

Deposition Testimony of:

Richard Lynch

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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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00695:10 Q. Now, sir, do you understand
11 that -- and when I say Anadarko, from now
12 on that I'm going to refer to Anadarko
13 Petroleum Corporation?
14 A. Okay.

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00695:19 Q. And do you understand, sir, that
20 Anadarko and MOEX are non-operating
21 investors in the lease for the Mississippi
22 Canyon Block 252 where the Macondo well was
23 located?
24 A. I understand they're working
25 interest partners, yes.

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00699:14 Q. Now -- now I want to focus on
15 the post incident period. And you
16 testified yesterday, in response to
17 questioning by Ms. McClellan, as I recall,
18 from the Justice Department, that Anadarko
19 was among the various companies which
20 provided aid and assistance to BP in
21 connection with its efforts to cap the well
22 and control the flow of hydrocarbons; is
23 that right?
24 A. They did.
25 Q. And did you have -- and in fact,
00700:01 I was noticing in Exhibit 2354, which is
02 the -- your PowerPoint entitled, Harnessing
03 the Lessons of DEEPWATER HORIZON, I think
04 your presentation?
05 A. Yes.
06 Q. If you'd look at page 5.
07 A. Yes.
08 Q. The Anadarko logo is listed
09 among the industry producers. Is that the
10 reason that Anadarko is shown there as
11 being a participant in the -- the team, if
12 you will, that worked on the cap and
13 control of flow?
14 A. Yes.
15 Q. And did you personally have
16 communications with any representatives of
17 Anadarko or MOEX in connection with that
18 process, the post-incident process?
19 A. Please repeat your question.
20 Q. Sure. Did you personally have
21 communications with representatives of
22 Anadarko or MOEX in connection with your
23 efforts following the incident?

24 A. Yes, I did. And my memory's not
25 so good. I've forgotten the individual's
00701:01 name, but he participated in many of the
02 meetings actually that we were involved in,
03 part of the peer assist, part of the
04 HAZOPs-HAZIDs, part of the pre-planning
05 sessions, things of that nature.

06 Particularly when it got in time
07 for the capping stack, I know he was
08 involved in the relief well teams, maybe
09 more so. But just to say, I apologize for
10 not remembering the name of a -- say a
11 senior, seasoned, drilling or completion
12 style engineer. He's probably a
13 great technical --

14 Q. Does the name Bob Quitzau sound
15 right to you?

16 A. Bob sounds right. I don't know
17 the last name.

18 Q. And I'm sorry, you said that he
19 was involved in which aspects of the relief
20 process?

21 A. He would have been involved in
22 the meetings around -- for sure, I remember
23 distinctly at meetings around static kill.
24 He may have been participating in some of
25 the other HAZOPs, HAZIDs that we did to the
00702:01 buildup of the containment systems.

02 I just remember Bob, in
03 particular, in a couple of the meetings and
04 his -- you know, his contribution, if you
05 will, so.

06 Q. Okay. And -- well, let me ask
07 you this: Were his -- were his
08 contributions valuable to you and the other
09 members of the BP team?

10 A. Certainly, yes.

11 Q. And were there any times during
12 the course of your meetings or in dealings
13 with him in which you found that he had
14 anything other than -- was making anything
15 other than a good faith effort to assist in
16 the relief effort?

17 A. Never did I see anything
18 otherwise.

19 Q. Do you recall that Anadarko also
20 offered to provide resources to BP
21 following -- I think it was -- the
22 June 15th meeting that you and your
23 colleagues had in the Department of the
24 Interior with Secretary Salazar and Chu?

25 A. Yes, sir.

00703:01 Q. And do you know whether or not,
02 BP took advantage of those offered
03 resources?

04 A. I don't specifically recall now.

05 Again, I know there was -- each one of the
 06 operators had a varied list of things that
 07 they had available. We did go through the
 08 list and we did -- we did borrow, if you
 09 will, from different individuals. I just
 10 don't remember now the specific details on
 11 who Anadarko was.

12 MR. NEGER:

13 I'm going to ask the reporter to
 14 mark, I guess, as 2367, an e-mail bearing
 15 Bates number BP-HZN-2179-MDL 00641275
 16 through 77, with an attachment that's been
 17 produced in native form. And actually I'll
 18 mark it myself.

19 (Whereupon, the document
 20 referred to was marked as Exhibit No. 2367
 21 for identification.)

22 MR. GODFREY:

23 What's the tab?

24 MR. NEGER:

25 Yes, it's Tab 12. Sorry.

00704:01 EXAMINATION BY MR. NEGER:

02 Q. I'll just ask you to identify
 03 that document, if you would.

04 A. Yes. This is an e-mail that I
 05 sent to my -- my broad containment team
 06 with a spreadsheet of response that we had
 07 back from the meetings that you mentioned
 08 earlier, and I was asking them did they
 09 find anything on the list that we -- that
 10 we needed as part of the effort.

11 Q. And Anadarko's name is on that
 12 list as having offered resources in aid of
 13 the effort?

14 A. Yes, sir. That is correct.

Page 704:17 to 704:22

00704:17 Q. You -- in response to your
 18 questioning this morning, you identified
 19 the authorities, if you will, who were part
 20 of the decision-making process during the
 21 course of the relief effort.

22 A. Yeah.

Page 705:09 to 705:13

00705:09 Is it fair to say that neither
 10 Anadarko, nor MOEX, were part of the
 11 decision-making group involved in
 12 responding to the Macondo incident?

13 A. Not that I know of.

Page 764:16 to 765:02

00764:16 Q. Now, I understand from your
17 earlier testimony that you are still
18 working on your Global Wells Organization
19 operations management system; correct?
20 A. Correct.
21 Q. But in the meantime, as I
22 understand your testimony, you believe that
23 you and others at BP have taken steps to
24 apply lessons learned from the Horizon
25 tragedy to improve safety.
00765:01 Am I correct on that?
02 A. Yes, sir.

Page 823:14 to 823:20

00823:14 Q. Now, let me go back to the Texas
15 City refinery and the lessons learned.
16 What mitigation of risks in the
17 safety process was taught to you all after
18 March of 2005 so that problems such as the
19 loss of 15 workers' lives could be avoided
20 in the future?

Page 823:24 to 824:15

00823:24 There were several lessons
25 learned from that. One was occupied
00824:01 portable buildings in and around
02 hydrocarbon sources.
03 EXAMINATION BY MR. BREIT:
04 Q. Keep on going.
05 A. Some was the maintenance and
06 understanding of flare systems.
07 Q. What were you saying about
08 maintenance?
09 A. I said the maintenance and
10 understanding of how a flare system -- of a
11 flare system.
12 Q. Okay. Go on.
13 A. A flare system. I think it was
14 close-out of action items related to
15 audits.

Page 832:21 to 832:25

00832:21 Q. Well, do you believe that
22 there's any changes actually made or were
23 they just talked about?
24 A. I explained that the operating
25 management system was put into place.