

# Deposition Testimony of:

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Page 14:22 to 15:04

00014:22 Q. All right. And let's try to get a time  
23 frame now. What year are we talking about when  
24 you first went to work for Transocean?  
25 A. 2009.  
00015:01 Q. Okay. All right. When you went to work  
02 for them, what was your position?  
03 A. Motorman. I was hired as -- hired as --  
04 in the position of Motorman.

Page 20:18 to 21:04

00020:18 Q. All right. When was your first hitch on  
19 the DEEPWATER HORIZON?  
20 A. I believe my first hitch started on  
21 December the 10th of 2009.  
22 Q. All right. And did you work the -- I  
23 understand you worked three months before -- of  
24 your -- before the blowout on April 20th,  
25 correct?  
00021:01 A. I worked approximately three months on  
02 the DEEPWATER HORIZON.  
03 Q. All right. From December through April?  
04 A. Yes.

Page 70:17 to 70:20

00070:17 Q. Okay. Okay. All right. The -- what I  
18 want you to do now is help me walk through the  
19 events on April 20th, okay?  
20 A. Okay.

Page 106:10 to 108:23

00106:10 Q. Okay. What happened after the first  
11 explosion occurred and the door was blown off,  
12 what did you do?  
13 A. I was standing just off-center of this  
14 door, and I moved over towards the forward of the  
15 rig.  
16 Q. You're pointing to the -- to the door  
17 that was blown off, that we've marked "door"?  
18 A. No, I moved from that door --  
19 Q. Right.  
20 A. -- towards the bow of the rig. You see  
21 this right here? This is the SVC console.  
22 Q. Let's see. Okay.  
23 A. This is the SVC console.  
24 Q. You've -- you've highlighted in red the  
25 SVC. Why don't you draw a line from there and  
00107:01 write "SVC"?  
02 A. (Complying.)  
03 Q. Okay.

04 A. I was then in between the console and the  
05 back wall, and whenever I moved over to that, and  
06 due to the -- the debris that was floating in the  
07 air, the insulation, I leaned up against the wall  
08 and I slid down the wall to -- to sit down.  
09 Again, I don't know the exact -- it's my  
10 belief that it was 10 to 15 seconds after the  
11 first explosion, there was a second explosion.  
12 At that time, I was sitting --  
13 Q. Well, hang on. Hang on. What do you  
14 mean there, "your belief? You don't remember  
15 specifically a second explosion?  
16 A. No. I remember specifically being a  
17 second explosion.  
18 Q. Okay.  
19 A. The amount of time between the two --  
20 Q. You don't recall?  
21 A. -- I don't -- I don't have a stopwatch.  
22 It's my --  
23 Q. Well, understanding you were just  
24 involved in an explosion --  
25 A. So I don't -- I don't -- I don't know the  
00108:01 exact time frame between the two, but there was a  
02 second explosion.  
03 Q. Were we talking about -- and I know you  
04 don't know the exact time frame, and I don't --  
05 and that's okay.  
06 But are we talking minutes between the  
07 two, or seconds between the two?  
08 A. Seconds.  
09 Q. Okay.  
10 A. I mean, like -- like I said, 10 to 15  
11 seconds. It wasn't one large blast. It was two  
12 individual blasts.  
13 Q. Okay.  
14 A. At that time, I was sitting directly in  
15 front of another steel fire door that came from  
16 the stairs up to the ECR, and that door is the  
17 door that was blown off that I took the full  
18 brunt of --  
19 Q. Okay.  
20 A. -- being hit by.  
21 Q. Okay. And that was during the second  
22 explosion?  
23 A. The second explosion.

Page 109:17 to 110:09

00109:17 Q. All right. So you were in front of that  
18 door when the second explosion occurred, and that  
19 door blew open, as well?  
20 A. Correct.  
21 Q. All right.  
22 THE COURT REPORTER: Two minutes.  
23 MR. LUNDY: Okay.

24 Q. (By Mr. Lundy) What did you do after  
 25 that?  
 00110:01 A. The first thing I recall after the second  
 02 explosion was Mike Williams coming through the  
 03 ECR, heading out the exit of the back. I  
 04 remember him saying, "I'm hurt, I'm hurt."  
 05 At -- at first, I didn't say anything. I  
 06 was just kind of stunned, and then I -- I began  
 07 to reply, "I'm hurt, too." I don't know if he  
 08 heard me or -- or what, but he continued out --  
 09 out the door.

Page 110:22 to 111:21

00110:22 Q. Okay. Did you see any -- okay. What --  
 23 you said you were hurt when the second explosion  
 24 occurred?  
 25 A. Yes.  
 00111:01 Q. What -- how were you injured?  
 02 A. Specifically, I don't know --  
 03 Q. Well, not how you were --  
 04 A. -- I'm not sure what it is.  
 05 Q. That's a poor question. Let me -- what  
 06 was hurt on you?  
 07 A. My whole left side.  
 08 Q. Okay. Did you see damage in the ECR?  
 09 A. There was a lot of damage.  
 10 Q. Can you describe it?  
 11 A. It's a raised floor computer room, has  
 12 removable tiles. A lot of the floor had been  
 13 blown out. A lot of the ceiling above the  
 14 starboard side of the room had been blown out and  
 15 had fallen to the floor. There was a -- a  
 16 group -- there was two desks with a huge cabinet,  
 17 a refrigerator, and a water bottle dispenser --  
 18 not a water bottle dispenser, but the big Ozarka  
 19 bottles that you get water out of was all in the  
 20 center of the room, and all of that was blown to  
 21 the starboard side of the rig -- or the room.

Page 115:24 to 116:10

00115:24 Q. Okay. Fair enough. Thank you.  
 25 Now, you were telling me after the second  
 00116:01 explosion, you were in front of the stairway  
 02 door, right?  
 03 A. Correct.  
 04 Q. And it blew open?  
 05 A. Correct.  
 06 Q. And you were injured, right?  
 07 A. Correct.  
 08 Q. And then Mike Williams came through the  
 09 ECR saying he was injured?  
 10 A. Right.

Page 120:23 to 122:03

00120:23 Q. Okay. All right. After y'all -- after  
24 the second explosion and -- and -- and Mike  
25 Williams came through the ECR room and out the  
00121:01 watertight door, what happened?  
02 A. I kind of sat there for a second, and  
03 then I guess I -- I decided that I needed to get  
04 up and get out. I got up, started making my way  
05 towards the watertight door.  
06 I don't recall seeing anybody in the room  
07 until I started getting close to the -- to the  
08 door, and I could hear Brent, I guess he was  
09 moaning. He was buried under the leftovers of  
10 his desk and everything that he was in front of  
11 at the time. He was --  
12 Q. Brent Mansfield?  
13 A. Brent Mansfield.  
14 Q. Okay.  
15 A. I moved a bunch of debris that was on top  
16 of him and in the way out of the way so that I  
17 could get to him. I got to him, and I started  
18 yelling that I had found Brent.  
19 At that time, I believe that Willie  
20 Stoner had already exited but had came back into  
21 the Engine Control Room to help.  
22 I got Brent stood up. He had been struck  
23 by something. He was extremely dazed. He could  
24 stand with assistance. We started moving him,  
25 trying to get him out the ECR.  
00122:01 Q. Okay. Who -- you and -- and Willie  
02 Stoner were trying to help Brent out the ECR?  
03 A. Correct.

Page 122:11 to 125:03

00122:11 Q. Did -- did anyone try to contact the  
12 bridge from the ECR?  
13 A. Okay. As we -- after myself and Willie  
14 Stoner and Brent exited the ECR, there's a  
15 telephone mounted on the exterior of the wall. I  
16 was trying to assess Brent's injuries, how bad  
17 they were. He -- his whole head and face was  
18 covered in blood. Willie got on the phone and  
19 tried to -- tried to call the bridge. He said  
20 the phone was dead.  
21 There's a sink also back there. Brent  
22 tried to -- he had enough -- enough about him he  
23 realized that his hands were covered in blood,  
24 his face was covered in blood. He wanted to try  
25 to wash himself off. He went over there, but  
00123:01 there was no water. I happened to have a pocket  
02 full of rags. I handed him a rag so he put them  
03 on his head to help control the bleeding.

04           At that time, I guess it was -- we didn't  
05 really talk about it, but we decided that we were  
06 going to head to the bridge.  
07       Q. Okay. Did y'all have any lighting at  
08 all, was there any backup lighting or emergency  
09 lighting?  
10       A. Ah, if there was, I don't specifically  
11 remember taking any real note of artificial  
12 lighting. I recall going out and there being the  
13 glow.  
14       Q. From the fire?  
15       A. From the fire.  
16       Q. Okay. What -- what route did y'all take  
17 to head to the bridge?  
18       A. There's two ways: Initially I wanted to  
19 take a lower -- a lower route that took us across  
20 the aft of the rig to the far port side. There's  
21 a small set of steps that goes from the upper  
22 part of it, down to the lower part, to the lower  
23 walkway. That set of steps was damaged, where we  
24 couldn't pass that way. But there's another set  
25 of steps that take you up to the Level 1 main  
00124:01 deck at the center aft of the rig. We went up  
02 that set of steps, and then moved across the main  
03 deck to the port side.  
04       Q. Did you notice any damage as y'all were  
05 heading to the bridge?  
06       A. There was damage and a lot of debris. I  
07 remember coming up to the main deck and there  
08 being a large hole where a piece -- where some of  
09 the ventilation or something had been there, I  
10 don't specifically recall what was there. I  
11 remember there being a big hole, and saying  
12 "Don't fall in it," because Brent and Willie were  
13 behind me.  
14       Q. Were y'all having to carry Brent, or how  
15 were you getting him to the bridge?  
16       A. Main -- mainly he was able to walk, but  
17 he had to -- somebody had to kind of stabilize  
18 him so he walked straight.  
19       Q. Okay.  
20       A. And he -- he was very -- he was still  
21 very dazed and confused as to where we were  
22 going, what was going on. Whenever we reached  
23 the port side, there's a door that -- another  
24 watertight door on the main deck that leads back  
25 down into the rig. Brent was trying to go back  
00125:01 down into the rig through that door, and Willie  
02 was like, "No, no, we're not going that way." He  
03 was still very disoriented.

Page 134:11 to 137:02

00134:11       Q. Okay. So what did y'all do when you got  
12 to the lifeboat station and there were no --

13 A. Well --  
14 Q. -- lifeboats?  
15 A. When we got there, at that time two other  
16 people were coming down to the -- to that  
17 lifeboat deck at the same time with a man on a  
18 stretcher. I wasn't -- there -- there was some  
19 talk. I wasn't involved in it. I guess they  
20 were -- I guess somebody brought up launching  
21 the -- one of the inflatable liferafts.  
22 Q. All right. Who was on the stretcher?  
23 A. I don't recall his name. It was -- it  
24 was an employee I hadn't met.  
25 Q. Okay. Who was -- was he being carried on  
00135:01 a stretcher, obviously?  
02 A. Yes.  
03 Q. Who was carrying him?  
04 A. Chad Murray and another person that I  
05 hadn't met.  
06 Q. Okay. So then there was some discussion  
07 about launching the liferaft?  
08 A. Correct. And at that time, I remember  
09 going over to the -- to the davit and trying to  
10 get it ready, but I hadn't -- I didn't know what  
11 to do with it. At that time the Captain came  
12 over and took over operations of the davit while  
13 Yancy was preparing the inflatable liferaft  
14 container to be launched.  
15 They got it up, got it inflated. Then  
16 they brought the man over on the stretcher and  
17 got him into the -- the liferaft. At some point  
18 during that operation, I guess the wind died  
19 down, or something occurred, but heat from the  
20 fire and smoke came up through the grating where  
21 we were standing at. I remember turning and  
22 covering my face to -- to get out of it, and  
23 whenever it stopped and I turned back, the  
24 liferaft was -- had already been launched to the  
25 water and that there was, I believe, four of us  
00136:01 left on the -- on the lifeboat deck.  
02 Q. So who got in the liferaft?  
03 A. My understanding, it was Chad Murray,  
04 Andrea, the injured man, Mike Williams, and  
05 somebody else, one of the other guys that I  
06 didn't know.  
07 I know myself, Yancy, and the Captain  
08 were left, were still up there, and I don't  
09 remember who the fourth person was.  
10 Q. All right. So the liferaft was launched,  
11 and the four of you -- the Captain, Yancy, you,  
12 and somebody else you don't recall -- were  
13 still --  
14 A. Were still on the deck.  
15 Q. -- up there on the -- on the lifeboat  
16 deck?  
17 A. Right.  
18 Q. How far is it from the lifeboat deck to

19 the water?  
 20 A. I don't know the exact. I'd say between  
 21 60 and 80 feet.  
 22 Q. All right. What did y'all do then?  
 23 A. H'm, jump.  
 24 Q. Who -- who jumped first?  
 25 A. I believe it was the guy that I don't  
 00137:01 remember, and then Yancy, myself, and then the  
 02 Captain.

Page 137:16 to 140:11

00137:16 Q. When you hit the water, describe the  
 17 conditions around you.  
 18 A. The first thing I remember when I came up  
 19 is I remember the Captain yelling for everybody  
 20 to come over and assist with the liferaft. I  
 21 guess standard procedure is to keep the nose of  
 22 the rig facing into the wind. Well, we went off  
 23 the nose of the rig. So what little wind there  
 24 was that day was blowing that liferaft back  
 25 underneath the rig toward the fire and the well  
 00138:01 and everything. So he was yelling for everybody  
 02 to try to keep the liferaft from drifting back up  
 03 underneath the rig.  
 04 Q. How were y'all doing that?  
 05 A. We were attempting to swim with it.  
 06 Q. Okay. Were there any paddles in the  
 07 liferaft?  
 08 A. From my recollection, the only person  
 09 that was still in the liferaft was the man with  
 10 the broken leg, the injured man.  
 11 Q. So everybody had jumped out, and y'all  
 12 were trying to swim the raft away from the -- the  
 13 rig?  
 14 A. Correct.  
 15 Q. Okay. What -- describe the conditions of  
 16 the water that night.  
 17 A. Very light chop. It was really a very  
 18 unusually calm day.  
 19 Q. Well, was stuff pouring off the rig in  
 20 the water? Was there oil? Was there --  
 21 A. If there was --  
 22 Q. -- debris or --  
 23 A. -- I wasn't paying attention to it.  
 24 Q. Did y'all get the liferaft to the DAMON  
 25 BANKSTON or --  
 00139:01 A. We were attempting to -- to swim with it,  
 02 not being very successful, and the Captain --  
 03 there was an FRC from the DAMON BANKSTON was out,  
 04 had picked up -- was picking up a few people that  
 05 were in the water. The only person I  
 06 specifically know it picked up was Andrea.  
 07 And the Captain was yelling for him to  
 08 come help us, and it seemed like at first,



09 because we were so close to the rig, that they  
10 were reluct -- reluctant to come in that close.  
11 But they, eventually -- I don't know if it was  
12 because they were reluctant or if they were  
13 trying to find a rope, but eventually they came  
14 in and threw us a rope that they tied onto the --  
15 the liferaft and used the FRC to pull it away  
16 from the rig.

17 Q. I read something -- and I don't know if  
18 it's correct or not -- but was the liferaft still  
19 tied to the rig with some rope, and y'all had  
20 to --

21 A. It's called a painter's line.

22 Q. Okay.

23 A. It's designed in the event if the rig is  
24 sinking that these liferafts don't float away  
25 before people can get into them. Now, it's got a  
00140:01 device on it that is designed to cut that rope  
02 once that device becomes submerged in water. But  
03 the rig wasn't sinking at that time, so it was  
04 still tied to the rig through that painter's  
05 line.

06 Q. So what did y'all do to -- to -- to cut  
07 the rope?

08 A. They were yelling for a knife. Somebody  
09 from the -- the FRC had a knife. I believe it  
10 was the Captain swam over there, got the knife,  
11 and came back and cut the painter's line.

Page 141:23 to 144:21

00141:23 Q. Did it appear to you that any particular  
24 person or persons were in charge on the DAMON  
25 BANKSTON?

00142:01 A. The people that -- I mean, most of the  
02 people were just standing out on the -- out on  
03 their, I guess, storage deck, just ev --  
04 everybody -- they kind of clustered in groups and  
05 were talking and whatnot. All the people that  
06 were -- the Captain and the OIM and, I guess, all  
07 the other people were inside the -- I guess, the  
08 cabin area, dealing with some of the more  
09 critically injured personnel and doing whatever  
10 else, I don't know.

11 Q. All right. So the rest of the crew or  
12 crews from the BANKSTON and the -- and the rig  
13 were walking around talking to one another; is  
14 that correct?

15 A. Correct.

16 Q. All right. Were any instructions being  
17 given to you?

18 A. Initially, no. There was people going  
19 around with check sheets, trying to take tally  
20 of -- and account for people.

21 Q. All right. Who do you remember talking

22 to when you got on the DAMON BANKSTON?

23 A. The only people I specifically remember  
24 talking to was -- I remember talking to Terry  
25 Sellers and Doug Brown. I remember talking  
00143:01 several times with some of the crew of the -- the  
02 BANKSTON, because at that time I was starting to  
03 really hurt bad, and they kept asking me, you  
04 know, where I was hurting at and whether I needed  
05 some water and stuff like that.

06 Q. Where were you hurting?

07 A. At -- at that time, my primary concern  
08 and injury was from my mid to lower back.

09 Q. All right. Other than Doug Brown and  
10 Sellers and people asking, you know, whether you  
11 were hurt or not, do you recall talking to anyone  
12 else?

13 A. Not about anything in particular. I  
14 remember asking about -- asking about Brent and  
15 asking about what -- what men were injured and  
16 that, but I don't specifically remember having  
17 any other kind of conversation.

18 Q. Do you recall anybody discussing what the  
19 heck happened on the rig?

20 A. Not really. I don't -- I mean, the main  
21 concern right at -- at that time was what people  
22 were unaccounted for.

23 Q. How long did y'all stay there by the rig,  
24 on the DAMON BANKSTON?

25 A. I was on -- on the DAMON BANKSTON -- I --  
00144:01 I don't really have an idea of the amount of  
02 time. I know Coast Guard showed up. Coast Guard  
03 dropped a couple of their people onto the  
04 BANKSTON, which took assessment of injured  
05 personnel. I know myself and Doug Brown and  
06 Willie Stoner were picked up by the Coast Guard  
07 chopper and flown to the production platform  
08 AKITA and -- where we stayed there for a while  
09 and then --

10 Q. When were you flown from -- let me back  
11 up. How -- do you remember ex -- how long you  
12 stayed on the DAMON BANKSTON?

13 A. I don't know the specific amount of time.  
14 I would assume an hour and a half, two hours.

15 Q. And then you were transported to shore?

16 A. I was transfor -- ported to the  
17 production platform AKITA, where I was there for,  
18 again, probably a -- an hour to two hours.

19 Q. Okay. Were you flown because you were  
20 one of the injured?

21 A. Yes.