

Deposition Testimony of:

Gillian Cowlam

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Page 8:05 to 8:07

00008:05 GILLIAN SUSAN COWLAM
06 was called as a witness by the Plaintiffs and, being
07 first duly sworn, testified as follows:

Page 8:10 to 8:16

00008:10 Q. Good morning, Ms. Cowlam. My name is Ronnie
11 Penton, and I am here on behalf of the PSC in this
12 litigation. We're here today to take what's called a
13 deposition, and that deposition, very simply, is sworn
14 testimony that you will give after you've just given
15 your oath.
16 A. (Nodding.)

Page 11:04 to 12:10

00011:04 Q. Okay. And what is your education?
05 A. I -- I did a -- a BSC Honors in Chemical
06 Engineering at UMIST, which is in Manchester.
07 Q. Okay. And what year was that?
08 A. I graduated in 1984.
09 Q. All right. And is that a -- a -- a four-year
10 degree, or how many years did it take?
11 A. It's three years.
12 Q. It's three years?
13 A. Yeah.
14 Q. And did you come out with a license or
15 certificate or diploma? Exactly how is it done in the
16 U.K.?
17 A. So in the U.K., I graduated with a Bachelor's
18 degree and Upper Second Class, and so that's -- that's
19 the end of your formal education.
20 And then we have a system similar to the
21 Professional Engineering System with our Engineering
22 institutions, and so in 1990 I became a Chartered
23 Engineer.
24 Q. A Chartered Engineer?
25 A. Yes.
00012:01 Q. Okay.
02 A. Which is a bit like a Professional Engineer in
03 the U.S.
04 Q. I understand. You're recognized by a
05 professional society as being someone registered and
06 qualified with them, correct?
07 A. Yeah. The Chartered Engineering status is
08 basically confirming that you have the ability to apply
09 your knowledge of what you've learned academically, in
10 the workplace.

Page 12:17 to 13:17

00012:17 Q. And what did you do after 1984?
 18 A. I joined the British Oxygen Company as a --
 19 BOC, British Oxygen Company --
 20 Q. Okay.
 21 A. -- as a Chemical Engineer.
 22 Q. All right. What did you do for them?
 23 A. I worked in a -- in a Process Engineering
 24 Department, and I was doing both some Engineering
 25 design and mostly the commissioning of air separation
 00013:01 units.
 02 Q. Okay. All right. How long did you stay with
 03 BOC?
 04 A. I stayed with them just over four years.
 05 Q. Okay. And you left that employment for
 06 another Chemical Engineering job?
 07 A. Yes.
 08 Q. And so around 19, what, '88, '89?
 09 A. '88.
 10 Q. Okay. Who did you go to then?
 11 A. I went to work for Courtaulds Research.
 12 Q. Could you spell that?
 13 A. C-o-u-r-t-a-u-l-d-s.
 14 Q. Okay. And what did you do for them?
 15 A. Again, I -- I worked in a Process Engineering
 16 Department, but we also did some process safety-type
 17 work, so it was doing some quantified risk analysis.

Page 14:10 to 16:16

00014:10 So where did you go next?
 11 A. So I went -- I actually formed my own limited
 12 company, and I went as a contractor, working for
 13 Britoil in the North Sea.
 14 Q. And -- and what year would that have been?
 15 A. That would have been the start of '89.
 16 Q. '89?
 17 A. Yeah.
 18 Q. Okay. What did you do for them?
 19 A. So I spent a long -- nearly a year doing the
 20 evaluation of high pressure/low pressure interfaces.
 21 So following on from some incidents that happened
 22 earlier in the '80s when BP acquired the Britoil
 23 assets, they applied these studies, and that's what I
 24 was doing.
 25 Q. Okay. And do you recall what year that BP
 00015:01 acquired this company?
 02 A. No, I don't.
 03 Q. The work that you did were forcil -- for --
 04 facilities that were in the North Sea --
 05 A. Yes.
 06 Q. -- or on land?
 07 A. In the North Sea.
 08 Q. Were they compressor stations? Were they
 09 storage facilities? What were they?
 10 A. So they were oil -- so the main facility I

11 worked on was Thistle, is predominantly an oil
12 producing facility, with some gas.
13 Q. Okay. So it was a producing well?
14 A. A producing asset.
15 Q. Okay. And so you did the -- the pressure work
16 on -- on that, correct?
17 A. So -- so I looked at where they had high
18 pressure to low pressure interfaces and looked at the
19 adequacy of the protection that was provided.
20 Q. These were on stationary platforms?
21 A. Yes. It's a fixed -- so it's a --
22 Q. Yes.
23 A. -- fixed steel jacket, yes.
24 Q. Okay. And how long did you do that?
25 A. So that was nearly a year.
00016:01 Q. A year. Okay. So till about 1990?
02 A. Nine -- so to the end of '89.
03 Q. All right.
04 A. End of '88. Sorry.
05 Q. All right. Well, I thought you went to the
06 North Sea in '89.
07 A. Yes. Sorry. I'm getting my years confused.
08 Q. No problem.
09 A. That's a little while ago. So I went -- yes.
10 So it was --
11 Q. Okay.
12 A. -- so from the end of '89.
13 Q. Good. So what was your next job?
14 A. So then I went over to work with -- to --
15 for -- for BP, working in the Technical Safety
16 Department, again as a contractor.

Page 16:21 to 16:25

00016:21 Q. And what -- as a contractor in what division
22 or department --
23 A. So I was in --
24 Q. -- of BP?
25 A. So I was in the Technical Safety Department.

Page 17:03 to 19:22

00017:03 Q. What did -- what did that mean to that job --
04 A. So --
05 Q. -- Technical Safety?
06 A. Technical Safety is probably what these days
07 you would call "Process Safety."
08 Q. Process Safety, okay.
09 Now, was there a BP Process Safety Department?
10 A. There was a BP Technical Safety Department.
11 Q. Technical Safety, which included Process
12 Safety?
13 A. Looking back with the term that we call
14 "Process Safety" now, yes, but it wasn't a recognized

15 term in the U.K. at that time.
16 Q. Okay. What other specialties were in this
17 Technical Safety Department?
18 A. So we had fire engineers, so people who
19 understand fire and gas, and then people who did
20 quantified risk analysis.
21 Q. Okay. The work that you did in -- in this
22 capacity, did it involve land-based facilities or
23 offshore facilities?
24 A. Offshore facilities --
25 Q. Okay.
00018:01 A. -- and land-based facilities.
02 Q. And. Okay. And facilities as opposed to
03 vessels?
04 A. Yes, facilities. So the work that I did there
05 was either on offshore installations, or I also did
06 some work for a rail terminal.
07 Q. Okay. No vessel work?
08 A. No vessel work.
09 Q. No mobile offshore --
10 A. No.
11 Q. -- drilling units of any kind, no --
12 A. No.
13 Q. -- jack-up rigs?
14 A. No.
15 Q. Facilities fixed to the seabed?
16 A. Correct.
17 Q. All right. And so what type of -- would you
18 say that you were in Process Safety in this job?
19 A. I would.
20 Q. Okay. All right. And was there a Process
21 Safety Engineer who headed that department?
22 A. At that time, because Process Safety wasn't a
23 recognized discipline, it was a Chemical Engineer who
24 led that department.
25 Q. I understand. When did Process Safety become
00019:01 recognized as a separate Engineering subspecialty?
02 A. I would say that -- so we have had --
03 Technical Safety kind of grew in the North Sea, sort of
04 following Piper Alpha. So prior to Piper Alpha, it was
05 very much an embryonic discipline, and then post Piper
06 Alpha, with the requirement in the U.K. to produce
07 safety cases for all our installations, then Technical
08 Safety became a kind of recognized discipline in the
09 U.K.
10 Q. Okay.
11 A. The -- the switch to the term "Process Safety"
12 probably only occurred post Texas City. Up until then,
13 in the U.S. it had been called "Process Safety." In
14 the U.K. it had been called "Technical Safety."
15 Q. I understand. Did you do any work on the --
16 the Grangemouth, Scotland refinery, of any kind?
17 A. What kind of work?
18 Q. Any kind of work.
19 A. Not specifically, although I in -- in recent

20 times I have been involved in reviewing some of the
21 work that has been done there. But I haven't kind of
22 done the work myself.

Page 22:07 to 22:11

00022:07 Q. And so October of '90, you were a BP Chemical
08 Engineer?
09 A. Yes.
10 Q. What was your job that you hired into?
11 A. Technical Safety Engineer.

Page 23:25 to 24:15

00023:25 Q. Okay. And so in '95, what was your role?
00024:01 A. So in '95, I joined BP's North Sea Internal
02 Audit Department.
03 Q. All right. Say that, BP North Sea --
04 A. North Sea Internal Audit.
05 Q. -- Internal Audit?
06 A. Yes.
07 Q. Tell me what an Internal Audit Department is.
08 A. So what we were doing in that department, we
09 were doing a range of auditing activities for the
10 business. So some of that was project-related audits.
11 Some of it was looking at the business.
12 And the majority of what I did when I was
13 there was looking at how the different pieces of the
14 business were performing against our internal HSE
15 protocol.

Page 27:18 to 27:20

00027:18 Let me ask you: How long did you stay in the
19 Audit Department?
20 A. Four years.

Page 28:21 to 34:14

00028:21 Q. What job did you go into in '99?
22 A. So as a result of the merger, I moved into the
23 Process and Production Engineering for Thistle and
24 North West Hutton.
25 Q. Thistle and --
00029:01 A. And North West Hutton.
02 Q. -- North West Hutton.
03 What does that mean?
04 A. So Thistle is one of installations in the
05 North Sea. North West Hutton no longer is there, but
06 at that time was a producing asset in the -- in the
07 North Sea.
08 Q. Okay.
09 A. So both quite mature assets at that time.

10 Q. Okay. And so these were production
11 facilities --
12 A. Production off --
13 Q. -- offshore, correct?
14 A. -- offshore.
15 Q. And what was your role and responsibility with
16 respect to those two facilities?
17 A. So my role was as -- as basically as the
18 Process Engineer, so I was supporting them and have
19 a -- efficiently operated the facility, dealing with
20 any concerns about operating envelopes, how --
21 optimization, that kind of stuff.
22 Q. Okay. How long did you do that?
23 A. For just over a year.
24 Q. Okay. So what was your next job?
25 A. So then I went offshore, in the Southern Gas
00030:01 Sector as an OIM designate.
02 Q. What is an "OIM designate"?
03 A. So OIM is an Offshore Installation Manager.
04 Q. Yes.
05 A. And that's a role very specifically laid out
06 in U.K. legislation. And I had been offered the job --
07 the designate is basically an opportunity to go
08 offshore in the -- the role beneath the OIM to learn
09 the role.
10 Q. I understand. And then once you are there for
11 so long and can demonstrate that you can be a
12 licensed --
13 A. Yes.
14 Q. -- certified OIM, under U.K. law, then you can
15 become an OIM?
16 A. Yes.
17 Q. All right. How long did that take to get rid
18 of the designee status?
19 A. Less than six months.
20 Q. Okay. So then did you assume the job of OIM
21 on any production facilities, whether fixed or mobile?
22 A. So, yes. Then I became an OIM for 23 CHARLIE.
23 Q. 23 CHARLIE, what -- what is 23 CHARLIE?
24 A. 23 CHARLIE --
25 Q. Yes.
00031:01 A. -- was a small satellite platform --
02 Q. Yes.
03 A. -- in the Indefatigable Field in the --
04 Q. Say that again.
05 A. Indefatigable.
06 Q. Indefatigable?
07 A. Indefatigable. "Inde" is what we called it
08 for short.
09 Q. That's good.
10 THE COURT REPORTER: Good. Call it that.
11 Q. (By Mr. Penton) Inde. Okay.
12 A. Okay. So -- so it's a small satellite
13 platform --
14 Q. Yes.

15 A. -- in the Inde Field where we had 22 beds.
16 Predominantly we were using that for bed and breakfast
17 for the crew that went around all the other normally
18 unattend -- tended installations, and I was the OIM for
19 that facility.
20 Q. Okay. But it was a satellite production
21 facility, correct?
22 A. Yes, it's -- so -- so as well as being -- if
23 you like, providing the bed-and-breakfast facility, we
24 also had our own wells and our own producing facility.
25 Q. I see. And so how long did you function as an
00032:01 OIM?
02 A. On that facility, not very long. About four
03 months.
04 Q. Okay.
05 A. And I got promoted up to a larger facility,
06 which was the 27 Alpha which is in the Lemman Field --
07 Q. Okay.
08 A. -- which is a much -- which is a compression
09 facility. So it has both wells and quite a complicated
10 compression train, and had 10 normally unattended
11 facilities which fed back to it. So it's kind of like
12 the -- in the hub --
13 Q. Right.
14 A. -- of a wheel.
15 Q. Yeah. It was a compressor facility is what it
16 was?
17 A. Yeah. And we also had our own wells, as well.
18 Q. Okay. How long did you do that?
19 A. And so I did that until about August of 2003.
20 Q. All right. So in August of '03, where did you
21 go?
22 A. So in August '03, I came back onshore, and
23 I -- unfortunately, I -- I left Lemman because of a
24 medical issue, and I was off work for a couple of
25 months. And then when I came back, I came back into
00033:01 supply chain.
02 Q. And what does that mean, "supply chain"?
03 A. So it's procurement, supply chain management,
04 so it's the department that deals with contracts and
05 contractors.
06 Q. And what -- what -- what part of the business
07 was that in?
08 A. So that was back in the North Sea.
09 Q. Okay.
10 A. And it's the kind of main, if you like,
11 procurement department for the North Sea.
12 Q. So why do you go from Engineering to contract?
13 A. So within that department there was a desire
14 to bring in some people who, if you like, knew what the
15 shopping was like, to -- because wells had lots of
16 supply chain procurement professionals involved with
17 negotiating contracts and tenders and -- and all that
18 kind of general transaction stuff.
19 There was a desire that actually once the

20 contract had been placed, that we work with the
 21 contractors in terms of improving performance. So I
 22 was involved with a couple of contractors looking at
 23 how they -- how we could work together to improve their
 24 performance, not in part, in their safety performance,
 25 as well.

00034:01 Q. Okay. So you say "their safety performance."
 02 Engineering safety performance or --
 03 A. For --
 04 Q. -- operations safety performance?
 05 A. For -- for those particular contracts I was
 06 involved with, it was more about what you might call
 07 occupational safety.
 08 Q. Was this all in connection with the offshore
 09 business only?
 10 A. Well, given that the North Sea at that time
 11 encompassed both offshore and onshore --
 12 Q. Yes.
 13 A. -- it would have covered the whole area, but
 14 predominantly offshore related.

Page 35:23 to 36:09

00035:23 Q. So your next job in '04 was what?
 24 A. So kind of building on the -- the supply
 25 chain, we had changed our engineering contractor in the
 00036:01 North Sea. We -- we had two and we had changed one of
 02 them. And one of our assets had a major project
 03 ongoing, which was with the engineering contractor that
 04 we were not going to use any -- any further. So I went
 05 up into that asset to help work with the engineering
 06 contractor through the end of their contract to make
 07 sure that we -- we didn't have any loss of performance,
 08 so I was the Contract Transition Manager is what they
 09 called it.

Page 36:23 to 37:15

00036:23 Q. Okay. And your next job?
 24 A. So then I took -- so within that asset, I then
 25 took over as the Engineering Team Leader for that
 00037:01 asset, which was Bruce.
 02 Q. Was what?
 03 A. Bruce. It's the Bruce Asset. So -- so --
 04 Q. The Bruce. What is the Bruce Asset?
 05 A. Bruce Asset is a -- is now -- is a
 06 three-jacket gas -- it's a gas condensate field. It
 07 has both production and drilling facilities.
 08 Q. Okay. Both drilling and -- is that the first
 09 time you've been involved in drilling?
 10 A. I wasn't involved in drilling per se, because
 11 at that time, they were actually upgrading the drilling
 12 facilities. So I was involved in more of the
 13 Engineering of how we managed the modifications that

14 they wanted to make to the drilling facility to make it
15 current.

Page 39:01 to 40:15

00039:01 Q. All right. How long did you stay in that role
02 with the Bruce Asset?
03 A. Tu-tu-tu-tu. Wow, we're going back. That
04 would be probably until late '07.
05 Q. Okay. So during this period of time in your
06 employment with BP, Texas City occurred, did it not?
07 A. It did.
08 Q. All right. Of course you weren't involved in
09 that, correct?
10 A. No.
11 Q. Know nothing about it other than what you've
12 read, I guess?
13 A. Know -- know nothing really other than -- than
14 what I've been exposed to, yes.
15 Q. Okay. Well, tell me, what I need to know is
16 after the Texas City event, was the -- the
17 investigations, the findings of the various agencies
18 and -- and groups who studied the Texas City event,
19 were they communicated to the part of BP that you work
20 for, at that time the Bruce Asset, and the Engineering
21 Team?
22 A. So I think what you're saying is, did I --
23 did -- did I receive information about what happened at
24 Texas City --
25 Q. Yes.
00040:01 A. -- that was relevant --
02 Q. Officially.
03 A. Officially?
04 Q. Yes.
05 A. So what we had was a number of activities that
06 were mandated that we had to do in order to kind of
07 address some of the recommendations from Texas City
08 called the Six Point Plan.
09 Q. Okay.
10 A. And some of that was around occupied
11 buildings, so you -- so we -- we need to be really
12 clear about what buildings are occupied, whether
13 they're permanent or temporary, and have a register,
14 have a -- undertake risk assessment for them, and we
15 did all that for -- for Bruce.

Page 42:20 to 43:14

00042:20 Q. Okay. After Texas City, were there any
21 Engineering policies that were promulgated to give
22 Engineers guidance as to process safety?
23 A. Sorry. I don't understand the question.
24 Q. Okay. Did you have a Process Safety
25 Engineering manual?

00043:01 A. No.
 02 Q. Did you have any kind of written guidance
 03 whatsoever from BP on process safety?
 04 A. Not -- we didn't have something that said
 05 process safety, this is what you need to do. But given
 06 the U.K. legislative environment already required us to
 07 have safety cases, we were in a slightly different
 08 place, I believe, than -- than where Texas City was.
 09 Q. Did -- was the traction database a functioning
 10 system in -- in '05?
 11 A. So we had traction as an action tracking
 12 system, yes, in '05.
 13 Q. Okay. Did you have risk registers in your
 14 Operations in '05?

Page 43:16 to 45:03

00043:16 A. I believe that we had a risk matrix at that
 17 time. I don't know whether it would have been a risk
 18 register as you recognize it today.
 19 Q. (By Mr. Penton) Okay. But some form of that?
 20 A. Yes.
 21 Q. Okay. So you said about two years you worked
 22 in this role as the Engineering Team Leader at the
 23 Bruce Asset, correct?
 24 A. Yes.
 25 Q. And where did you go next?
 00044:01 A. Well, I stayed within the Bruce Asset. What
 02 had happened was we were implementing the IM standard.
 03 Q. Yes.
 04 A. So as the Safety Management Standard, I was
 05 trying do that as well as being the Engineering Team
 06 Leader. My boss said, "This job's getting too big.
 07 You need to stick with the IM standard and I'll get
 08 somebody else to -- to cover the Engineering Team
 09 Leader piece." So I actually -- so stayed within the
 10 Bruce Asset and looked after the -- the implementation
 11 of the Integrity Management Standard.
 12 Q. And how long did you do that?
 13 A. Pretty much until the end of '08.
 14 Q. All right. And you moved into another job at
 15 that point?
 16 A. Yes.
 17 Q. What was that job?
 18 A. So then -- actually, so it must have been the
 19 end of 0 -- April '08, sorry, because we -- in -- we
 20 reorganized, and I rejoined Technical Safety as the
 21 Lead Technical Safety Engineer for the North Sea.
 22 Q. Okay.
 23 A. So we're still calling it Technical Safety at
 24 that point.
 25 Q. Okay. So what was your scope called?
 00045:01 A. So I had a very small team of Technical Safety
 02 professionals working within the HSE function of the
 03 North Sea.

Page 45:15 to 46:05

00045:15 Q. Okay. Now, what was your job?
16 A. So I was the Lead Technical Safety Engineer.
17 I said I had a small team of Technical Safety
18 professionals, and our primary focus was the support of
19 U.K. offshore safety cases.
20 Q. And when you say "offshore U.K. safety cases,"
21 you're talking about fixed facilities as well as mobile
22 drilling units and mobile facilities including vessels?
23 A. So the -- so an installation under the U.K.
24 Regulations encompasses all of those things. But
25 within our portfolio that we were responsible for was
00046:01 all the BP specs producing facilities, plus also one
02 FPSO, floating production storage and offloading
03 vessel, which is the --
04 Q. The Schiehallion?
05 A. The Schiehallion.

Page 46:14 to 46:23

00046:14 Q. Okay. And what was your role with respect to
15 that facility?
16 A. So other than the ongoing support of what one
17 might call minor stuff in relation to the safety case,
18 I did conduct a thorough review for the Schiehallion
19 asset. So the thorough review is a review that's
20 required under the Safety Case Regulations every five
21 years, and it's basically looking at the safe -- the
22 existing safety case and concluding whether it's --
23 it's suitable to continue to operate.

Page 47:16 to 48:15

00047:16 Q. When you were -- you were aware that in this
17 era, the '07-'08 period of time, that the U.K. HSE gave
18 BP notice that they felt that there was a severe lack
19 of maintenance on this particular facility, and they --
20 they gave them a warning in -- in '07-'08. Are you
21 aware of that?
22 A. I'm aware of that.
23 Q. And so as a part of that notice and those
24 issues with that agency, did you do things to help
25 correct those maintenance issues?
00048:01 A. So my responsibility as the Thorough Review
02 Team Leader was not to change anything but to report on
03 the state that the facility was in at the time that we
04 looked at it. So we looked at any letters or
05 communications from the Regulator where they had raised
06 any issues with concern or followup, and we then
07 provided a narrative about what had the asset done and
08 we validated that they had done it.

09 Q. Okay. And so did you have any interface with
10 U.K. HSE on this facility?

11 A. I had -- through my role leading the Technical
12 Safety team, I did interact with the Regulator, and
13 specifically in relation to this part of the kind of
14 handing over the thorough review document, we would --
15 I handed it over to the Regulator.

Page 49:06 to 50:18

00049:06 Q. All right. So April of '08, is that your job
07 you're in now?

08 A. No.

09 Q. Okay. So how long were you in that
10 department? From April '08 to when?

11 A. So let me just backtrack from where we are.
12 So '10. So sometime probably in '09, the -- the name
13 of my job changed, although the job remained the same.
14 So -- so I went into that role as the Lead Technical
15 Safety Engineer, and the -- because of the
16 organizational changes, became the Process Safety
17 Technical Authority. So I was in the same job doing
18 the same things, but they just changed the title, so
19 Process Safety Technical Authority for the North Sea.

20 Q. For the North Sea. And how long did you do
21 that?

22 A. Until about March '10.

23 Q. Okay. So prior to March '10, Process Safety
24 Technical Authority North Sea, and what was that job,
25 the same as before?

00050:01 A. So still primarily focused on the Safety Case
02 and support of that, but also assisting the assets with
03 risk assessments with some of the ETP conformance work
04 that we were doing, so occupied buildings being one,
05 and coordinating with the process TA around HAZOP,
06 writing site technical practices for the group-defined
07 standards, conducting fitness for service assessments
08 against those standards.

09 Q. Okay. So were the --

10 A. I conducted train --

11 Q. I'm sorry. Go ahead.

12 A. I conducted some training, as well.

13 Q. Okay. Now, let's just kind of look at it
14 globally. Okay? April '08 is kind of a -- the change
15 as I -- I see what you were doing. You really went to
16 Technical Safety HSE at that point, and you continued
17 in that until March of '10, correct?

18 A. Yes.

Page 53:21 to 55:19

00053:21 How many reorganizations of departments that
22 related to your job in Engineering had taken place say
23 between 2005 and -- and January of 2010, about a

24 four -- four-year period or so?

25 A. So from -- so the first real reorganization
00054:01 that was involved was the one in 2008, when we moved
02 from the asset base model to the functional base model.
03 So that's what we did in the North Sea in 2008.

04 Q. And what does that mean, from an assay --
05 asset base model to a functional base model?

06 A. So in the asset base model -- well, we talked
07 about BRUCE earlier on.

08 Q. Yes.

09 A. So -- so in the asset base model, you --
10 you -- we -- we looked at the world from a BRUCE
11 perspective, and there would be another team sitting,
12 looking at from it a MAGNUS perspective. And there was
13 a cen -- there was a central team, but they weren't in
14 a place where they could if you like tell MAGNUS and
15 BRUCE or -- and any other assets what to do. They were
16 more advisory.

17 And then we moved -- so you would -- you could
18 find different ways of interpreting standards within
19 each of those assets. And so we moved to a functional
20 model, which is where you still count the assets but
21 there's much -- there's a much clearer role for
22 functions. So the Technical Authorities would say, you
23 know, "This is -- this is the standard way we are going
24 to do X across the North Sea," and everybody would do
25 it.

00055:01 So rather than having ten different ways of
02 doing it in one building, we had one way to do it.

03 Q. So in -- in July of 2009, and in that era, did
04 you -- and I say, you, the departments that you worked
05 in, the arms of the BP business you worked in, did you
06 see staff reductions in Health, Safety, Security, and
07 Environment?

08 A. In 2009?

09 Q. Yes.

10 A. No.

11 Q. When did you see changes in staff, reductions
12 in staff?

13 A. In the North Sea, I haven't seen changes in
14 head count in HSSE and Engineering, that -- that arm of
15 the organization, at all.

16 Q. You have -- you've never seen that in the arm
17 that you work in?

18 A. Since we went to the functional model, I have
19 not seen any reductions in head count at all.

Page 56:06 to 57:09

00056:06 Q. So from January to March of 2010, you were the
07 Acting Engineering Authority North Sea?

08 A. Correct.

09 Q. But it was for the Technical Authorities, not
10 the Engineers?

11 A. That's correct.

12 Q. What does that mean?

13 A. So the Technical Authorities are the -- if you
14 like, they're the experts in their discipline matter
15 for the North Sea, so they have a number of areas of
16 responsibilities. They are the go-to people for
17 expert advice. They are the people who set the
18 practice for the North Sea. So if someone doesn't
19 understand what a standard says, you go to them and you
20 say, "What does this mean," and if they don't know,
21 they'll go up the technical chain to explore that.

22 They look after discipline health, so they
23 take a view on, "Do we have the right number of, say,
24 Corrosion Engineers in the North Sea." They look after
25 the development of those Engineers, and they are
00057:01 accountable for learning and sharing knowledge and --
02 both within the North Sea and back into the bigger BP.

03 Q. Okay. So as of March of 2010, did you have
04 any direct experience whatsoever in Exploration,
05 Drilling, and Production?

06 A. So my -- I have no experience in Drilling.

07 Q. Okay. All right. And as of today, you have
08 none. You had none in March of 2010?

09 A. No, I still have no experience in Drilling.

Page 57:18 to 58:05

00057:18 A. So I stayed in the Engineering Authority role
19 through -- until April of this year.

20 Q. Okay.

21 A. So at the end -- in March, I lost the process
22 Technical Authority to somebody else, so somebody else
23 came and took that role, and so from March on, I was
24 just in the Engineering Authority role, and in -- in I
25 should say May of this year, I've moved to Baku.

00058:01 Q. Baku?

02 A. Baku.

03 Q. And what are you doing there?

04 A. I'm the Engineering Manager for Sangachal
05 Terminal.

Page 58:23 to 60:04

00058:23 Q. I understand. Okay. So tell me this -- and
24 that's really why you're here, but I needed to know who
25 you were --

00059:01 A. That's okay.

02 Q. -- how would -- if you know this, how -- and
03 this is not in any way a personal criticism of you and
04 your ability, but with a person who had no exploration
05 or drilling experience, do you know how you were
06 selected to play a role on the investigative team
07 arising out of the DEEPWATER HORIZON blowout?

08 A. All I know is that it was a request from Dave
09 Wall to my boss.

10 Q. Dave Wall? Okay. What was Dave Wall to you?
11 A. So I had known Dave from when he had worked in
12 the North Sea.
13 Q. All right. And did he give you a call and ask
14 would you help them with this? How did --
15 A. He gave my boss a call, and my boss called me.
16 Q. Okay. And about when was that?
17 A. That would have been on the Tuesday morning
18 following the events.
19 Q. Okay. And let's talk globally right now.
20 A. It's the 27th, I think.
21 Q. Once you got that call, what happened at that
22 point with respect to your participation in the
23 investigative process?
24 A. So I got the call saying, would I come over
25 and help with the investigation. And I said "Yes."
00060:01 I've got a longstanding commitment. I would prefer if
02 I could honor that. If, you know, the investigation
03 needs me to cancel, I can, but I would prefer not to.
04 And then I flew out on the following morning.

Page 60:09 to 61:01

00060:09 Q. On the 28th of April. And what did you do
10 when you got to Houston?
11 A. So I joined Dave Wall's Hazard Analysis Team.
12 Q. Okay. And what was your -- what was your
13 orientation to what had happened on the Macondo Well?
14 A. So really what Dave explained to me was we
15 were a team that was trying to use or -- or look to
16 understand the events, the consequences of the release.
17 So we weren't looking so much at the causes, but more
18 evaluating the consequences to try and under -- to
19 understand that.
20 Q. Now, the Hazardous Analysis Team was headed by
21 Dave Wall?
22 A. That's correct.
23 Q. And you were told that you're looking at the
24 consequences as opposed to the causes?
25 A. I was told there was a number of teams looking
00061:01 with different agreements.

Page 62:04 to 62:25

00062:04 Q. Okay. What did you do? What was your first
05 task?
06 A. So what Dave explained to me was that we
07 needed to build a timeline of -- from the statements
08 that we had, so we didn't have very many, but from the
09 statements that we had, that we needed to build a
10 timeline so we could establish the sequence of -- or
11 try to establish the sequence of events as best we
12 could.
13 Q. Okay.

14 A. So -- so I undertook that -- that undertaking,
 15 and -- and there were several versions of the timeline.
 16 But basically it was a very large Excel spreadsheet.
 17 Q. Yes.
 18 A. And we -- and -- and it kind of had time along
 19 the top, and then each statement down the side, and
 20 then just trying to pick from the statements, you know,
 21 someone said, "There was a loud bang." Okay, we put
 22 that there. Then somebody else wrote, "Well, can we
 23 line that up," and just trying to --
 24 Q. All right.
 25 A. -- get -- establish a -- a -- a sequence.

Page 63:20 to 63:22

00063:20 Q. Okay. All right. So how long did you stay on
 21 the ground in Texas working for this team?
 22 A. Just under three weeks.

Page 63:25 to 64:25

00063:25 Q. Okay. So in that three-week period, have you
 00064:01 pretty much described what you did in that three weeks?
 02 You're building a timeline?
 03 A. Pretty much I spent the majority of my time
 04 building a timeline. Towards the end of the period, we
 05 started to try and construct a -- a process flow
 06 diagram, a PFD of the mud system, because the -- we had
 07 lot -- we had some P&IDs, Process -- Process
 08 Instrumentation Diagrams, for the mud system. And we
 09 were trying to under -- because it's on a lot of
 10 drawings, we were trying to just kind of get high-level
 11 view of what was connected to what in the mud system.
 12 So I started that, but I didn't complete it before I
 13 left.
 14 Q. Okay. Were you told why that may be
 15 important?
 16 A. Given it was a drilling facility, understand
 17 mud is one of the things that helps you, it was
 18 important to understand just kind of what -- how the
 19 system worked.
 20 Q. Okay. Have you -- did you ever read a Term of
 21 Reference, a document called Term of Reference on this
 22 investigation?
 23 A. For the investigation team --
 24 Q. Yes.
 25 A. -- as a whole, no, I didn't.

Page 65:24 to 68:01

00065:24 You were in Houston about three weeks. Your
 25 main focus was -- the Group was -- under Dave Wall was
 00066:01 a consequences is how it was described to you, correct?

02 A. That's correct.
03 Q. You've never read what I've defined as a term
04 of reference?
05 A. No, not that I've --
06 Q. You don't know what that is?
07 A. Not -- I know what it is, but I don't recall
08 reading one, no.
09 Q. Okay. It was just your understanding that
10 you -- that this team was looking at consequences,
11 correct?
12 A. Yes.
13 Q. And that you specifically were charged with
14 the timeline of events, correct?
15 A. Correct.
16 Q. From limited documentation during the three
17 weeks you were there?
18 A. For the -- from the document -- I mean,
19 obviously, it wasn't complete because there was more
20 information after I left, right.
21 Q. And you believe that you got some information
22 from a Well Log; is that correct?
23 A. Yes.
24 Q. Does it have another name, other than Well
25 Log?
00067:01 A. It may well have, but --
02 Q. Is it realtime data, graphic, or is -- or was
03 it Reports?
04 A. It was -- I -- I believe realtime would be a
05 good way to describe it.
06 Q. Yes. Graphic?
07 A. Because I'm -- because I'm not a driller,
08 I'm -- not got the right terminology, I'm afraid.
09 Q. Well, do you understand --
10 A. Realtime data.
11 Q. -- realtime data?
12 A. Yes.
13 Q. Okay. Did you interpret the realtime data
14 and -- and -- and put it into your draft timeline?
15 A. So I didn't do any interpretation, all I did
16 was just literally stretch it across the bottom of the
17 timeline so -- because we had an equidistant timeline,
18 we just kind of stretched it across the bottom to see
19 if, yeah, there was any correlation.
20 Q. Okay. And you had Engineers consulting on
21 what it meant?
22 A. Yes.
23 Q. Okay. Did you look at any physical evidence?
24 A. No.
25 Q. Anything?
00068:01 A. Other than photographs, no.

Page 69:08 to 69:12

00069:08 Q. I gotcha. Okay. Did you review any
09 Regulations or literature, industry literature, or

10 anything like that --
11 A. None whatsoever.
12 Q. -- in connection with your work?

Page 70:09 to 70:14

00070:09 Q. Okay. So you did this for three weeks, and
10 then you had to leave?
11 A. Yes.
12 Q. And did you reassume your role as an
13 Investigator after that?
14 A. No, I did not.

Page 70:22 to 71:05

00070:22 Q. Okay. I believe, and we'll look at that in a
23 minute, you did participate in at least one interview?
24 A. Just one, yes.
25 Q. Just one. That was with David Sims?
00071:01 A. On the telephone.
02 Q. On the telephone. Who assigned you to do
03 that?
04 A. It would have either have been Dave or Sam
05 DeFranco.

Page 71:08 to 71:11

00071:08 Q. All right. I want to show you a set of
09 documents that I've already given you and your counsel
10 that is going to be marked for identification as
11 Exhibit 6041.

Page 73:03 to 74:06

00073:03 Q. Okay. Let's look at this exhibit, if we
04 could. The first page appears to be a couple of
05 E-mails, May 6, from Dave Wall, transmitting to you and
06 others: "Interview notes from second Halliburton
07 Cementer and Mud Logger interview. Christopher Ryan
08 Haire and Cathleenia Willis."
09 Do you see that?
10 A. I do.
11 Q. And do you recall getting that E-mail?
12 A. I do.
13 Q. Okay. And you looked at those documents when
14 you got them?
15 A. Yes.
16 Q. And you used those documents to aid you in
17 your timeline effort?
18 A. Yeah. I took the -- the statements that -- so
19 the information that Dave had collected on those
20 statements and placed that as a couple of additional
21 lines on our timeline.

22 Q. Okay. All right. And do you remember
 23 Ms. Willis' interview?
 24 A. I don't remember the detail of it, no.
 25 Q. Okay. Well, was it -- was there a Coast Guard
 00074:01 interview of Ms. Willis, or was it -- if you remember,
 02 or was it a BP interview?
 03 A. This particular interview --
 04 Q. Yes.
 05 A. -- because it's come from Dave, was the notes
 06 that he took from the interview that he had with her.

Page 74:16 to 75:03

00074:16 Q. All right. And then right above that, it
 17 looks like an E-mail from you on May the -- Friday, May
 18 the 7th, back to Steve Robinson with copies to others:
 19 "Please find attached notes from the telephone
 20 interview with Dave Simms," correct?
 21 A. That's correct.
 22 Q. And you did send them that interview, correct?
 23 A. I did.
 24 Q. Now, let's take a look at it, and I want to
 25 make sure I have all of them. The second page, which
 00075:01 is the page without a Bates identification, this
 02 appears to be some sort of question outline. Is that
 03 how you would describe it?

Page 75:05 to 75:20

00075:05 A. This is -- basically, this is my transcribed
 06 notes from the interview. It was a very short
 07 interview.
 08 Q. (By Mr. Penton) Well, but, okay. Look at the
 09 substance of this. It doesn't -- do you see that "Q:
 10 Are we using the float collar model on the relief
 11 wells/other wells"?
 12 You see that?
 13 A. I do.
 14 Q. Where did you get that from?
 15 A. That was the question that I was asked to ask
 16 Dave.
 17 Q. And who asked you to ask that question?
 18 A. I believe it was Dave Wall.
 19 Q. Okay.
 20 A. But I can't be 100 percent certain.

Page 76:04 to 76:11

00076:04 Q. And -- and Dave Wall asked you to ask these
 05 questions?
 06 A. He asked us to ask those questions.
 07 Q. Us. Okay. Because I would --
 08 A. I -- I --

09 Q. -- I would believe that Steve would have led
10 this interview, am I right about that?
11 A. Yes. You would be right, yes.

Page 76:23 to 77:01

00076:23 Q. Okay. You took notes, correct?
24 A. We did.
25 Q. And then you typed up your notes?
00077:01 A. I did.

Page 78:09 to 78:22

00078:09 Q. Did you understand whatsoever what -- why
10 these que -- questions were relevant, or did you
11 just --
12 A. No --
13 Q. -- ask him?
14 A. -- I just noted --
15 Q. Do you know -- do you know what a float collar
16 is?
17 A. No, I don't.
18 Q. Okay. You don't know today what it is?
19 A. No, I don't.
20 Q. Okay. No problem.
21 You just simply wrote down what you heard?
22 A. Correct.

Page 79:05 to 79:12

00079:05 Q. Let's go to the next page. This is the one
06 with the Bates number ending in 743. Now, what I want
07 to do -- that's hard to read, but if you -- if you look
08 on through the documentation, there appear -- appears
09 to be a larger version of that large piece, you see, of
10 that one paper? You see? For instance, in the Bates
11 number ending 315?
12 A. Okay.

Page 80:02 to 80:11

00080:02 Q. But these are the notes that you took
03 contemporaneous with the interview?
04 A. Yeah, the -- these are the notes I took whilst
05 we were on the --
06 Q. Right.
07 A. -- telephone.
08 Q. And you simply transferred those to the
09 typewritten version on the first page of this document
10 that we've talked about?
11 A. The one that we just talked about, right.

Page 82:04 to 82:15

00082:04 Q. Okay. Do you know if there was more than one
05 interview of David Sims?
06 A. Yes, I do.
07 Q. Were you involved in that?
08 A. No, I was out -- so the reason I know there
09 was more than one was because we were asked to do this
10 followup interview, so -- with those specific
11 questions. So this, I presume, was the notes from the
12 first interview, and then we had those two questions to
13 go --
14 Q. I see.
15 A. -- back and ask.

Page 82:23 to 83:10

00082:23 Q. Okay. And if you'll look -- go to the next
24 page, 316. That's just a second hand -- typewritten
25 notes for the interview. And then 317, apparently this
00083:01 is a document that you're identified on. Do you see
02 that?
03 A. I do.
04 Q. And it's really -- it's just a takeoff of the
05 first document, isn't it?
06 A. I believe this may have been the recording of
07 the questions --
08 Q. Okay.
09 A. -- that we were asked to ask in that second
10 phone interview.

Page 83:16 to 84:04

00083:16 Q. Okay. So the only documents that I've shown
17 you under this exhibit that you're involved in is the
18 first one, ending Bates of 710, and then the attached
19 document, which is no Bates number, but your
20 typewritten notes that was taken directly from your
21 handwritten notes identified as Bates 00061719,
22 correct?
23 A. That would be correct.
24 Q. And this is -- and your handwriting is very
25 neat, so do you recall, even though you can't read
00084:01 this, that you verbatim typed what you wrote to --
02 A. There may be the odd grammatical change
03 between the typewritten and the handwritten, but pretty
04 much if I line these up, I can -- can align the two.

Page 85:13 to 85:15

00085:13 Q. Okay. Did you ever use the Group Practices as
14 they relate to drilling and wells?
15 A. No.

Page 94:22 to 96:07

00094:22 Q. Can you tell me in your own words what the
23 goal of Process Safety is?
24 MR. BROCK: Object to form.
25 A. So the goal of Process Safety -- I suppose if
00095:01 you take it to the ultimate, the goal of Process Safety
02 is to prevent those major events which result in
03 significant loss of life. And if you take it in the
04 kind of micro form, it's about controlling and keeping
05 things like hydrocarbons or other -- you know, other
06 chemicals, if you take it wider than the oil industry,
07 containing them within the systems that they're
08 supposed to be contained in. It's also about
09 monitoring things like energy. It's -- it's about
10 keeping control of your environment, if you like.
11 Q. (By Ms. Shutler) And -- and so part of that
12 would be trying to anticipate what could go wrong?
13 A. Absolutely.
14 Q. And what the potential impact would be of what
15 might go wrong; is that correct?
16 A. I would say part of Process Safety is you --
17 you -- you try to anticipate what might go wrong, and
18 how that might -- might develop, and then you can
19 identify things you could do that would change those
20 outcomes or change the likelihood of those outcomes.
21 Q. And those would be prevention or mitigation
22 type act -- actions; is that correct?
23 A. Preventative actions are always the most
24 effective.
25 Q. M-h'm.
00096:01 A. But then if you -- if you -- if you have a
02 release, then you have both control, mitigation, and
03 emergency response things, which can change the
04 likelihood of the outcome.
05 Q. Okay. And do you know if these Process Safety
06 Risk Management goals that we just discussed are
07 applied for -- in deepwater drilling operations?

Page 96:09 to 96:10

00096:09 A. I don't have enough knowledge about deepwater
10 drilling to be able to help you with that I'm afraid.

Page 96:12 to 96:21

00096:12 You mentioned earlier that you were familiar
13 with some of the Group practices --
14 A. (Nodding.)
15 Q. -- that deal with Process Safety. So you --
16 you would be familiar with the hazardous identification
17 process; is that correct?
18 A. That would be correct.

19 Q. And HAZID is simply one of the many tools that
 20 are available to address or to identify what hazards
 21 might be lurking behind a given operation.

Page 96:23 to 96:23

00096:23 Q. (By Ms. Shutler) Is that correct?

Page 96:25 to 97:24

00096:25 A. Yeah. HAZID is one of the techniques that you
 00097:01 can use to identify potential hazards.
 02 Q. (By Ms. Shutler) Okay. And other tools might
 03 be a what-if analysis?
 04 A. Correct.
 05 Q. A HAZOP?
 06 A. Correct.
 07 Q. A failure -- failure modes and effects
 08 analysis?
 09 A. Correct.
 10 Q. A fault tree analysis?
 11 A. Correct.
 12 Q. Okay. And is it important that a thorough
 13 hazard analysis be conducted in advance of the
 14 operation?
 15 MR. BROCK: Object to the form.
 16 A. As a general principle, identifying the
 17 hazards and then identifying what you're going to do to
 18 control, mitigate, or prevent those hazards is a good
 19 principle.
 20 Q. (By Ms. Shutler) And -- and that would be
 21 before the operation would begin?
 22 MR. BROCK: Object to the form.
 23 A. It's most valuable to be done before the
 24 operation begins.

Page 108:02 to 108:13

00108:02 Q. Prior to your involvement in the Macondo
 03 investigation, did you ever have any interaction with
 04 DEEPWATER HORIZON or its crew?
 05 A. None whatsoever.
 06 Q. You did not know and you had never met any of
 07 the individuals that were present on the rig the night
 08 of the incident as of April 20, 2010, correct?
 09 A. Correct.
 10 Q. Okay. And as part of your role in the
 11 investigation, you never met any members of the
 12 DEEPWATER HORIZON crew, correct?
 13 A. That is correct.

Page 109:01 to 111:08

00109:01 Q. You never learned of any evidence that
02 indicated that Transocean employees aboard the
03 DEEPWATER HORIZON as of April 20, 2010 were indifferent
04 toward the safety of other humans; is that right?

05 MR. BROCK: Object to form.

06 A. I -- I would not -- I said I just worked on --
07 on the statements that I had, and I don't recall any
08 statements of that nature.

09 Q. (By Mr. Johnson) Okay. So you're not aware of
10 any evidence of that nature of any kind, right?

11 A. No.

12 Q. Okay. Did you ever become aware of any
13 evidence that indicated that the Transocean crew aboard
14 the DEEPWATER HORIZON was indifferent toward the
15 environment in any way?

16 MR. BROCK: Object to form.

17 A. As I said before, because I only saw
18 statements, and there were a very limited number of
19 those. I don't recall anything that said that, no.

20 Q. (By Mr. Johnson) Okay. Aside from not seeing
21 any evidence, has anyone ever told you that the
22 Transocean crew aboard the DEEPWATER HORIZON as of
23 April 20, 2010 acted in a manner indicating that they
24 were indifferent toward the safety of other humans?

25 A. No, no one's ever said that to me.

00110:01 Q. How about has anyone ever told you that the
02 Transocean crew aboard the DEEPWATER HORIZON as of
03 April 20, 2010 was indifferent toward the environment?
04 Has anyone ever told you that?

05 A. No.

06 Q. Okay. I want to make -- make sure I
07 understand your testimony earlier, and I think this
08 will short circuit some of the questions, but I just
09 want to be clear. Is it fair to say in your -- the
10 three weeks that you were involved in the investigation
11 process that you assisted in an initial gathering of
12 facts, but you weren't involved in generating any of
13 the conclusions expressed in the Bly Report? Is that
14 right?

15 A. That would be absolutely correct.

16 Q. Okay. And in your initial fact gathering, did
17 you learn of any evidence indicating that there were
18 any maintenance problems or deficiencies that caused
19 any of the explosions that occurred on April 20th,
20 2010?

21 A. So because I was there such a limited time, I
22 saw no maintenance records or anything around
23 maintenance at all.

24 Q. Okay. So just to be clear, the answer to my
25 question is "No," you didn't see any evidence of that?

00111:01 A. That would be correct --

02 Q. Okay.

03 A. -- my answer is "No."

04 Q. Okay. And in your initial fact gathering
05 during that three weeks, you made no judgments

06 regarding the competency of the Transocean rig crew; is
07 that correct?
08 A. That's correct.

Page 113:24 to 114:02

00113:24 Q. Good, good. We've not met before. My name is
25 Don Godwin, and I represent Halliburton, and I'm here
00114:01 accompanied during your deposition, which I believe
02 will be brief, by my partner, Jenny Martinez. Have you

Page 115:11 to 115:18

00115:11 It is my understanding that on April 27, 2010,
12 Mr. Walls asked that you become involved with the -- a
13 part of the investigation dealing with the DEEPWATER
14 HORIZON incident; is that correct?
15 A. Dave Wall, yes.
16 Q. Dave Wall, yes, ma'am. And -- and you were
17 on -- you were on that Team for about how long?
18 A. Just under three weeks.

Page 116:18 to 116:25

00116:18 Q. Yeah, okay. Were the -- were -- were the
19 primary Members of your Team, for most of the time you
20 were involved, though, Mr. Wall and Mr. DeFranco?
21 A. Yes.
22 Q. Okay. Thank you. Now, it is my understanding
23 that -- that you participated in at least one in -- one
24 in-person interview with David Sims; is that correct?
25 A. Just the one.

Page 117:18 to 118:11

00117:18 Q. (By Mr. Godwin) Okay. And how do you know or
19 believe that Mr. Sims was interviewed for a second time
20 although you were not a part of it?
21 A. So I was asked to ask him some -- we were
22 asked to ask him some specific questions which had not
23 been covered in his original interview.
24 Q. Okay.
25 A. That's why I believe there was a previous
00118:01 interview.
02 Q. There was a former interview, and then you
03 were asked to come in and do a followup?
04 A. Correct.
05 Q. And -- and you were looking at some
06 handwritten notes earlier, and I'll tell you what I'm
07 going to do, is I'm going to have Jenny mark these
08 notes that -- you said the ones that the PSE's lawyer
09 had given you, you couldn't make those out. Does that
10 appear to be a somewhat better copy?

11 A. That is a better copy, yes.

Page 118:20 to 119:11

00118:20 (Exhibit No. 6042 marked.)
 21 Q. (By Mr. Godwin) Okay. You now have before you
 22 there the exhibit, which is marked 6042. Does that
 23 consist of a -- of a one-page set of handwritten notes?
 24 A. It does.
 25 Q. Okay. And are all of these notes in your own
 00119:01 handwriting?
 02 A. They are.
 03 Q. Okay. If you look at it briefly, do you
 04 recall having made these notes?
 05 A. I do.
 06 Q. Did you make the notes at the same time you
 07 were involved in the meeting with Mr. David Sims, or
 08 were they made at a subsequent time?
 09 A. They were made whilst he was on the telephone.
 10 Q. So contemporaneous with him. Okay.
 11 A. Yes.

Page 119:18 to 120:15

00119:18 Q. Let me ask you -- while we have these notes
 19 out, let's look at them here briefly, and we'll go
 20 through these very briefly.
 21 You've written Mr. "David Simms" at the top
 22 there, correct?
 23 A. Correct.
 24 Q. And then down below, what does that next line
 25 say, something "From sound of" -- what does that say?
 00120:01 A. It says: "From sound of escaping fluid..." --
 02 Q. Okay.
 03 A. -- then there's three period marks, and then
 04 it says "talk us through."
 05 Q. Okay. "Talk us through." And -- and what did
 06 you mean by that "talk us through"?
 07 A. So these notes above the line that says
 08 "Telephone call" were notes pre -- preceding the call.
 09 Q. Okay.
 10 A. So these were pointers about things that I
 11 wanted to cover in the call.
 12 Q. Yes, ma'am. Okay. And did you cover that in
 13 the call with him?
 14 A. Well, as you can see further down, we asked
 15 him to talk us through kind of what he observed.

Page 121:04 to 121:06

00121:04 Q. Okay. Were you on the call with Mr. Sims by
 05 yourself?
 06 A. No. Steve Robinson was also on the call.

Page 121:19 to 121:20

00121:19 Q. Okay. Did he take notes during the call?
20 A. I believe he did.

Page 122:07 to 123:03

00122:07 Q. Okay. Were you told at any time during your
08 part of the investigation that there was some
09 difficulty that was experienced in converting the float
10 collar, which necessitated that it be attempted nine
11 times to convert it?
12 A. No, I was not.
13 Q. Okay. Was there any discussion in your
14 presence at any time during the time you were involved
15 that there was any difficulty in converting the float
16 collar, regardless of how many times it took to convert
17 it?
18 A. I don't -- I don't -- I don't believe there
19 was.
20 Q. Okay. Read the next line, if you will,
21 please, ma'am, where it says: "Request Weatherford..."
22 A. So "Request Weatherford - what would damage
23 the collar?"
24 Q. Okay. And you had a question mark after that.
25 A. Yes.
00123:01 Q. Does that suggest to you that -- that somebody
02 with BP thought the Weatherford float collar was
03 damaged?

Page 123:05 to 123:10

00123:05 A. That was just a question that I was asked to
06 ask.
07 Q. (By Mr. Godwin) Who asked you to ask the
08 question of Weatherford if the Weatherford float
09 collar -- how it could be damaged?
10 A. I believe it was Dave Wall.

Page 123:18 to 124:07

00123:18 Q. "Reliability in the face of high shear." Did
19 Mr. Wall say to you at any time that he thought that
20 the Weatherford float collar was ex -- was exposed to
21 high shear?
22 A. He did not.
23 Q. Okay. When he told you that -- or when you
24 wrote the words "Reliability in the face of high
25 shear," where did you get that from?
00124:01 A. I believe that that is the response from
02 Mr. Sims to the question about what would damage the
03 collar.
04 Q. Okay. Reliability in the face of high shear.

05 Did Mr. Sims say to you that he thought that
06 the float collar had been exposed to high shear during
07 any part of the conversion process?

Page 124:09 to 124:13

00124:09 Q. (By Mr. Godwin) Did that come up for
10 discussion?
11 A. My recollection is that when we asked him what
12 could damage the collar, he said, "Reliability in the
13 face of high shear."

Page 125:02 to 125:07

00125:02 Q. "Any reliability statistics on the flapper,"
03 and you had a question mark after that.
04 A. Correct.
05 Q. Now, who told you to ask that question?
06 A. I believe that was another question that
07 Mr. Wall asked me to ask.

Page 125:17 to 126:11

00125:17 Q. Okay. And did you request of Weatherford what
18 could damage the float collar?
19 A. I did not, no.
20 Q. You did not?
21 Did anybody, to your knowledge, speak with
22 anyone from Weatherford to get an answer to the
23 question as to what could damage the float collar?
24 A. Not to my knowledge.
25 Q. Okay. So there was no followup by BP with
00126:01 Weatherford, to your knowledge, to that effect; is that
02 correct?
03 A. Not to my knowledge.
04 Q. As a part of the investigation?
05 A. As a part of the investigation.
06 Q. And likewise, the question is -- any
07 reliability statistics on the flapper, to your
08 knowledge, did anybody with BP follow up on that part
09 of the investigation to determine if there were any
10 statistics regarding the float collar flapper?
11 A. Not to my knowledge.

Page 127:24 to 128:01

00127:24 Q. Okay. And you mentioned Process Safety.
25 Would you agree that one goal of Process Safety is to
00128:01 postulate what incidents could happen --

Page 128:03 to 128:04

00128:03 Q. (By Mr. Godwin) -- in connection with the
04 well?

Page 128:06 to 128:24

00128:06 A. I -- I would say one of the goals of Process
07 Safety is to identify what undesirable outcomes and
08 then identify what you can do reduce the like -- the
09 likelihood of those occurring.
10 Q. (By Mr. Godwin) Would you agree that Process
11 Safety, one of the goals is to prevent incidents from
12 happening?
13 A. Yes.
14 Q. And -- and would you agree that one of the
15 goals of Process Safety is produce systems that would
16 prevent such potential incidents?
17 A. Yes, I would.
18 Q. Okay. Are -- would you also agree that one of
19 the goals of Process Safety is concerned with
20 controlling incidents once they begin?
21 A. Yes.
22 Q. Okay. Do you believe that it is critical for
23 BP to get Process Safety right in terms of -- of things
24 that are happening there at the company?

Page 129:01 to 129:07

00129:01 A. I believe it's important for any company to
02 get Process Safety right.
03 Q. (By Mr. Godwin) Yes, ma'am. And the reason
04 for that is, is that Process Safety protects
05 individuals, their lives, their health, their welfare,
06 as well as the equipment that they be involved with.
07 Would you agree with that?

Page 129:09 to 129:17

00129:09 A. Process Safety not only looks after -- looks
10 after people, environment, and -- and assets, as well,
11 yes.
12 Q. (By Mr. Godwin) And so it's important that
13 there be Process Safety mandates coming down from the
14 top of the company as to how to -- how to envision
15 things that might happen, what to do if they do happen,
16 and how to keep them from happening again. Would you
17 agree with that?

Page 129:19 to 130:02

00129:19 A. Not necessarily.
20 Q. (By Mr. Godwin) Okay.
21 A. I don't -- I don't believe it needs to be
22 cascaded down from the top. And if we look back about

23 certainly how Process Safety has developed in the
24 U.K. --
25 Q. Yes, ma'am.
00130:01 A. -- it's been much more from the bottom up,
02 rather than the top down.

Page 130:20 to 130:24

00130:20 Q. Okay. If Mr. DeFranco, if you were to learn
21 that Mr. DeFranco testified in his deposition that
22 Process Safety starts at the top of the company which
23 sets the tone, would you agree or disagree with his
24 position or statement in that regard?

Page 131:01 to 131:02

00131:01 A. I would agree that the top of the company sets
02 the tone for Process Safety.

Page 131:19 to 131:24

00131:19 Q. (By Mr. Godwin) Yes, ma'am. If
20 Mr. DeFranco -- if you were to learn that Mr. DeFranco
21 testified in his deposition that nothing worse could
22 happen on a deepwater well other than a blowout from
23 the Process Safety standpoint, would you agree that
24 with that statement?

Page 132:01 to 132:01

00132:01 A. I would.

Page 132:08 to 132:11

00132:08 Q. (By Mr. Godwin) If you were to learn that
09 Mr. DeFranco testified in his deposition that the No. 1
10 hazard on a deepwater well is a blowout, would you
11 agree with that?

Page 132:13 to 132:13

00132:13 A. Yes, I would.

Page 132:20 to 132:23

00132:20 Q. (By Mr. Godwin) I understand. Do you believe
21 that any proc -- do you believe that any thorough
22 Process Safety study for a deepwater well should
23 consider that a blowout is possible?

Page 132:25 to 133:06

00132:25 A. As I -- I'm not an expert in drilling --
 00133:01 Q. (By Mr. Godwin) Yes, ma'am.
 02 A. -- but that does not seem unreasonable to me.
 03 Q. Okay. Do you believe that it would be a safe
 04 practice for the operator of a well such as BP, in
 05 deepwater, to take all the precautionary steps to guard
 06 against the possibility of a blowout occurring --

Page 133:08 to 134:07

00133:08 Q. (By Mr. Godwin) -- as a part of Process
 09 Safety?
 10 A. My problem is I don't really understand the
 11 kind of who's responsible for what in the Gulf of
 12 Mexico.
 13 Q. Okay.
 14 A. So if I -- if I was talking about the North
 15 Sea, then it would be the duty holder for the
 16 facility --
 17 Q. Right.
 18 A. -- who I would look to to undertake that.
 19 Q. And the duty holder for the facility, would
 20 that be the operator or the owner of the well or would
 21 it be the -- the person -- the entity owning the rig?
 22 A. So if it -- if it was a Transocean rig --
 23 Q. Yes, ma'am.
 24 A. -- in the North Sea, then it would be
 25 Transocean.
 00134:01 Q. Okay. All right. Okay. Thank you.
 02 Now you mentioned earlier a HAZOP. Is that an
 03 acronym for a hazardous operation?
 04 A. No. It's a hazard and operability study.
 05 Q. Okay. Mr. DeFranco testified that BP has a
 06 policy that there be a written report for -- for a
 07 HAZOP study on each well. Are you aware of that?

Page 134:09 to 134:10

00134:09 A. I'm aware that the HAZOP practice requires
 10 that there is a written report.

Page 134:19 to 135:05

00134:19 Q. (By Mr. Godwin) Okay. Have you asked
 20 anyone -- did you ask anyone as a part of your -- part
 21 of the investigation as to whether or not there was a
 22 written HAZOP study for the Macondo Well?
 23 A. I believe that we may have re -- when we were
 24 doing the data request, we may have asked if there was
 25 a HAZOP study. I don't -- we didn't get an answer
 00135:01 during the period that I was there.

02 Q. So your recollection is that you remember
03 asking someone at BP if there was a HAZOP study that
04 was performed for the Macondo Well, and -- and you did
05 not get an answer?

Page 135:07 to 135:12

00135:07 A. No. I think we asked if there was a HAZOP for
08 DEEPWATER HORIZON --
09 Q. (By Mr. Godwin) Yes, ma'am.
10 A. -- not -- so we didn't ask BP for that
11 information. We asked -- we were -- I -- we believe we
12 requested had Transocean conducted a HAZOP study.

Page 135:15 to 135:17

00135:15 Q. Well, would -- would -- would BP have been a
16 part of preparing the written report for the HAZOP
17 study?

Page 135:19 to 136:09

00135:19 A. If that study was happening in the U.K., so it
20 were being led by Transocean --
21 Q. (By Mr. Godwin) Yes, ma'am.
22 A. -- you may well have had a BP Representative
23 as part of the Team, but they would not have been
24 writing the report. The report would be the re -- the
25 responsibility of the HAZOP Leader.
00136:01 Q. Okay. And -- and in the North Sea, that would
02 be the owner of the rig as opposed to the operator. Is
03 that what you're telling us?
04 A. The -- the Leader of the study could well be
05 an independent third party who was a competent HAZOP
06 study Leader.
07 Q. Okay.
08 A. But they would be performing the study on
09 behalf of Transocean were it in the U.K.

Page 137:08 to 137:16

00137:08 Q. Thank you. How did you learn that BP had a
09 policy that there be a written report to issue from a
10 HAZOP study?
11 A. So I'm -- I'm aware of the prac -- the HAZOP
12 practice, which has been around for a while, and it's
13 always been part of that practice that the HAZOP study
14 would have a report.
15 Q. Would be in writing?
16 A. Yes.

Page 138:01 to 138:23

00138:01 Q. Thank you, ma'am. Does BP have a -- a policy
02 that allows for a deviation from the policy that --
03 calling for a written HAZOP Report?
04 A. BP has a process whereby you can ask for a
05 deviation --
06 Q. Yes, ma'am.
07 A. -- to a practice, and that has a certain level
08 of approval and authority. Now, you could choose -- if
09 that's the clause you want to choose to apply for
10 deviation to, you could apply for it. I would be
11 extremely surprised if anyone ever said "Yes" to that.
12 Q. Be extremely surprised if anyone ever said
13 "Yes"?
14 A. To a deviation to a written report from a
15 HAZOP.
16 Q. Okay. And why would you be extremely
17 surprised by that?
18 A. Because the -- the value of HAZOP study is in
19 its output, and if you don't write a report, you've
20 lost the value of doing the study.
21 Q. If you don't have a report, you're, in a
22 sense, flying by the seat of your pants in -- as a way
23 of saying it, aren't you?

Page 138:25 to 139:13

00138:25 A. That's not a phrase that I would use.
00139:01 Q. (By Mr. Godwin) What phrase would you use?
02 A. I would say if you conducted a HAZOP study and
03 you didn't have a written report, then you would -- you
04 would not be able to codify the -- what you learned in
05 that study.
06 Q. Okay.
07 A. Because you've got -- there's a dan -- because
08 human memory can be quite short, and something would
09 get -- could get missed by not --
10 Q. Something --
11 A. -- having it.
12 Q. Something could be missed?
13 A. If you didn't have a written report.

Page 150:14 to 151:25

00150:14 Q. (By Mr. Godwin) I'm going to hand you here
15 what's been marked as Exhibit 6044, and I'll ask you to
16 turn over to the page dealing with the Joseph Keith
17 notes, that starts here (indicating) at 6982.
18 A. (Nodding.)
19 Q. And then there are some typewritten notes
20 after that. He was one of the people that was
21 identified as someone to interview. And on the front
22 page there, this shows the custodian of the documents
23 which I've given to you to come from your file, does it

24 not? You'll see the custodian designation there on the
 25 front page?

00151:01 A. Sorry, I don't understand what you mean by
 02 that.

03 (Discussion off the record.)

04 Q. (By Mr. Godwin) Okay. Here's -- well, I've
 05 given you the attached pages. But from your file,
 06 Gillam -- Gillian -- Gillian Cut -- Cowlam, are these
 07 pages here, and it shows -- as you'll see, then there's
 08 some E-mails --

09 A. Yeah. So --

10 Q. -- one from Mr. Dave Wall to you dated May 4?

11 A. Yes.

12 Q. Okay. And then after that, then there's a
 13 document that says: "Document Produced Natively."
 14 Do you see that?

15 A. I do.

16 Q. And then right after that are some interview
 17 notes of a Mr. Joseph Keith dated May 5 -- or April 5,
 18 2010.

19 Do you see that?

20 A. I do.

21 Q. Okay. And did you review these notes at any
 22 time as a part in -- of your investigate -- part of the
 23 investigation?

24 A. I believe I took these notes and inserted them
 25 into the timeline.

Page 152:07 to 152:11

00152:07 Q. Okay. Did -- at any time you were involved in
 08 the investigation, did anyone say anything in your
 09 presence to lead you to conclude that BP thought that
 10 any of the mud logging services provided by Halliburton
 11 was not up to the standards that BP expected?

Page 152:13 to 152:18

00152:13 A. During the time that I was there, we were
 14 still in a data collection mode, and so that's -- it
 15 wouldn't have happened while I was there.

16 Q. (By Mr. Godwin) So the -- so the answer to the
 17 question, then, is "No, no one ever said it"?

18 A. That's correct.

Page 153:18 to 153:22

00153:18 Q. Okay. Now, again, going back to my question:
 19 Other than that reference, did anyone with BP at any
 20 time while you were involved in the investigation ever
 21 suggest that he or she or they thought that my client's
 22 cement job was inferior in any way?

Page 153:24 to 154:08

00153:24 A. Given that --
25 Q. (By Mr. Godwin) Just during the investigation
00154:01 time.
02 A. Dur -- during while I was there --
03 Q. Yes, ma'am.
04 A. -- there was no real -- no conclusions drawn
05 at all. So no one said, "We believe it's the cement
06 job," or "We don't believe it's the cement job."
07 Q. So the answer to my question would be "No"?
08 A. That would be correct.

Page 154:24 to 155:18

00154:24 Q. Okay. And then, if you will, go over to the
25 third page after that for notes for Mr. Vince Tabler,
00155:01 T-a-b-l-e-r.
02 Do you have that, ma'am?
03 A. I have that, yes.
04 Q. Were you made aware during your part of the
05 investigation that Mr. Vince Tabler was a Halliburton
06 cementer who was there on the lo -- on the rig at the
07 time of the ex -- blowout?
08 A. Given that I believe I transcribed these notes
09 into the timeline, then I would have transcribed that
10 he was a Halliburton cementer.
11 Q. Yes, ma'am.
12 And then briefly down below -- I'll cover with
13 you very briefly -- where it says "Negative test," do
14 you see that?
15 A. I do.
16 Q. "Negative test is done by BP and Transocean
17 and they are not involved in the test. No pumping
18 involved during the" -- it looks like "negative test."

Page 155:20 to 156:02

00155:20 A. That would be my conclusion from that --
21 Q. (By Mr. Godwin) Okay.
22 A. -- from what's written.
23 Q. All right. And at any time you were involved
24 in the investigation, did anyone ever say to you from
25 BP that he or she or they thought that Halliburton was
00156:01 involved in any way with the negative test that BP had
02 performed on the Macondo Well?

Page 156:04 to 156:04

00156:04 A. No.

Page 156:07 to 156:16

00156:07 MR. GODWIN: Turn over -- and this is in
08 Tab 25 to the materials --
09 (Exhibit No. 6045 marked.)
10 MR. GODWIN: -- that I've given to you
11 guys. This is marked as 6045.
12 Q. (By Mr. Godwin) These are some -- what appear
13 to be interview notes of Mr. Christopher Ryan Haire?
14 A. Yes.
15 Q. Is that the one you have there?
16 A. That's what it says, "Interview Notes."

Page 159:07 to 159:15

00159:07 Okay. All right. Turn over now to the next
08 part of the notes there under that same exhibit, to the
09 notes of -- of an interview of Ms. Cathleenia Willis.
10 Do you see that? And, again, it's June 4, 2010, and
11 she was a surface data logger. Do you see that?
12 A. M-h'm.
13 Q. And you, of course, entered these notes also
14 in the timeline, did you not?
15 A. I did.

Page 159:17 to 159:24

00159:17 Q. (By Mr. Godwin) Or did you?
18 A. I did -- I believe I did.
19 Q. Okay. Thank you.
20 And were you made aware that Ms. Cathleenia
21 Willis was a data logger for a division or one of the
22 companies with Halliburton?
23 A. I was probably aware that she was Halliburton,
24 but I don't recall.

Page 160:15 to 160:22

00160:15 Q. (By Mr. Godwin) Going down here where it says:
16 "They were getting prepared." Do you see that?
17 A. I do.
18 Q. Quote: "They were getting prepared to
19 displace and discuss the program. At the safety
20 meeting they said they were displaced back to the boat.
21 AD" -- I think that's referring to the Assistant
22 Driller.

Page 160:24 to 161:11

00160:24 Q. (By Mr. Godwin) Does AD suggest to you the --
25 the title of Assistant Driller?
00161:01 A. That would be the conclusion I would draw.
02 Q. Thank you.
03 Assistant Driller "said they would call her
04 because she said she could not monitor displacement

05 back to the boat. When Joe came on tour he said he
 06 needed to talk to them about displacing to the boat and
 07 he was not happy with this."

08 Other than what is written here, did anybody
 09 with BP tell you that Joe Keith was not happy that he
 10 could not monitor the mud that was being circulated
 11 around the boat at the direction of BP?

Page 161:13 to 161:14

00161:13 Q. (By Mr. Godwin) Did you learn that?

14 A. No one said that to me, no.

Page 161:18 to 161:25

00161:18 (Exhibit No. 6046 marked.)

19 Q. (By Mr. Godwin) At any time during the
 20 investigation that you were a part of, did anyone tell
 21 you that Halliburton had complained there on the rig
 22 that there were numerous activities going on which made
 23 it difficult for the mud loggers to actually monitor
 24 the flow in and flow out there on the rig that evening?
 25 Did that come up for discussion in your presence?

Page 162:02 to 162:02

00162:02 A. Not in my -- not to my recollection.

Page 164:07 to 164:11

00164:07 Q. (By Mr. Godwin) Yes, ma'am. Was it said to
 08 you at any time during your part of the investigation
 09 that BP thought that the casing had lost its integrity,
 10 thereby allowing hydrocarbons to escape from the
 11 wellbore to the surface?

Page 164:13 to 165:10

00164:13 Q. (By Mr. Godwin) Was that said in your
 14 presence?

15 A. During the time that I was on the
 16 investigation, there were a number of potential causes
 17 that were explored.

18 Q. Okay.

19 A. And I believe loss integrity of the casing was
 20 one of the potentials that was explored at that time.

21 Q. Okay. And loss of the casing was one of the
 22 subjects that was discussed and explored during your
 23 time on the investigation?

24 A. I believe that was one of the -- one of -- the
 25 loss of integrity of the casing was one of the
 00165:01 potential causes that was discussed during the time I

02 was on the investigation, but the Team I was on was not
03 investigating that.

04 Q. Okay. It was others that did that.

05 Okay. Now, last thing, during your part of
06 the investigation, was there a discussion had in your
07 presence that BP thought that the hydrocarbons, the gas
08 that escaped from the wellbore, came up through the
09 annulus or what is referred to as the backside of the
10 casing?

Page 165:12 to 165:14

00165:12 Q. (By Mr. Godwin) When it escaped out of the
13 wellbore, it didn't come up the casing, but it came out
14 of the annulus. Was that said in your presence?

Page 165:16 to 166:03

00165:16 A. We had discussions about whether it was in the
17 annulus or whether it was in the casing, but actually
18 in terms of the consequence modeling that we were
19 doing, to some extent it was irrelevant for the work
20 that we were doing, which it was. So we didn't really
21 get involved in those discussions while I was there.

22 Q. (By Mr. Godwin) Okay. Last -- but it did come
23 up for discussion briefly?

24 A. It was discussed briefly, and we said we'll --
25 to be honest others are looking at that. We're
00166:01 actually interested in the consequences. Irrespective
02 of whether it's in the -- in the casing or in the
03 annuli, it's going to end up in the same place.

Page 173:01 to 173:19

00173:01 Q. And he says here that he was heading up the
02 "topsides Hazard Analysis." What do you understand, if
03 you have any understanding at all, of what he means by
04 "topside Hazards Analysis"?

05 A. Well, "topsides" is a general term which
06 reflects things which are on the facility, usually
07 determined as being downstream of a Christmas tree, so
08 not associated with the well. And it's the -- it's the
09 rest of the -- the offshore facility would be referred
10 to as "topsides."

11 And "Hazard Analysis" is -- so in this --
12 taken with the "topsides" as I described earlier, it
13 was about doing consequence modeling understanding,
14 trying to understand some of the events through
15 consequence modeling.

16 Q. Okay. So his reference to "topsides Hazard
17 Analysis" is synonymous with what you've been calling
18 "consequence analysis"?

19 A. Yes.

Page 188:01 to 188:24

00188:01 Q. When you were collecting the different sets of
02 data, the interview notes and the well logs that you
03 looked at, did you find any inconsistencies where say
04 one witness said he was in Spot A, but other evidence
05 indicated he may have been in Spot B?

06 A. We identified some inconsistencies, but not in
07 location, but in order. So given that the events
08 around the ignition were -- happened in very quick
09 succession, there was some -- some people observed the
10 lights flickered first and then they heard the noise,
11 and other people said they heard the noise and then
12 they saw the lights. So the order in which -- because
13 this is a very short space of time, the order in which
14 people reported stuff did change. But I do not recall
15 any inconsistencies about where people were located.

16 Q. Okay. And how, if at all, did you resolve any
17 inconsistencies in the versions of events that you were
18 provided?

19 A. So where we found them, we highlighted them,
20 and then we just kind of had to go with the majority
21 rule. If most people said this happened first, then we
22 have to go with that, but we highlight that that --
23 this particular person doesn't see it that -- doesn't
24 recall it that way.

Page 190:18 to 190:21

00190:18 Q. Do you have any information on why you were
19 chosen to be part of this Team given that you had no
20 experience in Exploration or Drilling?

21 A. No, I don't.

Page 190:23 to 191:11

00190:23 Q. (By Ms. Kuchler) When you left Houston after
24 your approximate three weeks of working on the
25 investigation, were you released from your role?

00191:01 A. I was.

02 Q. And if so, do you know why you were released
03 when your tasks weren't completed?

04 A. As I said earlier on, I had a -- an -- a
05 commitment to hire in which I asked if I could honor
06 it, which is why I was released when I was released.
07 And I think at the time that I was leaving, they
08 reviewed the tasks that were -- were left to complete,
09 the resources they had available, and said, "We can
10 complete those," and I know that my boss was really
11 missing me not doing my role back in the U.K.

Page 191:16 to 191:18

00191:16 Q. Were there any specific individuals' accounts
17 that you discounted because they didn't seem to line up
18 with the other evidence available to you?

Page 191:20 to 191:21

00191:20 A. Every Witness Statement I was given was put in
21 the timeline.

Page 196:22 to 197:15

00196:22 Q. Okay. Have you had any training in conducting
23 investigative interviews before you participated in the
24 telephone interview with Mr. Sims?

25 A. Yes.

00197:01 Q. What kind of training had you received on
02 that?

03 A. So on two different occasions, I've attended
04 interview -- incident investigation training for BP in
05 the North Sea.

06 Q. And do you have any training in root cause
07 analysis?

08 A. I've attended a course -- again, an incident
09 investigation course on determining root cause.

10 Q. How long did that course take?

11 A. That was a one-day course.

12 Q. Were you provided any guidance on how to
13 perform the investigative interviews as part of the Bly
14 Team?

15 A. No, I was not.