

Deposition Testimony of: **Richard Lynch**

Date: May 19, 2011

This bundle provides Penalty Phase-related objections and counter-designations to testimony that was previously the subject of not relevant to phase objections.

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00001:14 Deposition of RICHARD D. LYNCH, JR.,
15 taken in the Pan American Life Center,
15 Bayou Room, 11th Floor, 601 Poydras Street,
16 New Orleans, Louisiana 70130, on Thursday,

Page 9:03 to 9:15

00009:03 THE VIDEOGRAPHER:
04 This is the videotaped
05 deposition of Richard Lynch. This
06 deposition is being held today at 601
07 Poydras Street, New Orleans, Louisiana, on
08 May 19, 2011. The time indicated on the
09 video screen, which is 8:31 a.m.
10 This deposition is being taken
11 in the matter of the oil spill by the
12 Deepwater Horizon in the Gulf of Mexico on
13 April 20, 2010, taken in the United States
14 District Court for the Eastern District of
15 Louisiana.

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00009:17 RICHARD LYNCH,
18 after having been first duly sworn by
19 the above-mentioned Certified Court
20 Reporter, was examined and testified as
21 follows:

Page 11:02 to 12:17

00011:02 First of all, let me ask you:
03 What is your present position at BP?
04 A. Yes. I'm the vice-president for
05 the global wells organization for BP.
06 Q. And when did you take over that
07 position?
08 A. First of November, 2010.
09 Q. And prior to that, I understand,
10 my reading correctly, you had another
11 position that was also given to you in
12 2010?
13 A. Vice president --
14 Q. Just before that, what was that?
15 Vice president of what?
16 A. Okay. So let's slow down for a
17 minute. Let's get it clear.
18 So, in 2010, I had two different
19 roles that I actually -- actually, three
20 different roles I was involved in in 2010.
21 Q. All right. Let's start off with
22 January of 2010, what was your job?

23 A. In January of 2010, I was the
24 Vice-President of Drilling and Completions
25 for the Central Developments Organization.
00012:01 Q. And then, how long did that last
02 before they switched your position?
03 A. So on or about April the 24th, I
04 arrived in Houston and took on the role as
05 the near-term containment lead for the
06 Deepwater Horizon incident.
07 Q. So at the time of the explosion,
08 on April 20th, what was your position?
09 A. I was Vice-President of the CDO,
10 organization for drilling and completions.
11 Q. And then after April 24th, they
12 gave you a new position in November of
13 2010?
14 A. That's correct.
15 Q. And what is that position?
16 A. That's the vice president of the
17 Global Wells Organization.

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00177:12 If BP files an initial
13 exploration plan and tells the United
14 States Government that we can deal with a
15 worst-case scenario, and we can capably
16 respond to a worst-case scenario that is
17 okay if oil touches the shoreline, and that
18 still fits with the definition that you
19 understand of capably responding?

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00177:23 Well, there again, our
24 capability to respond was demonstrated. We
25 were responding. We were responding every
00178:01 day.

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00183:05 The fact that oil impacted those
06 beaches, do you believe that worst-case
07 scenario handling by BP under this filing
08 was done adequately and appropriately under
09 this filing?

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00183:13 I believe we -- we responded
14 with the capability that's we had to do
15 this. We must mustered the talents of the
16 industry around us. This was now a global

17 scenario. And, no, I don't -- so we
18 were -- we were doing everything we could
19 not to --

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00301:07 Q. In addition, were there any
08 other contractors that you worked with
09 during the various intervention?
10 A. Yes. Yes. I mean -- thank you
11 for bringing that up. The -- there was
12 certainly a gentleman there from Transocean
13 and people there from Cameron. At points
14 in time we had people there from Oil
15 States, which is the flex joint
16 manufacturer, another piece of equipment on
17 the BOP stack.
18 We would -- we had other folks
19 that were specialty-skilled people,
20 Allister -- what's Allister last name --
21 from Atkins. He ran all of our haz-op
22 hazard kind of processes. It's a
23 facilitation type role.
24 Schlumberger had a massive role
25 in the top size and equipment. Of then, of
00302:01 course, I added the Chevron team through
02 Tom Jones and Marshall Robichaux who
03 provided a full rig team and a full series
04 of engineers to support the intermediate
05 efforts that we were involved with. So you
06 know, there again in time, there were --
07 there were other entities.
08 And I probably -- even this --
09 we did have folks that were in the team
10 from Anadarko, and Mobile had folks that'd
11 come by. Shell had Mike Cohen come in and
12 played a huge role in the team at one point
13 there time. And I had some folks through
14 the organization.
15 So several different -- many
16 different operators, actually, come in --
17 come into play with part of the overall
18 element.

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00375:02 Q. After the well was killed, what
03 was your role then?
04 A. Well, so after the well was
05 killed, we monitored the pressures. We
06 then did a -- placed cement into the
07 wellbore itself. So are you saying after
08 all of that?
09 Q. Yes.
10 A. After all that's finished?

11 Okay. I'm just trying to --

12 Q. What was your next progression?

13 A. Yeah. So it -- so kind of my
14 last piece of the work in and around this
15 effort was actually, pulling together --
16 obviously, the presentation was made in
17 Mobile. I was involved getting the teams
18 organized for some lessons learned
19 exercises. I was involved with helping
20 present to Director Braumwich some of the
21 Deepwater Horizon lessons learned, things
22 of that nature.

23 I did get involved with marine
24 well containment consortium, helping them
25 and the companies involved understand what
00376:01 we had done and how it was executed, and
02 what that meant.

03 I did help out with deep well --
04 if the teams needed any help with their
05 plug and abandonment operations that were
06 ongoing on the different wells, including
07 the Macondo well. And then physically, my
08 last day in the center there, must've been
09 in the middle of October sometime.

10 Then by that point in time,
11 people were working really pretty heavily
12 around really understanding the lessons
13 learned, getting ready with marine well
14 consortium and then some other containment
15 options we were looking at.

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00380:14 Q. Other than what is contained in
15 Section 2, are there any other lessons
16 learned that weren't included in this
17 document that you believe are lessons
18 learned as a result of all of the spill
19 control efforts that you led?

20 A. All right. I think there's huge
21 numbers of lessons learned, you know.
22 Probably some of the hardest lessons
23 learned are, you know, the things that will
24 stick with me. I think as far as how you
25 actually manage, lead, and motivate people
00381:01 during a scenario of this order or
02 magnitude, I think there is so many lessons
03 about how we interact, collaborate, to
04 integrate the teams from multiple entities,
05 probably isn't fully represented in here.

06 I think the -- if you will, some
07 of the lessons around the SIMOPs, I mean
08 the SIMOPs we ran, we ran for a reason, and
09 we had to run those for a reason on the
10 other side. That was probably one of the

11 greatest risk areas that we actually had.
12 It was -- it went okay for us, but it was
13 one of huge concern actually through the
14 entire containment operation.

15 That's off to top of my head.

16 You know, I -- when I -- at night when I
17 think about these things, there's -- I
18 mean, there's a myriad of stuff that, if
19 you will, that I learned from the
20 experience, that, you know, shows up kind
21 of every day when I actually think about
22 it.

23 I would say too, the -- you
24 know, the world of being better prepared.

25 I think we certainly learned some huge
00382:01 lessons around that, that do and will make
02 a difference.

03 Q. Just give me one second.

04 A. If you give me an opportunity to
05 think a little bit more, I probably -- I
06 probably didn't answer with the most
07 obvious thing. I mean, the greatest thing,
08 actually -- probably the biggest lesson
09 learned of all is -- is the lesson of, you
10 know, kind of never again. So we should
11 never get ourselves so -- well, from a
12 prevention standpoint, actually, probably,
13 to me is probably the hardest and really
14 biggest lesson learned is about how do we
15 make sure we never put ourselves in a
16 position -- actually get in to a place
17 where the event has occurred.

18 And so, you know, a huge amount
19 of my new role and my new job is actually
20 focused in that area. And, yes, it is
21 important to be prepared -- to be prepared
22 differently now that we understand this
23 type of event. On the flip side of it,
24 though, is actually being really very
25 deeply prepared in the world of prevention

00383:01 where an actual event such as this can
02 never happen again.

03 So thanks for the time to let me
04 think a little bit, But I just wanted to
05 share that with you. Because it's another,
06 I think, a critical lesson of a collection
07 size for me personally.