

Deposition Testimony of:

Craig Breland

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Page 8:14 to 10:06

00008:14 CRAIG BRELAND,
15 having been first duly sworn, testified as
16 follows:
17 EXAMINATION
18 By MR. BONNER:
19 Q. Could you tell us your full
20 name?
21 A. Craig Michael Breland.
22 Q. Who do you work for?
23 A. Transocean.
24 Q. Okay. How long have you worked
25 for Transocean?
00009:01 A. 14 years.
02 Q. Okay. What is your current
03 position with Transocean?
04 A. Crane operator.
05 Q. Okay. How -- how long have you
06 been a crane operator?
07 A. About three years, four years.
08 Q. Okay. What position did you
09 start out with?
10 A. Seaman.
11 Q. Okay. And kind of give me a
12 progression up to what each position that
13 you held with Transocean.
14 A. When I started with them in
15 August of '97, I was a seaman. I was a
16 seaman for about three or four months then
17 became a roustabout. I stayed a roustabout
18 till about 2007. I became an assistant
19 crane operator, and I got my full crane job
20 in 2008. And since then, I've been a crane
21 operator.
22 Q. Do you have to have any
23 certifications or -- or certificates to be
24 a crane operator?
25 A. I have a crane operator's
00010:01 license.
02 Q. Okay. Who issues that license?
03 A. I got my first license through
04 Crane Petroleum Institute in Slidell, and
05 every four years, I have to have it
06 renewed.

Page 11:07 to 11:25

00011:07 Q. Now, you were on the DEEPWATER
08 HORIZON on April 20th, 2010, when it had
09 the blowout, correct?
10 A. Yes.
11 Q. Okay. When did you start your
12 hitch?
13 A. On that rig?

14 Q. On that rig.
15 A. That Friday.
16 Q. Okay. Do you know what date
17 that would have been?
18 A. 15th or so.
19 Q. Okay. Well, do you know how
20 many days you'd been on the HORIZON --
21 A. Five days.
22 Q. Okay. Had you ever been on the
23 HORIZON prior to the beginning of that
24 hitch?
25 A. No.

Page 13:24 to 18:24

00013:24 Q. Now, which crane -- were you --
25 were you assigned to a particular crane on
00014:01 the HORIZON?
02 A. No.
03 Q. Okay. Did you work on a
04 particular crane? Was there one that you
05 worked on more than the other?
06 A. Yes. The port crane.
07 Q. Okay. Which tour did you work?
08 A. I worked midnight to noon.
09 Q. So the morning tour?
10 A. Yes.
11 Q. Okay. Now, I want to ask you
12 some questions specifically about the
13 blowout. I know it's a -- a difficult
14 thing to -- to think about, remember, but
15 it's important for this case. It's also
16 important for the families of the men who
17 got left on that rig so that they'll have a
18 chance to -- to know what happened. So if
19 at anytime you need to take a break, just
20 let me know. You're welcome to, and we'll
21 take a break and let you compose yourself.
22 A. Okay.
23 Q. Let's start with -- with your
24 shift, the beginning of your shift on -- on
25 April 20, 2010.
00015:01 You said it began at
02 midnight?
03 A. Yes.
04 Q. Okay. What kind of day was it?
05 What was the weather like?
06 A. Calm, slick water.
07 Q. Pretty day?
08 A. Yeah.
09 Q. Okay. Was there any hint or
10 indication of -- of what was going to come
11 that night?
12 A. Not to me.
13 Q. Okay. Did you attend the

14 pre-tour meeting before your shift began?
15 A. Yes.
16 Q. Okay. Who was at that meeting?
17 A. The drill crew and the crane
18 crew.
19 Q. And who was the drill crew that
20 was at that meeting?
21 A. I don't remember.
22 Q. Okay. Was anyone from BP at
23 that meeting?
24 A. I can't recall.
25 Q. Was the company man at that
00016:01 meeting?
02 A. I mean, I can't recall. I'm
03 sure, but, I mean, I can't recall.
04 Q. What did y'all talk about at
05 that pre-tour meeting?
06 A. I really don't remember.
07 Q. Did anyone discuss any concerns
08 or issues with the well?
09 A. Not that I can remember.
10 Q. Okay. Were there any -- any
11 arguments or -- or discussions about the
12 plans for -- for what y'all were going to
13 do during your tour?
14 A. Not that I remember.
15 Q. When you left that meeting, did
16 it -- did it seem like everything was going
17 as planned with the well?
18 A. I really don't remember.
19 Q. Do you know where they were in
20 the well?
21 A. We had just cemented a casing.
22 That's the last thing I remember.
23 Q. Okay. Now, during your tour on
24 April 20th, were there any crane operations
25 going on?
00017:01 A. Yeah. I was backloading a boat
02 on the portside.
03 Q. Okay. And tell us what you mean
04 by backloading the boat.
05 A. I was taking products or
06 miscellaneous equipment off the rig and
07 putting it on the boat.
08 Q. Okay. Now, was that a typical
09 end of the well activity?
10 A. That was a typical -- it could
11 be every day depending on, you know, what
12 was going on.
13 Q. Okay. Now, did -- were there
14 any policies and procedures in place
15 regarding the use of cranes while they were
16 trying to monitor the well?
17 MR. GATEWOOD:
18 Objection to form.

19 A. No, not really.
20 Q. Okay. In your experience, have
21 there been situations with this ceased --
22 where anyone on the rig ceased crane
23 operations because there was a -- they were
24 entering a critical well monitoring phase?
25 A. Yes.
00018:01 Q. Okay. Was -- tell me when those
02 situations have occurred in the past.
03 A. If you're either losing mud flow
04 or gaining mud flow back and they're trying
05 to monitor the pits, the mud pits, they'll
06 stop it because when the crane swings left
07 or right, over the rig, or back on to it,
08 the rig will shift and they can't get
09 accurate measurements in the pits.
10 Q. Now, what rigs have you worked
11 on where they have told you to cease
12 operations because they're trying to
13 monitor the pits?
14 A. The RATHER, the MARIANAS, the
15 AMIRANTE. And I can't remember if we did
16 it on the GOODRICH, but most every rig that
17 I have been on.
18 Q. Okay. Okay. And who would
19 typically tell you to cease operations?
20 A. Depends at the time. I've had
21 the driller, I've had the AD, I've had
22 toolpusher, and I've had the deck pusher
23 call. It all depends on who gives me the
24 call first.

Page 19:04 to 29:05

00019:04 Q. Okay. Who did you report to as
05 crane operator?
06 A. To the head -- lead crane
07 operator and the deck pusher.
08 Q. Who is the lead crane operator
09 on the DEEPWATER HORIZON?
10 A. On the tour I was on was Eugene
11 Moss.
12 Q. Okay. Now, on April 20th, your
13 tour would have ended at what time in the
14 morning?
15 A. At noon.
16 Q. At noon. Okay.
17 So 12:00 p.m.?
18 A. Yes.
19 Q. Who relieved you?
20 A. Dale.
21 Q. Is that Dale Burkeen?
22 A. Yeah. I don't remember his last
23 name, but, yeah.
24 Q. After Dale relieved you, what

25 did you do then?
00020:01 A. Went inside, took a shower, and
02 then ate.
03 Q. What room were you assigned to
04 on the DEEPWATER HORIZON?
05 A. I don't remember the number.
06 Q. Okay. Do you remember where it
07 was located on the rig?
08 A. Yes.
09 Q. Okay. Was it on the second or
10 third deck?
11 A. It was the deck right below the
12 galley, whichever deck that is.
13 (Exhibit Number 2332 marked.)
14 Q. I'll show you what I've marked
15 as Exhibit 2332. And if you'll turn to the
16 second page, I think that's the -- the deck
17 that you're referring to as being beneath
18 the galley.
19 MR. KEEGAN:
20 Which tab?
21 MR. BONNER:
22 It's Tab E.
23 MR. KEEGAN:
24 Thanks.
25 Q. Can you identify where your room
00021:01 was by looking at that exhibit?
02 A. Yes.
03 Q. Okay. Would you -- would you
04 circle your room with this red marker for
05 me, if you don't mind? Okay.
06 Can I -- can I take a look
07 at where you circled?
08 Now, were you the only
09 person assigned to that room?
10 A. No. Dale was.
11 Q. Okay. And that's Dale Burkeen?
12 A. Yes.
13 Q. And -- and what -- Dale was also
14 a crane operator on the DEEPWATER HORIZON?
15 A. Yes.
16 Q. Okay. Now, after you took a
17 shower, grabbed something to eat, what did
18 you do next?
19 A. I went to the gym.
20 Q. Okay. Then after the gym, where
21 did you go?
22 A. Back to my room.
23 Q. Okay. Go to sleep?
24 A. No, not right away.
25 Q. Let me ask you this: What were
00022:01 you doing when you first realized that
02 there was an issue going on with the rig on
03 April 20th?
04 A. I'd woken up early. I usually

05 get up about 10, 10:15. Woken up early to
06 use the restroom. And before I could get
07 down, the first explosion happened.
08 Q. Okay. Tell me in your own words
09 kind of what happened after that.
10 A. My first instinct was, you know,
11 the crane boom either fell or they set off
12 the jars in the well. So I -- I paused for
13 a second. And then by the time my feet hit
14 the ground, the second one went off and
15 then the fire alarm went off. So I went to
16 my door, went to open it up, and then I was
17 putting on my clothes. They were hanging
18 on my door. 'Cause I thought I was going
19 to have to go fight the fire, because being
20 a crane operator you're on the fire team.
21 So then as soon as I got -- went to walk
22 out, the overboard -- abandon alarm went
23 off, so I grabbed my lifejacket and I went
24 to leave.
25 Q. Okay. How much time was there
00023:01 between the -- the first explosion and the
02 second explosion?
03 A. Seconds.
04 Q. Okay. You said you had time to
05 get your clothes on before you left your
06 room?
07 A. Yeah.
08 Q. Okay. Before the first
09 explosion, did you hear any alarms?
10 A. No.
11 Q. Okay. Before the second
12 explosion, did you hear alarms?
13 A. Not that I can recall.
14 Q. Okay. Is it fair to say the
15 first alarm that you heard was after the
16 second explosion?
17 A. Yes.
18 Q. Okay. And that was a fire
19 alarm?
20 A. Yes.
21 Q. Okay. And you said heard -- how
22 long was it between the fire alarm and the
23 overboard alarm?
24 A. Abandon. Seconds. I mean it
25 wasn't long, but I can't tell you exactly.
00024:01 Q. Did you hear any voices over the
02 intercom system?
03 A. Yeah. They were -- they were
04 making a PA announcement along with the
05 alarms.
06 Q. Okay. What was the PA
07 announcement that was made?
08 A. The first one was, this is not a
09 drill. This is not a drill. Fire, fire.

10 And then when the abandon
11 ship alarm went off, they said abandon the
12 rig.
13 Q. Okay. Was it a man or a woman's
14 voice?
15 A. A man.
16 Q. Okay. Did you recognize what
17 man's voice it was?
18 A. No, I didn't.
19 Q. Have you ever been on a rig that
20 had a fire before?
21 A. No.
22 Q. Okay. Have you ever had to
23 abandon a rig before?
24 A. No.
25 Q. At any point, did the -- did the
00025:01 lights go out on the rig? Did you lose
02 power?
03 A. Oh, yes.
04 Q. Okay. When did you lose power
05 on the rig?
06 A. The -- when I noticed it, it was
07 the second explosion.
08 Q. Okay. Before or after the
09 second explosion?
10 A. When I noticed it was after, you
11 know.
12 Q. Okay. Now, tell me, how did you
13 get -- did you go to the lifeboats after --
14 A. Yes.
15 Q. -- the second explosion?
16 How did you get from --
17 from your room to the lifeboats?
18 A. All right. I went out and took
19 a left out of my room, went to go up the
20 stairs by the galley but they were blocked
21 off by debris.
22 Q. Okay.
23 A. And I turned around, so I didn't
24 know where to go. And there was a guy
25 behind me, and he said follow me. Went up
00026:01 the spiral staircase and then went out and
02 came right out on the lifeboat deck.
03 Q. Do you know who that guy was?
04 A. Mike. I can't remember his last
05 name, but he's a mechanic.
06 Q. Is it Mike Williams? Does that
07 sound familiar?
08 A. No. No, it's not him.
09 Q. Okay. If you could, with this
10 orange marker, mark on Exhibit 2332 where
11 you initially tried to leave your room.
12 Okay.
13 If you could, hold that up
14 so the camera can see it. Okay.

15 And if we look on the first
16 page, is that the stairwell that you said
17 was blocked?
18 A. Yes.
19 Q. Okay. And describe for me when
20 you left your room. What was the -- the
21 area where you tried to -- to leave to go
22 to the life rafts? What did it look like?
23 A. All right. When I walked out of
24 my room, it was all dark, there was no
25 power. There was a couple of ceiling tiles
00027:01 hanging down. And we walked to the
02 staircase, and then it was just like --
03 like the staircase just ended. Like it
04 just went up to the ceiling. I mean it was
05 just -- you couldn't even push it, it was
06 so much stuff.
07 Q. Okay. Was there -- was there
08 any fire in the accommodations area?
09 A. I didn't see any.
10 Q. Okay. What about smoke?
11 A. There was some smoke. Not a
12 whole lot where I was.
13 Q. Okay. Could you feel any heat
14 or --
15 A. No.
16 Q. -- or -- or anything like that?
17 A. No.
18 Q. And ultimately, you did make it
19 out -- off the rig to the life -- or out of
20 your room to the life rafts; is that
21 correct?
22 A. Yes.
23 Q. Okay. If you could, draw me
24 with this red marker -- the red marker, how
25 you -- how you ultimately made it to the
00028:01 life rafts.
02 A. I don't know if I can find the
03 staircase.
04 There it is.
05 Q. Okay. If you could, hold both
06 those pages up so the camera can see it.
07 Okay. Thank you.
08 Other than Mike, who led
09 you to the life rafts, did you see anybody
10 else on your way to the life rafts?
11 A. Yeah. When we came out the
12 upper staircase, the spiral staircase and
13 was on the same deck as the -- the galley,
14 when we were going through all the debris,
15 there was a couple of people.
16 Q. Okay. Do you know who those
17 people were?
18 A. No.
19 Q. Were they -- were they injured?

20 What were they doing?
21 A. I didn't -- they were walking.
22 I didn't see anybody injured.
23 Q. Okay. When did you first
24 realize that this was not an ordinary
25 emergency?
00029:01 A. When I got to the lifeboat and
02 looked up at the derrick.
03 Q. Okay. What was going on with
04 the derrick?
05 A. It was engulfed in flames.

Page 31:16 to 32:07

00031:16 Q. Okay. Now, have you ever been
17 lowered from a -- a rig down to the water
18 in a lifeboat before?
19 A. Yes.
20 Q. Okay. When were those
21 situations when you've had that done?
22 A. There's many times 'cause I was
23 a part of testing them out.
24 Q. Okay.
25 A. It was part of PMs on them. You
00032:01 had to lower them, run them around, and
02 pick them back up.
03 Q. Now, how -- how far on the
04 HORIZON was it from where the lifeboats
05 were stored to the water?
06 A. I want to say like 40 or
07 50 feet. I don't know exactly.

Page 57:17 to 58:19

00057:17 And we'll actually mark
18 that as 2336.
19 (Exhibit Number 2336 marked.)
20 A. Yes.
21 Q. Okay. And did you take any
22 training courses outside of this list that
23 were conducted by any companies other than
24 Transocean?
25 A. Yes.
00058:01 Q. Okay. What were those courses?
02 A. One was BP's license to go
03 offshore. And I believe that's it, as far
04 as the ones I didn't see.
05 Q. Okay. Some of the training
06 courses that are listed on this document
07 are courses on actual crane operation; is
08 that correct?
09 A. Yes.
10 Q. Can you identify those courses,
11 if you can?

12 A. It's the one that says API RP 2D
13 crane operator cert.
14 Q. Is that the only one?
15 A. Yes.
16 Q. And in those -- in that course,
17 did you discuss simultaneous operations
18 occurring on the rig while operating the
19 crane?

Page 58:22 to 59:04

00058:22 A. Yes.
23 Q. Okay. Can you explain what that
24 training involved?
25 A. It was just an overview. It --
00059:01 in a book and talk.
02 Q. Okay. What guidance were you
03 given with respect to crane operations
04 while other things were going on the rig?

Page 59:06 to 59:11

00059:06 Objection, form.
07 A. They just said, you know, if two
08 things were going on, you know, you just
09 got to watch out for -- if it's two cranes,
10 watch out for crane boom, watch out for
11 loads. Watch out for people, mainly.

Page 59:17 to 59:20

00059:17 Q. Were you trained on -- were you
18 specifically trained on how crane operation
19 could affect the well control activities
20 that were going on -- going on on the rig?

Page 59:23 to 59:23

00059:23 A. Specifically trained, no.

Page 60:11 to 60:14

00060:11 Q. And I -- you -- you may have
12 been asked this earlier, but were there any
13 specific policies regarding simultaneous
14 operations that you were required to know?

Page 60:17 to 61:21

00060:17 A. Specific policies, no.
18 Q. Before you -- you began work
19 with the crane, did you have to participate

20 in a think plan?
21 A. Yes.
22 Q. Okay. And would that -- would
23 the think plan before a particular work
24 with the crane address simultaneous
25 operations?
00061:01 A. If there was simultaneous
02 operations going on, yes.
03 Q. Okay. And would that include
04 well control operations?
05 A. Yes.
06 MR. GATEWOOD:
07 Objection, form.
08 Q. Can you give an example of what
09 a think plan would -- regarding well
10 control operations and the interaction of
11 that with the crane would -- would involve?
12 MR. GATEWOOD:
13 Objection, form.
14 A. It depends on, you know, what
15 the operation is. It would list under
16 hazards to identify and it would be well
17 control or well operations or -- you know,
18 it depends on which person is writing it,
19 how it would be worded. And you would just
20 go over it in your think plan under the --
21 the hazards to identify.

Page 63:10 to 63:23

00063:10 Q. Okay. Was there any other
11 training or orientation you received upon
12 arriving on the DEEPWATER HORIZON?
13 A. Yes. I had an orientation.
14 Q. And what -- what did that
15 orientation include?
16 A. The description of the rig, the
17 alarms, where the lifeboats were, where the
18 room was, where my room was, where the
19 galley was, general stuff. They had a
20 video of the orientation on the rig. And
21 then they discussed who my supervisor would
22 be and stuff and showed me to him and stuff
23 like that.

Page 64:04 to 64:18

00064:04 Q. And how long did that
05 orientation last, approximately?
06 A. A couple of hours. We watched
07 the video and went and ate and then
08 finished the rest of it. I don't know
09 exactly how long.
10 Q. Okay. All right. Now, do you

11 recall how many cranes were present on the
12 DEEPWATER HORIZON?
13 A. There are four.
14 Q. Okay. Would you just explain
15 for the record where those are located?
16 A. You have a starboard and a port
17 crane and you have one on the bow and one
18 on the aft.

Page 64:25 to 67:02

00064:25 Q. At the time of your arrival
00065:01 onboard, were all four of those cranes
02 operational?
03 A. Yes.
04 Q. And were there -- were any of
05 the cranes in need of repair as far as you
06 knew?
07 MR. GATEWOOD:
08 Objection, form.
09 A. Needed repair like how?
10 Q. Was there any maintenance that
11 needed to be constructed?
12 MR. GATEWOOD:
13 Objection, form.
14 A. At the time of arrival?
15 Q. Yeah.
16 A. No.
17 Q. Okay. While you were on the
18 DEEPWATER HORIZON, was there any
19 maintenance that needed to be conducted?
20 A. Yes.
21 Q. Okay. And what was that?
22 A. The starboard crane, the boom
23 cable needed to be changed out. And on the
24 port crane, they had a small fire and had
25 to take care of that.
00066:01 Q. Was that -- did that occur while
02 you were working on the crane?
03 A. No.
04 Q. Do you know what -- what day
05 that took place on?
06 A. No, I do not.
07 Q. And you mentioned the starboard
08 crane needed service on the boom cable?
09 A. Yes.
10 Q. Okay. Do you know when that
11 took place?
12 A. It started, like, the second day
13 I was there, I believe.
14 Q. Was it completed?
15 A. The night of the explosion.
16 Q. How did -- was it completed
17 while you were on shift?
18 A. No.

19 Q. How did you become aware that it
20 was completed?
21 A. After we got on the BANKSTON.
22 Q. Okay. Who told you that?
23 A. I don't remember.
24 Q. What was the status of the
25 repair on the starboard crane while you
00067:01 were on shift on April 20th?
02 A. They were working on it.

Page 69:24 to 70:03

00069:24 Q. Are you aware -- you're aware
25 that the rig activities, including crane
00070:01 operation, can affect the ability of the
02 mudloggers and the driller to view the
03 levels of the mud in the pits?

Page 70:06 to 70:09

00070:06 A. Yes.
07 Q. And in fact, if the crane is
08 operating, it can make it more difficult to
09 monitor the mud in the pits?

Page 70:12 to 70:16

00070:12 A. Yes.
13 Q. And that's because the crane
14 movement can shift the weight on the rig,
15 and that -- that causes the mud in the pits
16 to roll?

Page 70:19 to 70:25

00070:19 A. Yes.
20 Q. Are you aware of any of the --
21 any Transocean policy regarding periods of
22 time when the -- when a crane use must
23 cease due to other operations that are
24 going on?
25 A. On that rig, no.

Page 72:15 to 72:18

00072:15 Q. Was there any ongoing
16 coordination between the crew that was
17 working the cranes and, for instance,
18 members of the drilling team?

Page 72:21 to 72:23

00072:21 A. Not on my end.
22 Q. Okay. How about with the
23 mudloggers?

Page 73:01 to 73:23

00073:01 A. Not on my end.
02 Q. Okay. When you say not on your
03 end, is there someone else who would be
04 coordinating?
05 A. Yes.
06 Q. Okay. Who would that be?
07 A. The other crane operator or the
08 deck pusher.
09 Q. Okay. And then do you -- do you
10 have knowledge of what that process is
11 like?
12 A. Yes.
13 Q. Can you just kind of explain to
14 me how that works?
15 A. If -- if there's a problem with
16 the flow or whatever, the -- either --
17 somebody on the drill floor would call the
18 crane that's running or they would call the
19 deck pusher and the deck pusher would call
20 the crane. That's basically -- and they
21 just tell you, hey, I have a problem. Stop
22 the operation. You need to stop the crane
23 right where it's at.

Page 74:08 to 75:01

00074:08 Q. And so if I understand
09 correctly, someone else other than the
10 crane operator actually makes the decision
11 that crane -- crane operation needs to
12 cease; is that correct?
13 A. In what fashion?
14 Q. Like someone would call you and
15 tell you, you need to stop, you don't
16 specifically make that decision? That's
17 not your decision to make, is that -- do I
18 understand that correctly?
19 A. In well operations; is that what
20 you're talking about?
21 Q. Right.
22 A. Yes.
23 Q. Someone else calls you up and
24 says, Mr. Breland, I need you to stop using
25 the crane?
00075:01 A. Yes.

Page 77:03 to 77:12

00077:03 Q. You don't recall any -- any rule
04 that said the crane has to stop when
05 we -- when we perform certain well
06 operations?

07 A. That right there is rig
08 specific.

09 Q. With respect to the DEEPWATER
10 HORIZON, do you remember any rule of that
11 nature?

12 A. No.

Page 79:08 to 79:12

00079:08 Q. And if -- and if the mudloggers
09 were -- or the driller were monitoring the
10 mud pits, crane operation wouldn't cease
11 unless somebody specifically told you to
12 stop?

Page 79:15 to 79:20

00079:15 A. Yes.

16 Q. And are you aware of any points
17 specifically on April 20th when crane
18 operations were -- were shut down because
19 of other things that were going on on the
20 well?

Page 79:23 to 79:23

00079:23 A. No.

Page 80:15 to 80:21

00080:15 Q. You mentioned backloading --
16 continuing to backloading materials to the
17 BANKSTON and finishing up with the boom
18 cable. Those were the two activities that
19 you knew would be -- would be occurring on
20 the evening of April 20th, correct?

21 A. Yes.

Page 83:17 to 84:02

00083:17 Q. Now, in the time that you were
18 on the DEEPWATER HORIZON, did you become
19 aware of any well control problems the crew
20 was experiencing?

21 A. Yes.

22 Q. Okay. And -- and what was that?

23 A. Mud weight going up and down.

24 Q. And was -- as far as you know,
25 was that happening around the time that you
00084:01 came on to the -- to the DEEPWATER HORIZON?
02 A. Yes.

Page 84:16 to 84:19

00084:16 Q. All right. Did you feel any
17 pressure while you were on the DEEPWATER
18 HORIZON to speed up operations because the
19 well was behind schedule?

Page 84:22 to 84:24

00084:22 A. No.
23 Q. Did you hear anything about
24 needing to -- to speed up because of that?

Page 85:02 to 86:02

00085:02 A. No.
03 Q. All right. In the time that you
04 were on the DEEPWATER HORIZON, did you
05 notice any activities by Transocean that
06 you felt was unsafe?
07 MR. GATEWOOD:
08 Objection, form.
09 A. No.
10 Q. And while you were on the
11 DEEPWATER HORIZON, did you notice any
12 activities on the part of BP that you felt
13 were unsafe?
14 A. No.
15 Q. Okay. As far as you're aware,
16 was -- did anyone else that you worked with
17 have any concerns about the way that
18 Transocean or BP was conducting operations
19 on the rig?
20 MR. GATEWOOD:
21 Objection, form.
22 A. No.
23 Q. Did you ever feel at anytime
24 that you were being asked to cut corners?
25 MR. GATEWOOD:
00086:01 Objection, form.
02 A. No.

Page 88:09 to 90:18

00088:09 Q. Did you ever work on a rig where
10 Don Vidrine was the company man --
11 A. Yes.
12 Q. -- other than the DEEPWATER

13 HORIZON?
14 Is that the MARIANAS?
15 A. Yes.
16 Q. How long did you work with Don
17 Vidrine?
18 A. I don't remember.
19 Q. Do you think Don Vidrine is a
20 good company man?
21 A. Do I think?
22 Q. Yeah.
23 A. No.
24 Q. No?
25 A. (Moves head side to side.)
00089:01 Q. Why not?
02 A. Just couldn't make decisions, in
03 my opinion.
04 Q. Is that based on your experience
05 on the MARIANAS?
06 A. Yes.
07 Q. Did you ever report to anyone at
08 Transocean that you didn't think the
09 company man could make decisions?
10 A. No.
11 Q. Did you report to anybody at
12 Transocean that you didn't think you had a
13 good company man on the MARIANAS when Don
14 Vidrine was there?
15 A. No.
16 Q. Did you ever tell anybody that
17 you didn't think Don Vidrine was a good
18 company man?
19 A. Yes.
20 Q. Other than me sitting here
21 today?
22 A. No.
23 Q. Did you think Don Vidrine
24 operated the MARIANAS safely when he was
25 the company man on there?
00090:01 A. I really don't know.
02 Q. You agree that everybody on the
03 rig has stop-the-job authority?
04 A. Yes.
05 Q. And that if you feel that
06 there's any situation where it's not --
07 safe operations aren't taking place, you
08 have the obligation to stop those
09 activities?
10 A. Yes.
11 Q. Do you agree with me that if you
12 felt that Don Vidrine wasn't operating the
13 rig safely, you would have had the
14 obligation to stop the activities on that
15 rig and make sure it was fixed?
16 A. Yes.
17 Q. Did you do that?

18 A. No.

Page 93:14 to 94:01

00093:14 Q. How did you know what the
15 activities were going to be during each --
16 each of your tours?
17 A. Pre-tour meeting and the pre-job
18 meetings.
19 Q. And who attended the pre-tour
20 meetings?
21 A. Everybody that was on tour at
22 that point.
23 Q. And who attended the pre-job
24 meetings?
25 A. Whoever was working in the job
00094:01 at that point.

Page 94:13 to 94:22

00094:13 And you started your career
14 shortly after a short stint as a seaman as
15 a roustabout, right?
16 A. Yes.
17 Q. Do roustabouts have any
18 responsibilities for well control?
19 A. No.
20 Q. Do crane operators have any
21 responsibilities for well control?
22 A. No.

Page 95:01 to 95:17

00095:01 Q. Can you turn to Tab 3? Bates
02 Number TRN-MDL-00767397.
03 Mr. Breland, have you ever
04 seen this document before?
05 A. No.
06 Q. Have you seen a document similar
07 to this before?
08 A. Yes.
09 Q. And when would you have seen
10 documents similar to this in your -- in
11 your work at Transocean?
12 A. Anytime that you're doing a job
13 and it has a TSTP, then you would pull it
14 out and overview it.
15 Q. And TSTP is task specific think
16 procedure?
17 A. Yes.

Page 96:12 to 96:14

00096:12 Q. Do you know if there's TSTPs for
13 drilling operations generally?
14 A. I believe so.

Page 96:19 to 96:22

00096:19 Q. Would you expect there to be a
20 TSTP for drilling operations during
21 negative-pressure test?
22 A. Yes.

Page 97:06 to 98:05

00097:06 Q. And the TSTPs are Transocean
07 documents, correct?
08 A. Yes.
09 Q. And what's the purpose of a
10 TSTP?
11 A. To help you identify hazards and
12 to follow the steps that -- in the order
13 that they need to be done and, you know, to
14 keep everybody safe, no harm to people, and
15 to keep from tearing up the equipment.
16 Q. It's a part of Transocean's
17 safety procedures?
18 A. Yes.
19 Q. And if you follow a TSTP, you --
20 you reduce the chance of an injury?
21 A. Yes.
22 Q. You reduce the chance of harm to
23 the environment?
24 A. Yes.
25 Q. And you reduce the risk of the
00098:01 operation that you're doing?
02 A. Yes.
03 Q. We'll mark that as the next
04 Exhibit, 2338.
05 (Exhibit Number 2338 marked.)

Page 105:19 to 105:22

00105:19 Q. You agree with me that it's
20 important to circulate lessons learned
21 across geographic areas?
22 A. Yes.

Page 105:25 to 106:03

00105:25 Q. You agree with me that it's
00106:01 important to improve your safety to
02 understand problems that other people on
03 other rigs have had?

Page 106:06 to 106:06

00106:06 A. Yes.

Page 107:07 to 107:10

00107:07 Q. Were you ever at anytime made
08 aware of a well control event in the North
09 Sea that occurred in December 2009?
10 A. No.

Page 107:24 to 108:01

00107:24 Q. Are you trained on Transocean's
25 emergency response procedures?
00108:01 A. No.

Page 108:11 to 110:05

00108:11 Q. But you understood that you had
12 firefighting responsibilities on the
13 DEEPWATER HORIZON, right?
14 A. Yes.
15 Q. And how did you -- how did you
16 learn that you had firefighting
17 responsibilities?
18 A. It's under Transocean's policy
19 and stuff. Depending on how the -- the
20 rigs are set up on who does it and when you
21 get on each rig, they tell you if you're on
22 the fire team or not. 'Cause some rigs,
23 the roustabouts aren't, they're on
24 emergency backup. Some rigs, they are part
25 of the fire team.
00109:01 Q. So when -- when did you learn
02 that you were part of the fire team on the
03 DEEPWATER HORIZON?
04 A. During the orientation.
05 Q. And do you remember who told you
06 you were part of the fire team to the
07 DEEPWATER HORIZON?
08 A. I looked up the -- the station
09 bill.
10 Q. So nobody told you it was -- it
11 was listed on a piece of paper?
12 A. Yes.
13 Q. Okay. As a member of the fire
14 team, did anybody tell you where
15 firefighting gear was located?
16 A. Yes.
17 Q. Who told you where the
18 firefighting gear was located?
19 A. The crane operator that walked

20 me around when I first came on tour.
21 Q. Do you remember who that was?
22 A. Dale.
23 Q. Dale.
24 One other thing about that
25 orientation, you said that they -- that
00110:01 they discussed alarms during that
02 orientation.
03 Do you remember that
04 testimony this morning?
05 A. Yes.

Page 111:21 to 113:10

00111:21 Q. Turn to Tab 13, please. It's
22 Bates Number TRN-HCJ-00088898 through
23 88921. Mark it as Exhibit 2342.
24 (Exhibit Number 2342 marked.)
25 Q. Mr. Breland, did you participate
00112:01 in a safety drill on April 17th, 2010,
02 onboard the DEEPWATER HORIZON?
03 A. Yes.
04 Q. And during that safety drill,
05 did the signal sound for abandonment on
06 vessel's whistle on PAGA?
07 A. Yes.
08 Q. And did you muster at the
09 primary muster station?
10 A. Yes.
11 Q. And do you recall if the
12 lifeboats were lowered during that safety
13 drill onboard the DEEPWATER HORIZON on
14 April 17th, 2010?
15 A. No, they weren't.
16 Q. And why do you recall that they
17 were not lowered on that safety drill on
18 the DEEPWATER HORIZON on April 17th, 2010?
19 A. 'Cause they just weren't.
20 Q. Did that surprise you that they
21 weren't lowered?
22 A. No.
23 Q. Are lifeboats normally lowered
24 during safety drills like this on your
25 other rigs that you worked on?
00113:01 A. No.
02 Q. About how long did that drill
03 last?
04 A. Maybe an hour. I can't really
05 recall.
06 Q. Did -- as you sit here today, do
07 you think that that abandon rig drill
08 prepared you for the evacuation on the
09 evening of the casualty and explosion?
10 A. Yes.

Page 121:19 to 122:05

00121:19 Q. Did you ever feel that if you
 20 reported an incident, there would be some
 21 reprisal against you as an individual?
 22 MR. GATEWOOD:
 23 Objection, form.
 24 A. No.
 25 Q. Did you ever feel that if you
 00122:01 reported a near hit, there would be some
 02 reprisal against you?
 03 MR. GATEWOOD:
 04 Objection, form.
 05 A. Nope.

Page 127:23 to 128:17

00127:23 Q. Who's in charge of the DEEPWATER
 24 HORIZON while it's drilling?
 25 A. The OIM.
 00128:01 Q. Who's in charge of the DEEPWATER
 02 HORIZON while it's underway?
 03 A. Captain.
 04 Q. Who's in charge of the DEEPWATER
 05 HORIZON during an emergency situation?
 06 MR. GATEWOOD:
 07 Objection, form.
 08 A. I don't know that one.
 09 Q. Anybody tell you either before
 10 or after you were aboard the DEEPWATER
 11 HORIZON on April 16th, 2010, that there was
 12 confusion onboard the DEEPWATER HORIZON
 13 during the emergency about who was in
 14 charge?
 15 MR. GATEWOOD:
 16 Objection, form.
 17 A. No.

Page 136:16 to 140:06

00136:16 Q. What does it mean for the -- for
 17 the crane to be coming out of the pedestal?
 18 A. Okay. When you set the -- out
 19 of the pedestal, well, you're on the
 20 pedestal. That's what the crane sits on.
 21 Q. Okay.
 22 A. So I don't know what you mean by
 23 out of the pedestal.
 24 Q. Is it -- is there a crane
 25 operation that you can engage in that --
 00137:01 that involves moving the crane out of
 02 pedestal or --
 03 A. Out of the boom rack.

04 Q. Okay.
05 A. Yeah. It's -- when the -- the
06 crane boom is horizontal, it lays in a rack
07 to rest, to keep tension off the cables, to
08 keep -- and all you do is you boom up out
09 of it.
10 Q. So when you're done with
11 operations for a day, for a period of time,
12 you will put the -- put the -- put it back
13 in the cradle?
14 A. Yes.
15 Q. Put the boom back in the cradle?
16 A. Yes.
17 Q. So when you're going to engage
18 in the next set of operations, you'll have
19 to bring the boom out of the cradle to then
20 move it to engage in those operations?
21 A. Yes.
22 Q. When -- when it comes out of the
23 boom cradle, does that cause movement on
24 the rig?
25 A. It would shift the weight from
00138:01 aft to forward a little bit depending on
02 how high you boom up.
03 Q. Okay. And how large are the --
04 these cranes, the starboard and port
05 cranes?
06 A. They're pretty big. I think --
07 I think they had 160-foot boom.
08 Q. Any idea of the approximate
09 weight?
10 A. No. I don't know the weight of
11 it, no.
12 Q. And how does that compare to the
13 aft and bow cranes in terms of size?
14 A. The bow crane is tiny. It's
15 small. It's like sitting in this chair
16 with a wall around it.
17 Q. So the movement of that crane
18 wouldn't necessarily impact the rig --
19 A. No.
20 Q. -- or the fluid levels in the
21 pits?
22 A. Now the aft one, yes. The aft
23 one would change it big time. It --
24 Q. How large is that aft crane?
25 A. It runs at least 75 foot long
00139:01 and it runs on rails, the full 75 feet. It
02 runs from port to starboard on rails. And
03 it's got to be a bridge over it with two
04 hooks that it travels.
05 Q. So the crane itself can travel
06 from -- from starboard to port on the rig
07 to engage in operations?
08 A. Yes.

09 Q. Any sense of the -- the size of
10 that crane compared to the starboard and
11 port cranes?

12 A. Probably close, not as -- maybe
13 not as heavy, but the impact is a little
14 bit worse.

15 Q. And you said that -- that it
16 would have -- I think your words were a big
17 time impact when it moves.

18 Why do you say that?

19 A. Because it travels all -- from
20 all the way starboard to all the way port.
21 It travels the whole length of the rig, and
22 all the weight can shift from one side of
23 the rig to the next.

24 Q. When you were talking about the
25 crane movement having an affect on the rig
00140:01 and the sway, have you had conversations
02 with employees over the course of your 14
03 years with Transocean about the influence
04 of the crane movement on the -- monitoring
05 the well?

06 A. Yes.

Page 140:09 to 140:11

00140:09 Q. What sort of conversations have
10 you had -- had about the impact of crane
11 movement on well monitoring?

Page 140:14 to 140:19

00140:14 A. They'll just -- they'll call you
15 up and say, hey, look, we're having some
16 trouble monitoring the well or whatever.
17 Stop the operation. And if -- if I have a
18 load, then I'll tell them, well, let me set
19 the load down, then I'll stop.

Page 141:08 to 142:04

00141:08 Q. Mr. Keegan asked you about prior
09 experience with -- with Mr. Vidrine. I
10 think you said that you did not view him as
11 a good company man because he was unable to
12 make decisions. Do you remember that?

13 A. Yes.

14 Q. What sort of decisions were you
15 referring to?

16 A. When -- when I was on the
17 MARIANAS, we would have a plan in -- in the
18 pre-tour then we'd go out, they'd change
19 the plan a couple of times before we could

20 really get started. That type of thing.
21 Q. Was that a one-time event or a
22 common occurrence with Mr. Vidrine?
23 A. No, it -- it happened a couple
24 of times.
25 Q. Do you know what sort of
00142:01 operations that occurred in?
02 A. Picking up BHA.
03 Q. Bottomhole assembly?
04 A. Yes.

Page 142:11 to 145:07

00142:11 Q. Do you recall any of those sorts
12 of issues with -- with negative-pressure
13 test procedures?
14 A. No.
15 Q. Do you recall that occurring in
16 a temporary abandonment procedure?
17 A. No.
18 Q. Are you familiar with
19 Transocean's timeout for safety policy?
20 A. Yes.
21 Q. Can you describe what -- your
22 understanding of that policy?
23 A. If you see an unsafe act, an
24 unsafe operation, anything unsafe or, you
25 know, something out of place, it don't even
00143:01 have to be unsafe, you may not understand
02 what's going on, call timeout, ask what's
03 going on or say, hey, you know, this is
04 wrong or you need to change this, you know.
05 It don't have to be just a safe -- you may
06 not understand what you're -- what's going
07 on and you stop the job.
08 Q. Is that something you've
09 exercised?
10 A. Yes.
11 Q. How often would you say you've
12 done that?
13 A. I've done it a couple of times.
14 Q. Have you done that on any BP
15 rigs?
16 A. I did one on the HORIZON.
17 Q. In the -- the April 16th to
18 April 20th time frame?
19 A. Yes.
20 Q. What caused you to exercise
21 that?
22 A. We started to change out on the
23 boom cable the first time and we had
24 already lowered the boom cable, deadman, to
25 the ground. They already had the welder
00144:01 cut it off. We had applied the snake to
02 the old cable and the new cable that was on

03 the wooden spool on the rack. We started
04 to spool up the new cable. When the end --
05 the new deadman turned, I look at the new
06 deadman versus the old deadman and saw that
07 they didn't match so I took a timeout for
08 safety because that pushes down. The whole
09 job shut down, 'cause it wasn't the right
10 cable.
11 Q. How long was the job shut down?
12 A. Two or three days. To get
13 another cable out there.
14 Q. This is when they end -- end up
15 fixing the cable on the 20th?
16 A. Yes.
17 Q. Was that the 16th or the 17th
18 that you exercised that timeout for safety?
19 A. I don't remember. I don't
20 remember.
21 Q. Pretty soon after you got on the
22 rig?
23 A. Yeah.
24 Q. Who did you communicate that to
25 when you stopped the work?
00145:01 A. Micah, the other crane operator.
02 Q. Mr. Sandell?
03 A. Yeah. Him and Dale worked over
04 that night because I've never changed one
05 on that rig, and I think they said the
06 other crane operator hadn't. So they
07 wanted some experience in it.

Page 153:18 to 153:22

00153:18 Q. Did you ever communicate with
19 anybody at MOEX about the Macondo well?
20 A. No.
21 Q. Do you know who MOEX is?
22 A. No.

Page 154:04 to 154:07

00154:04 Q. Do you know if anybody at
05 Transocean was communicating with MOEX
06 about the Macondo well?
07 A. No.

Page 154:12 to 154:15

00154:12 Q. Do you have any knowledge about
13 any communications between MOEX and BP
14 prior to the incident of April 20th --
15 A. No.

Page 155:09 to 160:25

00155:09 Q. On the night of April 20th, you
10 said that you were in bed when you heard
11 the first explosion?
12 A. Yes.
13 Q. Were you asleep or were you
14 awake?
15 A. I was awake when the first one
16 went off.
17 Q. Were you still lying down in
18 your bed?
19 A. No.
20 Q. Where were you exactly?
21 A. I was kind of sitting up in the
22 bed.
23 Q. Did you have both of your legs
24 in the bed?
25 A. No. One leg was on the step.
00156:01 Q. When you say on the step, was it
02 a staircase or a ladder?
03 A. A ladder.
04 Q. When you first -- first heard
05 that -- that noise, what did you think it
06 was?
07 A. Either the crane boom falling or
08 jar's setting off in the well.
09 Q. And if -- if one of those things
10 had happened, what would you have to do in
11 response?
12 A. Nothing.
13 Q. So what did you do after you
14 heard that noise?
15 A. Continued to get down out of the
16 bed.
17 Q. And what's the next thing you
18 remember happening?
19 A. The second explosion.
20 Q. Was the second explosion bigger
21 than the first?
22 A. Yes.
23 Q. Was it louder or softer?
24 A. Louder.
25 Q. How much louder?
00157:01 A. Five, ten times. I mean, it was
02 pretty --
03 Q. Had you got down to the floor by
04 the time the second explosion had occurred?
05 A. Yes.
06 Q. Had you just landed on the floor
07 or you'd been down there for a second?
08 A. I just landed.
09 Q. About how many seconds would you
10 say went by between the first explosion and
11 the second explosion?

12 A. Maybe ten seconds, maybe less
13 than that.
14 Q. When you heard the second
15 explosion, what did you think that was?
16 A. I didn't know.
17 Q. Did you have any cause for
18 concern at that point in time?
19 A. Yeah.
20 Q. Why is that?
21 A. Because right after it happened,
22 the fire alarm went off.
23 Q. How did you recognize it to be
24 the fire alarm?
25 A. By the continuous short beeps on
00158:01 the horn, the fire alarm.
02 Q. Did you -- did you hear anything
03 else when the alarm went off?
04 A. Yeah. Over the PA it said this
05 is not a drill, this is not a drill. Fire
06 on the rig.
07 Q. And what did you do when you
08 heard that?
09 A. I opened my door and grabbed my
10 clothes bag, put on my coveralls and my
11 tennis shoes.
12 Q. Where were you headed?
13 A. To the fire station.
14 Q. Why is that?
15 A. 'Cause that's my job, to fight
16 the fire.
17 Q. Did you expect, at that time,
18 that you would be back to your room at some
19 point?
20 A. Yes.
21 Q. About how many seconds after you
22 first heard the fire alarm did you hear
23 something different?
24 A. Maybe 10, 15 seconds. Maybe 30.
25 I don't know exactly how long. The abandon
00159:01 rig alarm went off and over the PA it was
02 telling you to abandon the rig.
03 Q. When you heard the abandon alarm
04 go off, had you got out of your room yet?
05 A. Halfway.
06 Q. So you'd not got fully out of
07 your room?
08 A. No.
09 Q. From the time that you were in
10 your bed and heard the first explosion to
11 the time that you heard the abandon alarm,
12 about how many seconds would you say went
13 by?
14 A. 30 seconds to a minute, you
15 know.
16 Q. Less than a minute?

17 A. Yes.
18 Q. When you're operating the
19 cranes, is it Transocean's policy that the
20 driller could contact the -- the crane
21 operator at anytime to stop the -- the
22 crane operation?
23 A. I don't know about policy, but
24 they do.
25 Q. Anytime the -- the driller may
00160:01 suspect that the cranes need to be shut
02 down, they contact the crane operator?
03 A. Yes.
04 Q. The same would be true for the
05 deck pusher, anytime the deck pusher
06 believes the cranes needs to be shut down
07 for whatever reason, they can contact the
08 crane operator and tell them to stop
09 operating the cranes?
10 A. Yes.
11 Q. And is it your experience that
12 the driller has contacted you before to
13 tell you to stop operating the cranes?
14 A. Yes.
15 Q. For any particular reason?
16 A. The time that happened to me was
17 they were trying to get a pit volume and we
18 were screwing up the pit volume so we had
19 to stop.
20 Q. And the deck pusher before has
21 contacted you to tell you to stop operating
22 the cranes?
23 A. Yes.
24 Q. Frequently?
25 A. Yeah.