 collapsed underneath me, and I fell down
24 into the cable tray area down there.

Page 74:22 to 86:17

00074:22 Q. So the explosion occurs. I
23 mean, was it an explosion such that it was
24 so loud that it hurt your ears kind of
25 explosion?
00075:01 A. Yes.
02 Q. And you're in amongst the floor
03 or below the flooring at this point. What
04 happens then?
05 A. Well, the best that I can recall
06 is I -- I heard cries for help. I heard
07 some screams of I'm hurt, I'm bleeding.
08 And I started trying to struggle up out of
09 the -- the hole. And by the time I made it
10 to a kneeling position up on my knees, the
11 second explosion took place.

12 Q. Is there any light in the ECR?
13 A. Absolutely nothing. It was
14 pitch black.
15 Q. All right. Is there any
16 electrical sparks or any --
17 A. I don't remember.
18 Q. -- thing like that? When -- how
19 long a period of time between the first
20 explosion and the second explosion do you
21 believe went by? More than a minute, less
22 than a minute?
23 A. I would say almost a minute, but
24 more than likely under a minute.
25 Q. When the second explosion
00076:01 occurred, what happened to you?
02 A. I was propelled again, down this
03 time, back into the hole.
04 Q. Was -- how would you describe
05 the second explosion versus the first
06 explosion? Was it bigger, smaller?
07 A. To me it seemed like the same.
08 Q. The -- when the second explosion
09 occurs, where do you end up?
10 A. I end up -- I was down in the
11 sub-flooring, quite exact position I don't
12 know. It was either somewhere in front of
13 the main SVC panel or off to the -- off to
14 the left-hand side of it now, on the port
15 side of the ECR.
16 Q. Okay. At that point is the ECR
17 a contained room anymore?
18 A. No.
19 Q. All right. And when you say
20 that, what do you mean?
21 A. Every door to the ECR -- there's
22 basically one on all four walls. One up
23 front, one in back, and two port and
24 starboard or one port and starboard each.
25 And there was a dim light now --
00077:01 Q. The doors were gone?
02 A. The doors were completely gone,
03 yes.
04 Q. What about the walls?
05 A. The walls are just -- they were
06 part of the wreckage. I saw there was some
07 pretty good damage to the port wall of the
08 ECR.
09 Q. Okay. And the port wall faced
10 what portion of the -- did it face out to
11 the water?
12 A. No. Alongside of the port side
13 of the ECR was an auxiliary room, and then
14 below and next to that was engine number 3.
15 Q. Was there any light at all,
16 emergency or otherwise?
17 A. No.

18 Q. Could you see outside after the
19 second explosion?
20 A. Yes, now I could. Yes.
21 Q. So -- I'm sorry. You were where
22 after the second explosion?
23 A. Partially in front of the SVC
24 panel to all the way towards the port side
25 of the ECR to the wall.

00078:01 Q. What did you see or hear at that
02 point or see and hear?
03 A. At first, nothing. And then I
04 heard -- I heard a panicked voice saying,
05 "I'm hurt. I'm hurt. I got to get out of
06 here."
07 Q. Do you know who that was?
08 A. At first I didn't, but then he
09 crawled over me pretty much, and it was
10 Mike Williams, the electronic technician.
11 And he was coming in from the -- his
12 compartment, which is directly in front of
13 the ECR.
14 Q. Did you hear or -- or see
15 anything else at that -- at that time?
16 A. Tons of wreckage; everything was
17 gone. And I mean that literally,
18 everything was gone.

19 Q. Did you see any of your fellow
20 workers that were in the ECR at the time?
21 A. Only one at the time and he was
22 in front of Mike, crawling over the
23 wreckage toward the open aft door.
24 Q. And who was that?
25 A. That was Willy Stoner.

00079:01 Q. What did you do then after
02 Mr. Williams crawled over you?
03 A. I -- mostly I remember just
04 crawling after him. I started following
05 him towards the open aft door.
06 Q. What was it like?
07 A. It was like trying to crawl over
08 broken metal wreckage in a dump yard.
09 There was no floor. There is just piles
10 and piles of wreckage everywhere.
11 Q. How were you feeling at the
12 time?
13 A. Pretty -- pretty frightened and
14 scared. I thought I was going to die. I
15 couldn't breathe from the insulation, the
16 smoke. At that moment I believe I was more
17 worried that I was going to die of
18 suffocation because each breath was a
19 laborious chore.
20 Q. What was the atmosphere like in
21 the room?
22 A. Smoky, hot. Like I said,
23 insulating [sic] from the -- insulation

24 in the walls and the ceiling was just all
25 over the room and in the air. That's all I
00080:01 really remember.

02 Q. So you're crawling out. Where
03 are you headed?

04 A. I'm heading towards the only
05 light source that I could see, which was
06 the back aft section, which goes outside on
07 to the back lifeboat deck.

08 Q. All right. And where is Mike
09 Williams in relationship to you at this
10 point?

11 A. He's ahead of me going in the
12 same direction.

13 Q. All right. Is he crawling as
14 well?

15 A. Yes.

16 Q. All right. And where is
17 Mr. Stoner at this point?

18 A. Willy was in front of Mike. But
19 Mike was pretty quickly over -- overhauling
20 him and actually did pass him to get out
21 the door first. But Willy was, at first,
22 in front of him doing the same thing,
23 crawling very slowly over the wreckage
24 trying to get out the back door.

25 Q. All right. And what about the
00081:01 -- the other two crewmen in the ECR?

02 A. At that time I wasn't hearing
03 anything from them. Actually -- no,
04 actually I did hear Paul saying something,
05 but I couldn't understand it, what he was
06 saying.

07 Q. Where was he in relationship to
08 you?

09 A. He was somewhere off to my left,
10 which would be starboard side of the -- of
11 the ECR.

12 Q. All right. Then what happened?

13 A. Mike Williams passed Willy and
14 then Willy went out, and a few moments
15 after that I finally made it out.

16 Q. All right. And when you made it
17 out, where did you make it out to?

18 A. The aft lifeboat deck.

19 Q. Okay. Was there a lifeboat on
20 the life -- aft lifeboat deck?

21 A. I don't recall. I don't -- I
22 would have to say, no, because I don't
23 recall seeing them.

24 Q. What -- did you at that point
25 make any observation of the damage to the
00082:01 rig at that point.

02 A. Yes, the back hall area of the
03 -- where engine 3 was at was -- was gone.
04 It took out the catwalk that was that way.

05 There's a big hole in the -- the whole side
06 there behind engine room 3. I couldn't see
07 beyond that point so I don't really know
08 what, but we could not go the bottom
09 catwalk at all because it was gone. So we
10 had no choice, either starboard or amidship
11 stairs going up. And Will --
12 Q. Did you all talk when you were
13 out there?
14 A. Yes.
15 Q. I mean a -- did you all stop and
16 look at each other and say something?
17 A. We tried to, but there was a lot
18 of panic. Mike -- Mike was bleeding down a
19 cut in his forehead and mostly what I got
20 out of him was he just kept repeating, "We
21 got to get out of here. We got to get out
22 of here. We're going to die. We have to
23 escape. We have to go forward."
24 Q. Okay.
25 A. And he actually left us, so --
00083:01 Q. At that point was the -- did you
02 see any fire?
03 A. At that time, no, we didn't see
04 a fire, but we saw a flickering orange all
05 around us.
06 Q. Okay. Did you see any portion
07 of the rig that had power at that point?
08 A. None.
09 Q. Did you see any emergency
10 lighting at that point?
11 A. None.
12 Q. All right. So the three of you
13 were together at one point and then what
14 happened after that?
15 A. I told Willy that I was going to
16 follow Mike because I didn't think he was
17 coherent properly to see where he was going
18 and I was worried about him, either
19 collapsing from his head injury or just
20 walking off the side of the rig. So I told
21 Willy I was going to follow him.
22 And at this point we heard Paul
23 shouting from inside saying he found Brent
24 and he needed help getting Brent out. So I
25 told Willy, okay, you go back and help
00084:01 Brent and all of you come forward then to
02 the bridge. And so I -- I raced up after
03 Mike.
04 Q. All right. And where did you
05 race up? What stairwells were --
06 A. The amidship stairway. It comes
07 out behind the roller skate platform.
08 Q. How were you physically at this
09 point?
10 A. At this time I was just

11 completely wired. I didn't -- I didn't
12 really feel anything accept to do what I
13 had to do.

14 Q. And so where did -- where did
15 you go?

16 A. Well, I -- I finally caught up
17 to Mike and he was -- he was looking at the
18 inferno on the drill floor.

19 Q. Okay. Where did you look at the
20 inferno with Mike from?

21 A. From the extreme aft end of the
22 main deck, amidship.

23 Q. And can you describe what you
24 saw?

25 A. We saw a complete inferno,
00085:01 starting at the drill floor and going up,
02 up almost all the way to the top of the
03 derrick.

04 Q. And so at the time that you saw
05 this inferno, the flames were already at
06 the top -- almost at the top of the
07 derrick?

08 A. Yes.

09 Q. How far would you say you were
10 away from the edge of the inferno?

11 A. 100 feet to 150 feet, perhaps.

12 Q. Did you, again, see any
13 emergency lighting on or any lighting on?

14 A. Nothing.

15 Q. Okay. Was there any
16 firefighting activity that you were
17 witnessing at that point?

18 A. We didn't see anybody at this
19 point in time or absolutely nothing. We
20 went to the port side because we saw that
21 the starboard side was inaccessible or
22 inaccessible with broken equipment and
23 wreckage on the deck. So we went up port
24 side, worked our way past the inferno. We
25 had to duck down close to the deck because
00086:01 the heat was penetrating even our -- our
02 coveralls at this point and we ended up
03 coming to the bridge.

04 Q. Okay. Prior to getting to the
05 bridge, did you see anyone else?

06 A. No, not until we -- not until we
07 arrived at the back end of the bridge. I
08 -- I saw -- I found our chief mate.

09 Q. Who was?

10 A. Young, Dave Young.

11 Q. Prior to seeing Mr. Young, what
12 were you hearing? Were you hearing any
13 explosions? Were you hearing any noise?

14 A. By this time I was hearing
15 mostly just the roar of the fire, and
16 behind that I can hear some screams and

17 yells.

Page 90:03 to 92:08

00090:03 Q. The -- how would you -- when you
04 entered the bridge and started reporting to
05 the captain, how would you describe what
06 was going on as a whole in the bridge?
07 A. Chaos, mayhem.
08 Q. What were you hearing?
09 A. I was hearing shouts, directions
10 being yelled that weren't being enacted.
11 Q. Such as?
12 A. I cannot -- I can't recall. But
13 I know the cap -- the captain was shouting
14 different things to different people, and I
15 can't remember what his words were, but I
16 do know it was that, something along that
17 line.
18 Q. All right. When you spoke to
19 the captain, you -- you said you weren't
20 sure whether he was hearing you or not.
21 Why was that?
22 A. Because his attention kept being
23 directed elsewhere in different places
24 while I was addressing him.
25 Q. The -- what happened then after
00091:01 you reported to the captain?
02 A. After I reported to him about
03 the ECR being gone, we -- there was nothing
04 we can do back there or no way to start up
05 anything, I told him that Mike was hurt.
06 And so he told us both to go -- go find the
07 medic on the forward lifeboat deck, which
08 was the muster site at this time.
09 Q. Okay. Up till this point had
10 you heard a -- any type -- I understand
11 that you heard gas alarms that were on your
12 panel. Had you heard any kind of general
13 alarm that was sounded throughout the rig?
14 A. No.
15 Q. All right. Now, I understand
16 from prior testimony that the alarm system
17 onboard the DEEPWATER HORIZON consists of
18 both audible alarms and visual alarms; is
19 that correct?
20 A. Yes.
21 Q. All right. And the visual
22 alarms I understand can show whether
23 there's combustible gas or whether there's
24 hazardous or poisonous gas and/or -- and/or
25 fire; is that fair?
00092:01 A. Yes.
02 Q. All right. Did you see any
03 visual alarms at any point during -- from

04 the start of this incident until you got to
05 the bridge?
06 A. All's I saw was the gas, the gas
07 alarms on the panel; and after that,
08 nothing.

Page 93:07 to 109:16

00093:07 Q. So the captain -- going back to
08 the bridge, the captain sends you and Mike
09 to go find a medic. What happens then?
10 A. We made it down to the forward
11 lifeboat deck.
12 Q. How -- what -- how did -- how
13 did you get there, and what -- what did you
14 see on your way?
15 A. We went outside the starboard
16 side of the bridge back outside and there,
17 right there, there's a stairway going down
18 to the forward lifeboat area.
19 Q. All right. And what did you see
20 as you were going down this area? Could
21 you still -- still see the fire from that
22 viewpoint?
23 A. Yes.
24 Q. Was it -- how would you describe
25 it in terms of how it was when you
00094:01 initially saw it?
02 A. It was bigger, hotter, stronger.
03 Q. Okay. What were you hearing?
04 A. Mostly the roar of the fire.
05 And as I approached the lifeboat deck, I
06 started hearing everybody screaming and
07 yelling down there.
08 Q. When you approa -- approached
09 the lifeboat deck what lifeboat -- what
10 lifeboat was this?
11 A. It was lifeboat 1 and 2.
12 Q. All right. And approximately --
13 when you get there, approximately how many
14 people were mustered there?
15 A. There were quite a few, I do
16 know that. I can't give you a number.
17 Q. Okay. We're talking 30 or 40
18 people, that kind of numbers?
19 A. I would say that at the minimum,
20 but there was probably more than that.
21 Q. All right. And were the
22 lifeboats still on the vessel?
23 A. Yes.
24 Q. Had anything been launched at
25 that point?
00095:01 A. No.
02 Q. What did you do when you got to
03 the -- to the lifeboat?

04 A. I looked for the medic, did not
05 see him, and then when I turned to address
06 Mike that -- he wasn't there. We needed to
07 look elsewhere for him. Mike was gone.

08 Q. All right. How was the state of
09 the people that were waiting at the muster
10 at that point?

11 A. Panic, fearful, screaming they
12 were going to die. We were going to sink.
13 We were going to blow up again. Everyone
14 was on the verge of panic.

15 Q. Okay. Was there any discernible
16 person in charge when you got to the muster
17 point?

18 A. My life boat is lifeboat number
19 one and the off-tour assistant driller is
20 the person designated to take the muster
21 for that lifeboat. And when I approached
22 him to have -- to have myself be identified
23 and checked off, he was just -- he himself
24 was in a state of panic. In fact, we known
25 -- we've have known each other since -- for
00096:01 8 years. And when he looked at me, he
02 couldn't remember my name?

03 Q. Who was this?

04 A. We called him Stumpy. But his
05 real name is Patrick Morgan.

06 Q. And after you -- after you tried
07 to get Mr. Morgan to check you off the
08 list, what happened?

09 A. After that I was -- I was told
10 to stand my ground in the muster area until
11 we received further orders.

12 Q. And who told you that?

13 A. It was shouted from somebody who
14 I couldn't identify.

15 Q. And approximately how long then
16 did you wait in the muster area?

17 A. Minutes.

18 Q. And what's going on during these
19 minutes?

20 A. The same thing that was going on
21 when I arrived, just people running back
22 and forth screaming, We have to get out of
23 here.

24 Q. Okay. How is Mr. Morgan doing
25 with his muster?

00097:01 A. Bad. He was doing bad. People
02 would come up to him and tell him their
03 name -- tell -- yeah, tell him their name,
04 and he would just up and down his list,
05 unable to find them.

06 Q. What's going on on the rig at
07 this point?

08 A. That was all I noticed that was
09 going on.

10 Q. Can you feel the fire?
11 A. We were somewhat below the main
12 deck there. You would have to back way up
13 to the edge of the forward section to see
14 the derrick at this point. But in the
15 shaded area where I was, I can hear it and
16 I can feel heat.
17 Q. What else are you hearing?
18 A. Screaming, panicking, shouts,
19 directions being called that were -- were
20 not happening.
21 Q. When -- before you get into
22 the -- I -- I -- I presume that you got
23 into a life boat at one point; is that --
24 A. Yes. We were finally told to
25 get on a lifeboat.
00098:01 Q. Prior to doing that, did you
02 witness anyone leave the rig by means of
03 jumping?
04 A. Yes.
05 Q. How -- how was that being -- how
06 was that perceived by other people on the
07 rig from your standpoint?
08 A. It was being perceived as
09 something that they would want to do, too,
10 because things weren't coming together
11 there at the lifeboats.
12 Q. And when you say things weren't
13 coming together, what wasn't coming
14 together?
15 A. No order, no control, no one in
16 charge. Everybody just in a state of
17 panic.
18 Q. When you were -- eventually made
19 your way to the lifeboat, tell me about
20 that. What happened?
21 A. Made my way?
22 Q. To the lifeboat, I mean. Were
23 you -- at one point, did someone say get on
24 the lifeboat?
25 A. Yes.
00099:01 Q. Can you tell me how that
02 occurred and what happened.
03 A. I was standing in a small group
04 trying to keep a couple of them calm
05 because they were literally shaking and
06 looking around apprehensively and saying
07 they were going to jump because we were
08 going to die. So I was trying to keep them
09 calm. And then just behind me, I heard cap
10 -- captain gave the order to man the
11 lifeboats. And so everyone just started
12 rushing to get on them.
13 Q. And, I mean, do we hear this
14 over a loudspeaker, do you hear this
15 through a megaphone?

16 A. Verbally, just verbally.
17 Q. And do you board -- which
18 lifeboat?
19 A. Number 1.
20 Q. All right. And how many people
21 does lifeboat number 1 hold, approximately?
22 A. 70, 78, I think.
23 Q. How was the manner in which
24 everyone is boarding the lifeboat, how
25 would you describe it?
00100:01 A. Chaotically pushing and shoving,
02 not following the training that we did have
03 for manning the lifeboats.
04 Q. What happen -- in terms of the
05 number of people getting in a lifeboat,
06 where are you? You're the beginning, the
07 end, the middle?
08 A. There's actually no order or
09 numbered order, so I just waited my turn
10 and I got on. And my -- my position is in
11 the back where the coxswain controls the
12 life capsule, because being the engineer on
13 duty, it was my job to sit by the little
14 engine in there and address it if it should
15 break down or have any problems.
16 Q. Who was the coxswain on this
17 particular lifeboat, if you recall?
18 A. I can see his face and I know
19 who he is, but I can't recall his name.
20 Q. All right. How long does it
21 take to load the lifeboat?
22 A. It took a long time because
23 after we were climbing in, someone shouted
24 that we were -- we were now being told to
25 get off. So actually people
00101:01 started -- some, not all started getting
02 back off. Then it was revised and we were
03 told, no, we were boarding.
04 Q. How was everyone onboard the
05 lifeboat at that point? What's the mood?
06 A. Same; still panicking. They're
07 yelling and screaming at the coxswain:
08 Let's go, let's go, what are you waiting
09 for? We're going to die.
10 And a couple actually got off
11 the lifeboat at this time and went and
12 jumped over the side.
13 Q. What happens then? How -- what
14 -- does everyone eventually board the
15 lifeboat that's going to get on?
16 A. We're in it. It's manned as I
17 could say it could be manned under the
18 conditions and they were -- everyone was
19 shouting, let's go, let's go. And someone
20 who was standing out -- outside the hatch
21 would say, no, wait, wait, wait. We're

22 still not -- everyone is still not here.
23 So we continue to wait and they
24 finally brought an injured man on a
25 stretcher and then spent, I would say, a
00102:01 good 10 minutes trying to figure out how to
02 get him in the capsule.
03 Q. So how long do you think that
04 you were actually at the lifeboat stand and
05 in the lifeboat waiting before the lifeboat
06 was actually deployed?
07 A. Twenty minutes to half an hour.
08 Q. And during that period of time,
09 does the situation on the rig, as you can
10 see, change?
11 A. It was getting worse. It
12 was -- the -- and at this point we could
13 now feel the heat from the inferno in the
14 boat, you know. We're -- we were enclosed
15 in a capsule and we were still feeling
16 heat. And you could put your hand on the
17 side of the lifeboat facing the fire and it
18 was warm to the touch.
19 Q. The -- you get the man on the
20 stretcher on. Do -- do you understand who
21 that was at this point?
22 A. It was Buddy Trahan.
23 Q. And, you know, up till this
24 point has anyone said anything that you've
25 heard as to why this thing has occurred?
00103:01 A. No. At this point I still
02 didn't know what was going on. All's I
03 know is that we're on fire. The rig was
04 completely dead in the water.
05 Q. At some point is the lifeboat
06 deployed?
07 A. Yes.
08 Q. Right. Has -- has the
09 other life -- there are two lifeboats at
10 this station?
11 A. Yes.
12 Q. All right. Has the other
13 lifeboat been deployed yet?
14 A. I do believe from what I heard
15 that the number 2 lifeboat went down before
16 us.
17 Q. Do you recall seeing it going
18 down at all?
19 A. No.
20 Q. All right. Then your lifeboat
21 is deployed. What happens?
22 A. Well, we fi -- we get to the
23 water and the coxswain was having trouble
24 starting the engine, and --
25 Q. Is the lifeboat still attached
00104:01 to -- to any cables?
02 A. The cables are supposed to

03 automatically unhook once we hit the water.
04 But for some reason the coxswain was
05 wondering if they did detach or not. So he
06 had the people at the bow of the boat open
07 the hatch and check and he had me and
08 another guy that was there open up the back
09 hatch and see if it was disconnected.
10 Q. What -- what -- can you see
11 anything that's going on at the rig at this
12 point when you first hit the water?
13 A. Oh, yes.
14 Q. What?
15 A. You saw the whole underneath
16 side of the rig and the water directly
17 below it was another inferno.
18 Q. And where were you in relation
19 to this -- the -- the water that was an
20 inferno -- I mean, I -- I take it when you
21 say that the water was an inferno, there --
22 there was -- there was flammable liquids or
23 gas on the water that were inflamed?
24 A. Yes.
00105:01 Q. And this was directly under the
02 rig?
03 A. Yes.
04 Q. All right. And where
05 were -- where were you in the lifeboat in
06 relationship to this water inferno?
07 A. We were on the forward end of
08 the rig from it and it was directly in the
09 center underneath the rig. I would
10 guesstimate we were about 50 to 70 feet
11 away from it.
12 Q. What's going on in your mind at
13 this point?
14 A. I was realizing we needed to get
15 out of there and get out of there now.
16 Q. Why?
17 A. Because fire on the water can
18 only spread. And there was oil on the
19 water all around us, thick, thick oil. And
20 so I was worried that it was going to start
21 spreading and engulf us.
22 Q. When you opened the hatches to
23 determine whether or not you were still
24 connected, what's going on inside the
25 lifeboat?
00106:01 A. Panic still. People were still
02 panicking and screaming and yelling that we
03 need to go, we need to go. Why haven't you
04 started the engine yet? You know, start it
05 up and let's get out of here. And I
06 actually started joining them when I
07 realized that the suction from the fire
08 going up was creating a draft that was
pulling us under it.

09 Q. Did you determine when you
10 opened the hatch whether or not you were
11 still connected to the --
12 A. Yes, I told them that we were
13 not dis -- we were not connected.
14 Q. What -- what happens then?
15 A. Well, I saw what was happening.
16 I had already told them at this time that
17 we were not connected. And so I started
18 telling him start the engine and get out of
19 here, we're being pulled underneath the
20 rig.
21 Q. Was he having any problem
22 starting the engine or was he just failed
23 -- had he just failed to initiate the
24 action to start the engine?
25 A. No. He was having problems
00107:01 starting it, and it turned out to just be a
02 simple mistake. He had to turn a switch to
03 connect the batteries to the engine
04 starter, and for some reason he had
05 forgotten to do that. So he finally
06 started the engine, we closed the hatches,
07 and we pulled away from the rig finally.
08 Q. Okay. Were there any people in
09 the water that you saw when you opened the
10 hatches or when you were looking out of
11 the --
12 A. We didn't see anybody, no.
13 Q. Where did you head when you
14 started the engines?
15 A. Being all the hatches were
16 closed and we could see nothing at this
17 point outside, according to what the
18 coxswain was saying, we're -- we're headed
19 forward and towards the DAMON BANKSTON.
20 Q. Is -- is the coxswain positioned
21 in the lifeboat so that he has the
22 visual --
23 A. Yes.
24 Q. -- that he was able to see?
25 A. Yes.
00108:01 Q. So you-all are in the lifeboat.
02 Can you see outside at all?
03 A. I had -- there was a little
04 window there on the back hatch, but it was
05 completely covered with oil, so I could not
06 see out of it. In fact, the coxswain was
07 complaining that it was hard for him to
08 drive because there was oil all over his
09 windshield up there. He tried to clean it
10 with the wiper system, but it just made a
11 bigger mess.
12 Q. How is -- does everyone's mood
13 change as you start the -- the engine or
14 what's going on? How is -- how is everyone

15 reacting?
16 A. Well, everyone started calming
17 down a little when they knew we were
18 pulling away. But when the coxswain
19 reported that he couldn't see where he was
20 going properly, he would -- he stopped and
21 that just got everyone fired up again. And
22 they started -- they started screaming at
23 him: What are you doing, keep going, get
24 us out of here.
25 And finally he ordered different
00109:01 ones on -- someone on the forward and
02 someone on the side to crack open the hatch
03 and look out and try to get a bearing on
04 which direction the BANKSTON was at, which
05 did happen and we slowly maneuvered that
06 way, stopping every now and then to peak
07 out the hatch and get our bearings and
08 going on.
09 Q. How long did it take you to get
10 to the DAMON BANKSTON after the time you
11 hit the water?
12 A. I would say a good half hour --
13 VIDEOGRAPHER:
14 Excuse me, Counsel.
15 THE WITNESS:
16 -- at least.

Page 110:19 to 117:20

00110:19 Q. Okay. What happened when you
20 got to the DAMON BANKSTON?
21 A. Once we were alongside the DAMON
22 BANKSTON, the hatches were opened all the
23 way and they made attempts with the
24 BANKSTON crew to tie off to them. That
25 took a little bit of trial and error before
00111:01 they finally succeeded.
02 Q. Were you the first lifeboat to
03 arrive at the DAMON BANKSTON?
04 A. No.
05 Q. The other lifeboat had arrived
06 there?
07 A. Ahead of us, yes.
08 Q. Right. And once you tied off,
09 what happened then?
10 A. Once we tied off, they dropped a
11 Jacob ladder over the side of the BANKSTON
12 and we started disembarking onto the
13 BANKSTON pretty much one person at a time.
14 Q. All right. And how high on the
15 Jacob's ladder did you have to climb to get
16 onto the BANKSTON?
17 A. I only climbed -- kind of about
18 halfway up. I would say a total of maybe

19 two to three ladder rungs. Then there was
20 three of them who actually grabbed my arms
21 and hauled me up over the side.
22 Q. And what happened to the
23 gentleman that was in the stretcher?
24 A. They -- I'm a little hazy on
25 this, but I believe they used a crane, a
00112:01 little crane that they have on the BANKSTON
02 to lower a line down and connect his
03 stretcher to it, and then hauled him up
04 over the side.
05 Q. When you got onto the DAMON
06 BANKSTON, what did you -- what did you
07 observe?
08 A. I observed that everyone was
09 basically in little groups here and there,
10 and they were sharing stories and asking,
11 are you all right, to the different ones.
12 And then they called out they wanted
13 everyone to get in a line so they could
14 take a proper muster, you know, find out
15 who -- who is there and who is still
16 missing. That's basically what was the
17 atmosphere there when I got there.
18 Q. Did -- who was -- was there
19 anyone visibly in charge when you got onto
20 the BANKSTON?
21 A. Yes, there was actually a couple
22 of them that were taking control, but I
23 can't remember who they were.
24 Q. All right. Did -- what -- were
25 you able to see the rig from the BANKSTON?
00113:01 A. Yes, I was.
02 Q. How far from the rig was the
03 BANKSTON at that point?
04 A. We were pretty far out. I would
05 say maybe a third of a mile, perhaps.
06 Q. All right. Could you -- could
07 you feel any heat from the inferno on the
08 rig?
09 A. Yes, I could.
10 Q. Could you hear anything?
11 A. Yes, I could still hear it.
12 Q. What were you hearing?
13 A. I was hearing the roar of the
14 inferno and, yes, if you stood facing it
15 you could actually feel the warmth and the
16 heat from it.
17 Q. Did you observe anyone in the
18 water at that point or could you see anyone
19 in the water at that point?
20 A. No.
21 Q. Did you have any discussions
22 once you got aboard the DAMON BANKSTON as
23 to what might have been the cause of this?
24 A. At this time, yes, and there was

25 different ones saying it was a blowout.
00114:01 Q. Right. And who -- who were you
02 talking with specifically?
03 A. Different ones of my buddies who
04 were -- either worked on the bridge -- like
05 I talked to Yancy. I talked to some of the
06 other off-tour rig -- drill floor hands and
07 drilling. Yeah, they told me basically
08 what happened was a blowout.
09 Q. All right. Did you learn
10 anything else other than it was a blowout
11 through any of these conversations or
12 anything else that you ever heard?
13 A. Different things; where
14 different people were, and their little
15 stories about they were blown out of their
16 bed, and they were just walking the deck
17 when every -- when it started falling from
18 the sky on them, just different little
19 horror stories that different people went
20 through.
21 Q. Okay. How was everyone's -- how
22 would you describe everyone's mood on the
23 BANKSTON when you -- when you got there in
24 the first hour or so?
25 A. I would say shock and disbelief.
00115:01 Q. Did there come a time while you
02 were on the BANKSTON that the Coast Guard
03 arrived?
04 A. Yes. Timeline for that was
05 anywhere from 45 minutes to an hour or hour
06 and a half. I'm not really sure.
07 Q. How long did you stay on the
08 BANKSTON?
09 A. When the Coast Guard showed up
10 they started setting up the injured people
11 in a certain order to be taken off and I
12 was one of them because -- when we -- when
13 we were just starting to disembark from the
14 lifeboats, I started noticing that my
15 knee -- my leg felt funny, my left knee and
16 lower calf area. And from then on it just
17 progressively got worse.
18 Q. And so were you one of the
19 individuals that was evacuated from the
20 DAMON BANKSTON by the Coast Guard?
21 A. Yes, I was.
22 Q. And how would -- how did that
23 occur?
24 A. At this point I couldn't stand
25 on it anymore, so they ushered me to a
00116:01 bench where I sat until the Coast Guard
02 personnel was lowered down from a hovering
03 helicopter and he went around to the
04 different injured ones finding out exactly
05 what their injuries were. And then he came

06 and told me that I was going to be the
07 first to go up into the helicopter.
08 Q. How was that?
09 A. Scary. They put me in a little
10 basket and -- underneath the hovering
11 helicopter and gave the signal, and then I
12 was hauled up alone in the basket up to the
13 helicopter above.
14 Q. Okay. Where did you -- where
15 did you go from there?
16 A. After they had me onboard, we
17 flew to a BP platform called the Nakika, I
18 think it was. And they had set up a little
19 triage area there on that rig to take in
20 injured personnel. And from the -- from
21 their heli deck on Nakika, they carried me
22 down to the triage area where my vitals
23 were taken and my injury was looked at and
24 then wrapped up, and then they tagged me.
25 They tagged me about -- with my injuries
00117:01 and set me on the couch to wait for another
02 helicopter that was on its way to take us
03 into shore and a hospital.
04 Q. Okay. The -- how long did that
05 take? How long were you on the BP rig?
06 A. I would say a good hour and a
07 half to two hours.
08 Q. And were you then transported by
09 the other helicopter?
10 A. Yes.
11 Q. And where were you transported
12 to?
13 A. I flew with others. There was a
14 few other injuries, including Buddy Trahan.
15 He was on the helicopter. And we flew to a
16 hospital in Alabama; Mobile, Alabama. I
17 can't really remember the name of it. I
18 think it's University or something. It was
19 a hospital that dealt with -- that dealt
20 with burn casualties.

Page 122:09 to 122:18

00122:09 Q. After -- how long did the
10 questioning by Transocean take?
11 A. Hour perhaps, 45 minutes, an
12 hour. It might have been longer. I was at
13 this point really fuzzy and hazy, and they
14 had me on pain medication.
15 Q. This was pain medication you
16 received at the hospital as a result of
17 your injuries?
18 A. Yes.

Page 126:23 to 127:22

00126:23 Q. Are you currently employed by
24 Transocean?
25 A. Yes, I believe I am.
00127:01 Q. You believe that you are? Okay.
02 Are you still a chief mechanic?
03 A. Yes.
04 Q. And have you been able to work,
05 like go back to work for Transocean in any
06 capacity since the injure -- the explosion
07 and your injuries?
08 A. No.
09 Q. And is that just a result of
10 your medical condition or an -- some
11 decision of your employers?
12 A. It's the result of my medical
13 condition.
14 Q. Okay. And so are you receiving
15 salary or compensation from Transocean
16 during this time or --
17 A. No.
18 Q. -- some kind of workers' comp?
19 Okay.
20 A. Workers' comp. It's what they
21 call a maintenance payment, which is
22 basically 900 -- 900 a month.