

Deposition Testimony of:

Alaric Durkan

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Page 8:12 to 8:14

00008:12 ALARIC DURKAN,
13 having been first duly sworn, testified as
14 follows:

Page 8:21 to 9:02

00008:21 Could you give your full
22 name for the record, please?
23 A. Full name is Alaric Sherman
24 Durkan.
25 Q. And Mr. Durkan, you're from
00009:01 Houston?
02 A. That is correct.

Page 9:25 to 10:07

00009:25 Q. By whom are you employed?
00010:01 A. Kongsberg Maritime Incorporated.
02 Q. And how long have you work for
03 them?
04 A. Since July of 2008.
05 Q. And what is your position with
06 them?
07 A. I'm the training center manager.

Page 11:05 to 11:11

00011:05 Q. All right. What is your
06 educational background besides -- outside
07 of the U.S. Navy?
08 A. I graduated from the U.S. Naval
09 Academy.
10 Q. All right. And when was that?
11 A. 2003.

Page 12:12 to 13:08

00012:12 Q. All right. What are your duties
13 as the director of the training center?
14 A. As the training center manager,
15 I'm responsible for leading our team of
16 instructors in delivering training courses
17 offered by KMI. As such, I'm responsible
18 for kind of the operations management as
19 well as the administration of the
20 department.
21 Q. All right. As the operational
22 manager and administrator of the
23 department, do you teach?
24 A. Yes. I am still actively
25 involved with instructing courses.

00013:01 Q. And what courses do you teach?
02 A. I teach several of them still.
03 Okay. The DP basic operator and DP
04 advanced operator courses. The advanced DP
05 power simulation course, the DP drilling
06 simulation course, the DP familiarization
07 course, DP introduction course, and the DP
08 course for ABS surveyors.

Page 13:17 to 14:09

00013:17 Q. Have you taken any courses in
18 dynamic positioning at all?
19 A. Yes.
20 Q. All right. What courses in
21 dynamic positioning have you taken?
22 A. During internal training with
23 KMI, I have attended several DP basic and
24 advanced operator courses as well as
25 internal product familiarization courses.
00014:01 And with regards to certification, as an
02 instructor -- accreditation of instructors
03 is through the Nautical Institute.
04 Q. And are you an accredited
05 instructor?
06 A. Yes.
07 Q. And when -- when did you become
08 an accredited instructor?
09 A. In October of 2008.

Page 15:02 to 15:06

00015:02 Q. Does the -- does the dynamic
03 positioning operators course that you have
04 for KMI include simulations of a well
05 blowout?
06 A. No.

Page 15:11 to 16:20

00015:11 Q. Why?
12 A. When you look at the training we
13 offer, you can put it into, really, three
14 categories. First off would be the DP
15 operator certification training, which is
16 through the DP operator basic and advanced
17 courses I had mentioned earlier. With
18 that, we also -- or in addition to that, we
19 also offer product training courses. And
20 then the special simulation courses we run,
21 being the DP drilling simulation course and
22 the advanced DP power simulation course,
23 deal only with dynamic positioning and/or

24 power management. There's no -- no
 25 simulation for, as -- as you put it, well
 00016:01 blowout.
 02 Q. All right. Let's talk about
 03 fire and gas, the use of the fire and gas
 04 detection and the ESD systems onboard the
 05 Deepwater Horizon. You're familiar with
 06 what KM systems those were?
 07 A. Yes.
 08 Q. All right. And with regard to
 09 those systems, if I am a -- going to a
 10 Kongsberg -- or a KMI training course, what
 11 courses cover the operation of those
 12 systems?
 13 A. It depends which -- which vessel
 14 you belong to.
 15 Q. Let's talk about a deepwater --
 16 let's talk about MODU.
 17 A. Okay. For the -- for any MODU,
 18 you have either the K-Chief basic course --
 19 Q. I'm sorry? The --
 20 A. K-Chief basic.

Page 16:24 to 17:05

00016:24 A. Which corresponds with our
 25 latest version of automation system. For
 00017:01 those vessels that would be equipped with
 02 the Simrad line of products, such as the
 03 Simrad safety systems, you would receive
 04 training via the Simrad safety system
 05 course for fire and gas and ESD.

Page 17:13 to 17:22

00017:13 My question is, is what
 14 involvement does Transocean have with KMI
 15 in terms of the actual course material
 16 and -- and -- that is taught?
 17 A. For which course?
 18 Q. Any course.
 19 A. For the DP -- correction. For
 20 the advanced DP power simulation course, we
 21 developed the course material and the
 22 course curriculum working with Transocean.

Page 19:14 to 19:24

00019:14 Q. All right. The -- outside of
 15 the K-Chief basic course and the Simrad
 16 safety system course, are there any other
 17 courses that cover the fire and gas
 18 detection and ESD system on a vessel such

19 as the Deepwater Horizon?
20 A. No.
21 Q. Does -- do either of those
22 courses offer simulations where there are
23 multiple instances of fire on the rig?
24 A. No.

Page 20:04 to 21:05

00020:04 Q. All right. Are there any
05 simulation based courses that you offer for
06 a DP operator which would -- which would
07 have -- include simulations of multiple
08 fires on a rig such as the Deepwater
09 Horizon?
10 A. No.
11 Q. Are there any courses that KM
12 offers that simulate multiple detections of
13 combustible gas aboard a vessel such as the
14 Deepwater Horizon?
15 A. No.
16 Q. How does KM train, if at all, DP
17 operators to respond to those situations?
18 Those situations being multiple fires or
19 multiple gas detections aboard a rig such
20 as the Deepwater Horizon.
21 A. We don't conduct that training.
22 Q. Is there any reason why you
23 don't conduct that type of training?
24 A. As primarily a vendor of these
25 systems to -- to the offshore market, our
00021:01 expertise is really in the software
02 engineering, the hardware engineering, the
03 product itself. You know, the -- the
04 emergency response to an incident of that
05 scope is outside of our expertise.

Page 21:11 to 22:16

00021:11 that you don't -- although you put the
12 system to monitor, detect, and respond to
13 all those instance, you don't train people
14 to use the system, once -- once it detects,
15 to respond?
16 A. We train them how to use a tool.
17 You can -- you can think of it like that.
18 We -- we produce the tool. We train them
19 how to use the tool. Beyond that, the --
20 the scope of something like that
21 encompasses more than just what our system
22 is involved with.
23 Q. All right. But you have
24 simulators, do you not?
25 A. Yes.

00022:01 Q. And those simulators could
02 simulate multiple fire alarms onboard a
03 vessel such as the Deepwater Horizon, could
04 they not?
05 A. We do not have simulators that
06 simulate that particular kind of event.
07 Q. So you have no programming that
08 simulates sensor alarms onboard the vessel?
09 A. What kind of sensors?
10 Q. Fire, gas, combustible gas,
11 toxic gas.
12 A. No.
13 Q. Do you have simulators that
14 simulate the screens which show those
15 sensors when you teach?
16 A. No.

Page 23:01 to 23:20

00023:01 Q. We're talking about K-Chief
02 basic course and Simrad systems safety
03 course.
04 A. If you're participating in
05 either of those courses, you will be
06 looking at the safety systems screens. But
07 once again, we're not running a simulation
08 of those. You're -- you're using software
09 kind of -- I mean granted, yes, it is -- it
10 is simulated, but we're not simulating the
11 full operations of those systems.
12 Q. Okay. Do you know of any other
13 course outside of the courses that KM
14 offer, perhaps that Transocean offers, that
15 stimulates those conditions and trains DP
16 officers to respond? And when I say those
17 conditions, detections of multiple fire and
18 gas alarms and trains DP officers to
19 respond to those?
20 A. No, I don't know.

Page 24:07 to 25:13

00024:07 (Exhibit Number 1120 marked.)
08 Q. We'll go ahead and mark this as
09 Exhibit Number 1120. It's Tab Number 30 in
10 your book.
11 MR. BICKFORD:
12 Mr. Connelly.
13 MR. CONNELLY:
14 Got it. Thank you.
15 Q. Okay. This is a Transocean
16 document. It's 00023807.
17 Sir, I direct your
18 attention down to the -- the highlighted

19 name of Andrea Fleytas. It's
20 F-l-e-y-t-a-s. And I'm asking you to look
21 at the course -- the courses that she has
22 taken to the -- in the column, the --
23 what's this course is on top. And I'm
24 going to ask you to identify which courses
25 would be ones offered by KMI.

00025:01 A. Okay. The courses we would
02 offer. Here, you have listed DP lessons
03 learned simulator. That is how Transocean
04 refers to the advanced DP power simulation
05 course.

06 Q. Okay. And just for -- and this
07 is the next exhibit we're going to talk
08 about. That's this course?

09 A. Correct.

10 Q. All right. And I'm just holding
11 it up, KMI 009896, which I'll go ahead and
12 mark as 1121.

13 (Exhibit Number 1121 marked.)

Page 25:23 to 28:18

00025:23 Q. Okay. Sir, go ahead.

24 A. And then you also have Nautical
25 Institute DP simulator course, which is the
00026:01 DP advanced operator course that we teach.

02 And then also the Nautical Institute DP
03 induction course, which is the DP basic
04 operator course.

05 Q. Okay. Is that the K-Chief basic
06 course?

07 A. No.

08 Q. All right. And that's not the
09 Simrad safety system course either,
10 correct?

11 A. Correct. It is not.

12 Q. Okay. Does -- does that course
13 include the elements of either of those
14 with regard to fire and gas safety?

15 A. Which of these courses?

16 Q. The one that we just talked
17 about, the basic course.

18 A. No.

19 Q. All right. Continue.

20 A. And those are the only courses
21 listed here that are offered through KMI.

22 Q. All right. With regard to the
23 courses that you mentioned here, would any
24 of those courses include the elements of
25 the K-Chief basic course or the Simrad
00027:01 safety systems course in terms of fire and
02 gas system?

03 A. No.

04 Q. Sir, turning to the next tab.

05 And if you'll let the court reporter mark
 06 it right there. That's Exhibit 1121.
 07 This is the -- you can just
 08 stick that on the -- on that cover. Thank
 09 you.
 10 This course in front of
 11 you, the DP power simulation training
 12 concept course, is it the course developed
 13 with -- between KMI and Transocean?
 14 A. Yes.
 15 Q. All right. And I think we
 16 talked about that earlier. But to -- with
 17 regard to dynamic positioning itself, you
 18 do have simulators, correct?
 19 A. Yes.
 20 Q. And you do have simulators which
 21 simulate bad weather conditions, correct?
 22 A. Yes.
 23 Q. And power failure, correct?
 24 A. Yes.
 25 Q. And do you have simulators that
 00028:01 simulate a well blowout event with regard
 02 to the DP operator; in other words, that
 03 the -- the riser somehow becomes entangled
 04 or will not disconnect?
 05 A. No.
 06 Q. All right. Do you have any --
 07 other than -- other than power failures and
 08 equipment failures, do you have any courses
 09 that entail, what I would call, man-made
 10 disasters, blowouts or explosions on the --
 11 on the -- in the -- on the rig in terms of
 12 a DP operator course?
 13 A. No, not specifically. For
 14 instance, you had mentioned explosions.
 15 What we would simulate with a -- with a DP
 16 simulator is what inputs or connections to
 17 the DP would be lost if there were an
 18 explosion.

Page 28:22 to 32:19

00028:22 Q. All right. Go ahead and turn to
 23 Tab Number 29, please. 1122. She's going
 24 to hand you -- just put that over some
 25 portion of it that doesn't have writing on
 00029:01 it. I appreciate it.
 02 (Exhibit Number 1122 marked.)
 03 A. Tab Number 29?
 04 Q. Yes. You're right there.
 05 Can you identify that
 06 document for me?
 07 A. Yes.
 08 Q. What is it?
 09 A. This is a printout of an Excel

10 spreadsheet listing our registered
11 Transocean course participants.
12 Q. Okay. These are the -- and from
13 what date period is -- does this run from?
14 A. This covers the entire range of
15 our recordkeeping.
16 Q. Which would be?
17 A. I believe from 1999 onwards.
18 Q. So 1999 until you ran this. And
19 when was this run? Within the last two
20 months? Is it fair to say --
21 A. I don't know the creation date.
22 Q. Is it fair to say it was run
23 after April 10th, 2010 --
24 A. Yes.
25 Q. -- April 20th, 2010?
00030:01 A. Yes.
02 MR. CONNELLY:
03 Counsel can represent it was
04 run in connection with your request for
05 documents.
06 MR. BICKFORD:
07 All right. Thank you.
08 Q. And I'm sorry. This represents
09 all of the employees of Transocean who have
10 been sent to the -- to KMI for training?
11 A. No.
12 Q. All right. What does it
13 represent?
14 A. It represents Transocean
15 employees who have run training courses
16 throughout the Kongsberg Maritime training
17 structure. So not just at KMI.
18 Q. Okay. So any -- any course
19 that -- and tell me what the KM training
20 structure is.
21 A. Okay. We have several training
22 centers around the world, one of which is
23 the training center at KMI in Houston.
24 Q. So any Kongsberg training that
25 was done worldwide from approximately 1999
00031:01 until whenever this data was run in --
02 presumably in the last couple of months
03 of -- in the first part of 2011. These are
04 all the attendees from Transocean who have
05 taken a course with Kongsberg; is that
06 fair?
07 A. Yes.
08 Q. All right. And the -- and it
09 lists the rig or ship that they were
10 attached to at the time they took the
11 course?
12 A. Yes. However, when -- when the
13 course bookings are made, it is not always
14 identified to us to which vessel the person

15 was or wasn't assigned to.
 16 Q. Understood. But if they do,
 17 this is -- this is the vessel that they
 18 were on at the time that they took the
 19 course?
 20 A. That is correct.
 21 Q. All right. And then the -- the
 22 course that they actually took is listed
 23 next to their name?
 24 A. No. It's in Column E.
 25 Q. That's what I'm saying. I
 00032:01 apologize.
 02 If I go across, it's
 03 essentially different students from
 04 Transocean. Their names is Column B, the
 05 ship that they were attached to at the time
 06 of the course was Column C, and the course
 07 is Column E; is that correct?
 08 A. That is correct.
 09 Q. What was Column D?
 10 A. I don't know.
 11 Q. All right. Column F is the year
 12 they took the course?
 13 A. Yes.
 14 Q. Column G is the week of the year
 15 they took the course?
 16 A. Correct.
 17 Q. And when it says started, is
 18 that a date sequence?
 19 A. Yes.

Page 38:18 to 39:04

00038:18 Q. And specifically what I'm
 19 getting at is, if a -- if a vessel has the
 20 Kongsberg safety system, does Kongsberg
 21 recommend that DP operators take either the
 22 Simrad safety system course or the K-Chief
 23 basic course as recommended?
 24 A. Only in so much and in that the
 25 DP operator would be using that system.
 00039:01 Assume they don't maintain it but assume
 02 that they use it, then once again, the
 03 general recommendation is that, yes, they
 04 receive the training for it.

Page 41:06 to 41:20

00041:06 Q. Are you aware of the frequency
 07 with which the K-Chief basic course is
 08 offered?
 09 A. Not specifically.
 10 Q. Generally, are you aware of how
 11 often it's offered?

12 A. Yes.
13 Q. Okay. How often?
14 A. Very often.
15 Q. Can you be more specific?
16 A. Not without reviewing, once
17 again, our -- our course documentation, our
18 information. But at least once a month.
19 Q. So about 12 times a year?
20 A. At least.

Page 42:18 to 43:17

00042:18 Q. I'd like you to turn to what --
19 what's previously marked as Exhibit 1122.
20 It's Tab 29 in the -- in the binder in
21 front of you. And I just -- I just want to
22 clarify that I understand exactly what this
23 spreadsheet includes.
24 Does it -- am I correct in
25 that it includes a list of all employees
00043:01 that Transocean has -- let me rephrase
02 that.
03 It includes a list of
04 Transocean employees who have attended
05 Kongsberg training courses within the KMI
06 training structure since approximately
07 1999?
08 A. Generally, yes. For course
09 bookings, for students identified as being
10 employees of Transocean, where available or
11 when known which vessel they were assigned
12 to, and not just with KMI, but within the
13 Kongsberg Maritime kind of global scheme of
14 training, yes.
15 Q. And to your knowledge, is that a
16 complete and accurate list?
17 A. Yes.

Page 44:08 to 44:20

00044:08 Do I understand correctly
09 that the DP basic operator course includes
10 no training regarding the Simrad safety
11 system?
12 A. That's correct.
13 Q. Okay. And DP advanced operator
14 course includes no training on the safety
15 system?
16 A. Correct.
17 Q. And the advanced DP power
18 simulator course does not include training
19 on safety systems?
20 A. Correct.

Page 45:24 to 46:10

00045:24 Q. Good morning. I'm Don Haycraft
25 representing BP, and I thank you for your
00046:01 time this morning.
02 Looking at Exhibit 1122,
03 I'm going to ask you about three people --
04 Yancy Kiplinger, Andrea Fleytas, Curt
05 Kuchta, K-u-c-h-t-a. And I would like you
06 to look through the spreadsheet of TO
07 employees receiving Kongsberg Maritime
08 training and see if any of those three
09 individuals have taken the Simrad safety
10 curriculum at Kongsberg Maritime.

Page 50:09 to 50:14

00050:09 Q. Is it correct for me, then, to
10 say from Exhibit 1122, that neither Andrea
11 Fleytas, Yancy Keplinger, or Curt Kuchta
12 have taken, according to Kongsberg
13 Maritime's records, a course in Simrad
14 safety systems?

Page 50:17 to 50:22

00050:17 Q. You can answer.
18 A. That is correct.
19 Q. Does Kongsberg Maritime certify
20 any other vendors to teach Kongsberg safety
21 systems, fire and gas and ESD systems?
22 A. No.

Page 51:10 to 51:12

00051:10 Q. Sir, my name is Daniel Johnson,
11 and this is my colleague Stephanie Legrand.
12 We represent Transocean in this litigation.

Page 54:08 to 56:16

00054:08 Q. Could you turn to the front of
09 that tab. And that's Tab 11 of the PSC
10 binder.
11 What's the title of that
12 document that's Exhibit 996?
13 A. Quotation Number 1452-7.
14 Q. That's a quotation from
15 Kongsberg?
16 A. Yes.
17 Q. Okay. Could you turn to Page 50
18 of that document, sir?

19 And on Page 50, do you see
 20 the title of that section that says
 21 training?
 22 A. Yes.
 23 Q. Okay. And it says training is
 24 included, correct?
 25 A. Correct.
 00055:01 Q. Okay. Would you list -- what is
 02 the first item there of the training that's
 03 included?
 04 A. The first bullet point is SDP
 05 operator course.
 06 Q. And how long does that course
 07 last?
 08 A. Indicated here, a five-day
 09 operator course.
 10 Q. Tell me what that training would
 11 entail.
 12 A. That would be the DP basic
 13 operator course, which is one of those two
 14 courses I listed as being the
 15 non-quantitude certification courses.
 16 Q. Gotcha.
 17 And then the next item,
 18 which was included in the training is -- is
 19 what?
 20 A. The next bullet point is SVC
 21 operator course.
 22 Q. Can you tell me what's included
 23 in that course?
 24 A. The SVC operator course is an
 25 introduction to the functionality and
 00056:01 options available with the Simrad vessel
 02 control system.
 03 Q. And how long is that course?
 04 A. Listed here as two days.
 05 Q. And then the last piece of
 06 training that was included with the
 07 product?
 08 A. The last bullet point is a
 09 maintenance course.
 10 Q. And how long would that last?
 11 A. Indicated here as a -- as a
 12 five-day course.
 13 Q. And this was training that
 14 Kongsberg provided to, at the time, R&B
 15 Falcon when the system was purchased; is
 16 that true?

Page 56:19 to 59:19

00056:19 A. I'm not sure when the training
 20 was held. But --
 21 Q. Fair --
 22 A. But included, yes, with -- with

23 the delivery.

24 Q. So you're not -- you're not
25 sure, in terms of the timing, exactly when
00057:01 it was done, but you're -- you can testify
02 that, in fact, the training occurred?

03 A. In general, yes. It is -- it is
04 customary to include with -- with these
05 large contracts, you know, some training
06 offered. You know, there -- there would
07 often be training included with the
08 delivery. Whether or not the actual course
09 bookings used this offer, I don't know.

10 Q. Okay. Do you have any reason to
11 doubt that that did not occur?

12 A. No, I have no reason to doubt.

13 Q. In terms of the Transocean
14 employees that compromised the crew of the
15 Deepwater Horizon, do you have any
16 knowledge of the training that they
17 received from Transocean internally?

18 A. No.

19 Q. Okay. That probably answers my
20 next question, but I just want to make
21 sure. Since you're not aware of any
22 internal Transocean training, I'm correct,
23 sir, that you don't have any criticisms of
24 that training, correct?

25 A. Correct. I have -- I have no
00058:01 knowledge of internal training by
02 Transocean.

03 Q. Okay. Is Kongsberg -- you hold
04 yourselves out as experts in drilling
05 operations?

06 A. No.

07 Q. Do you offer courses in well
08 control?

09 A. No.

10 Q. Do you offer -- I gather, then,
11 no well control certification courses?

12 A. No.

13 Q. You don't hold yourself out as
14 knowledgeable or experts in well control,
15 correct?

16 A. That is correct.

17 Q. I wanted to ask you -- just
18 briefly, if you could, turn to Exhibit 1122
19 again. I'm going to give you the line.
20 Line 479.

21 MR. BICKFORD:
22 I'm sorry. What line did
23 you say?

24 MR. JOHNSON:
25 479. And it's Bates ending
00059:01 in 1628.

02 Q. Have you found that line, sir?

03 A. Yes.
04 Q. That was a course taken by Yancy
05 Keplinger; is that right?
06 A. Correct.
07 Q. And the course is dynamic --
08 dynamic positioning basic operator course,
09 correct?
10 A. Correct.
11 Q. And moving forward across the
12 line there, that was taken in 2003?
13 A. Correct.
14 Q. And then under Category K, an
15 instructor is listed. Do you see that?
16 A. Yes.
17 Q. And the instructor's name is
18 Angel Rodriguez?
19 A. That is correct.

Page 60:09 to 60:14

00060:09 Q. What kind of courses did
10 Mr. Rodriguez teach other than the DP
11 courses, if you know?
12 A. Without a review of all of our
13 course history, in general, he was a
14 dynamic positioning instructor.

Page 62:09 to 63:02

00062:09 Q. With regard -- I would like you
10 to look at this exhibit, which I've marked
11 as 1123.
12 (Exhibit Number 1123 marked.)
13 Q. Which is the SSS basic operating
14 course, F&G drilling. Do you see that?
15 A. Yes.
16 Q. What is that, sir?
17 A. This is the Simrad safety system
18 basic operator course.
19 Q. All right. And was this -- was
20 this the -- one of the two courses that you
21 had indicated earlier in your testimony
22 that teaches the fire and gas safety
23 system?
24 A. Yes.
25 Q. All right. And is the material
00063:01 for the other course, I think you called it
02 the big chief course or the chief course?

Page 63:05 to 64:06

00063:05 A. The K-Chief course.
06 Q. The K-Chief course. Okay.

07 So your big chief course,
08 is -- does that include the basic
09 operating -- the same materials?

10 A. In general, yes.

11 Q. All right. When you say in
12 general, yes, what's different about it?

13 A. The difference here is the
14 product itself. The Simrad line of
15 products in this case, those such as the
16 Simrad safety system, Simrad vessel control
17 system are a, you know, separate and -- and
18 different product than the newer K line of
19 products such as K-Chief.

20 Q. Okay. And the K-Chief line of
21 products was onboard the Deepwater Horizon;
22 is that correct?

23 A. That is correct.

24 Q. All right. So people that were
25 on the Deepwater Horizon would have --
00064:01 would have -- well, if, in fact, you were
02 teaching someone aboard the Deepwater
03 Horizon to operate the systems on the
04 Deepwater Horizon, they would have taken
05 the SSS basic operator course versus the
06 K-Chief course, correct?

Page 64:09 to 64:10

00064:09 A. They could have taken that
10 course, yes.

Page 65:25 to 66:04

00065:25 Q. If, in fact, someone who worked
00066:01 at Transocean took a Kongsberg course
02 anywhere in the world, would -- from 2001
03 on, would their name be listed on this
04 register --

Page 66:10 to 66:11

00066:10 A. Yes. If the course booking was
11 in coordination with Transocean.

Page 67:02 to 67:08

00067:02 Q. All right. Sir, turning to what
03 we just marked as Exhibit 1123. The --
04 explain to me -- this is the SSS basic
05 operator course. Explain to me, is this
06 the PowerPoint presentation?

07 A. This document, yes, is the
08 printout of the PowerPoint presentation.

Page 68:09 to 68:13

00068:09 Q. Okay. And so the -- and just so
10 that I'm clear, the basic operating course
11 has a four- or five-day course that just
12 concentrates on F&G drilling?
13 A. Yes.

Page 68:23 to 69:04

00068:23 Q. Okay. And -- and that just
24 concentrates on the fire and gas systems
25 onboard the -- the rig?
00069:01 A. Yes.
02 Q. All right. Did any of these
03 individuals, Mr. Kuchta, Ms. Fleytas, or
04 Mr. Keplinger --

Page 69:10 to 69:12

00069:10 A. We have no record of
11 Mr. Kuchta -- Kuchta, Ms. Fleytas, or
12 Mr. Keplinger attending this course.

Page 73:16 to 73:20

00073:16 Q. All right. And has Transocean,
17 since you have been at the training
18 facility, asked you to tailor a -- a
19 particular basic operating course in fire
20 and gas drilling to a particular vessel?

Page 73:24 to 73:24

00073:24 A. Not to my knowledge, no.

Page 74:11 to 74:19

00074:11 Q. Does -- are you aware of any
12 instructors within Transocean -- within the
13 Transocean company that instruct their
14 employees on Kongsberg systems?
15 A. I don't know.
16 Q. The answer is you -- you don't
17 know of any?
18 A. I don't know of any. That's
19 correct.

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00076:25 Q. Just so that I'm clear with
00077:01 regard to your prior testimony, is that
02 there is no course with regard to the use
03 of the fire and gas safety systems and the
04 ESD systems connected with that other --
05 for a Simrad safety system, other than this
06 basic operating course?
07 A. That is correct.
08 Q. And this basic operating course
09 offers no actual simulations of events that
10 might occur on a drilling rig with regard
11 to the detection of fire and gas hazards;
12 is that fair?
13 A. What do you mean by events?
14 Q. The detection of high
15 combustible gas, the detection of multiple
16 fires?
17 A. What the training course would
18 involve might be an input from a sensor to
19 the Simrad safety system, and you -- you
20 know, the course participant would be able
21 to see that -- that input and then, you
22 know, work with the functionality beyond
23 that. So in that regard, yes, we do
24 simulate that.
25 Q. Okay. But there's no simulation
00078:01 of an actual event, such as you simulate a
02 blackout on a rig in a DPO training course
03 where you're teaching the dynamic
04 positioning operator how to react when the
05 vessel goes blacked out, you don't have a
06 simulation in this basic operating course,
07 which takes the operator through multiple
08 fires erupting on the rig, correct?
09 A. Correct.

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00081:12 Q. Well, your system has an ESD
13 component to it, does it not?
14 A. That is correct.
15 Q. And that's taught in this basic
16 operating course, is it not?
17 A. The functionality is, yes.
18 Q. All right. And is the cause and
19 effect outputs taught in the course?
20 A. The cause and effect logic?
21 Q. Yes.
22 A. Yes.
23 Q. And so do you run simulations
24 which simulate inputs from multiple gas and
25 fire detectors showing an event aboard a
00082:01 vessel where that occurs in this operating
02 course?
03 A. Once again, we do not simulate

04 the event, only the inputs that such an
05 event would create.
06 Q. Which was my question.
07 A. And yes, you would be able to
08 see the flow of the input to the output
09 according to the cause and effect.
10 Q. My question, sir, is: Do you do
11 it?
12 A. Yes.
13 Q. You do?
14 A. Yes.