

# Deposition Testimony of:

## **Robert Quitzau**

Date: November 2, 2012

Created by:



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Page 392:06 to 392:17

00392:06 So you testified yesterday that you were  
07 part of a Team called the Top Kill Procedures  
08 Team; is that correct?  
09 A. That's correct.  
10 Q. And you also said that you were part of  
11 the Top Kill Concept Team; is that correct?  
12 A. That's correct.  
13 Q. So when you referred to your membership  
14 on this Team, are you only referring to your  
15 involvement in the planning of the step-down  
16 test, both from the Concept Team and in the  
17 Procedures Team?

Page 392:19 to 393:11

00392:19 A. No, I'm not.  
20 Q. (By Mr. Seilie) In what other capacity  
21 were you involved in this -- on these Teams?  
22 A. The Concept Team was a generalized small  
23 Group that dealt with the overall concept of how  
24 the junk shot might be pumped, and the top kill  
25 followed, and -- and the cement might follow  
00393:01 that. So it was just kind of scoping out the --  
02 the plan in a small group of people.  
03 And then moving into the Procedures Team,  
04 as I testified, I -- I focused largely on matters  
05 related to stabilizing the well after the kill  
06 and conducting the cement job, if the well was  
07 stable.  
08 So those -- those parts of the procedure,  
09 I contributed through the groups I was working  
10 on, and -- and some of that input made it into  
11 the procedure.

Page 406:04 to 406:12

00406:04 Q. Did you participate in the planning  
05 process for the junk shot procedure?  
06 A. In the sense that the junk shot procedure  
07 includes all the operations from killing --  
08 pumping junk shot, killing the well, stabilizing  
09 the well, and cementing, yes, I was involved in  
10 the last two that I just mentioned.  
11 Q. And just to get it on the record, what is  
12 the junk shot procedure?

Page 406:14 to 407:01

00406:14 A. The junk shot procedure is -- is outside  
15 my area of expertise, but as I understand it from  
16 listening to Wild Well Control, that is -- would  
17 be a procedure whereby a junk shot -- while --

18 while pumping mud from the surface, junk shot  
19 would be released into that mud stream to go into  
20 the -- to the well and the BOP.

21 Q. And what do you mean by "junk shot," in  
22 that?

23 A. Junk shot is a term that Wild Well used  
24 and consisted of various manners -- manners of  
25 plugging agents. And that's the extent of my  
00407:01 knowledge of junk shot.

Page 414:12 to 414:13

00414:12 Q. What was Mr. Hackett's involvement in the  
13 DEEPWATER HORIZON response?

Page 414:15 to 414:19

00414:15 A. I don't know Mr. Hackett's role.

16 Q. (By Mr. Seilie) But you stated before  
17 that nobody except for you participated in the  
18 top kill operation; is that correct?

19 A. That's correct.

Page 416:24 to 417:01

00416:24 Q. (By Mr. Seilie) Did anyone from Anadarko  
25 play a role in assessing why the top kill was  
00417:01 unsuccessful?

Page 417:03 to 417:03

00417:03 A. I'm not aware of anybody.

Page 521:03 to 521:18

00521:03 Q. (By Mr. Leopold) Okay. Let's turn to one  
04 more exhibit, Tab 110. Go ahead and mark it.

05 (Exhibit No. 9975 marked.)

06 Q. (By Mr. Leopold) And it's a -- an E-mail  
07 from Keith Powell to some -- a group of folks.  
08 And I understand you're not on the E-mail. It's  
09 dated August 13th, 2010. Do you see -- do you  
10 see that at the top of the E-mail, Mr. Quitzau?

11 A. I do.

12 Q. But you're referenced in the E-mail by  
13 Mr. Powell, and he says: "Bob Quitzau (Anadarko  
14 Drilling Engineer) has been seconded to the IMT  
15 operations since the beginning of the event, and  
16 has been a key member of the engineering team for  
17 Top Kill, Static Kill and the Relief Wells."

18 Do you agree with that assessment?

Page 521:20 to 521:20

00521:20       A.   (Reviewing document.) Yes, I do.

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF LOUISIANA

3 IN RE: OIL SPILL ) MDL NO. 2179  
4 BY THE OIL RIG )  
5 "DEEPWATER HORIZON" IN ) SECTION "J"  
6 THE GULF OF MEXICO, ON )  
7 APRIL 20, 2010 ) JUDGE BARBIER  
8 ) MAG. JUDGE SHUSHAN

9 REPORTER'S CERTIFICATION  
10 TO THE ORAL AND VIDEOTAPED DEPOSITION OF  
11 ROBERT QUITZAU,  
12 UNITED STATES OF AMERICA 30(b)(6)  
13 NOVEMBER 2, 2012  
14 VOLUME 2

15 I, Emanuel A. Fontana, Jr., Certified  
16 Shorthand Reporter in and for the State of Texas,  
17 hereby certify to the following:

18 That the witness, **ROBERT QUITZAU**, was duly  
19 sworn by the officer and that the transcript of  
20 the oral deposition is a true record of the  
21 testimony given by the witness;

22 That the deposition transcript was submitted  
23 on November 7, 2012, to the witness or to  
24 Attorney Connie Delgado for the witness to  
25 examine, sign, and return to Worldwide Court  
Reporters, Inc., by December 22, 2012.

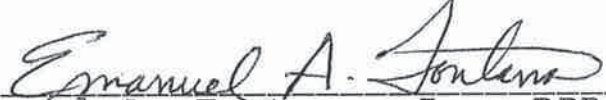
That the amount of time used by each party  
at the deposition is as follows:

Mr. Seilie - 56 Minutes  
Mr. Diaz - 4 Minutes  
Mr. Hartley - 8 Minutes  
Ms. Wilms - 2 Minutes  
Mr. Leopold - 1 Hour, 1 Minute

1 I further certify that I am neither counsel  
2 for, related to, nor employed by any of the  
3 parties in the action in which this proceeding  
4 was taken, and further that I am not financially  
5 or otherwise interested in the outcome of the  
6 action.

7  
8 SUBSCRIBED AND SWORN to by me on this 2nd  
9 day of November, 2012.

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Emanuel A. Fontana, Jr., RPR  
Texas CSR No. 1232  
Expiration Date: 12/31/12  
Worldwide Court Reporters  
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3000 Wesleyan, Suite 235  
Houston, Texas 77027  
(713) 572-2000

I, ROBERT QUITZAU, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted on the attached Amendment Sheet.

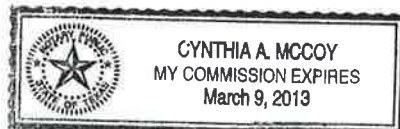
Robert Quitzau  
ROBERT QUITZAU

THE STATE OF Texas )  
COUNTY OF Montgomery )

Before me, Cynthia A. McCoy, on this day personally appeared ROBERT QUITZAU, known to me (or proved to me under oath or through Company Profile) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this 10th day of December, 2012.

Cynthia A. McCoy  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS  
COMMISSION EXPIRES: 3-9-13



PURSUANT TO CONFIDENTIALITY ORDER

Errata to Deposition of Robert Quitzau  
November 1-2, 2012

Page/Line	Change	Reason
15:5	"that" to "around 2004"	Clarification
28:2	"Sherson" to "Shursen"	Typographical error
63:10	"Reisel" to "Rigel"	Typographical error
64:12	"Lemkar" to "Lemker"	Typographical error
64:13	"Lemkar" to "Lemker"	Typographical error
93:25	"you" to "you're"	Typographical error
130:3	"Team, the" to "Team. The"	Typographical error
184:18	"pumping 16.4'" to "pumping 16.4"	Typographical error
184:19	"gallon "mud ramping up quickly to 40'" to "gallon mud ramping up quickly to 40"	Typographical error
184:20	"with" Wild Well" to "with Wild Well"	Typographical error
184:21	"Control, "Bill Burch" to "Control, Bill Burch"	Typographical error
187:3	"pumping" 4.2" ppg" to "pumping 4.2 ppg"	Typographical error
187:4	"keep" oil" to "keep oil"	Typographical error
187:5	"flowing -- "oil" to "flowing -- oil"	Typographical error
195:13	"teamwork" to "team work"	Typographical error
200:17	"Expert" to "expert"	Typographical error
213:10	"never" to "versus"	Typographical error
214:9	"were" to "was"	Typographical error
225:12	"after. One" to "after one"	Typographical error
227:4	"Loya" to "Hollek"	Typographical error
230:15	"on, in" to "on in"	Typographical error
258:20	"Proposal" to "proposal"	Typographical error
266:2	"would" to "was"	Typographical error
266:3	"speculate in the HAZID, could" to "speculated in the HAZID could"	Typographical error
283:12	"cop" to "top"	Typographical error
307:6	"met" to "meet"	Typographical error
404:21	"Concept Team Relief Well" to "Concept Team -- Relief Well"	Typographical error
449:15	"Regulatory" to "regulatory"	Typographical error
463:2	"relief well efforts" to "relief efforts"	Typographical error
475:21	"co-process" to "kill process"	Typographical error

  
Robert Quitzau