

Deposition Testimony of:

Caleb Holloway

Date: May 19, 2011

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Page 6:10 to 6:11

00006:10 RECORD. MAY THE WITNESS PLEASE BE SWORN.
11 (WITNESS SWORN)

Page 13:01 to 13:11

00013:01 MR. HOLLEY: WELL, LET ME SAY THIS
02 BECAUSE THAT'S NOT ON THE RECORD YET.
03 MR. HOLLOWAY WILL NOT ANSWER QUESTIONS FROM
04 11:30 ON 20 APRIL 2010 UNTIL THE MOMENT OF
05 THE EXPLOSION. THAT PERIOD OF TIME HE
06 INTENDS TO INVOKE HIS PRIVILEGE OF -- AGAINST
07 SELF-INCRIMINATION ON THE FIFTH AMENDMENT.
08 AFTER THE EXPLOSION HE WILL
09 DISCUSS ANYTHING WITH THE EXCEPTION OF HE'S
10 NOT GOING TO GO INTO HIS INJURIES OR THE
11 DAMAGES THAT RESULTED FROM THE EXPLOSION.

Page 16:05 to 16:09

00016:05 CALEB CHASE HOLLOWAY,
06 HAVING BEEN FIRST DULY SWORN, TESTIFIED AS
07 FOLLOWS:
08 EXAMINATION
09 BY MR. WILLIAMSON:

Page 16:16 to 17:19

00016:16 Q. (BY MR. WILLIAMSON) PLEASE
17 STATE YOUR NAME FOR THE RECORD.
18 A. CALEB CHASE HOLLOWAY.
19 Q. OKAY. ARE YOU WORKING
20 PRESENTLY, MR. HOLLOWAY?
21 A. NO, SIR.
22 Q. OKAY. WHEN WAS THE LAST TIME
23 YOU WORKED?
24 A. APRIL THE 20TH, 2010.
25 Q. OKAY. AND AT THAT TIME, WHO
00017:01 WERE YOU WORKING FOR?
02 A. TRANSOCEAN.
03 Q. OKAY. TELL ME WHEN YOU WENT TO
04 WORK FOR TRANSOCEAN.
05 A. I BELIEVE IT WAS OCTOBER THE
06 15TH OR THE 25TH OF 2007.
07 Q. OKAY. AND WHAT WAS YOUR JOB
08 WITH TRANSOCEAN FROM OCTOBER 15TH, 2007 UP
09 UNTIL APRIL -- DID YOU WORK FOR THEM FROM
10 OCTOBER 2007 UNTIL APRIL 2010?
11 A. YES.
12 Q. OKAY. TELL ME A LITTLE BIT
13 ABOUT -- AND WHAT WAS YOUR JOB WITH
14 TRANSOCEAN? FROM OCTOBER 2007 THROUGH APRIL

15 2010, WHAT WAS YOUR JOB?
16 A. I STARTED AS A ROUSTABOUT
17 WORKING FOR THE CRANE CREW, THEN I WAS
18 PROMOTED TO FLOOR HAND. AND I WORKED AS A
19 FLOOR HAND UP UNTIL APRIL THE 20TH OF 2010.

Page 17:23 to 18:04

00017:23 Q. OKAY. AND THERE WAS AN
24 EXPLOSION ON THE RIG ON APRIL 20TH, 2010, ON
25 THE DEEPWATER HORIZON RIG, CORRECT?
00018:01 A. YES.
02 Q. AND YOU WERE PRESENT ON THE RIG
03 AT THAT -- ON THAT DATE?
04 A. YES.

Page 18:16 to 18:25

00018:16 Q. FAIR ENOUGH. OKAY. WHEN DID
17 YOU GET OUT OF HIGH SCHOOL IN CHIRENO?
18 A. 2000, THE YEAR 2000.
19 Q. OKAY. TELL ME BRIEFLY WHAT YOU
20 DID -- DID YOU GET ANY EDUCATION PAST THE
21 YEAR 2000?
22 A. I ATTENDED A SEMESTER OF
23 COLLEGE.
24 Q. WHERE?
25 A. AT ANGELINA JUNIOR COLLEGE.

Page 19:03 to 20:23

00019:03 Q. ANYTHING PAST THAT FORMAL
04 EDUCATION?
05 A. NO, SIR.
06 Q. OKAY. TELL ME WHAT YOU DID IN
07 THE WAY OF WORK IN BETWEEN 2000 AND OCTOBER
08 2007 WHEN YOU TOOK A JOB WITH TRANSOCEAN.
09 LET'S START THIS WAY. WERE YOU IN THE OIL
10 FIELDS? WERE YOU WORKING IN THE OIL FIELD
11 AREA?
12 A. NOT -- NOT UNTIL 2005, I
13 BELIEVE.
14 Q. ALL RIGHT. LET'S SEE IF WE CAN
15 COVER 2000 AND 2005 PRETTY QUICKLY.
16 DID YOUR EXPERIENCE FROM 2000 TO
17 2005 HAVE ANYTHING TO DO WITH THE OIL FIELD
18 IN TERMS OF DRILLING WELLS, WORKING ON WELLS,
19 WORKING ON RIG FLOORS, WORKING ON RIGS,
20 THINGS LIKE THAT? DID YOUR WORK EXPERIENCE
21 HAVE ANYTHING TO DO WITH THAT?
22 A. NO, SIR.
23 Q. OKAY. AND I'M SURE UP UNTIL
24 2005 YOU DON'T CLAIM ANY EXPERTISE OR

25 BACKGROUND IN THE OIL FIELD OR THE OIL PATCH
00020:01 IN TERMS OF THE WAY TO HANDLE DRILLING RIGS
02 OR MUD WORK. YOU DON'T KNOW ANYTHING ABOUT
03 THAT SUBJECT BEFORE 2005?
04 A. NO, SIR.
05 Q. OKAY. FROM 2005 TO 2007, WHAT
06 DID YOU DO?
07 A. I WORKED FOR TODCO. IT'S A
08 SHALLOW WATER DRILLING COMPANY.
09 Q. LAND-BASED?
10 A. OFFSHORE.
11 Q. OKAY. WHAT DID YOU DO FOR
12 TODCO?
13 A. ROUSTABOUT.
14 Q. OKAY. TELL ME WHAT YOUR
15 UNDERSTANDING OF WHAT A ROUSTABOUT DOES.
16 A. WE WORK AS DIRECTED UNDER THE
17 CRANE OPERATOR, RIGGING LOADS AND -- AND --
18 FOR THE CRANE AND OFFLOADING SUPPLY BOATS,
19 JUST WORKING -- HOUSEKEEPING.
20 Q. ANYTHING AND EVERYTHING IN THE
21 WAY OF LABOR NECESSARY TO GET STUFF ON AND
22 OFF THE RIG?
23 A. YES.

Page 21:05 to 21:20

00021:05 Q. OKAY. OKAY. SO YOU WORKED AS A
06 ROUSTABOUT FOR TODCO UP UNTIL THE TIME YOU
07 WENT TO WORK FOR TRANSOCEAN?
08 A. YES, SIR.
09 Q. OKAY. AND I ASSUME DURING THE
10 TIME YOU WERE WITH TODCO YOU WERE A
11 ROUSTABOUT THE WHOLE TIME. DO I HAVE IT
12 RIGHT?
13 A. YES, SIR.
14 Q. OKAY. ALL RIGHT. WHEN YOU WENT
15 TO WORK FOR TRANSOCEAN, OCTOBER 15, 2007, I
16 WANT YOUR WORK HISTORY BEFORE APRIL 2010. DO
17 YOU UNDERSTAND WHAT I'M SAYING? SO TELL ME
18 GENERALLY, WHEN YOU STARTED WITH TRANSOCEAN
19 YOU STARTED AS A ROUSTABOUT, RIGHT?
20 A. YES.

Page 22:06 to 24:03

00022:06 Q. OKAY. WAS IT A YEAR OR SO YOU
07 WERE A ROUSTABOUT AND THEN YOU BECAME A FLOOR
08 HAND, OR WAS IT LONGER THAN THAT, OR IS IT --
09 JUST AN APPROXIMATION?
10 A. YES, SIR, A YEAR OR SO.
11 Q. I'M SURE IT WAS A PROMOTION TO
12 BECOME A FLOOR HAND?
13 A. YES, SIR.

14 Q. OKAY. NOW -- AND SO YOU GET
 15 PROMOTED TO FLOOR HAND ON TRANSOCEAN ON WHAT
 16 VESSEL?
 17 A. DEEPWATER HORIZON.
 18 Q. OKAY. SO WHEN YOU BECAME A
 19 FLOOR HAND, YOU WERE A FLOOR HAND ON THE
 20 DEEPWATER HORIZON UP UNTIL APRIL 2010,
 21 CORRECT?
 22 A. YES, SIR.
 23 Q. OKAY. AND I ASSUME ALL OF YOUR
 24 EXPERIENCE WITH TRANSOCEAN WAS OFFSHORE?
 25 A. YES, SIR.
 00023:01 Q. TELL ME WHAT YOU -- A FLOOR HAND
 02 DOES.
 03 A. WELL, A LITTLE BIT OF
 04 EVERYTHING, REALLY. WE WORK AS DIRECTED
 05 AS -- UNDER -- UNDER THE DRILLER AND
 06 ASSISTANT DRILLERS.
 07 Q. OKAY. ONE OF YOUR DUTIES IS TO
 08 HANDLE THE PIPE WHEN IT COMES OUT OF THE HOLE
 09 WHEN YOU'RE TRIPPING IN OR TRIPPING OUT?
 10 A. YES.
 11 Q. AND TO HELP MAKE UP THE JOINTS
 12 AND MAKE SURE THE PIPE GOES IN AND OUT THE
 13 HOLE?
 14 A. YES.
 15 Q. AND SET SLIPS?
 16 A. YES, SIR.
 17 Q. OKAY. AND THEN WHEN YOU'RE NOT
 18 TRIPPING, WHEN YOU'RE NOT -- AND THEN, OF
 19 COURSE, YOU ALSO HELP ATTACH ANY TOOLS THAT
 20 GO DOWNHOLE IF THERE'S GOING TO BE TOOLS AS
 21 PART OF THE RIG FLOOR?
 22 A. YES, SIR.
 23 Q. AND, OF COURSE, WHEN YOU'RE
 24 DOING THAT, YOU'RE REALLY UNDER THE
 25 SUPERVISION OF THE DRILLER OR THE ASSISTANT
 00024:01 DRILLER OR PERHAPS SOMETIMES THE TOOL PUSHER.
 02 WOULD THAT BE FAIR?
 03 A. YES.

Page 26:02 to 27:13

00026:02 A. NO, SIR.
 03 Q. OKAY. AND SAME QUESTION FOR THE
 04 BLOWOUT PREVENTER STACK. THE BLOWOUT
 05 STACK -- BLOWOUT PREVENTER STACK AND THE
 06 LOWER MARINE RISER PACKAGE THAT SITS ON IT,
 07 YOU'RE NOT IN A POSITION WHERE YOU'RE
 08 CLAIMING TO BE AN EXPERT IN THOSE AREAS OF
 09 DESIGN OR OPERATION OR LIMITATIONS OR
 10 MECHANICALLY, RIGHT?
 11 A. NO, SIR.
 12 Q. OKAY. I'M NOT FUSSING AT YOU
 13 FOR IT. I'M JUST MAKING SURE YOU HAD NOT YET

14 REACHED ANY POINT IN YOUR CAREER WHERE YOU
15 HAD SOME SORT OF SPECIAL EXPERTISE IN THOSE
16 PARTICULAR PIECES OF MECHANICAL EQUIPMENT.
17 AM I RIGHT ABOUT THAT?
18 A. YES, SIR.
19 Q. OKAY. AND THE SAME THING, WHILE
20 I'M ON IT, THE BOP CONTROL SYSTEM. WERE YOU
21 AWARE THE BOP HAS A CONTROL SYSTEM IN THE
22 BLOWOUT PREVENTER ROOM AND IN THE TOOL
23 PUSHER'S -- THERE'S A PANEL IN THE TOOL
24 PUSHER'S STATION AND THERE'S A PANEL ON THE
25 RIG FLOOR STATION. YOU WERE AWARE THAT THOSE
00027:01 CONTROL PANELS EXISTED, RIGHT?
02 A. YES, SIR.
03 Q. BUT YOU'RE NOT HOLDING YOURSELF
04 OUT AS AN EXPERT ON HOW THOSE CONTROL PANELS
05 WORKED OR FUNCTIONED OR WERE DESIGNED OR
06 PROGRAMMED? YOU'RE NOT AN EXPERT IN THOSE
07 AREAS?
08 A. NO, SIR.
09 Q. OKAY. SO IF WE'RE ANALYZING
10 THOSE AREAS AND TRYING TO FIGURE OUT IF
11 SOMETHING WENT WRONG, CALEB HOLLOWAY IS NOT
12 THE RIGHT PERSON TO GO TO TO ASK FOR AN
13 OPINION ON THAT SUBJECT?

Page 27:18 to 28:02

00027:18 Q. OKAY. AND THEN -- I WILL TELL
19 YOU SOMETHING ELSE. YOU GAVE AN INTERVIEW TO
20 THE NEW YORK TIMES. DO I UNDERSTAND THAT
21 CORRECTLY?
22 A. YES, SIR.
23 Q. AND YOU SAID ON THERE THAT WHAT
24 YOU SAW WAS THAT YOU SAW THAT PEOPLE WHO YOU
25 WORKED WITH AT TRANSOCEAN SEEMED TO BE
00028:01 CONCERNED ABOUT SAFETY. DID I SEE YOU KIND
02 OF SAY THAT TO THE NEW YORK TIMES --

Page 28:10 to 28:14

00028:10 Q. (BY MR. WILLIAMSON) YOU MADE
11 SOME COMMENT IN THE NEW YORK TIMES INTERVIEW
12 THAT SAID, "GEE, IT LOOKED TO ME LIKE PEOPLE
13 AT TRANSOCEAN WERE -- HAD SOME CONCERN ABOUT
14 THE SAFETY OF THE WORKERS ON THE RIG."MR.

Page 28:16 to 28:19

00028:16 Q. (BY MR. WILLIAMSON) DID YOU
17 MAKE A COMMENT LIKE THAT TO THE NEW YORK
18 TIMES?
19 A. I -- I DON'T REMEMBER.

Page 37:20 to 38:01

00037:20 Q. YOU WERE RELYING UPON THE
21 MANAGEMENT OF TRANSOCEAN, THE MANAGEMENT OF
22 BP AND WHOEVER THEY HIRED, PEOPLE WHO WERE
23 VERY SMART AND SOPHISTICATED AND EXPERIENCED,
24 YOU WERE RELYING UPON THESE -- THOSE PEOPLE
25 TO MAKE SURE THE OIL WELL GOT DONE SAFELY.
00038:01 AM I CORRECT ABOUT THAT?

Page 38:03 to 38:03

00038:03 A. YES, SIR.

Page 38:14 to 38:19

00038:14 Q. AND IN TERMS OF HOW IT WAS
15 DESIGNED, WHAT ITS LIMITATIONS WERE, WHAT IT
16 COULD DO, WHAT IT COULDN'T DO, YOU WERE
17 RELYING UPON MANAGEMENT ABOVE YOU TO MAKE
18 SURE THOSE SYSTEMS AND PROCESSES WERE SAFE.
19 IS THAT CORRECT?

Page 38:21 to 40:11

00038:21 A. YES, SIR.
22 Q. (BY MR. WILLIAMSON) OKAY. ARE
23 YOU ON ANY MEDICATIONS TODAY -- WELL, FIRST
24 LET'S START THERE. ARE YOU ON ANY
25 MEDICATIONS AT THE PRESENT TIME?
00039:01 A. YES.
02 Q. TELL ME WHAT, PLEASE.
03 A. XANAX, VALIUM, LUNESTA.
04 Q. OKAY. IS THAT IT?
05 A. YES, SIR.
06 Q. TELL ME WHAT THE LUNESTA IS FOR,
07 YOUR UNDERSTANDING OF WHY YOU'RE TAKING
08 LUNESTA.
09 A. YES, SIR.
10 Q. WHAT'S YOUR UNDERSTANDING OF WHY
11 YOU'RE TAKING LUNESTA?
12 A. SLEEP.
13 Q. OKAY. TELL ME WHAT YOUR
14 UNDERSTANDING IS OF WHY YOU'RE TAKING VALIUM.
15 A. ANTIANXIETY.
16 Q. OKAY. AND TELL ME YOUR
17 UNDERSTANDING OF WHY YOU'RE TAKING XANAX.
18 A. ANTIANXIETY.
19 Q. OKAY. DO YOU BELIEVE THOSE -- I
20 DON'T WANT TO GO INTO YOUR PROBLEMS OR
21 MALADIES THAT YOU PERSONALLY HAVE, BUT I WANT
22 TO ASK THIS ONE QUESTION. DO YOU BELIEVE
23 THOSE MIGHT IMPACT YOUR ABILITY TO REMEMBER

24 WHAT HAPPENED OR YOUR ABILITY TO TESTIFY
25 TODAY?
00040:01 A. YES.
02 Q. OKAY. SO YOU FEEL A LITTLE
03 UNCOMFORTABLE IN TERMS OF -- THE FACT THAT
04 YOU HAVE TO BE ON MEDICATIONS BECAUSE OF YOUR
05 PHYSICAL PROBLEMS, YOU FEEL A LITTLE
06 UNCOMFORTABLE IN TRYING TO GIVE COMPLETELY
07 TRUTHFUL TESTIMONY TODAY? NOT THAT YOU'RE
08 NOT -- TRYING TO BE UNTRUTHFUL, BUT YOU FEEL
09 UNCOMFORTABLE WHETHER YOU HAVE THE PHYSICAL
10 CAPACITY TO ACTUALLY DELIVER ON THEM?
11 A. YES.

Page 41:03 to 41:22

00041:03 Q. ALL RIGHT. I'M GOING TO FAST
04 FORWARD TO APRIL 2010, WHEN YOU'RE ON THE
05 DEEPWATER HORIZON ON THE MACONDO WELL. YOU
06 OBVIOUSLY REMEMBER THAT, RIGHT?
07 A. YES.
08 Q. WHEN DID YOU COME ON SHIFT, COME
09 ON DUTY FROM SHORE? DO YOU REMEMBER?
10 A. I DON'T REMEMBER THE EXACT DAY.
11 WE WERE SCHEDULED TO GO HOME THE 21ST.
12 Q. I SHOW -- THE RECORDS SEEM TO
13 SHOW YOU ARRIVED ON THE RIG ON MARCH 31ST,
14 WHICH WOULD BE ALMOST EXACTLY THREE WEEKS
15 BEFORE APRIL 21ST. SO DOES THAT SOUND ABOUT
16 RIGHT IN TERMS OF YOUR THREE WEEKS ON, THREE
17 WEEKS OFF?
18 A. YES, SIR.
19 Q. OKAY. SO YOU WERE SCHEDULED TO
20 GET THE BOAT OR HELICOPTER OUT THE NEXT DAY
21 ON APRIL 21ST?
22 A. YES.

Page 43:20 to 44:09

00043:20 Q. YEAH. OKAY. NOW I'M TRYING TO
21 FIGURE OUT WHEN DID YOU GO ON SHIFT. WERE
22 YOU ON SHIFT WHEN THE EXPLOSION OCCURRED?
23 MAYBE WE CAN GO AT IT THAT WAY.
24 A. YES, SIR.
25 Q. WHAT TIME DID YOU COME ON SHIFT
00044:01 THE DAY OF THE EXPLOSION?
02 A. 11:30.
03 Q. A.M.?
04 A. A.M.
05 Q. SO ON THE DAY OF APRIL 20TH, YOU
06 COME ON SHIFT AT 11:30 A.M., AND YOU'RE ON
07 SHIFT UP UNTIL THE TIME OF THE EXPLOSION,
08 RIGHT?
09 A. YES, SIR.

Page 44:16 to 45:04

00044:16 Q. (BY MR. WILLIAMSON) PLEASE
17 DETAIL FOR ME WHAT YOU REMEMBER FROM 11:30
18 A.M. ON APRIL 20 OF 2010 UP UNTIL THE TIME OF
19 THE EXPLOSION.
20 (SOTO VOCE DISCUSSION OFF THE RECORD)
21 A. I REFUSE TO ANSWER THAT QUESTION
22 UNDER THE FIFTH AMENDMENT. PLEAD THE FIFTH
23 AMENDMENT.
24 Q. (BY MR. WILLIAMSON) OKAY.
25 THE -- YOU'RE GOING TO FOLLOW YOUR ADVICE OF
00045:01 COUNSEL AND REFUSE TO ANSWER QUESTIONS FOR
02 THAT TIME PERIOD? AM I CORRECT ABOUT THAT,
03 MR. HOLLOWAY?
04 A. YES, SIR.

Page 49:11 to 49:22

00049:11 Q. WHO WAS YOUR BOSS WHEN YOU WERE
12 WORKING? WHEN YOU SHOWED UP FOR WORK AND YOU
13 REPORTED FOR YOUR TOWER, WHO WAS YOUR BOSS?
14 A. MR. DEWEY REVETTE.
15 Q. AND MR. -- WHAT WAS HIS JOB?
16 A. DRILLER.
17 Q. OKAY. DID YOU ALSO WORK FOR
18 MR. JASON ANDERSON?
19 A. YES, SIR.
20 Q. OKAY. HE WAS AN ASSISTANT
21 DRILLER. DO I REMEMBER THAT CORRECTLY?
22 A. NO, SIR. HE WAS A TOOL PUSHER.

Page 53:10 to 54:06

00053:10 Q. OKAY. I WILL TELL YOU, ONE OF
11 THE THINGS THIS PIECE OF PAPER SAYS ON THE
12 SECOND PAGE, THE BOTTOM OF THE HANDWRITTEN
13 PARAGRAPH, IT SAYS, "RUNNING THE HOLE WITH
14 CASING ON LANDING STRING AT THREE MINUTES PER
15 STRAND FROM 13,295 TO 15,736."
16 OKAY. HERE'S MY QUESTION TO
17 YOU, MR. HOLLOWAY. DO YOU REMEMBER ONE WAY
18 OR THE OTHER ON APRIL 19 WHETHER YOU-ALL RAN
19 CASING INTO THE HOLE THAT DAY? IS THAT JUST
20 SOMETHING YOU REMEMBER OR SOMETHING YOU DON'T
21 REMEMBER?
22 A. I DO REMEMBER RUNNING CASING IN
23 THE HOLE.
24 Q. OKAY. DO YOU REMEMBER ANYTHING
25 IN PARTICULAR ABOUT THAT CASING?
00054:01 A. IT WAS SMALLER CASING THAN I'VE
02 EVER RAN ON THE DEEPWATER HORIZON.

03 Q. SPEAKING OF THAT, YOU-ALL HAD
04 SEVERAL KICKS ON THE DEEPWATER HORIZON,
05 DIDN'T YOU? WERE YOU AWARE OF THAT?
06 A. YES, SIR.

Page 54:12 to 54:18

00054:12 Q. MAYBE I CAN APPROACH IT THIS
13 WAY. WHEN YOU EXPERIENCED A KICK AND YOU
14 WERE ON DUTY, WHAT WAS YOUR JOB?
15 A. BEING ON STANDBY --
16 Q. OKAY.
17 A. -- AND WORK AS DIRECTED UNDER
18 THE DRILLER.

Page 60:16 to 60:24

00060:16 Q. TELL ME WHAT THE MOON POOL IS.
17 A. THE MOON POOL IS THE CUTOUT AT
18 THE BOTTOM OF THE RIG THAT GOES UNDERNEATH
19 THE ROTARY TABLE FOR THE -- FOR THE RISE IN
20 THE PIPE AND EVERYTHING TO GO -- BE ABLE TO
21 GO TO THE WATER.
22 Q. OKAY. SO IT'S ON THE FLOOR
23 BELOW THE RIG FLOOR?
24 A. YES, SIR.

Page 61:11 to 61:17

00061:11 Q. DID YOU -- I WANT -- NOW, I'VE
12 ASKED YOU WHAT YOU KNOW ABOUT AND YOU'VE TOLD
13 ME, RIGHT, WHAT YOU DID DURING THAT TIME
14 PERIOD? YOU WERE A RIG FLOOR HAND AND YOU
15 DID WHAT THE DRILLER AND ASSISTANT DRILLER
16 TOLD YOU TO DO, RIGHT?
17 A. YES, SIR.

Page 81:10 to 81:11

00081:10 MY NAME IS DON HAYCRAFT AND I'M HERE TODAY
11 REPRESENTING BP. IF AT ANY TIME I ASK YOU A

Page 82:02 to 82:23

00082:02 Q. WHAT I WOULD LIKE TO DO IS HAVE
03 YOU LOOK AT THE BOOK I PUT IN FRONT OF YOU, A
04 BINDER OF DOCUMENTS. AND AT TAB NO. 1 ARE
05 SOME DOCUMENTS THAT HAVE BEEN PRODUCED BY
06 TRANSOCEAN IN THIS LITIGATION. AND IF YOU
07 COULD JUST THUMB THROUGH THOSE AND TELL US,
08 NOT ONE BY ONE WHAT THEY ARE, BUT DOES THAT
09 APPEAR TO BE YOUR TRAINING RECORD AND

10 CERTIFICATION RECORD WHILE YOU WERE EMPLOYED
11 WITH TRANSOCEAN?
12 A. SOME OF THESE CERTIFICATES ARE
13 FROM THE COMPANY I WORKED FOR BEFORE, TODCO.
14 Q. OKAY. BETWEEN TODCO AND
15 TRANSOCEAN, DO THESE APPEAR TO BE THE VARIOUS
16 CERTIFICATIONS THAT YOU GAINED OVER YOUR
17 YEARS OF WORKING ON OIL RIGS?
18 A. YES, SIR.
19 Q. ALL RIGHT. ON ONE OF THE COPIES
20 THAT YOU OR YOUR ATTORNEY HAVE I'LL PUT --
21 I'LL HAVE YOU PUT THIS EXHIBIT STICKER TO
22 MAKE THIS EXHIBIT 2619.
23 (EXHIBIT NO. 2619 MARKED)

Page 84:04 to 84:08

00084:04 Q. DOES THIS APPEAR TO BE ACCURATE
05 IN IDENTIFYING THAT IN JUNE OF 2009, WHILE
06 EMPLOYED AT TRANSOCEAN, YOU TOOK AN
07 INTRODUCTORY WELL CONTROL COURSE?
08 A. YES, SIR.

Page 84:15 to 84:19

00084:15 Q. DID YOU KNOW OR DID YOU LEARN IN
16 THAT COURSE OR DID YOU JUST KNOW FROM YOUR
17 SEVERAL YEARS WORKING ON OIL RIGS THAT EARLY
18 DETECTION OF A KICK IS AN IMPORTANT PART OF A
19 DRILL CREWS' JOB?

Page 84:21 to 84:25

00084:21 A. YES.
22 Q. (BY MR. HAYCRAFT) AND THAT IT'S
23 IMPORTANT TO ACT EARLY WHEN A KICK IS
24 DETECTED TO ENGAGE IN WELL CONTROL
25 ACTIVITIES?

Page 85:02 to 85:02

00085:02 A. YES, SIR.

Page 85:11 to 86:23

00085:11 Q. WHEN YOU WERE ON THE RIG WHEN
12 YOU GOT UP IN THE MORNING ON APRIL THE 20TH,
13 WOULD THAT 12-HOUR SHIFT HAVE BEEN YOUR LAST
14 OF A 21-DAY TOWER?
15 A. YES, SIR.
16 Q. AND WAS THAT TRUE OF OTHERS IN
17 YOUR PARTICULAR CREW? IN OTHER WORDS, THERE

18 WERE SEVERAL -- SEVERAL OF YOU IN YOUR
 19 DRILLING CREW WHO WERE ON THEIR LAST DAY OF
 20 THEIR 21-DAY HITCH?
 21 A. YES, SIR.
 22 Q. YOU SAID THAT YOUR BOSS WAS
 23 DEWEY REVETTE. DID I GET THAT RIGHT?
 24 A. YES, SIR.
 25 Q. OKAY. SO, AGAIN, WE'RE TALKING
 00086:01 ABOUT THE 21-DAY HITCH. WAS THAT DEWEY
 02 REVETTE'S LAST DAY OR LAST HITCH BEFORE THE
 03 END OF HIS 21-DAY HITCH?
 04 A. YES, SIR.
 05 Q. CAN YOU NAME OTHERS IN YOUR
 06 IMMEDIATE CREW WITH WHOM YOU WORKED FOR WHOM
 07 APRIL THE 20TH WOULD BE THEIR LAST 12-HOUR
 08 WORKING SHIFT?
 09 A. MR. WYMAN WHEELER.
 10 Q. TOOL PUSHER?
 11 A. YES, SIR. MR. ROY KEMP.
 12 Q. DRILLER?
 13 A. DECK HAND.
 14 KARL KLEPPINGER, SHAKER HAND;
 15 ADAM WEISE, FLOOR HAND; SHANE ROSHTO, ALSO A
 16 FLOOR HAND; STEPHEN -- MR. STEPHEN CURTIS AND
 17 MR. DONALD CLARK. THAT'S ABOUT ALL I CAN
 18 RECALL.
 19 Q. THAT SOUNDS LIKE FOR YOUR --
 20 YOUR SHIFT OF THE DRILLING CREW, THAT WAS
 21 EVERYBODY WORKING WITH YOU ON APRIL THE 20TH
 22 WAS FIXING TO GO OFF THE RIG THE NEXT DAY;
 23 FAIR TO SAY?

Page 86:25 to 86:25

00086:25 A. YES, SIR.

Page 88:05 to 88:19

00088:05 Q. (BY MR. HAYCRAFT) AND WHAT
 06 WOULD -- AS A FLOOR HAND, DO I UNDERSTAND
 07 THAT YOU WORKED AT THE DIRECTION OF THE
 08 DRILLER OR THE ASSISTANT DRILLER, WHOEVER
 09 WOULD BE ON SHIFT ON THE DRILL FLOOR?
 10 A. YES, SIR.
 11 Q. AND WOULD THE DRILLER AND THE
 12 ASSISTANT DRILLER TYPICALLY WORK IN ABOUT --
 13 WELL, LET ME ASK WHAT YOU CALL IT. DO YOU
 14 CALL IT A DRILL SHACK OR THE DRILLER'S CABIN?
 15 WHAT WAS YOUR TERM?
 16 A. THE DRILL SHACK.
 17 Q. OKAY. SO THE DRILLER AND THE
 18 ASSISTANT DRILLER WOULD BE MANNING THE DRILL
 19 SHACK FOR THE MOST PART DURING THEIR SHIFTS?

Page 88:21 to 89:14

00088:21 A. YES, SIR.
 22 Q. AND THEN YOU -- HOW MANY
 23 FLOOR -- WOULD IT BE YOU AND ANOTHER FLOOR
 24 HAND OR TWO WHO WOULD BE IN THE SAME CREW
 25 DURING THIS LAST 21-DAY HITCH ABOARD THE
 00089:01 DEEPWATER HORIZON?
 02 A. USUALLY THREE FLOOR HANDS ON THE
 03 RIG FLOOR.
 04 Q. SO THREE FLOOR HANDS AND USUALLY
 05 A DRILLER AND AN ASSISTANT DRILLER IN THE
 06 DRILL SHACK?
 07 A. TWO ASSISTANT DRILLERS.
 08 Q. AND A DRILLER AND TWO ASSISTANT
 09 DRILLERS IN THE DRILL SHACK?
 10 A. YES, SIR.
 11 Q. AND THEN YOU WOULD BE GOING
 12 WHEREVER THEY TOLD YOU TO GO TO DO WHATEVER
 13 PARTICULAR ACTIVITIES IN CONNECTION WITH THE
 14 DRILL FLOOR WERE CONCERNED?

Page 89:16 to 91:05

00089:16 A. YES, SIR.
 17 Q. (BY MR. HAYCRAFT) AND THEN
 18 WOULD THERE BE A TOOL PUSHER ON THE SAME
 19 TOWER, SAME 12-HOUR SHIFT?
 20 A. THE TOOL PUSHERS WORK FROM 6:00
 21 TO 6:00, SO WE WOULD HAVE A TOOL PUSHER FOR
 22 HALF OF OUR SHIFT AND THEN WE'D HAVE ANOTHER
 23 ONE THE NEXT HALF OF OUR SHIFT.
 24 Q. SO THERE WOULD BE A -- I'M
 25 REALLY FOCUSED ON APRIL 2010. THERE WOULD BE
 00090:01 A TOOL PUSHER FOR HALF OF YOUR SHIFT AND THEN
 02 THE SENIOR TOOL PUSHER FOR THE OTHER HALF OF
 03 YOUR SHIFT?
 04 A. YES, SIR.
 05 Q. WHO WAS THE SENIOR TOOL PUSHER
 06 ON APRIL THE 20TH, 2010, ON DEEPWATER
 07 HORIZON?
 08 A. SENIOR TOOL PUSHER WAS MR. RANDY
 09 EZELL.
 10 Q. WHO WAS THE OTHER TOOL PUSHER?
 11 A. THE OTHER TOOL PUSHERS WERE
 12 MR. JASON ANDERSON AND MR. WYMAN WHEELER.
 13 Q. AND THEN THE OIM WAS JIMMY
 14 HARRELL?
 15 A. YES, SIR.
 16 Q. AND EACH DAY WHEN YOU BEGAN YOUR
 17 12-HOUR TOWER, DID THE RIG HOLD A PRE-TOWER
 18 MEETING?
 19 A. YES, SIR.
 20 Q. WOULD THAT BE AT ABOUT 11:30 IN

21 THE MORNING IF YOU WERE DOING THE 11:30 A.M.
22 TO 11:30 P.M. SHIFT?
23 A. IT WOULD BE AROUND 11:00.
24 Q. AND WOULD THE ENTIRE DRILL CREW
25 GETTING READY TO GO ON SHIFT ATTEND THAT
00091:01 MEETING?
02 A. YES, SIR.
03 Q. WOULD A BP COMPANY MAN BE
04 ATTENDING THAT MEETING, TOO?
05 A. YES, SIR.

Page 91:14 to 91:16

00091:14 Q. (BY MR. HAYCRAFT) FAIR ENOUGH.
15 AT THOSE PRE-TOWER MEETINGS, DID YOU GET THE
16 SENSE THAT EVERYBODY WAS WORKING AS A TEAM?

Page 91:18 to 91:18

00091:18 A. YES, SIR.

Page 92:12 to 93:06

00092:12 Q. WELL, DO YOU RECALL GIVING
13 TESTIMONY OR GIVING AN INTERVIEW TO ANYONE,
14 NOT A REPORTER, BUT IN AN OFFICIAL
15 FACT-GATHERING CAPACITY?
16 A. YES, SIR.
17 Q. AND DID -- IN THOSE INTERVIEWS,
18 DID YOU TELL WHAT YOU REMEMBERED ABOUT THE
19 EVENTS OF APRIL THE 20TH?
20 A. I DON'T RECALL WHAT WE -- WHAT
21 ALL WAS TALKED ABOUT.
22 Q. WELL, DID YOU -- IF IT WAS AN
23 OFFICIAL PERSON IN A FACT-GATHERING CAPACITY,
24 DID YOU TELL THAT PERSON WHAT YOU REMEMBERED
25 FROM THE EVENTS OF APRIL THE 20TH?
00093:01 A. YES.
02 Q. AND THE SAME QUESTION FOR THE
03 NEW YORK TIMES REPORTER OR REPORTERS. DID
04 YOU TELL THAT PERSON OR PERSONS WHAT YOU
05 REMEMBERED ABOUT THE EVENTS OF APRIL THE
06 20TH?

Page 93:08 to 93:13

00093:08 A. YES, SIR.
09 Q. (BY MR. HAYCRAFT) AND DID
10 YOU -- DID YOU CONSENT TO THE NEW YORK TIMES
11 PERSON TO BE VIDEOTAPED IN TELLING YOUR
12 ACCOUNT OF WHAT HAPPENED THAT NIGHT?
13 A. YES, SIR.

Page 93:24 to 94:04

00093:24 Q. (BY MR. HAYCRAFT) NO, NOT YOUR
25 DIRECT BOSS, BUT WHO WAS IN OVERALL CHARGE OF
00094:01 THE ACTIVITIES OF THE DEEPWATER HORIZON IN
02 APRIL OF 2010? WHO DID YOU UNDERSTAND, AS
03 CALEB HOLLOWAY, FLOOR HAND, TO BE IN OVERALL
04 CHARGE OF THE RIG?

Page 94:06 to 94:08

00094:06 A. MR. JIMMY HARRELL, ME BEING A
07 TRANSOCEAN EMPLOYEE, HE WAS THE TOP OF THE
08 CHAIN OF COMMAND FOR ME.

Page 94:18 to 95:08

00094:18 Q. (BY MR. HAYCRAFT) AS A FLOOR
19 HAND WORKING ON THE DRILL CREW, DID YOU
20 UNDERSTAND THE TIME-OUT FOR SAFETY PROGRAM?
21 A. YES, SIR.
22 Q. DID YOU BELIEVE, AS A FLOOR HAND
23 FOR TRANSOCEAN, THAT IF YOU BELIEVED
24 SOMETHING WAS HAZARDOUS OR POTENTIALLY
25 HAZARDOUS, THAT YOU HAD THE RIGHT TO CALL A
00095:01 TIME-OUT FOR SAFETY?
02 A. YES, SIR.
03 Q. AND DID YOU FEEL THAT YOU COULD
04 DO THAT IF DEWEY REVETTE HAD AN ACTIVITY FOR
05 YOU THAT YOU QUESTIONED, YOU FELT LIKE YOU
06 COULD TELL DEWEY, "HOLD ON, TIME-OUT FOR
07 SAFETY." DID YOU FEEL YOU COULD DO THAT?
08 A. YES, SIR.

Page 95:11 to 96:22

00095:11 AS PART OF A PRETOWER MEETING?
12 MR. KINCHEN: OBJECT TO FORM.
13 A. YES, SIR.
14 Q. (BY MR. HAYCRAFT) DID -- WERE
15 YOU TOLD BY WHOEVER CONDUCTED THE MEETING OR
16 WHOEVER SPOKE AT THE MEETING THAT EVERYONE,
17 FLOOR HAND, ROUSTABOUT, CRANE OPERATOR,
18 DRILLER, TOOL PUSHER, EVERYONE HAD THE RIGHT
19 TO CALL A TIME-OUT FOR SAFETY?
20 A. YES, SIR.
21 Q. LET'S TAKE A LOOK IN THE BOOK
22 AGAIN. AND I'M GOING TO LOOK AT TAB 3. WE
23 WILL MARK THAT AS 2620.
24 (EXHIBIT NO. 2620 MARKED)
25 Q. (BY MR. HAYCRAFT) I'M NOT GOING
00096:01 TO ASK YOU ANY PARTICULAR QUESTIONS, BUT WHAT
02 I WANT TO -- WHAT I BASICALLY WANT TO FIND

03 OUT IS IF YOU RECALL THAT ON MAY 28, 2010,
04 ABOUT FIVE WEEKS AFTER THE TRAGEDY, THAT YOU
05 WERE INTERVIEWED BY A COUPLE OF PEOPLE AND
06 NOTES WERE TAKEN DURING THE INTERVIEW. DO
07 YOU RECALL THAT -- THAT INTERVIEW PROCESS?
08 A. YES.
09 Q. THERE WAS A FELLOW NAMED BOB
10 SCOTT WHO WAS INVOLVED IN THE INTERVIEW. DO
11 YOU KNOW WHO BOB SCOTT WAS?
12 A. NO, SIR.
13 Q. DID YOU KNOW HIM TO BE A
14 TRANSOCEAN PERSON?
15 A. YES, SIR.
16 Q. WAS THE INTERVIEW CONDUCTED AT
17 TRANSOCEAN'S OFFICE?
18 A. YES, SIR.
19 Q. THERE WAS ANOTHER PERSON WHOSE
20 NAME IS WES BELL. DOES THAT NAME -- DOES
21 THAT NAME RING A BELL TO YOU, WES BELL?
22 A. YES.

Page 96:25 to 97:03

00096:25 Q. WELL, WHEN THEY INTERVIEWED YOU,
00097:01 DID YOU GIVE THEM AN ACCOUNT OF WHAT YOU WERE
02 DOING, WHAT ACTIVITIES YOU WERE ENGAGED IN IN
03 THE HOURS LEADING UP TO THE EXPLOSIONS?

Page 97:05 to 97:11

00097:05 A. YES, SIR.
06 Q. (BY MR. HAYCRAFT) AND THERE WAS
07 SOMEBODY -- DO YOU RECALL THAT THERE WAS
08 SOMEBODY THERE, A WOMAN NAMED DIANE WILLEY,
09 WHO WAS TAKING NOTES, TAKING DOWN WHAT
10 VARIOUS PEOPLE WERE TALKING ABOUT IN THE
11 ROOM?

Page 97:13 to 98:23

00097:13 A. YES, SIR.
14 Q. (BY MR. HAYCRAFT) THEN THE NEXT
15 TAB -- WE MAY AS WELL JUST GO IN ORDER. THE
16 NEXT TAB IS TAB NO. 4, WHICH HAS BEEN -- I
17 DON'T NEED TO MARK IT AGAIN BECAUSE IT'S BEEN
18 MARKED IN THE DEPOSITION RECORD AS EXHIBIT
19 571. AND ACROSS THE TOP IT SAYS, "SAFETY
20 DRILL REPORT." DO YOU SEE THAT, SIR? THERE
21 YOU GO. "SAFETY DRILL REPORT"?
22 A. YES, SIR.
23 Q. I'M GOING TO TURN A COUPLE OF
24 PAGES INTO THAT EXHIBIT. AND IT'S A PAGE --
25 IT'S A PAGE IN THE LOWER RIGHT-HAND CORNER,

00098:01 HAS A BATES NUMBER WHOSE LAST FOUR DIGITS ARE
 02 7546. IT'S ACTUALLY SEVERAL PAGES INTO THE
 03 SERIES OF PAGES. 7546. AND JUST TO MAKE IT
 04 EASY FOR EVERYBODY, I'M GOING TO DO SOME
 05 READING.
 06 IT SHOWS -- WELL, FIRST, AS A
 07 BASIC QUESTION, AS A MEMBER OF THE DRILLING
 08 CREW, DID YOU PARTICIPATE IN REGULAR SAFETY
 09 DRILLS?
 10 A. YES, SIR.
 11 Q. AND THEY WERE DRILL
 12 CREW-ORIENTED SAFETY DRILLS, CORRECT?
 13 A. YES, SIR.
 14 Q. IN OTHER WORDS, WHAT I'M -- WHAT
 15 I'M TRYING TO MAKE SURE WE'RE ON THE SAME
 16 PAGE FOR IS THERE WERE WEEKLY SAFETY DRILLS
 17 RELATED TO MUSTERING AND DIFFERENT SCENARIOS
 18 FOR EMERGENCIES FOR THE WHOLE RIG. THE
 19 SAFETY DRILL REPORTS GIVE AN ACCOUNT OF A
 20 SPECIAL SAFETY DRILL THAT THE DRILLING CREW
 21 CONDUCTED FOR ITSELF. DO I HAVE THE TWO
 22 TYPES OF DRILLS ON DEEPWATER HORIZON
 23 STRAIGHT?

Page 98:25 to 99:22

00098:25 A. YES.
 00099:01 Q. (BY MR. HAYCRAFT) FOCUSING NOW
 02 ON THIS PAGE WITH THE SAFETY DRILL REPORT, DO
 03 YOU SEE IT SAYS DRILL DATE APRIL 18, 2010,
 04 DRILL TIME 10:00, AND THEN VARIOUS
 05 DESCRIPTIONS? WHAT I WANT TO READ IS THE
 06 DESCRIPTION OF THE DRILL AND COMMENTS. SO IF
 07 WE COULD JUST GO OVER THAT TOGETHER.
 08 "DESCRIPTION OF DRILL: WEEKLY
 09 WELL-CONTROL DRILL, 15,426 OF BAY (RIGHT)
 10 ONBOARD."
 11 DID I READ THAT CORRECTLY?
 12 A. DID YOU READ IT CORRECTLY?
 13 Q. YES.
 14 A. YES.
 15 Q. FROM THAT DESCRIPTION IT WOULD
 16 APPEAR THAT YOU -- THE DRILL CREW WOULD HAVE
 17 A WEEKLY WELL-CONTROL DRILL, CORRECT?
 18 A. YES.
 19 Q. AND A WELL-CONTROL DRILL, CAN
 20 YOU TELL US IN YOUR OWN WORDS WHAT A -- WHAT
 21 SORTS OF THINGS YOU WOULD DO IN A
 22 WELL-CONTROL DRILL?

Page 99:24 to 101:09

00099:24 A. WELL, WE WOULD SIMULATE A
 25 BLOWOUT WHILE WE WERE TRIPPING PIPE. AND WE

00100:01 WOULD GEAR EVERY -- EVERY SINGLE PERSON
 02 DESIGNATED TO A SPECIFIC PLACE TO GO, AND WE
 03 WOULD STAB THE TIW VALVE AND CLOSE THE
 04 KEYWAY.
 05 Q. TIW VALVE, IS THAT SOMETIMES
 06 CALLED AN IBOP?
 07 A. NOT -- I DON'T --
 08 Q. TELL US WHAT A TIW VALVE IS.
 09 A. IT STANDS FOR TEXAS IRON WORKS.
 10 IT'S JUST A VALVE -- A BALL VALVE THAT YOU
 11 CAN STAB ON THE TOP OF THE PIPE AND MAKE IT
 12 OPEN AND CLOSE, OPEN AND CLOSE.
 13 Q. IS IT A VALVE THAT'S OPEN ON
 14 BOTH ENDS, YOU CAN LIFT IT UP AND PLACE IT ON
 15 TOP OF THE DRILL PIPE?
 16 A. YOU -- YOU HAVE TO HAVE AN AIR
 17 HOIST TO DO THAT.
 18 Q. OKAY. SO THE TIW VALVE IS
 19 SOMETHING THAT'S -- IT'S STATIONED NEAR THE
 20 ROTARY TABLE?
 21 A. YES, SIR.
 22 Q. DOES IT HAVE A STUB ON THE DRILL
 23 FLOOR WHERE -- WHERE THE TIW VALVE IS -- YOU
 24 ALWAYS KNOW WHERE IT IS? IT'S ON THAT STUB
 25 READY TO GO?
 00101:01 A. YES, SIR.
 02 Q. IS IT IN A READY -- IS IT IN AN
 03 OPEN POSITION; THAT IS, IT'S READY TO STAB
 04 ONTO THE TOP OF THE DRILL PIPE?
 05 A. YES, SIR.
 06 Q. AND THEN ONCE -- AND THE REASON
 07 IT'S OPEN IS SO THAT THE FLOW CAN CONTINUE
 08 FLOWING WHILE THE BALL VALVE IS CLOSED?
 09 A. CORRECT.

Page 102:04 to 102:07

00102:04 Q. (BY MR. HAYCRAFT) IS PART OF
 05 THE PURPOSE OF THE DRILL IS TO LEARN THAT
 06 WHEN A WELL CONTROL SITUATION EXISTS, THAT
 07 YOU'RE STATIONED NEAR THE DRILL FLOOR?

Page 102:09 to 103:03

00102:09 A. YES, SIR.
 10 Q. (BY MR. HAYCRAFT) LET'S --
 11 WE'LL CONTINUE READING. UNDER THE COMMENT
 12 SECTION IT STATES, "DISCUSS ROLES AND
 13 RESPONSIBILITIES WITH THE CREW. ALSO DISCUSS
 14 KICKS DURING CEMENT JOBS. KICKS THAT OCCUR
 15 WHILE CEMENTING ARE THE RESULTS OF REDUCING
 16 THE HYDROSTATIC PRESSURE DURING THE
 17 OPERATION." WELLS -- WELL -- WELL,
 18 SINGULAR -- "WELL HAVE BEEN LOST DUE TO

19 IMPROPERLY DESIGNED CEMENT SLURRIES AND
20 SPACERS."
21 DID I READ THAT CORRECTLY?
22 A. YES, SIR.
23 Q. SO THE FIRST QUESTION IS, DO YOU
24 HAVE A MEMORY THAT ON APRIL THE 18TH, 2010,
25 HAVING A DRILL WITH THIS DISCUSSION ABOUT
00103:01 REDUCTION OF HYDROSTATIC PRESSURES IN
02 CEMENT -- DURING -- AFTER A CEMENT JOB HAS
03 BEEN DONE ON A WELL?

Page 103:05 to 103:05

00103:05 A. I DO NOT RECALL.

Page 103:09 to 103:14

00103:09 Q. BASED ON READING THIS HERE IN
10 THE DATE APRIL 18TH, DO YOU HAVE ANYTHING TO
11 DISPUTE THAT THIS DRILL OCCURRED ON APRIL
12 18TH?
13 A. I JUST -- I DON'T RECALL THAT --
14 THAT DAY. IT'S PRETTY MUCH A BLUR.

Page 104:03 to 104:05

00104:03 DO YOU HAVE ANY BASIS TO SUGGEST
04 TO ANYONE THAT THIS DRILL, AS DESCRIBED, DID
05 NOT OCCUR?

Page 104:07 to 105:09

00104:07 A. I DON'T RECALL ONE.
08 Q. YOU JUST DON'T REMEMBER ONE WAY
09 OR THE OTHER? FAIR ENOUGH?
10 A. FAIR ENOUGH. I DON'T -- I DON'T
11 REMEMBER.
12 Q. OKAY. DO YOU SEE THE LISTING
13 OF -- IT GOES OVER TO THE SECOND PAGE, TOO.
14 BUT DO YOU SEE THERE'S A LISTING OF
15 ATTENDANCE AT THIS DRILL? DO YOU SEE THAT?
16 A. UH-HUH.
17 Q. AND, SPECIFICALLY, IF YOU LOOK
18 DOWN THE LIST, YOU SEE A LOT OF THE NAMES
19 THAT YOU -- YOU JUST TOLD US WERE ON YOUR
20 CREW. BUT YOU SEE THAT YOU'RE -- YOU'RE
21 IDENTIFIED THERE, CALEB HOLLOWAY, FLOOR HAND,
22 AS IN ATTENDANCE AT THAT DRILL. DO YOU SEE
23 THAT?
24 A. YES, SIR.
25 Q. OKAY. AND YOU ALSO SEE THAT
00105:01 DONALD VIDRINE, COMPANY MAN, IS IDENTIFIED.
02 DO YOU SEE THAT ON THE SECOND PAGE?

03 A. YES, SIR.
 04 Q. DOES THAT NAME RING A BELL WITH
 05 YOU, DONALD VIDRINE?
 06 A. YES, SIR.
 07 Q. DO YOU KNOW HIM TO HAVE BEEN ONE
 08 OF THE BP COMPANY MEN?
 09 A. YES, SIR.

Page 106:10 to 107:12

00106:10 (EXHIBIT NO. 2621 MARKED)
 11 Q. (BY MR. HAYCRAFT) AND WHAT THIS
 12 IS, SIR, IS AN EXCERPT, ONE SECTION FROM THE
 13 VERY BIG MANUAL THAT'S CALLED "DEEPWATER
 14 HORIZON EMERGENCY RESPONSE MANUAL, VOLUME 1
 15 OF 2." AND WHAT I'VE DONE IS THERE'S A
 16 SECTION IN THAT MANUAL THAT'S SECTION 7, AND
 17 I'VE EXCERPTED PAGES BPHVNNBI 00132016
 18 THROUGH BPHVNNBI 00132026, AND IT'S THE
 19 SECTION IN THE BOOK CALLED "WELL
 20 CONTROL/SHALLOW GAS BLOWOUT." AND, AS I SAID
 21 BEFORE, IT'S SECTION 7 OF THE DEEPWATER
 22 HORIZON EMERGENCY RESPONSE MANUAL.
 23 THAT'S A LOT OF TALKING. BUT
 24 HERE'S -- HERE'S WHAT I WANT TO ASK YOU.
 25 SECTION 1.1 TALKS ABOUT LEVEL 1, LEVEL 2 AND
 00107:01 LEVEL 3 AS LEVELS -- AND I'M QUOTING --
 02 LEVELS OF WELL CONTROL EMERGENCIES ARE
 03 DEFINED BELOW.
 04 MY QUESTION, MR. HOLLOWAY, IS
 05 DURING YOUR WORK FOR TRANSOCEAN AS A FLOOR
 06 HAND IN A DRILL CREW, DID YOU LEARN THAT
 07 THERE WERE LEVEL 1, LEVEL 2, LEVEL 3 KICK
 08 SITUATIONS?
 09 I'M SORT OF ASKING YOU ABOUT
 10 TERMINOLOGY. DID YOU EVER HEAR THE PHRASE,
 11 OKAY, "THERE'S LEVEL 1, THERE IS LEVEL 2,
 12 THERE'S LEVEL 3," WORDS LIKE THAT?

Page 107:14 to 108:14

00107:14 A. NO, SIR.
 15 Q. YOU WERE ASKED BY COUNSEL A BIT
 16 AGO ABOUT CAN -- THERE BEING SOME KICKS TAKEN
 17 AT THE MACONDO WELL WHILE YOU WERE ON THE
 18 DEEPWATER HORIZON PREVIOUSLY. AND MY
 19 QUESTION IS, I THINK MR. WILLIAMSON ASKED
 20 DID -- DID SOMEBODY CALL OUT A KICK
 21 SITUATION, OR "IT'S A KICK," OR, "WE'RE
 22 TAKING A KICK," OR WORDS TO THAT EFFECT? DO
 23 YOU RECALL THOSE QUESTIONS?
 24 A. IN WHAT TIME -- TIME FRAME?
 25 Q. THIS WOULD HAVE BEEN --
 00108:01 MR. WILLIAMSON ASKED ABOUT THE WELL TAKING A

02 PREVIOUS KICK OR KICKS. AND HE ASKED YOU IF
03 YOU REMEMBERED THE WELL TAKING KICKS. I
04 THINK YOU SAID YOU DID.
05 AND SO I'M ASKING YOU ABOUT
06 THOSE PRIOR EVENTS, IF THERE WAS A PRIOR
07 EVENT OR EVENTS, WHILE YOU WERE ON BOARD,
08 WHETHER ANYONE CALLED OUT "THIS IS A LEVEL I
09 KICK SITUATION," OR "WE'RE AT LEVEL 1," OR
10 "WE'RE" -- "WE'RE IN THE EARLY STAGES," OR
11 "WE'RE TAKING A KICK" -- WHETHER ANYBODY
12 ALERTED THE DRILL CREW TO THE FACT THAT A
13 KICK WAS BEING PERCEIVED BY THE DRILLER OR
14 ASSISTANT DRILLER?

Page 108:18 to 108:22

00108:18 MR. HAYCRAFT: YEAH. THIS IS ON ANY
19 PRIOR KICK EVENT ON MACONDO ON DEEPWATER
20 HORIZON BEFORE APRIL THE 20TH, WHETHER THOSE
21 TYPES OF WORDS WERE SPOKEN DURING A KICK
22 SITUATION?

Page 108:24 to 108:24

00108:24 A. YES, SIR.

Page 109:22 to 109:25

00109:22 Q. AS A MEMBER OF THE DRILLING
23 CREW, AS A FLOOR HAND ON DEEPWATER HORIZON,
24 YOU DRILLED AND KICKED AND WELL CONTROL --
25 KICK DETECTION AND WELL CONTROL, DID YOU NOT?

Page 110:02 to 110:07

00110:02 A. YES, SIR.
03 Q. (BY MR. HAYCRAFT) OKAY. AS
04 PART OF THE DRILL, DID YOU LEARN THAT THE
05 DRILLER OR ASSISTANT DRILLER, TOOL PUSHER OR
06 OIN ALERTS THE DRILL CREW TO THE FACT THAT
07 THERE IS A KICK SITUATION?

Page 110:09 to 110:16

00110:09 A. YES, SIR.
10 Q. I THINK YOU TOLD US PREVIOUSLY,
11 BUT I WANT TO MAKE SURE WE'RE DOING IT IN
12 THIS PART OF THE RECORD, THAT PART OF KNOWING
13 THAT A KICK IS IN PROGRESS IS SO THAT THE
14 DRILL CREW CAN BE IN THE RIGHT PLACE TO DO
15 WHAT THE DRILLER OR ASSISTANT DRILLER
16 DIRECTS?

Page 110:18 to 110:25

00110:18 A. YES, SIR.
 19 Q. (BY MR. HAYCRAFT) DID YOU LEARN
 20 IN YOUR WELL CONTROL SCHOOL OR, FOR THAT
 21 MATTER, DURING THESES DRILLS, THAT IT'S
 22 IMPORTANT FOR THE DRILL CREW TO ACT AS EARLY
 23 AS POSSIBLE TO ENGAGE IN WELL CONTROL ACTIONS
 24 IN ORDER TO PREVENT THE KICK FROM GETTING
 25 WORSE?

Page 111:02 to 111:13

00111:02 A. YES.
 03 Q. (BY MR. HAYCRAFT) DID YOU AS A
 04 FLOOR HAND UNDERSTAND THE PHYSICAL LOCATION
 05 OF THE -- WELL, DID YOU CALL IT A MUD GAS
 06 SEPARATOR, DID YOU CALL IT A DEGASSER, DID
 07 YOU CALL IT A POOR BOY DEGASSER? WHAT WAS
 08 YOUR -- WHAT WAS THE TERM YOU GUYS USED OUT
 09 THERE FOR THAT DEVICE?
 10 A. I'VE HEARD DEGASSER, I'VE HEARD
 11 POOR BOY.
 12 Q. MUD GAS SEPARATOR?
 13 A. NO.

Page 112:17 to 112:21

00112:17 Q. OKAY. NOW, HERE IS MY QUESTION.
 18 DID YOU KNOW WHERE THE DIVERTER WAS IN THE
 19 DRILL SHAFT, OR OTHERWISE, FOR THE -- FOR THE
 20 FLOW TO BE DIRECTED EITHER -- TO BE DIVERTED?
 21 DID YOU KNOW WHERE THE DIVERTER WAS?

Page 112:23 to 112:23

00112:23 A. NO.

Page 114:10 to 114:11

00114:10 Q. (BY MR. HAYCRAFT) DID YOU KNOW
 11 OR DO YOU KNOW THE FUNCTION OF THE DIVERTER?

Page 114:13 to 114:21

00114:13 A. TO A CERTAIN EXTENT.
 14 Q. (BY MR. HAYCRAFT) TELL US WHAT
 15 YOU DO KNOW.
 16 A. THAT IT DIVERTS THE GAS -- IT
 17 DIVERTS GAS WHENEVER IT -- WE NEED TO DIVERT
 18 GAS FOR TAKING A KICK.

19 Q. DID YOU EVER DRILL IN ACTUALLY
20 DOING THE DIVERTER, MEANING THE KNOB HANDLE,
21 LEVER, VALVE, TOGGLE, BUTTON?

Page 114:23 to 114:25

00114:23 A. NO.
24 Q. DO YOU KNOW WHERE THE VALVE,
25 LEVER, TOGGLE, BUTTON WAS LOCATED?

Page 115:02 to 115:06

00115:02 A. NO, SIR.
03 Q. (BY MR. HAYCRAFT) OKAY. YOU
04 DID UNDERSTAND THAT THE PURPOSE OF THE
05 DIVERTER WAS TO DIVERT THE GAS SOMEWHERE,
06 RIGHT?

Page 115:08 to 115:12

00115:08 A. YES, SIR.
09 Q. (BY MR. HAYCRAFT) AND THAT
10 SOMEWHERE WAS EITHER INTO ONE OF THE TWO
11 DIVERTER PIPES THAT SENT THE FLOW OVERBOARD
12 OR INTO THE POOR BOY DEGASSER, RIGHT?

Page 115:14 to 115:19

00115:14 A. I DON'T RECALL EXACTLY. I DON'T
15 RECALL.
16 Q. (BY MR. HAYCRAFT) IS IT THAT
17 YOU DON'T RECALL OR YOU DIDN'T KNOW --
18 A. I DON'T KNOW THE WHOLE ASPECT OF
19 THE -- HOW THAT WORKS.

Page 116:07 to 116:12

00116:07 DURING THE EVENTS THAT -- THAT
08 ENDED UP OR CULMINATED IN AN EXPLOSION OR
09 EXPLOSIONS, DID ANYBODY IN THE DRILL CREW
10 ALERT YOU THAT THERE WAS A WELL CONTROL
11 SITUATION?
12 A. NO, SIR.

Page 116:22 to 116:22

00116:22 A. I'LL PLEAD THE FIFTH.

Page 117:07 to 117:12

00117:07 Q. (BY MR. HAYCRAFT) OKAY. AT THE

08 TIME -- WELL, IN THE -- IN THE PERIOD BEFORE
 09 THE EXPLOSION -- AND I'LL BREAK IT INTO
 10 PARTS, BUT LET'S SAY IN THE 45 MINUTES BEFORE
 11 THE EXPLOSION, WERE YOU AT ALL TIMES AT OR
 12 NEAR THE DRILL FLOOR?

Page 117:15 to 118:03

00117:15 A. I WOULD LIKE TO PLEAD THE FIFTH
 16 AMENDMENT.
 17 Q. (BY MR. HAYCRAFT) AGAIN,
 18 FOCUSED ON 45 MINUTES BEFORE THE EXPLOSION,
 19 DID THE DRILLER, THE ASSISTANT DRILLER, OR
 20 ANY TOOL PUSHER OR THE OIM REQUEST THAT YOU
 21 RETURN TO THE DRILL FLOOR?
 22 A. I WOULD LIKE TO PLEAD THE FIFTH.
 23 Q. WAS THERE A SUFFICIENT CREW IN
 24 THE DRILL SHACK OR IN THE IMMEDIATE VICINITY
 25 OF THE DRILL FLOOR TO ENGAGE IN WELL CONTROL
 00118:01 ACTIVITIES IN THE EVENING -- AT THE EVENING
 02 IN THE PRECEDING 25 -- EXCUSE ME -- IN THE
 03 PRECEDING 45 MINUTES BEFORE THE EXPLOSION?

Page 118:10 to 118:13

00118:10 IN THE 45 MINUTES BEFORE THE
 11 EXPLOSION, WERE THERE SUFFICIENT DRILL CREW
 12 AVAILABLE TO ENGAGE IN ALL APPROPRIATE WELL
 13 CONTROL ACTIVITIES?

Page 118:15 to 118:20

00118:15 A. PLEAD THE FIFTH.
 16 Q. (BY MR. HAYCRAFT) WERE THE
 17 PROCEDURES IN THE TRANSOCEAN WELL CONTROL
 18 MANUAL FOLLOWED BY THE DRILL CREW DURING THE
 19 EVENING OF APRIL 20TH, 2010, IN THE 45
 20 MINUTES PRIOR TO THE EXPLOSION?

Page 118:22 to 119:02

00118:22 A. I WOULD LIKE TO PLEAD THE FIFTH.
 23 Q. (BY MR. HAYCRAFT) WERE THE
 24 PROCEDURES SET FORTH IN TRANSOCEAN'S
 25 EMERGENCY RESPONSE MANUAL, SECTION 7, WELL
 00119:01 CONTROL, SHALLOW GAS BLOWOUT, FOLLOWED BY ANY
 02 OF THE PEOPLE ON THE DRILL CREW AT THAT TIME?

Page 119:04 to 119:14

00119:04 A. I WOULD LIKE TO PLEAD THE FIFTH.
 05 Q. (BY MR. HAYCRAFT) DID DEWEY --

06 WERE YOU IN RADIO CONTACT WITH DEWEY REVETTE
 07 DURING THE TIME PERIOD 45 MINUTES BEFORE THE
 08 EXPLOSION?
 09 A. I WOULD LIKE TO PLEAD THE FIFTH.
 10 Q. DID DEWEY REVETTE ALERT YOU TO
 11 COME TO THE DRILL FLOOR BECAUSE A WELL
 12 CONTROL EVENT WAS OCCURRING AT ANY POINT IN
 13 THE HOUR BEFORE THE EXPLOSION?
 14 A. I WOULD LIKE TO PLEAD THE FIFTH.

Page 119:20 to 120:11

00119:20 AT SOME POINT IN THE ONE HOUR
 21 BEFORE THE EXPLOSION, DID DEWEY REVETTE
 22 DIRECT YOU TO BLEED OFF THE DRILL PIPE --
 23 DRILL PIPE PRESSURES?
 24 A. I WOULD LIKE TO PLEAD THE FIFTH.
 25 Q. DID YOU, IN RESPONSE TO HIS
 00120:01 DIRECTION, CRACK OPEN A VALVE ON THE
 02 STANDPIPE MANIFOLD IN ORDER TO BLEED IT DOWN?
 03 A. I WOULD LIKE TO PLEAD THE FIFTH.
 04 Q. AFTER THAT YOU WERE TOLD BY
 05 DEWEY REVETTE -- DEWEY REVETTE TO CLOSE IT
 06 BACK -- TO CLOSE THAT BLEED-OFF VALVE?
 07 A. PLEAD THE FIFTH.
 08 Q. DURING THE 45 MINUTES BEFORE THE
 09 EXPLOSION, DID YOU GET THE SENSE FROM PEOPLE
 10 IN THE DRILL CREW THAT THERE WAS AN EMERGENCY
 11 GOING ON?

Page 120:13 to 120:24

00120:13 A. PLEAD THE FIFTH.
 14 Q. (BY MR. HAYCRAFT) DID YOU OR
 15 DID ANYONE ON THE DRILL CREW, TO YOUR
 16 KNOWLEDGE, NOTIFY THE SENIOR TOOL PUSHER,
 17 RANDY EZELL OR THE OIM, JIMMY HARRELL, THAT
 18 THERE WAS A WELL CONTROL SITUATION ONGOING?
 19 A. I WOULD LIKE TO PLEAD THE FIFTH.
 20 Q. DID YOU OR DID ANYONE THAT YOU
 21 SAW TAKE THE TIW AND TRY TO STAB IT ON TOP OF
 22 THE DRILL PIPE AT ANY POINT IN THE HOUR
 23 BEFORE THE EXPLOSION?
 24 A. I WOULD LIKE TO PLEAD THE FIFTH.

Page 121:12 to 121:14

00121:12 Q. (BY MR. HAYCRAFT) TO YOUR
 13 KNOWLEDGE, ON THE NIGHT OF APRIL THE 20TH,
 14 2010, WAS THE TIW VALVE IN GOOD REPAIR?

Page 121:16 to 122:20

00121:16 A. I WOULD LIKE TO PLEAD THE FIFTH.
 17 Q. TO YOUR KNOWLEDGE, WAS THE TIW
 18 VALVE IN AN OPEN POSITION -- THAT IS THE BALL
 19 VALVE, IN THE OPEN POSITION?
 20 A. I WOULD LIKE TO PLEAD THE FIFTH.
 21 Q. WAS THE TIW VALVE IN ITS
 22 CUSTOMARY PLACE NEAR THE ROTARY TABLE ON THE
 23 NIGHT OF APRIL THE 20TH?
 24 A. PLEAD THE FIFTH.
 25 Q. WERE YOU ENGAGED IN VACUUMING OR
 00122:01 CLEANING -- WELL, STRIKE THAT.
 02 WERE YOU INVOLVED IN CLEANING
 03 OUT THE POLLUTION PANS APPROXIMATELY 45
 04 MINUTES BEFORE THE EXPLOSION?
 05 A. I WOULD LIKE TO PLEAD THE FIFTH.
 06 Q. WAS CLEANING OUT THE POLLUTION
 07 PANS PART OF A WELL CONTROL ACTIVITY ON BOARD
 08 THE DEEPWATER HORIZON THAT EVENING?
 09 A. PLEAD THE FIFTH.
 10 Q. I'M NOW GOING TO ASK A QUESTION
 11 THAT ISN'T APRIL 20TH. AND I THINK I ASKED
 12 IT BEFORE, BUT I WANT TO MAKE SURE I ASKED
 13 IT. DID YOU -- DID YOU AND THE DRILL CREW
 14 DRILL ON STABBING THE TIW VALVE ON THE DRILL
 15 PIPE AS A WELL CONTROL STEP? WAS THAT
 16 SOMETHING YOU DRILLED ON?
 17 A. YES, SIR.
 18 Q. AND BY "DRILLED ON" I MEAN
 19 PRACTICE MANIPULATING THE TOOL AND STABBING
 20 IT AND CLOSING THE BALL VALVE?

Page 122:22 to 122:24

00122:22 A. YES, SIR.
 23 Q. (BY MR. HAYCRAFT) AND SO YOU
 24 DRILLED ON THAT?

Page 123:01 to 123:09

00123:01 A. YES, DRILLED ON IT.
 02 Q. (BY MR. HAYCRAFT) AND, AGAIN,
 03 I'M NOT TALKING ABOUT THE EVENING OR THE DAY
 04 OF APRIL THE 20TH, BUT JUST IN GENERAL, OUT
 05 THERE ON THE DRILL CREW ON DEEPWATER HORIZON,
 06 DO YOU AGREE, SIR, THAT IT WAS THE
 07 DRILLER'S -- IT WAS ONE OF THE DRILLER'S FEW
 08 RESPONSIBILITIES TO CONSTANTLY MONITOR PIT
 09 VOLUMES, PUMP PRESSURES, AND FLOW?

Page 123:11 to 123:16

00123:11 Q. (BY MR. HAYCRAFT) CAN YOU
 12 ANSWER THAT?

13 A. TO MY KNOWLEDGE, YES.
 14 Q. DID YOU -- DID YOU UNDERSTAND AS
 15 A FLOOR HAND THAT "CONSTANTLY MONITOR" MEANS
 16 CONSTANTLY AND NOT OCCASIONALLY?

Page 123:18 to 123:23

00123:18 A. YES, SIR.
 19 Q. NOW, I'M BACK TO THE NIGHT OF
 20 APRIL THE 20TH. DID YOU KNOW THAT EVENING
 21 THAT SOMEONE IN THE DRILL CREW DIVERTED THE
 22 FLOW TO THE POOR BOY DEGASSER RATHER THAN
 23 DIVERTED IT TO THE OVERBOARD LINES?

Page 123:25 to 123:25

00123:25 A. I WOULD LIKE TO PLEAD THE FIFTH.

Page 124:19 to 126:08

00124:19 Q. (BY MR. HAYCRAFT) OKAY.
 20 MR. WILLIAMSON ASKED YOU A NUMBER OF
 21 QUESTIONS TO FIND OUT WHETHER YOU CONSIDERED
 22 YOURSELF AN EXPERT ON VARIOUS PARTS OF THE
 23 DRILLING OPERATIONS, AND SO I'M GOING TO DO
 24 SOME FOLLOW-UP ON THAT.
 25 HOW LONG HAD YOU BEEN ON
 00125:01 DEEPWATER HORIZON AT THE TIME OF APRIL THE
 02 20TH?
 03 A. FROM OCTOBER OR -- I THINK IT
 04 WAS NOVEMBER THE 1ST OF '07 UNTIL APRIL THE
 05 20TH.
 06 Q. SO ABOUT THREE, THREE-AND-A-HALF
 07 YEARS, NOT QUITE THREE-AND-A-HALF YEARS. AND
 08 PART OF THAT THREE-AND-A-HALF YEARS YOU WERE
 09 A ROUSTABOUT WORKING AS A RIG -- DOING
 10 RIGGING FOR THE CRANE CREW?
 11 A. YES, SIR.
 12 Q. AND THEN THE SECOND HALF OF THAT
 13 THREE-AND-A-HALF YEARS YOU WERE WORKING AS A
 14 FLOOR HAND, RIGHT?
 15 A. YES, SIR.
 16 Q. AND DO I UNDERSTAND A FLOOR HAND
 17 IS THE ENTRY LEVEL POSITION FOR THE -- FOR
 18 THE DRILLING HIERARCHY -- DRILL CREW
 19 HIERARCHY?
 20 A. YES, SIR.
 21 Q. SO -- SO NOT -- NOT TO DEMEAN IT
 22 IN ANY WAY, BUT IT'S THE BOTTOM POSITION OR
 23 THE LOWEST POSITION AMONG THE DRILL CREW,
 24 RIGHT?
 25 A. YES, SIR.
 00126:01 Q. AND -- AND SO WHEN

02 MR. WILLIAMSON WAS ASKING YOU ARE YOU AN
03 EXPERT ON CEMENT OR AN EXPERT ON FLOAT
04 COLLARS, IS IT FAIR TO SAY THAT AS A
05 ROUSTABOUT AND THEN A FLOOR HAND, THOSE AREAS
06 OF THE MORE COMPLICATED PARTS OF DRILLING,
07 JUST -- YOU'RE JUST LEARNING ALL OF THAT
08 STUFF? FAIR TO SAY?

Page 126:10 to 126:18

00126:10 A. YES, SIR.
11 Q. (BY MR. HAYCRAFT) AND YOU WERE
12 LOOKING TO MOVE UP AND WERE BEING GROOMED, AS
13 I UNDERSTAND IT, TO ENTER THE SUBSEA
14 DEPARTMENT AS OPPOSED TO THE DRILLING
15 SECTION, CORRECT?
16 A. YES, SIR.
17 Q. AND THE SUBSEA DEPARTMENT TAKES
18 CARE OF THE WELL CONTROL EQUIPMENT?

Page 126:20 to 127:04

00126:20 A. YES, SIR.
21 Q. (BY MR. HAYCRAFT) AND THE WELL
22 CONTROL EQUIPMENT INCLUDES THE EQUIPMENT ON
23 THE RIG ITSELF, BUT ALSO THE EQUIPMENT THAT'S
24 SET DOWN ON BOTTOM THAT ENGAGES IN -- IN WELL
25 CONTROL?
00127:01 A. YES, SIR.
02 Q. YOU HADN'T YET MOVED TO THE
03 SUBSEA DEPARTMENT, THOUGH; IS THAT CORRECT?
04 A. THAT'S CORRECT.

Page 128:25 to 129:03

00128:25 Q. OKAY. WAS THE MACONDO 252 WELL
00129:01 MORE OR LESS DIFFICULT, FROM YOUR PERSPECTIVE
02 AS A FLOOR HAND, THAN OTHER WELLS THAT
03 DEEPWATER HORIZON HAD DRILLED?

Page 129:05 to 129:11

00129:05 A. THE MACONDO ITSELF?
06 Q. (BY MR. HAYCRAFT) YES.
07 A. NO, SIR.
08 Q. I PROBABLY FORGOT MY OWN
09 QUESTION. NO, SIR, AS TO WHAT?
10 A. I DIDN'T SEE ANY -- ANY OTHER
11 DIFFICULTIES.

Page 130:24 to 131:14

00130:24 WHEN -- WHEN YOU WERE AT THE
 25 LOCATION WHERE YOU WERE BEFORE THE EXPLOSION
 00131:01 OCCURRED, DO I UNDERSTAND CORRECTLY THAT YOU
 02 HEARD THE ENGINES -- THE BIG DIESEL ENGINES
 03 ON DEEPWATER HORIZON REVVING UP?
 04 A. I PLEAD THE FIFTH.
 05 Q. IS IT TRUE, MR. HOLLOWAY, THAT
 06 YOU DID NOT HEAR A GENERAL ALARM BEING
 07 SOUNDED THAT EVENING?
 08 A. PLEAD THE FIFTH.
 09 Q. THAT EVENING DID YOU HEAR OVER
 10 YOUR RADIO OR OVER THE LOUD SPEAKERS OR
 11 VERBALLY FROM ONE OF YOUR SUPERIORS THAT A
 12 PHASE I OR PHASE II OR PHASE III WELL CONTROL
 13 SITUATION WAS IN PROGRESS?
 14 A. I PLEAD THE FIFTH.

Page 131:24 to 132:01

00131:24 Q. MR. HOLLOWAY, MY NAME IS DOUG
 25 KRAUS. I'M HERE ON BEHALF OF THE STATE OF
 00132:01 LOUISIANA. I'M GOING TO BE VERY, VERY BRIEF,

Page 136:20 to 138:21

00136:20 Q. DID YOU HAVE ANY HANDS-ON WORK
 21 WITH DRILLING MUDS AT ALL ON THE DEEPWATER
 22 HORIZON?
 23 A. DRILLING MUD?
 24 Q. YES, SIR.
 25 A. YES, SIR.
 00137:01 Q. WHAT -- WHAT WOULD THAT BE?
 02 A. I ASSISTED THE DERRICKMEN IN THE
 03 MIXING CHEMICALS AND WEIGHING UP MUD.
 04 Q. OKAY. WERE YOU RESPONSIBLE FOR
 05 MONITORING THE FLOW IN AND FLOW OUT?
 06 A. NO, SIR, I WASN'T RESPONSIBLE
 07 FOR THAT.
 08 Q. WHOSE JOB WAS THAT?
 09 A. THE DERRICK HAND AND THE SHAKER
 10 HAND.
 11 Q. WHO DID THEY WORK FOR?
 12 A. THEY WORKED FOR TRANSOCEAN.
 13 Q. WHO WERE THOSE INDIVIDUALS ON
 14 APRIL 20, 2010?
 15 A. THE DERRICKMAN AND THE SHAKER
 16 HAND?
 17 Q. YES, SIR.
 18 A. MR. KARL KLEPPINGER WAS THE
 19 SHAKER HAND, MR. ROY KEMP WAS THE DERRICKMAN.
 20 Q. ON YOUR WORK ON THE DEEPWATER
 21 HORIZON I WANT TO ISOLATE THE TIME YOU WERE A
 22 FLOOR HAND. DID YOU EVER TAKE DIRECTIONS
 23 FROM ANYBODY THAT WASN'T A TRANSOCEAN

24 EMPLOYEE?
 25 A. NO SIR.
 00138:01 Q. NOBODY FROM BP EVER TOLD YOU
 02 WHAT TO DO?
 03 A. THEY MAY HAVE TOLD ME WHAT TO
 04 DO, BUT I WOULD HAVE RUN IT BY MY DRILLER
 05 BEFORE I DID IT.
 06 Q. SO THERE WOULD BE A LAYER OF --
 07 A LAYER BETWEEN YOU AND THE BP PERSON AS IT
 08 RELATES TO THOSE INSTRUCTIONS?
 09 A. UH-HUH.
 10 Q. THAT'S A YES?
 11 A. YES.
 12 Q. AND WOULD THE SAME BE TRUE OF
 13 ANY -- ANY NON-TRANSOCEAN CONTRACTOR OR
 14 EMPLOYEE THAT WAS ON -- ON BOARD THE
 15 DEEPWATER HORIZON -- STRIKE THAT QUESTION.
 16 DID YOU EVER TAKE ANY ORDERS OR
 17 DIRECTIONS ON HOW TO DO YOUR JOB FROM ANYBODY
 18 ABOARD THE DEEPWATER HORIZON THAT WAS NOT A
 19 TRANSOCEAN EMPLOYEE AT ANY TIME -- AT ANY
 20 TIME THAT YOU WERE ON BOARD?
 21 A. NO, SIR.

Page 141:05 to 141:06

00141:05 Q. MR. HOLLOWAY, MY NAME IS JOHN
 06 KINCHEN AND I REPRESENT TRANSOCEAN. THIS IS

Page 142:07 to 149:22

00142:07 Q. WAS SAFETY A PRIORITY FOR YOU
 08 ONBOARD THE DEEPWATER HORIZON?
 09 A. YES.
 10 Q. DID TRANSOCEAN STRESS TO YOU THE
 11 IMPORTANCE OF SAFETY IN YOUR ACTIVITIES AS
 12 BOTH A FLOOR HAND AND A ROUSTABOUT?
 13 MR. HOLLEY: OBJECT TO FORM.
 14 A. YES, SIR.
 15 Q. (BY MR. KINCHEN) YOU INDICATED
 16 THAT YOUR BOSS WAS DEWEY REVETTE. HE WAS A
 17 DRILLER?
 18 A. YES, SIR.
 19 Q. WAS HE A FRIEND OF YOURS?
 20 A. VERY GOOD FRIEND OF MINE.
 21 Q. DID YOU WORK WITH HIM SINCE THE
 22 FIRST DAY YOU WERE ONBOARD THE DEEPWATER
 23 HORIZON?
 24 A. I DIDN'T WORK DIRECTLY WITH HIM.
 25 I WORKED WITH -- AS A ROUSTABOUT UNTIL I GOT
 00143:01 THE FLOOR HAND SPOT. AND WHEN I GOT THE
 02 FLOOR HAND SPOT THEN I WAS ON HIS CREW FOR --
 03 FOR THE REMAINDER OF THE TIME WE WERE OUT
 04 THERE.

05 Q. HE WAS A HARD WORKER?
06 A. YES, SIR.
07 Q. YOUR LAST HITCH DID YOU WORK
08 WITH HIM EVERY DAY?
09 A. YES, SIR.
10 Q. DID YOU CONSIDER HIM TO BE
11 SAFETY CONSCIOUS?
12 A. YES.
13 Q. DID SAFETY -- DID YOU CONSIDER
14 SAFETY TO BE A PRIORITY FOR HIM?
15 MR. HOLLEY: OBJECT TO FORM.
16 A. WHAT WAS YOUR QUESTION?
17 Q. (BY MR. KINCHEN) I ASKED YOU IF
18 YOU CONSIDERED SAFETY TO BE A PRIORITY FOR
19 YOU, AND YOU INDICATED IT WAS. MY QUESTION
20 IS DID YOU CONSIDER SAFETY TO BE A PRIORITY
21 TO -- FOR MR. REVETTE?
22 A. YES, SIR.
23 MR. HOLLEY: SAME OBJECTION.
24 Q. (BY MR. KINCHEN) WERE YOU AWARE
25 OF ANYTHING THAT MR. REVETTE EVER DID ON THE
00144:01 DEEPWATER HORIZON THAT ENDANGERED THE LIFE OF
02 THE CREW ON THE DEEPWATER HORIZON?
03 MR. HAYCRAFT: OBJECT TO FORM.
04 JUST FOR CLARITY'S SAKE, WE'VE
05 ALL BEEN OPERATING UNDER THE ASSUMPTION THAT
06 WE'RE TALKING ABOUT UP UNTIL 11:30 ON APRIL
07 THE 20TH. I WOULD WITHDRAW MY OBJECTION
08 IF -- IF THE WITNESS UNDERSTOOD THAT'S WHAT
09 YOU WERE TALKING ABOUT.
10 Q. (BY MR. KINCHEN) AND
11 MR. HAYCRAFT BRINGS UP A VERY GOOD POINT.
12 ALL MY -- I UNDERSTOOD YOUR -- THE POINT THAT
13 YOUR ATTORNEY MADE AT THE BEGINNING, AND SO
14 ALL OF MY QUESTIONS -- AND I SHOULD HAVE MADE
15 THIS CLEAR EARLIER -- RELATE TO THE TIME
16 PERIOD UP TO 11:30 ON APRIL THE 20TH. AND I
17 DON'T WANT TO SPEAK TO ANY EVENTS AFTER THAT
18 UNLESS I ASK YOU A SPECIFIC QUESTION ABOUT
19 POST -- AFTER THE EXPLOSION. DO YOU
20 UNDERSTAND?
21 A. YES, SIR.
22 MR. KINCHEN: OKAY. THANK YOU FOR
23 THAT.
24 MR. HAYCRAFT: I'LL WITHDRAW MY
25 OBJECTION.
00145:01 Q. (BY MR. KINCHEN) JASON
02 ANDERSON, YOU WORKED UNDER HIM ON THE
03 DEEPWATER HORIZON, TOO, CORRECT?
04 A. YES, SIR.
05 Q. HE WAS A TOOL PUSHER?
06 A. YES, SIR.
07 Q. FRIEND OF YOURS?
08 A. YES, SIR.
09 Q. HARD WORKER?

10 A. YES, SIR.
11 Q. DID YOU CONSIDER MR. ANDERSON TO
12 BE SAFETY CONSCIOUS?
13 A. YES, SIR.
14 Q. WAS SAFETY -- DID YOU CONSIDER
15 SAFETY TO BE IMPORTANT FOR MR. ANDERSON?
16 A. YES, SIR.
17 Q. WERE YOU AWARE OF ANYTHING THAT
18 MR. ANDERSON EVER DID ON THE DEEPWATER
19 HORIZON THAT ENDANGERED THE LIFE OF ITS CREW?
20 A. NO, SIR.
21 Q. I RECOGNIZE THAT SOME OF THESE
22 QUESTIONS ARE DIFFICULT BECAUSE OF THE PEOPLE
23 I'M ASKING ABOUT, BUT I THINK THEY'RE
24 IMPORTANT QUESTIONS. IF AT ANY TIME YOU WANT
25 TO TAKE A BREAK, THAT'S FINE.

00146:01 STEPHEN CURTIS, IN THE HIERARCHY
02 ON BOARD THE RIG, STEPHEN CURTIS WAS ABOVE
03 YOU?
04 A. YES, SIR.
05 Q. HE WAS ASSISTANT DRILLER?
06 A. YES, SIR.
07 Q. OKAY. WAS HE A FRIEND OF YOURS?
08 A. YES, SIR.
09 Q. DID YOU WORK WITH HIM EVERY DAY
10 ON THAT LAST DITCH?
11 A. I DID.
12 Q. DID YOU CONSIDER HIM TO BE
13 SAFETY CONSCIOUS?
14 A. YES, SIR.
15 Q. DID YOU CONSIDER SAFETY TO BE A
16 PRIORITY FOR HIM?
17 A. YES, SIR.
18 Q. AND WERE YOU AWARE OF ANYTHING
19 THAT HE EVER DID ON THE DEEPWATER HORIZON
20 THAT ENDANGERED THE LIFE OF THE CREW?
21 A. NO, SIR.
22 Q. DON CLARK IS ANOTHER ASSISTANT
23 DRILLER ABOVE YOU, CORRECT?
24 A. YES, SIR.
25 Q. FRIEND OF YOURS?

00147:01 A. YES, SIR.
02 Q. HARD WORKER?
03 A. YES, SIR.
04 Q. DID YOU CONSIDER HIM TO BE
05 SAFETY CONSCIOUS?
06 A. YES, SIR.
07 Q. DID YOU CONSIDER SAFETY TO BE A
08 PRIORITY FOR HIM?
09 A. YES, SIR.
10 Q. WERE YOU AWARE OF ANYTHING THAT
11 HE EVER DID ON THE DEEPWATER HORIZON THAT
12 ENDANGERED THE LIFE OF ITS CREW?
13 A. NO, SIR.
14 Q. JIMMY HARRELL WAS THE OIM WHILE

15 YOU WERE ON THE LAST HITCH?
16 A. YES, SIR.
17 Q. HOW LONG DID YOU WORK WITH
18 JIMMY?
19 A. THE WHOLE -- THE WHOLE TIME I
20 WAS ON THE DEEPWATER HORIZON HE WAS OIM. I
21 WORKED SOME WITH HIM AND SOME WITH THE OTHER
22 OIM BECAUSE WE WEREN'T ON THE SAME SCHEDULE.
23 Q. DO YOU BELIEVE HIM TO BE
24 COMPETENT IN CARRYING OUT THE DUTIES THAT YOU
25 OBSERVED HIM CARRYING OUT AS OIM?
00148:01 A. YES, SIR.
02 Q. WAS SAFETY A PRIORITY FOR HIM?
03 A. YES, SIR.
04 Q. WAS HE A DETAIL-ORIENTED GUY?
05 A. YES, SIR.
06 Q. DID HE HAVE AN OPEN-DOOR POLICY?
07 A. YES, SIR.
08 Q. YOU FELT COMFORTABLE TALKING TO
09 HIM?
10 A. YES, SIR.
11 Q. RANDY EZELL WAS THE SENIOR TOOL
12 PUSHER ON THE LAST DAY, CORRECT?
13 A. YES, SIR.
14 Q. HOW LONG DID YOU WORK WITH
15 MR. EZELL?
16 A. THE SAME -- THE SAME STATUS AS
17 MR. HARRELL. I DIDN'T WORK DIRECTLY WITH HIM
18 BECAUSE WE WERE ON DIFFERENT SCHEDULES, BUT
19 THE WHOLE TIME I WAS ON THE HORIZON FROM DAY
20 ONE I MET HIM AND KNEW HIM UP UNTIL THE 20TH.
21 Q. DID YOU CONSIDER HIM TO BE
22 SAFETY CONSCIOUS SUCH AS YOURSELF?
23 A. YES, SIR.
24 Q. WERE YOU AWARE OF ANYTHING THAT
25 HE EVER DID ON THE DEEPWATER HORIZON THAT
00149:01 ENDANGERED THE LIFE OF THE CREW?
02 A. NO, SIR.
03 Q. IN YOUR DUTIES AS FLOOR HAND --
04 I KNOW YOU'VE COVERED THEM GENERALLY WHEN
05 MR. HAYCRAFT AND MR. WILLIAMSON WERE ASKING
06 YOU SOME QUESTIONS. DID I GATHER THAT TO
07 SOME EXTENT IT INVOLVED MAINTENANCE OF
08 CERTAIN EQUIPMENT?
09 A. YES, SIR.
10 Q. OKAY. AND YOU TOOK THAT PART OF
11 YOUR JOB SERIOUSLY, RIGHT?
12 A. YES, SIR.
13 Q. DO YOU BELIEVE THAT OTHERS --
14 YOUR OTHER CREW MEMBERS TOOK MAINTENANCE OF
15 RIG EQUIPMENT SERIOUSLY?
16 A. YES, SIR.
17 Q. DID YOU EVER SEE ANYTHING DURING
18 THE ENTIRE TIME YOU WERE ON THE DEEPWATER
19 HORIZON THAT SUGGESTED TO YOU THAT CREW

20 MEMBERS WERE NOT TAKING MAINTENANCE OF THE
21 EQUIPMENT SERIOUSLY?
22 A. NO, SIR.

Page 150:10 to 151:12

00150:10 WERE YOU AWARE AS OF APRIL THE
11 20TH, 2010, BEFORE 11:30 A.M., OF ANY UNSAFE
12 CONDITIONS ONBOARD THE DEEPWATER HORIZON?
13 A. NO, SIR. NOTHING UNSAFE WE
14 HADN'T DEALT WITH BEFORE.
15 Q. AND IF YOU EVER SAW ANYTHING
16 THAT WAS UNSAFE ONBOARD THE DEEPWATER
17 HORIZON, YOU WOULD SAY SOMETHING ABOUT IT,
18 CORRECT?
19 A. YES, SIR.
20 Q. AND THAT WAS THE TIME-OUT FOR
21 SAFETY THAT SOMEBODY ASKED YOU ABOUT. HAD
22 YOU EVER ACTUALLY CALLED A TIME-OUT FOR
23 SAFETY?
24 A. YES, SIR.
25 Q. DID YOU FEEL COMFORTABLE DOING
00151:01 THAT?
02 A. YES, SIR.
03 Q. DID YOUR SUPERVISOR SUPPORT YOU
04 WHENEVER YOU DID THAT?
05 A. YES, SIR.
06 Q. JIMMY HARRELL SUPPORTED YOU IN
07 DOING THAT?
08 A. YES, SIR.
09 Q. ARE YOU AWARE OF ANYONE, ANY
10 TRANSOCEAN EMPLOYEE, EVER GETTING REPRIMANDED
11 OR FIRED FOR CALLING A TIME-OUT FOR SAFETY?
12 A. NOT THAT I'M AWARE OF.

Page 157:05 to 157:21

00157:05 Q. (BY MR. KINCHEN) WERE YOU
06 IMPRESSED WITH THE TRAINING THAT -- WERE YOU
07 IMPRESSED WITH THE KNOWLEDGE OF SUBSEA
08 EQUIPMENT THAT THE SWAT TEAMS HAD?
09 MR. BERKA: OBJECTION, FORM.
10 A. I WAS IMPRESSED WITH THE -- WITH
11 THE GUYS ON THE RIG. BOTH OUR SENIOR SUBSEA
12 ENGINEERS AND BOTH OF OUR ASSISTANT SUBSEA
13 ENGINEERS TAUGHT ME A LOT.
14 Q. (BY MR. KINCHEN) WHY? WHY WERE
15 YOU IMPRESSED?
16 A. WHY WAS I IMPRESSED?
17 Q. YEAH. WHAT IMPRESSED YOU?
18 A. WELL, THEY KNEW THEIR -- THEY
19 KNEW THEIR BUSINESS. THEY KNEW THE EQUIPMENT
20 AND THEY WANTED TO TEACH ME BECAUSE THEY KNEW
21 I HAD A VERY BIG INTEREST IN IT.

Page 158:23 to 159:02

00158:23 Q. WAS IT YOUR UNDERSTANDING THAT
24 IF ANY OF THE BP COMPANY MEN SAW SOMETHING ON
25 THE RIG THAT THEY DIDN'T LIKE THEY COULD STOP
00159:01 IT?
02 A. MY UNDERSTANDING.

Page 165:13 to 165:15

00165:13 Q. MY NAME IS JERRY VON STERNBERG.
14 I'M ONE OF THE LAWYERS REPRESENTING
15 HALLIBURTON IN THIS MATTER. I KNOW YOU'VE

Page 165:21 to 166:16

00165:21 Q. THE DOCUMENT YOU HAVE HAD IN
22 YOUR HAND I JUST HANDED TO YOU IS NUMBERED
23 EXHIBIT 2622 FOR IDENTIFICATION. CAN YOU
24 TELL US WHAT THAT IS?
25 A. THIS IS THE FIRST STATEMENT I
00166:01 GAVE -- I GAVE TO THE COAST GUARD WHILE
02 ABOARD THE DAMON BANKSTON.
03 Q. OKAY. AND JUST FOR OUR
04 INFORMATION, IS THAT YOUR HANDWRITING THAT'S
05 ACTUALLY ON EXHIBIT 2622?
06 A. YES, SIR.
07 Q. THANK YOU VERY MUCH, SIR.
08 EARLIER YOU TESTIFIED THAT YOU
09 WERE AWARE THAT THERE WERE SOME PREVIOUS
10 KICKS ON BOARD THE VESSEL. IS THAT TRUE?
11 A. YES, SIR.
12 Q. OKAY. AND I THINK YOU ADVISED
13 US THAT YOU DIDN'T HAVE ANY SPECIFIC
14 KNOWLEDGE OR SPECIFIC RECOLLECTIONS OF THOSE
15 KICKS. IS THAT ALSO TRUE?
16 A. YES, SIR.

Page 167:04 to 167:23

00167:04 Q. OKAY. AND SINCE WE'RE TALKING
05 ABOUT IT IN TERMS OF A KICK, WHEN I SAY A
06 "KICK," YOU KNOW I'M TALKING ABOUT A WELL
07 CONTROL EVENT; IS THAT CORRECT?
08 A. YES, SIR.
09 Q. AND DO YOU RECALL WHETHER OR NOT
10 YOU WERE ACTUALLY ON THE DRILL FLOOR ON MARCH
11 8TH OF 2010 WHEN YOU-ALL INCURRED A WELL
12 CONTROL EVENT?
13 A. I DON'T RECALL.
14 Q. SO DO YOU RECALL ANY
15 CONVERSATIONS ABOUT THAT EVENT THAT OCCURRED

16 AFTER MARCH 8TH OF 2010 UP UNTIL 1:30 ON
17 APRIL 20TH, 2010?
18 A. NO, SIR, I DON'T.
19 Q. NO SAFETY MEETINGS OR ANY
20 DISCUSSIONS THAT YOU CAN RECALL AT THIS POINT
21 ABOUT THAT PARTICULAR WELL CONTROL INCIDENT
22 ON MARCH 8TH, 2010?
23 A. NO, SIR.

Page 169:25 to 171:21

00169:25 Q. THAT'S FINE. NOW, SINCE THE
00170:01 INCIDENT HAVE YOU SPOKEN WITH ANYBODY FROM
02 HALLIBURTON OR SPERRY-SUN WITH REGARDS TO
03 WHAT HAPPENED OUT THERE ON THE VESSEL?
04 A. NO, SIR.
05 Q. I THINK EARLIER YOU TESTIFIED
06 THAT YOU DON'T HAVE ANY EXPERTISE IN
07 REFERENCE TO CEMENTING FROM THE DESIGN SIDE;
08 IS THAT CORRECT?
09 A. THAT'S CORRECT.
10 Q. IN OTHER WORDS, IF I ASKED YOU
11 TO GO DESIGN A SLURRY YOU'RE NOT GOING TO BE
12 ABLE TO DO THAT; IS THAT CORRECT?
13 A. THAT'S CORRECT.
14 Q. YOU DON'T HAVE THE TRAINING OR
15 EXPERIENCE TO DO THAT?
16 A. NO, SIR.
17 Q. AND, SIMILARLY, WITH THE
18 PROCEDURES THAT YOU OUTLINE OR SOMEBODY
19 OUTLINES FOR A CEMENTING JOB, YOU DON'T HAVE
20 THE EXPERTISE TO PUT THAT TYPE OF PROCEDURE
21 TOGETHER; IS THAT TRUE?
22 A. THAT'S CORRECT.
23 Q. YOU HAVEN'T BEEN TRAINED AS A
24 CEMENTER; IS THAT CORRECT?
25 A. THAT'S CORRECT.
00171:01 Q. AND DURING YOUR TIME OUT THERE
02 ON THE VESSEL, OBVIOUSLY YOU WOULD HAVE COME
03 IN CONTACT WITH HALLIBURTON CEMENTERS ON THE
04 JOB; IS THAT RIGHT?
05 A. YES, SIR.
06 Q. AS YOU SIT HERE TODAY, YOU DON'T
07 HAVE ANY RECOLLECTIONS OF HAVING ANY
08 COMPLAINT ABOUT ANY OF THOSE INDIVIDUALS, DO
09 YOU?
10 A. NO, SIR.
11 Q. AND THE SAME IN REFERENCE TO THE
12 MUD LOGGERS, THE SPERRY MUD LOGGERS THAT WERE
13 ONBOARD THE VESSEL. YOU DON'T HAVE ANY
14 PARTICULAR INSTANCES IN YOUR MIND WHERE YOU
15 THOUGHT YOU SHOULD COMPLAIN ABOUT HOW THEY
16 DID THEIR JOB, DO YOU?
17 A. NO, SIR.
18 Q. DO YOU HAVE THE EXPERTISE AND

19 EXPERIENCE TO SIT IN FRONT OF A MONITOR AND
20 DO MUD LOGGING?
21 A. NO, SIR.

Page 172:04 to 172:17

00172:04 YOU DISCUSSED A LITTLE BIT HERE
05 TODAY ABOUT WHAT YOUR PARTICULAR DUTIES WERE
06 AS A FLOOR HAND; IS THAT CORRECT?
07 A. YES, SIR.
08 Q. OKAY. DO YOU MONITOR FLOW OF
09 THE WELL INTO THE TANKS, FOR INSTANCE, OR IN
10 THE MUD PITS, OR IS THAT SOMEBODY ELSE ON THE
11 VESSEL?
12 A. THAT'S THE DERRICKMAN.
13 Q. THE DERRICKMAN?
14 A. YES, SIR.
15 Q. OKAY. NOW, AS THE FLOOR HAND,
16 AREN'T YOU THE EYES OF THE DRILLER OR THE
17 ASSISTANT DRILLER WHILE YOU'RE ON DECK?

Page 172:19 to 172:23

00172:19 A. YES, SIR.
20 Q. (BY MR. VON STERNBERG) SO IF
21 YOU SAW SOMETHING THAT YOU THOUGHT WAS
22 UNUSUAL, YOU WOULD GET ON THE RADIO AND TALK
23 TO THE DRILLER; IS THAT RIGHT?

Page 172:25 to 173:06

00172:25 A. YES, SIR.
00173:01 Q. (BY MR. VON STERNBERG) AND I
02 THINK YOU TESTIFIED EARLIER TO THIS, BUT I
03 JUST DON'T RECALL. ON A NORMAL TOUR WOULD
04 THERE BE ONE DRILLER AND TWO ASSISTANTS IN
05 THE SHACK?
06 A. YES, SIR.

Page 176:08 to 176:23

00176:08 Q. WERE YOU INVOLVED IN ANY
09 DISCUSSIONS WITH REFERENCE TO WHETHER OR NOT
10 THEY WERE GOING TO DO A BOTTOMS-UP
11 CIRCULATION PRIOR TO DOING THE CEMENT JOB?
12 A. I BELIEVE I WAS INVOLVED IN
13 THAT. I DON'T RECALL WHAT WAS -- WHAT WAS
14 DISCUSSED OR ANY OF THAT.
15 Q. DO YOU RECALL WHO WAS INVOLVED
16 IN THE DISCUSSION?
17 A. I DON'T RECALL EXACTLY WHO WAS
18 INVOLVED IN IT.
19 Q. DO YOU RECALL WHETHER IT WAS

20 JUST TRANSOCEAN PEOPLE TALKING ABOUT IT OR
21 WHETHER THERE WERE BP PERSONNEL REPRESENTED
22 THERE AS WELL?
23 A. I BELIEVE THERE WAS BOTH.

Page 177:03 to 178:02

00177:03 DO YOU RECALL DISCUSSIONS IN
04 REFERENCE TO HOW TO PERFORM THE DISPLACEMENT
05 OF THE WELL AFTER YOUR TOUR BEGAN ON THE 20TH
06 OF APRIL, 2010?
07 A. I HAVE TO PLEAD THE FIFTH.
08 Q. DID YOU PARTICIPATE IN A
09 NEGATIVE PRESSURE TEST AFTER 11:30 ON APRIL
10 20TH, 2010?
11 A. I HAVE TO PLEAD THE FIFTH.
12 Q. DID YOU PARTICIPATE IN ANY
13 CONVERSATIONS WITH REFERENCE TO WHETHER OR
14 NOT THAT TEST -- AND IT'S STILL THE SAME TIME
15 FRAME SO YOU CAN ANSWER APPROPRIATELY -- AS
16 TO WHETHER OR NOT THAT TEST WAS SUCCESSFUL?
17 A. I PLEAD THE FIFTH.
18 Q. AT ANY TIME WERE YOU ASKED TO
19 BLEED OFF PRESSURE FROM THE WELL?
20 A. I PLEAD THE FIFTH.
21 Q. AT ANY TIME WERE YOU ASKED TO
22 BLEED OFF PRESSURE FROM THE DRILL PIPE?
23 A. PLEAD THE FIFTH.
24 Q. ARE YOU FAMILIAR IF ANYONE
25 ATTEMPTED TO USE THE EDS SYSTEM TO TRY TO
00178:01 SEPARATE THE VESSEL FROM THE HORIZON?
02 A. PLEAD THE FIFTH.

Page 179:01 to 179:03

00179:01 MY NAME IS CHRIS BERKA. I'M ONE OF THE
02 ATTORNEYS REPRESENTING ANADARKO AND MOEX
03 OFFSHORE 2007. THANK YOU FOR COMING HERE

Page 179:06 to 180:04

00179:06 EARLIER IN YOUR DEPOSITION TODAY
07 YOU MENTIONED THAT THERE WERE OCCASIONS WHERE
08 YOU WOULD BE GIVEN A DIRECTION BY A BP
09 REPRESENTATIVE, AND BEFORE CARRYING THAT OUT
10 YOU WOULD CHECK WITH YOUR DRILLER. DO YOU
11 RECALL INDICATING THAT?
12 A. I DO RECALL INDICATING THAT.
13 Q. GIVE US EXAMPLES OF WHEN THAT
14 HAPPENED.
15 A. THERE WAS A TIME WHEN THEY -- BP
16 HAD THEIR -- THEIR SAFETY COORDINATOR OUT
17 THERE, AND HE WOULD ASK US AS ROUSTABOUTS --

18 ASKED US IF WE COULD CLEAN UP A CERTAIN SPOT
19 OR -- OR GET SOME PIPE IN A STRAIGHT LINE.
20 AND WE WOULD -- WE WOULD HAVE TO GO TO OUR
21 IMMEDIATE SUPERVISOR AND RELAY IT TO HIM.
22 BUT OTHER THAN MINOR THINGS LIKE THAT, THAT'S
23 ABOUT IT.
24 Q. NOW, DID THAT HAPPEN,
25 MR. HOLLOWAY, ON ONE OCCASION, OR WAS THERE
00180:01 MORE THAN ONE OCCASION WHERE THAT HAPPENED?
02 A. IT DIDN'T HAPPEN OFTEN.
03 Q. BUT MORE THAN ONCE?
04 A. ONCE OR TWICE.

Page 180:19 to 180:23

00180:19 Q. DID ANYONE WHOM YOU UNDERSTOOD
20 TO BE A BP SAFETY COORDINATOR EVER COME OUT
21 ONTO THE DEEPWATER HORIZON WHILE YOU WERE AT
22 THE MACONDO WELL?
23 A. NOT THAT I'M AWARE OF.

Page 184:05 to 184:20

00184:05 Q. OKAY. SO YOU GOT ON THE
06 BANKSTON AFTER THE BLOWOUT OCCURRED, CORRECT?
07 A. YES, SIR.
08 Q. AND WHILE YOU WERE ON THE
09 BANKSTON, WHAT COMMUNICATIONS DID YOU HAVE
10 WITH THE PEOPLE WHO YOU UNDERSTOOD WERE
11 EMPLOYED BY BP?
12 A. WHY WE COULDN'T CALL OUR
13 FAMILIES AND LET THEM KNOW WHAT WAS GOING ON
14 BECAUSE THEY WERE -- THEY WERE ALL ON THE
15 BRIDGE AND WE -- ALL THE REST OF US ARE
16 DOWNSTAIRS. WE KNEW THEY HAD A SATELLITE
17 PHONE. WE COULDN'T -- WE DIDN'T UNDERSTAND
18 WHY WE COULDN'T CALL OUR FAMILIES WHILE WE
19 WERE SITTING OUT THERE FOREVER, YOU KNOW, AND
20 LET OUR FAMILIES KNOW THAT WE WERE OKAY.

Page 185:07 to 186:04

00185:07 Q. WHERE WERE THE -- WHERE WERE THE
08 PEOPLE LOCATED WHO YOU UNDERSTOOD TO BE
09 EMPLOYED BY BP AT THE TIME THAT YOU WERE ON
10 THE BANKSTON?
11 A. ON THE BRIDGE.
12 Q. ON BRIDGE OF THE -- OF THE
13 DEEPWATER HORIZON?
14 A. OF THE BANKSTON.
15 Q. THEY WERE ON THE BRIDGE OF THE
16 BANKSTON. OKAY. AND YOU CALLED UP TO THEM,
17 RIGHT?

18 A. I DIDN'T CALL UP TO THEM.
19 THEY -- EVERY NOW AND AGAIN ONE OF THE -- ONE
20 OF THE GUYS OF THE FUTURE WELL SITE LEADERS
21 WOULD COME OUT AND HAVE A CIGARETTE. AND WE
22 WOULD ASK HIM WHY, YOU KNOW, WHAT'S THE DEAL,
23 WHAT'S GOING ON, WHY CAN'T WE USE YOU-ALL'S
24 PHONE, WHY CAN'T WE LEAVE HERE AND WE'RE
25 SITTING THERE WATCHING OUR HOUSE BURN DOWN.
00186:01 Q. SO YOU WERE ASKING THEM, "CAN
02 YOU CONTACT OUR FAMILIES," OR WORDS TO THAT
03 EFFECT?
04 A. PRETTY MUCH.

Page 186:24 to 187:13

00186:24 MY UNDERSTANDING IS THAT YOU HAD
25 A PRETOWER MEETING EVERY DAY BEFORE YOUR
00187:01 SHIFT BEGAN; IS THAT CORRECT?
02 A. YES, SIR.
03 Q. AND IS IT TRUE THAT THE
04 PRE-TOWER MEETINGS BEGAN AT APPROXIMATELY
05 11:30 A.M., WHEN YOU WERE SCHEDULED TO START
06 YOUR DUTY AT NOON?
07 A. I BELIEVE THAT THE PRE-TOWER
08 MEETINGS WERE AT 11:00 AND WE WERE TO BE ON
09 TOWER AT 11:30.
10 Q. OKAY. SO TO THE BEST OF YOUR
11 KNOWLEDGE, THEN, WAS THERE A PRE-TOWER
12 MEETING AT 11:00 A.M. ON APRIL 20, 2010?
13 A. YES, SIR.

Page 188:08 to 188:18

00188:08 Q. OKAY. ARE YOU TAKING THE FIFTH
09 AMENDMENT WITH RESPECT TO QUESTIONS THAT
10 WOULD ASK YOU WHAT HAPPENED AT THE PRE-TOWER
11 MEETING BETWEEN 11:00 AND 11:30?
12 A. YES. I PLEAD THE FIFTH.
13 Q. NOW, TYPICALLY, WHO ATTENDED THE
14 PRETOWER MEETINGS?
15 A. THE ROUSTABOUT CREW, CRANE CREW,
16 THE DRILLING CREW, TOOL PUSHERS, OIM,
17 DRILLERS, THE ASSISTANT DRILLERS, BP COMPANY
18 MEN. THAT'S BASICALLY IT.

Page 194:10 to 194:22

00194:10 Q. HAVE YOU BY YOURSELF,
11 MR. HOLLOWAY, EVER HAD ANY COMMUNICATION
12 DIRECTLY WITH ANYBODY WHO YOU UNDERSTOOD TO
13 BE AFFILIATED WITH OR EMPLOYED BY A COMPANY
14 CALLED ANADARKO RELATING IN ANY WAY TO THE
15 DEEPWATER HORIZON OR THE MACONDO WELL?

16 A. NO, SIR.
17 Q. HAVE YOU PERSONALLY EVER HAD ANY
18 COMMUNICATION, TO THE BEST OF YOUR KNOWLEDGE,
19 WITH ANYBODY WHO WAS EMPLOYED BY OR
20 AFFILIATED IN ANY WAY WITH A COMPANY CALLED
21 MOEX, SPELLED M-O-E-X?
22 A. NO.

Page 196:07 to 196:14

00196:07 Q. DO YOU RECALL APPROXIMATELY TWO
08 MONTHS BEFORE -- TWO TO THREE MONTHS BEFORE
09 THE INCIDENT DOING MAINTENANCE WORK ON THE
10 BOP? APPROXIMATELY. I DON'T NEED TO HAVE
11 YOU BE SPECIFIC.
12 A. IF -- IF THE STACK WAS ON THE
13 DECK, THEN -- AND I WAS OUT THERE, THEN, YES,
14 I WAS DOING MAINTENANCE ON IT.

Page 196:19 to 197:09

00196:19 Q. OKAY. SO, IN OTHER WORDS, THE
20 BOP WAS ON THE DECK AT THE TIME THAT YOU WERE
21 INVOLVED IN MAINTENANCE, CORRECT?
22 A. YES.
23 Q. DID YOU EVER DO ANY MAINTENANCE
24 ON THE BOP WHILE THE BOP WAS LOCATED SUBSEA?
25 A. NO, SIR.
00197:01 Q. DO I UNDERSTAND CORRECTLY THAT,
02 AMONG OTHER THINGS, WHEN YOU WERE INVOLVED
03 WITH THE BOP MAINTENANCE, YOU WERE INVOLVED
04 IN ACTUALLY REPLACING SHEAR RAMS; IS THAT
05 CORRECT?
06 A. YES, SIR.
07 Q. BESIDES THAT, WHAT ELSE WAS
08 INVOLVED IN THAT MAINTENANCE WORK ON THAT
09 PARTICULAR OCCASION?

Page 197:11 to 197:14

00197:11 A. GREASING THE FAILSAFE VALVES.
12 JUST SPLITTING THE STACK, GETTING IT CLEAN.
13 REPLACING GASKETS AND THE O-RINGS. GENERAL
14 MAINTENANCE.

Page 199:04 to 199:05

00199:04 Q. MR. HOLLOWAY, MY NAME IS TIMOTHY
05 JOHNSON. EARLIER YOU HAD A CONVERSATION

Page 200:19 to 200:24

00200:19 Q. (BY MR. JOHNSON) DURING THE BOP
20 MAINTENANCE THAT YOU TESTIFIED ABOUT EARLIER,
21 DID YOU CHANGE THE RUBBER ELEMENTS -- ANY OF
22 THE RUBBER ELEMENTS IN THE BOP DURING THAT
23 MAINTENANCE?
24 A. YES.

Page 201:06 to 201:11

00201:06 Q. YOU WORKED WITH JASON ANDERSON
07 PRIOR TO APRIL 20TH, 2010, ABOARD THE
08 DEEPWATER HORIZON; IS THAT CORRECT?
09 A. YES, SIR.
10 Q. WAS HE ONE OF YOUR SUPERVISORS?
11 A. YES, SIR.

Page 202:01 to 202:11

00202:01 Q. DID YOU EVER TALK TO HIM ABOUT
02 HOW TO PERFORM WHAT'S CALLED A NEGATIVE
03 PRESSURE TEST?
04 A. NO, SIR.
05 Q. DID YOU EVER TALK TO HIM ABOUT
06 HOW TO INTERPRET A NEGATIVE PRESSURE TEST?
07 A. NO, SIR.
08 Q. AT ANY TIME PRIOR TO APRIL 20TH,
09 2010, HAD MR. ANDERSON EVER MENTIONED TO YOU
10 THE TERM "BLADDER EFFECT"?
11 A. NO, SIR.

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BOARD-CERTIFIED COURT REPORTERS & LITIGATION SUPPORT

WITNESS NAME: CALEB CHASE HOLLOWAY

DATE TAKEN: May 19, 2011

**IN RE: OIL SPILL BY THE OIL RIG "DEEPWATER HORIZON" IN
THE GULF OF MEXICO, ON APRIL 20, 2010**

CORRECTIONS:

Ignore {

PAGE: ~~50~~ LINE: ~~7~~ CHANGE: ~~add Date Bookers~~

PAGE: ~~56~~ LINE: ~~3~~ CHANGE: ~~Derrick hand~~

PAGE: ~~100~~ LINE: ~~7~~ CHANGE: ~~would give everyone~~

PAGE: ~~113~~ LINE: ~~11~~ CHANGE: ~~is the same~~

PAGE: 86 LINE: 13 CHANGE: Derrick man

PAGE: 113 LINE: 14 CHANGE: meant to say, not sure

PAGE: _____ LINE: _____ CHANGE: _____

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SIGNED: _____



DATE: 6/14/11

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