

Deposition Testimony of:

Steven Johnson

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Page 6:07 to 6:08

00006:07 STEVEN JOHNSON,
08 having been duly sworn, testified as follows:

Page 6:11 to 6:15

00006:11 Q. Good morning. Would you state your
12 full name and your residence address for the
13 record, please, sir?
14 A. Steven Paul Johnson, [REDACTED]
15 [REDACTED]

Page 6:22 to 7:08

00006:22 Q. Okay. What's your current
23 occupation?
24 A. Drilling fluids specialist.
25 Q. Okay. And you work for M-I Swaco?
00007:01 A. That's correct.
02 Q. Recently absorbed into Schlumberger?
03 A. That's correct.
04 Q. Now, was that your occupation in
05 April of 2010?
06 A. Yes, it was.
07 Q. Drilling fluids --
08 A. Specialist.

Page 17:05 to 17:17

00017:05 Q. When was the last time that you were
06 aboard the DEEPWATER HORIZON before she was lost?
07 A. I'm -- I don't know the date
08 exactly, but I left before the well TD'd and any
09 of the accident happened.
10 Q. But you did have at least one hitch
11 on the Macondo location?
12 A. Yes.
13 Q. Okay. How many hitches do you
14 think?
15 A. I'm not exactly sure.
16 Q. Okay. More than one?
17 A. Oh, yes.

Page 21:03 to 21:09

00021:03 Q. Okay. And when did you leave the
04 rarefied world of self-employment?
05 A. When -- when I got hired on with
06 M-I Swaco.
07 Q. Okay. And when was that?
08 A. November of 1995 -- no, no -- 2005.
09 I'm sorry.

Page 22:02 to 23:10

00022:02 And so around -- so that in 2005,
03 sometime in the fall of 2005, you applied and you
04 got hired in November?
05 A. That's correct.
06 Q. And that job, what entry level job
07 did you take?
08 A. Compliance specialist.
09 Q. Okay. Now, we're going to -- I
10 mean, some of us are not quite familiar with the
11 different job titles that -- that might have
12 your -- your current job of drilling --
13 A. Fluids specialist.
14 Q. Fluids specialist is different from
15 compliance?
16 A. That's correct, sir.
17 Q. And it is called compliance
18 specialist?
19 A. Yes.
20 Q. Okay. And what's the difference?
21 A. Compliance specialist, you basically
22 monitor all the discharges going into the Gulf of
23 Mexico, retention on cuttings, so on and so
24 forth; whereas drilling fluids specialist, you're
25 actually working with the mud and the chemicals
00023:01 that go in the mud.
02 Q. The training for each of those two
03 jobs is different?
04 A. Yes.
05 Q. So when you entered as a compliance
06 specialist, you took training with M-I Swaco
07 relative to regulations and -- and methods by
08 which the cuttings and so forth were to be
09 disposed of, correct?
10 A. Correct.

Page 25:08 to 25:12

00025:08 Q. Yes. So that the company that is
09 hiring in -- in this case, in the case of the
10 DEEPWATER HORIZON BP, would define how many
11 members of the team there would be from
12 M-I Swaco, correct?

Page 25:15 to 25:20

00025:15 A. Correct.
16 EXAMINATION BY MR. PALMINTIER:
17 Q. And that would be embodied in a
18 contract between M-I Swaco, your employer, and
19 BP, correct?

20 A. Correct.

Page 26:21 to 26:22

00026:21 You thought that you were working
22 for BP, correct? I mean --

Page 27:01 to 27:06

00027:01 Q. -- that is, M-I Swaco was working
02 for BP, correct?
03 A. Well, I was working for M-I Swaco.
04 Q. Yes. And M-I Swaco was working for
05 BP out there?
06 A. Yes.

Page 27:16 to 28:24

00027:16 Q. When guys work aboard vessels, they
17 are often required to be certified as able-bodied
18 seamen or something along those lines. I take it
19 you were not required to do that?
20 A. I was required to take a BP training
21 to go on a BP rig.
22 Q. Okay.
23 A. I was required to have safe Gulf
24 training, water survival, a number of different
25 certifications to actually work offshore.
00028:01 Q. Understood.
02 But not able-bodied seaman papers?
03 A. No.
04 Q. Okay. Did you do well -- did you go
05 to well control school?
06 A. I have not.
07 Q. Okay. Understood.
08 You were not on board the vessel,
09 the DEEPWATER HORIZON, on April 20, 2010,
10 correct?
11 A. No.
12 Q. All right. And I think your
13 testimony was that you don't remember the last
14 hitch before the explosion?
15 A. I don't -- I don't recall the exact
16 time frame, but it was before the explosion, for
17 sure, that . . .
18 Q. And how -- what were the length of
19 your hitches when you were aboard the DEEPWATER
20 HORIZON?
21 A. 14 on, 14 off.
22 Q. Okay. And was it a 12-hour shift or
23 tower?
24 A. Yes, 12-hour.

Page 29:03 to 29:16

00029:03 You started off as a -- a compliance
04 specialist. Then what did you do? How long
05 for -- for -- were you a -- a compliance
06 specialist?
07 A. Approximately about two years.
08 Q. Okay. And then what?
09 A. Then I went to mud school.
10 Q. Okay.
11 A. And then went into the mud side.
12 Q. And that would be to become a
13 drilling fluids specialist?
14 A. Correct.
15 Q. Sometimes known as a mud engineer?
16 A. Correct.

Page 30:01 to 30:03

00030:01 Q. Okay. How long did that course
02 take?
03 A. Too long.

Page 30:05 to 30:06

00030:05 A. I believe it was eight or nine
06 weeks. I'm not exactly sure.

Page 35:15 to 36:01

00035:15 When did you first go to work aboard
16 a vessel that was being operated by BP?
17 A. That would have been DEEPWATER
18 HORIZON.
19 Q. Okay. Did you ever go to any other
20 BP-operated jobs in deep water?
21 A. No, sir.
22 Q. Or on the shelf?
23 A. No.
24 Q. Okay. So your experience with BP is
25 all aboard the DEEPWATER HORIZON, correct?
00036:01 A. Yes.

Page 39:17 to 39:17

00039:17 Q. Okay. See that's why I made that

Page 39:19 to 40:03

00039:19 were -- you had left the DEEPWATER HORIZON long
20 before it exploded.
21 When did you -- is it fair to say

22 that you went to another job, then?
 23 A. Correct.
 24 Q. Before the DEEPWATER HORIZON
 25 exploded and sunk?
 00040:01 A. Yes.
 02 Q. What job was that?
 03 A. I went to work for LLOG.

Page 41:07 to 41:09

00041:07 Q. Okay. Do you remember the reason
 08 why they pulled you from the DEEPWATER HORIZON
 09 and sent you there?

Page 41:12 to 42:02

00041:12 A. Yes.
 13 EXAMINATION BY MR. PALMINTIER:
 14 Q. Would you tell us, please.
 15 A. They told me they wanted someone
 16 with more experience in my place.
 17 Q. Okay. Understood.
 18 Who told you that?
 19 A. My project engineer.
 20 Q. And who was that?
 21 A. Doyle Maxie.
 22 Q. And did Mr. Maxie tell you who had
 23 asked for that change?
 24 A. No.
 25 Q. All right. Was there any event,
 00042:01 occurrence, or occasion that gave rise to that
 02 request that you know of?

Page 42:05 to 42:13

00042:05 A. I believe it was over a mixing of
 06 a -- of a pill.
 07 EXAMINATION BY MR. PALMINTIER:
 08 Q. Okay. What is a pill?
 09 A. When you mix certain products for
 10 LCM to stop losses.
 11 Q. Okay. And do you remember what the
 12 formula for that pill was that they complained
 13 about?

Page 42:17 to 43:02

00042:17 Q. Let me -- let me back up.
 18 You say it was a -- it was over the
 19 mixing of a pill, a particular event, correct?
 20 A. Correct.
 21 Q. You had not had any problems with
 22 the mixing of pills before, correct?

23 A. I have never mixed one of those
 24 before.
 25 Q. Okay. So that was the first time
 00043:01 you mixed a pill?
 02 A. Correct.

Page 46:12 to 47:04

00046:12 First, when you mix a pill, where do
 13 you mix it? In a pit, correct?
 14 A. Yes.
 15 Q. And someone tells you, Mix the pill
 16 and make it out of these chemicals, correct?
 17 A. Yes.
 18 Q. And by "you," I mean you as a -- as
 19 a drilling fluids specialist.
 20 A. Yes.
 21 Q. You don't decide how to mix the
 22 pill, do you?
 23 A. No.
 24 Q. You are told what to put together,
 25 correct?
 00047:01 A. Correct.
 02 Q. And in this instance where you were
 03 working for BP, BP told you how to put the pill
 04 together, correct?

Page 47:07 to 47:20

00047:07 A. No.
 08 EXAMINATION BY MR. PALMINTIER:
 09 Q. All right. Then who did?
 10 A. Software, the M-I software.
 11 Q. Okay. Understood. But someone had
 12 to program the software which is called One-TRX,
 13 correct?
 14 A. It is One-TRX. But that one is a
 15 FAS software, I believe it's called, for the
 16 Form-A-Set, Form-A-Squeeze.
 17 Q. Okay. All right. Who puts the
 18 information into the software in order to have it
 19 tell how to comprise the mix for the pill?
 20 A. Mud engineer --

Page 47:23 to 48:14

00047:23 A. Mud engineer will put it in on the
 24 rig, send it to the project engineer to -- to
 25 verify.
 00048:01 EXAMINATION BY MR. PALMINTIER:
 02 Q. And who would that be in this --
 03 A. Doyle Maxie.
 04 Q. Okay.

05 A. On the HORIZON, you had to have --
06 everything got checked three or four different
07 times by engineers and everything.
08 Q. Okay.
09 A. As a -- as a mud engineer, basically
10 your hands were really tied. You did what they
11 told you to do.
12 Q. Okay. BP had input into that
13 network of folks that gave you instructions?
14 A. Yes.

Page 49:01 to 49:06

00049:01 Q. How did you get the instruction to
02 mix the pill?
03 A. How'd I get the instruction?
04 Q. Yes. In other words, where did
05 it -- did you look at your One-TRX computer?
06 A. Yes.

Page 49:19 to 50:08

00049:19 Q. Okay. Well, tell me how that's
20 done.
21 A. In the process of, if you need LCM,
22 whatever, you go in and punch in into the
23 software, what size pill, what -- the size of the
24 hole, everything you needed to put into the
25 software so it spits out the right size pill and
00050:01 how many pails of whatnot and, you know, sacks
02 and everything that need to make the pill.
03 Q. Yes, but the mud engineer or the
04 drilling fluids specialist isn't the one who
05 decides that the pill is necessary, correct?
06 A. Correct.
07 Q. Who does?
08 A. Comes from above.

Page 51:08 to 51:12

00051:08 We've been talking about a pill,
09 right?
10 A. (Moving head up and down.)
11 Q. You at least -- that's a "yes"?
12 A. Yes.

Page 51:20 to 51:25

00051:20 Q. All right. That particular pill is
21 what I want to focus on. The instructions from
22 above that you've alluded to, do you know who in
23 particular gave those instructions?
24 A. That would have been Doyle Maxie and

25 John LeBleu.

Page 52:10 to 52:12

00052:10 Q. Okay. Now, the reason for the pill
11 is there has been loss returns, correct?
12 A. Yes.

Page 52:20 to 52:23

00052:20 Q. The -- the loss returns are sort of
21 cured, if you will, by this pill. That's the
22 objective, correct?
23 A. Yes.

Page 53:10 to 53:13

00053:10 Q. Well, you mentioned that they had a
11 problem with the mixing of a pill. I'm wondering
12 what that problem is.
13 A. Okay.

Page 53:16 to 53:18

00053:16 A. According to the software that you
17 follow, it says to mix certain chemical through
18 the top of a pit --

Page 53:20 to 54:08

00053:20 Q. Okay.
21 A. -- with the accelerant.
22 Q. Okay.
23 A. When we were going through the top
24 of the pit, it would not -- the agitation in that
25 pit was not great enough. So it didn't provide
00054:01 the chemical to go throughout all of the pill.
02 Q. Okay.
03 A. So, in essence, it didn't set hard
04 enough.
05 Q. All right. Okay. Now, were you
06 given an opportunity to explain that?
07 A. Yes.
08 Q. And was that explanation accepted?

Page 54:11 to 55:08

00054:11 EXAMINATION BY MR. PALMINTIER:
12 Q. At least from your perspective?
13 A. Yes.
14 Q. What was wrong with the agitators?
15 A. There's nothing wrong with the

16 agitator. It's just when you have a -- a pit
 17 that's this -- this big and you have this much
 18 pill in it and your agitator blade is down here,
 19 it takes a while to agitate. When you're putting
 20 a dry -- something dry on top of something wet,
 21 it doesn't mix too good unless you have more
 22 agitation.
 23 Q. Okay. So from your perspective now,
 24 not from anyone else's, the reason why the pill
 25 that was being mixed didn't mix properly is
 00055:01 because the pit didn't function properly. Is
 02 that fair?
 03 A. Yes.
 04 Q. And -- did you -- but you do
 05 acknowledge that, as a result of that improperly
 06 functioning pit, we had a batch of mixed
 07 chemicals that didn't meet the requirements that
 08 we had for that pill?

Page 55:11 to 55:17

00055:11 A. It -- it was pumping, and it worked
 12 some. It just didn't seal it off totally.
 13 EXAMINATION BY MR. PALMINTIER:
 14 Q. Okay.
 15 A. Okay.
 16 Q. It was actually pumped?
 17 A. Yes.

Page 57:23 to 58:13

00057:23 Q. Okay. All right. Now, I know you
 24 know what a pill is. You've given me a -- a
 25 decent explanation of that. What's a spacer?
 00058:01 A. A spacer?
 02 Q. Yes.
 03 A. It's a viscous spacer, viscous mud
 04 or water-based mud usually, that you -- you pump
 05 before or after cement or displacing or . . .
 06 Q. Creates a --
 07 A. A space, yeah, between two fluids so
 08 you don't intertwine the two fluids.
 09 Q. Is that something that as a mud
 10 engineer or a drilling fluids specialist that you
 11 worked with regularly creating spacers?
 12 A. I have in the past, not -- not
 13 regularly.

Page 58:23 to 59:03

00058:23 Now, while you were aboard the
 24 DEEPWATER HORIZON, what BP workers did you work
 25 with?

00059:01 A. Ronny Sepulvado, Murry Sepulvado. I
02 think Don Vidrine. That would have been all the
03 company representatives I worked with.

Page 59:15 to 59:17

00059:15 Q. These fellows you just mentioned are
16 BP company men, correct?
17 A. Correct.

Page 60:03 to 60:08

00060:03 Q. Okay. Was -- in your experience in
04 this period of time aboard the DEEPWATER HORIZON
05 and the Macondo well, was it your experience that
06 the BP well site leader would give instructions
07 directly to the mud engineers for M-I Swaco?
08 A. Yes.

Page 61:02 to 61:13

00061:02 Q. It's okay.
03 Had you ever participated in the
04 entire time you were in deep water a negative
05 pressure test?
06 A. I'm sure I was on a rig for one.
07 I -- I don't -- I don't recall when or what.
08 Q. Okay. But did you actually
09 participate in one and --
10 A. No.
11 Q. -- have to follow instructions about
12 how to do it properly?
13 A. No.

Page 65:25 to 67:15

00065:25 Q. Okay. That's fair. And were you
00066:01 aboard when it was announced that we -- the rig
02 was approaching total depth?
03 A. I don't believe so.
04 Q. Okay. Were you aware of that
05 substantial amount of loss of return while you
06 were still aboard the DEEPWATER HORIZON?
07 A. Yes.
08 Q. Okay. Did -- did you find out what
09 the reason for that was?
10 A. No.
11 Q. Okay. But, of course, as a mud
12 engineer, the loss of return affects what you
13 have to do, correct?
14 A. Yes.
15 Q. And that's one of the reasons for
16 the mixing of a pill, correct?

17 A. Correct.
 18 Q. What else does one have to do --
 19 does a mud engineer have to do when there's a
 20 loss of returns? What other job functions?
 21 A. I don't understand.
 22 Q. You mix pills and pump them,
 23 correct?
 24 A. Correct.
 25 Q. What else? Anything else as a
 00067:01 result of loss of returns?
 02 A. Try to regain returns, you know,
 03 everything in your power to mix and send down the
 04 hole to seal up the formation.
 05 Q. Understood. How do you learn about
 06 the loss of those returns?
 07 A. How do you learn?
 08 Q. Yeah. Just -- see, this is a real
 09 basic question on my part. You're way ahead of
 10 me. But, you know, how -- how does a mud
 11 engineer find out that there are a loss of
 12 returns?
 13 A. Shaker hand will call and say, Lost
 14 returns. There's nothing coming over the
 15 shakers.

Page 67:22 to 67:24

00067:22 A. And no flow. So if you're pumping
 23 fluid down hole and no fluid's coming out, you're
 24 losing.

Page 70:07 to 71:02

00070:07 Q. Okay. Understood. Do you know what
 08 simultaneous operations are?
 09 A. SIMOPS?
 10 Q. Yes.
 11 A. Yes.
 12 Q. What's that?
 13 A. Basically accomplishing more than
 14 one thing at a time.
 15 Q. During the last weeks that you were
 16 aboard the DEEPWATER HORIZON, were SIMOPS
 17 occurring?
 18 A. There's always SIMOPS occurring.
 19 Q. The answer is "yes"?
 20 A. Yes.
 21 Q. Okay. And, for example, were there
 22 times when the cranes, for example, would be in
 23 operation and drilling would be occurring
 24 simultaneously and there being an effect on the
 25 flow -- sorry -- effect on the level of fluids in
 00071:01 the tank, in the pit?
 02 A. Yes.

Page 71:08 to 71:12

00071:08 What effect does SIMOPS have on --
09 on the mud engineer's ability to determine flow?
10 A. It just changes your -- your pit
11 levels, you know, as -- as the vessel goes
12 from -- you know, the ballast change.

Page 71:18 to 72:03

00071:18 Q. Yes. Okay. Is there a way -- was
19 there a way aboard the DEEPWATER HORIZON to
20 accommodate SIMOPS, or was it just one of those
21 situations where you just couldn't be as accurate
22 about pit levels?
23 A. That's -- that's correct. You could
24 strap before and then strap after and then
25 calculate, you know, from the leaning. But --
00072:01 Q. While it was going on, it was --
02 it's hard to get an accurate read?
03 A. Yes.

Page 76:17 to 77:08

00076:17 Q. Do you know when Doyle Maxie started
18 working on the Macondo well?
19 A. I would imagine from the beginning.
20 He was a project engineer.
21 Q. Okay. So was he on the -- the
22 project engineer when the MARIANAS was drilling
23 the Macondo?
24 A. I wouldn't know.
25 Q. Okay. So from the time that you
00077:01 started in -- in February of 2010 on the
02 DEEPWATER HORIZON, Doyle Maxie was the project
03 engineer?
04 A. From the time I started on it.
05 Q. Okay. And then when you left the
06 DEEPWATER HORIZON, he was still the project
07 engineer?
08 A. Yes.

Page 78:13 to 78:17

00078:13 Q. Okay. Now, M-I Swaco -- and this is
14 in your opinion -- is a -- what's their job when
15 they're -- they're on a rig? What are they
16 employed to do, specifically the DEEPWATER
17 HORIZON?

Page 79:01 to 79:05

00079:01 A. Oh. We -- we're -- provide mud
02 services.
03 Q. Okay. And what does that entail?
04 A. Drilling fluids, the chemicals you
05 need to put into the fluid.

Page 83:21 to 83:24

00083:21 Q. Okay. And who tells you you need a
22 spacer?
23 A. Usually the company man or
24 the project engineer or it's in the prog --

Page 85:11 to 85:13

00085:11 Q. But Ronnie Sepulvado or Murry
12 Sepulvado would rely on M-I Swaco on -- regarding
13 drilling fluids and spacers; is that right?

Page 85:16 to 85:17

00085:16 A. They would -- no, not really. I
17 mean, they -- they may tell us what they want.

Page 88:13 to 89:11

00088:13 Q. Okay. Would they tell you to do
14 anything after -- after looking at the mud
15 reports?
16 A. Well, not -- not necessarily after
17 looking at the mud reports.
18 Q. Okay.
19 A. If we need to weight up, the company
20 man usually told us when to weight up and what to
21 do there for -- because they -- as a mud engineer
22 on -- on the DEEPWATER HORIZON, you basically did
23 as you were told --
24 Q. Uh-huh.
25 A. -- you know. You had the company
00089:01 man or you had all -- whatever the engineers were
02 and Doyle Maxie and John LeBleu. So basically
03 you -- you did what you were told to do --
04 Q. Okay.
05 A. -- period.
06 Q. And what were you told to do?
07 A. It all depend. If they want -- they
08 wanted you to run the mud with this much
09 background LCM or they wanted the mud to be this
10 weight or whatever, they told you, and that's
11 what you accomplished.

Page 92:03 to 92:08

00092:03 For the mud weight, how would you --
04 how would you ensure that the mud weight complies
05 with the -- the drilling fluid program?
06 A. How would I ensure?
07 Q. Uh-huh.
08 A. Go weigh it.

Page 93:12 to 94:01

00093:12 Q. Okay. And if -- if the weight
13 wasn't right, what would you do?
14 A. You'd weight up or cut back.
15 Q. Okay. And how would you do that?
16 A. The derrick hands would do it. They
17 would either add barite or add base oil.
18 Q. Uh-huh. And is that something you
19 would ask them to do or is that something
20 somebody else would ask them to do?
21 A. Usually the -- the company man would
22 either call them or he'd call me, one of the two.
23 Q. Okay. And so the company man
24 would -- would ask you or ask the -- the derrick
25 hand to -- to adjust the mud weight?
00094:01 A. Right, right.

Page 94:20 to 94:25

00094:20 Q. Okay. And -- and how would you
21 change the viscosity of the mud?
22 A. I'd add -- add more base oil or
23 less --
24 Q. Uh-huh.
25 A. -- base oil.

Page 95:15 to 96:23

00095:15 So is that something that you
16 would -- you would make a decision to do or is it
17 something someone would ask -- would ask you to
18 do?
19 A. It would be asked of me.
20 Q. Okay. And by whom?
21 A. By the company man or by my project
22 engineer.
23 Q. Okay. For -- when the project
24 engineer -- would the project engineer -- and
25 this is Doyle Maxie --
00096:01 A. Yes.
02 Q. -- is that right?
03 And would the project engineer
04 receive his or her direction from -- from the

05 company man?
 06 A. Not the company man.
 07 Q. Okay. From whom?
 08 A. Someone in BP, I'm sure.
 09 Q. Okay. Okay. Now, when you're
 10 referring to the company man, who -- who are you
 11 talking about? Just making sure.
 12 A. Murry or Ronnie --
 13 Q. So the --
 14 A. -- Sepulvado.
 15 Q. -- well site leaders?
 16 A. Well site leaders.
 17 Q. Okay. All right. Did you work
 18 with -- with any other well site leaders when you
 19 were on the DEEPWATER HORIZON? You said Don
 20 Vidrine?
 21 A. Don Vidrine, but there was maybe a
 22 day or so lapse before I -- my hitch was up and
 23 his hitch.

Page 103:20 to 104:08

00103:20 Q. The -- was it the form -- Form-A-Set
 21 AK pill that, I guess, there were issues with --
 22 A. Yes.
 23 Q. -- the agitator? Okay. The
 24 Form-A-Set AK.
 25 You also said that maybe the pit
 00104:01 didn't function properly?
 02 A. No, I didn't say that.
 03 Q. Okay. So it would -- I mean, if any
 04 talk in terms of the pit, I think, was it the
 05 size of the pit that -- I mean, the amount of
 06 Form-A-Set pill versus the size of the pit that
 07 may have caused some issue in mixing?
 08 A. Correct.

Page 104:16 to 104:21

00104:16 I guess, first off, based on your
 17 experience with the Transocean personnel on the
 18 DEEPWATER HORIZON, did you ever get the
 19 impression that any of them deliberately wanted
 20 to cause injury to the environment or to any
 21 person?

Page 104:24 to 104:24

00104:24 A. No.

Page 105:01 to 105:06

00105:01 Q. Okay. And based on your experience

02 with the Transocean personnel on the DEEPWATER
03 HORIZON, did you ever get the impression that any
04 of them were malicious or didn't care in any way
05 about causing injury to another human or the
06 environment?

Page 105:09 to 105:09

00105:09 A. No.

Page 105:11 to 105:15

00105:11 Q. Okay. In your experience on the
12 DEEPWATER HORIZON and also on the DISCOVERER
13 SPIRIT, did you feel that the Transocean rig crew
14 made safety a priority?
15 A. Yes.

Page 105:19 to 105:20

00105:19 Q. Did you feel that Transocean was a
20 safety conscious company?

Page 105:23 to 105:23

00105:23 A. Yes.

Page 106:10 to 106:12

00106:10 Your experience on the DEEPWATER
11 HORIZON, did you feel that the Transocean crew
12 were competent?

Page 106:15 to 106:15

00106:15 A. And when I dealt with them, yes.

Page 106:17 to 107:15

00106:17 Q. While onboard the DEEPWATER HORIZON,
18 did you participate in safety drills?
19 A. Yes.
20 Q. And how often did you participate in
21 those?
22 A. I don't recall, but there was plenty
23 of them.
24 Q. Was it on a weekly basis?
25 A. Yes.
00107:01 Q. Okay. Did you ever participate in
02 any well control drills?
03 A. Yes.

04 Q. Did you -- did you feel like, based
05 on your participation in those drills, that you
06 knew what your responsibilities were in the case
07 of a well control event?

08 A. Yes.

09 Q. Okay. Do you feel like you were
10 adequately trained?

11 A. Yes.

12 Q. Did you have any complaints about
13 the safety drills that you participated in
14 onboard the DEEPWATER HORIZON?

15 A. No.

Page 108:10 to 109:18

00108:10 In response to some of
11 Mr. Palmintier's questions, you talked about your
12 training at M-I.

13 Do you generally recall that?

14 A. Yes.

15 Speak up a little bit more.

16 Q. Do you generally recall discussing
17 your training with Mr. Palmintier this morning?

18 A. I remember talking about going to
19 mud school, yes.

20 Q. Right. You started off at M-I as a
21 compliance specialist?

22 A. Yes.

23 Q. About November of 2005?

24 A. Yes.

25 Q. You did that for about two years
00109:01 before going to mud school; is that right?

02 A. Yes.

03 Q. So in about 2007, you went to mud
04 school?

05 A. I believe so.

06 Q. That was in Houston?

07 A. Houston.

08 Q. So it was about a eight- or
09 nine-week course?

10 A. I believe so.

11 Q. Can you tell me what sort of topics
12 you were trained on during that eight to nine
13 weeks?

14 A. Water-based mud, oil-based mud,
15 synthetic-based mud, clay chemistry, how to do
16 mud checks; you did the lab work, contamination,
17 your basic oil field math, volumes, environmental
18 stuff.

Page 110:10 to 111:02

00110:10 Q. So then if I understand, you were --
11 you were generally taught about the basic

12 properties of the various fluids you used in the
 13 course of your job?
 14 A. Yes.
 15 Q. You were also taught about the --
 16 generally when to apply those fluids to specific
 17 jobs?
 18 A. Yes.
 19 Q. Were you taught about testing the
 20 compatibility of those fluids?
 21 A. I don't recall.
 22 Q. Were you taught about the chemical
 23 properties of the fluids you would be using?
 24 A. Yes.
 25 Q. You said you were taught about doing
 00111:01 mud checks?
 02 A. Yes.

Page 111:07 to 113:23

00111:07 Q. And -- and I didn't get the whole
 08 list. When you do -- when you do a mud check,
 09 what are you exactly testing about the mud?
 10 A. You're checking the -- the
 11 properties of rheology, the gel strengths, the
 12 fluid loss. Let me think what else.
 13 Like I said, on that particular
 14 well, you tested to see how much LCM --
 15 background LCM was in -- in -- in the mud.
 16 Q. So I have rheology, gel strength,
 17 fluid loss, and background LCM.
 18 Anything else come to mind that you
 19 would -- you would test the --
 20 A. Oil to water ratio, chloride level.
 21 Q. And how often do you do these mud
 22 checks?
 23 A. You do -- all -- all depends. You
 24 know, some from two to four a day.
 25 Q. So every day you're performing at
 00112:01 least one mud check?
 02 A. Yes.
 03 Q. Are these all checks of mud sitting
 04 static in the pits on the rig?
 05 A. You'll do one in the active, the
 06 suction pit, which is going down the hole, and
 07 you'll do one on the mud returning.
 08 Q. And you perform this mud check on
 09 the rig itself?
 10 A. Yes.
 11 Q. Now, at the end of your hitch, do
 12 you take samples of the mud back to shore with
 13 you to conduct additional testing?
 14 A. Some -- sometimes they require you
 15 to take it back and have it sent to the lab.
 16 Q. Did that happen on the DEEPWATER
 17 HORIZON?

18 A. Probably so. I'm -- I'm not exactly
 19 sure of -- it's been -- been a long time.
 20 Q. Do you ever recall taking samples of
 21 mud back to shore for testing in the lab?
 22 A. Yes, I've -- I've taken mud back.
 23 Q. Mud on the DEEPWATER HORIZON?
 24 A. I -- I don't recall.
 25 Q. How do you test the rheology when
 00113:01 you do these mud checks?
 02 A. How do you test it?
 03 Q. Yes, sir.
 04 A. There's a meter. There's a heat cup
 05 that heats up. Put it in there, turn it on. The
 06 viscometer it's called.
 07 Q. Is that a Fann 35?
 08 A. Yes.
 09 Q. And you do one of those every day?
 10 A. Yes, at least one.
 11 Q. How about the -- the gel strength?
 12 How do you test that when you do your mud checks?
 13 A. Well, you -- you stop and you do a
 14 5-second, 10-minute, and 30-minute.
 15 Q. How do you actually do the testing?
 16 A. How do you do it?
 17 Q. Yes.
 18 A. You stop the Fann, take your
 19 stopwatch, 10 seconds. Go to your three -- set
 20 three rpm's, bump it. And where it tops out at
 21 is your gel strength for that reading.
 22 Then again with 10-minute; then
 23 again with 30-minute.

Page 114:10 to 114:12

00114:10 Q. Do you understand -- or what is your
 11 understanding of why you test the gel strength of
 12 the mud?

Page 114:15 to 114:17

00114:15 A. My understanding is when the -- the
 16 mud is set still, the gel strength, the stronger
 17 the gel strength to break the mud over.

Page 114:19 to 115:04

00114:19 Q. What do you mean by "break the mud
 20 over"?
 21 A. For the mud to spin.
 22 Q. The gel strength is a test of how --
 23 A. How much pressure it takes.
 24 Q. To move the mud?
 25 A. To move the mud.

00115:01 Q. And that's important when mud is
02 downhole so you know how to move it out of the
03 way, whether it's for a spacer to displace or to
04 pump a cement job?

Page 115:07 to 115:09

00115:07 A. Oh, I don't know -- I don't know
08 about the -- if it's a spacer or -- or any of
09 that.

Page 115:11 to 115:15

00115:11 Q. What -- do you have an understanding
12 of why you would need to know the gel strength of
13 the mud?
14 A. Do I know why I need it?
15 Q. Yes.

Page 115:18 to 115:21

00115:18 A. When we go back in the hole and make
19 sure we don't create a problem as far as the mud
20 spinning, coming out -- flow back out of the
21 hole.

Page 115:23 to 115:25

00115:23 Q. Do you have any sort of appreciation
24 of what kind of problems would be created?
25 A. No.

Page 116:11 to 117:04

00116:11 Q. You testified a little earlier that
12 you had never -- if -- if I heard it right,
13 you've never actually asked a Form-A-Set AK or
14 Form-A-Squeeze pill prior to the DEEPWATER
15 HORIZON?
16 A. That's correct.
17 Q. Did I hear that correctly?
18 A. Yes.
19 Q. Okay. Had you had any training on
20 either of those products, Form-A-Set AK or
21 Form-A-Squeeze?
22 A. No.
23 Q. Okay. Had you mixed LCM pills
24 before?
25 A. Yes.
00117:01 Q. What sort of LCM pills?
02 A. Calcium carbon, you know, so many
03 pounds per barrel, or with graphite or, you know,

04 combination.

Page 117:09 to 117:18

00117:09 Q. The only time you've ever mixed a
10 Form-A-Set AK pill was the one time on the
11 DEEPWATER HORIZON?
12 A. Yes.
13 Q. Do you have an understanding of what
14 Form-A-Set AK is used for?
15 A. Yes.
16 Q. What is that understanding?
17 A. To seal off a lost zone.
18 Q. And how does it do that?

Page 117:21 to 117:21

00117:21 A. It sets up.

Page 117:23 to 118:01

00117:23 Q. Do you understand how or why it sets
24 up?
25 A. Yes.
00118:01 Q. Why is that --

Page 118:05 to 118:13

00118:05 Q. -- or how?
06 A. Cross link polymer.
07 Q. What do you mean when you say cross
08 link polymer? Is that the Form-A-Set XL or
09 Form-A --
10 A. Form-A-Set AK.
11 Q. Form-A-Set AK.
12 What is the -- what is the cross
13 linking agent?

Page 118:16 to 118:17

00118:16 A. It's a -- I don't know exactly. I'm
17 not a chemist.

Page 118:19 to 119:02

00118:19 Q. When you mix the Form-A-Set AK pill
20 on the DEEPWATER HORIZON, I think you said you
21 added some accelerant --
22 A. Yes.
23 Q. -- is that right?
24 What accelerant did you add?
25 A. The accelerant it calls for.

00119:01 Q. Do you know what that is?
02 A. No, sir.

Page 119:09 to 119:11

00119:09 Q. Do you know what that accelerating
10 agent is?
11 A. No.

Page 119:15 to 119:16

00119:15 Q. Do you have any understanding or
16 appreciation for what Form-A-Squeeze is?

Page 119:19 to 119:19

00119:19 A. No.

Page 119:21 to 120:08

00119:21 Q. Have you ever worked with
22 Form-A-Squeeze?
23 A. Other than that time, no.
24 Q. Which time did you work with
25 Form-A-Squeeze?
00120:01 A. With -- on -- on the HORIZON.
02 Q. Okay. And you mixed a
03 Form-A-Squeeze pill in addition to the Form-A-Set
04 AK?
05 A. Yes.
06 Q. Okay. Do you understand how
07 Form-A-Squeeze work -- works or what it's used
08 for?

Page 120:11 to 120:11

00120:11 A. Yes.

Page 120:13 to 120:18

00120:13 Q. And what is it used for as you
14 understand it?
15 A. To seal off a loss zone.
16 Q. Do you know how it works to seal off
17 a loss zone?
18 A. Yes.

Page 120:22 to 121:05

00120:22 Q. How does it work?
23 A. It is pressure squeezed in -- into

24 the formation.
25 Q. Does the Form-A-Squeeze require a
00121:01 cross linking agent?
02 A. No.
03 Q. How does it operate or how does it
04 form or set up if --
05 A. I don't know.

Page 121:13 to 121:23

00121:13 Q. Have you ever used or seen used
14 Form-A-Set AK as a spacer in your time with M-I?
15 A. No.
16 Q. Have you ever seen Form-A-Squeeze
17 used as a spacer in your time at M-I?
18 A. No.
19 Q. Have you ever seen the both of them
20 used in combination as a spacer?
21 A. No.
22 Q. Have you ever seen the both of them
23 used combined ever for any purpose?

Page 122:01 to 122:20

00122:01 A. Yes.
02 EXAMINATION BY MR. HARTLEY:
03 Q. When was that?
04 A. On the HORIZON.
05 Q. Okay. You mixed a Form-A-Set AK
06 pill and a Form-A-Squeeze pill, right?
07 A. Yes.
08 Q. Did you mix those in separate pits?
09 A. Yes.
10 Q. Were they going to be used as a
11 tandem pill sequentially one behind the other?
12 A. Yes.
13 Q. Were they going to be used in
14 combination mixing them together in one pit on
15 the rig before being pumped downhole?
16 A. I don't recall.
17 Q. Have you ever seen that done,
18 Form-A-Set AK and Form-A-Squeeze mixed together
19 before being pumped downhole?
20 A. No.

Page 122:24 to 123:01

00122:24 Q. Do you know whether that would --
25 that would cause any chemical reaction between
00123:01 the two materials?

Page 123:04 to 123:07

00123:04 A. No clue.
05 EXAMINATION BY MR. HARTLEY:
06 Q. Was that discussed at all in your
07 eight-to-nine week mud school?

Page 123:10 to 123:10

00123:10 A. I --

Page 123:13 to 123:18

00123:13 A. -- don't recall.
14 EXAMINATION BY MR. HARTLEY:
15 Q. In the four years or so you've been
16 a drilling fluids specialist with M-I Swaco, have
17 you ever seen any reports, studies, analyses of
18 the use of Form-A-Set AK as a spacer?

Page 123:21 to 123:25

00123:21 A. I don't recall.
22 EXAMINATION BY MR. HARTLEY:
23 Q. Have you seen any -- any material of
24 that nature regarding Form-A-Squeeze being used
25 as a spacer?

Page 124:03 to 124:03

00124:03 A. I don't recall.

Page 124:13 to 124:17

00124:13 In -- in the less than a year so you
14 were on the DEEPWATER HORIZON, had you ever heard
15 anybody discussing using Form-A-Set AK,
16 For-A-Squeeze, or both as a spacer?
17 A. I don't recall.

Page 124:23 to 125:05

00124:23 Q. Did Mr. Lindner ever discuss with
24 you the possibility of using these LCM pills as a
25 spacer?
00125:01 A. No.
02 Q. Did Mr. Maxie ever tell you that?
03 A. No.
04 Q. Did Mr. Haygood ever mention that as
05 an option?

Page 125:08 to 125:08

00125:08 A. No.

Page 125:12 to 125:15

00125:12 Q. Did either of the Sepulvados mention
13 to you the possibility of using an LCM pill as a
14 spacer?
15 A. No.

Page 126:07 to 126:21

00126:07 Q. In working on these roughly ten
08 wells, recognizing that's not a specific number,
09 have you ever been involved in the -- the final
10 stages of a well when -- of the well when they go
11 to displacement?
12 A. Probably so.
13 Q. Have you ever been --
14 A. I'm not exactly sure.
15 Q. I'm sorry.
16 A. Go ahead.
17 Q. Have -- have you ever been involved
18 in drafting or working on the displacement
19 procedure?
20 A. No.
21 Q. Do you know who does that?

Page 126:24 to 127:05

00126:24 A. I imagine the -- the -- the company
25 men, the -- the mud engineer, the project
00127:01 engineer. It's -- it's a coalition of forces.
02 EXAMINATION BY MR. HARTLEY:
03 Q. Do you have any understanding of
04 what M-I's role is in drafting the displacement
05 procedure?

Page 127:08 to 127:08

00127:08 A. No.

Page 131:18 to 131:25

00131:18 Q. Do you know whether any Fann 70
19 testing was run on mud from the Macondo well?
20 A. I'm not sure.
21 Q. Have you seen any Fann 70 mud
22 reports?
23 A. I don't recall.
24 Q. Would it surprise you if none were
25 run?

Page 133:24 to 134:02

00133:24 Q. Do you recall whether the drilling
25 fluids program for the Macondo well required any
00134:01 Fann 70 testing?
02 A. I wouldn't remember that.

Page 135:19 to 135:21

00135:19 What is the highest pressure you can
20 apply to the mud when you're running your mud
21 properties checks with the Fann 35?

Page 135:24 to 136:06

00135:24 A. I don't believe there is pressure.
25 EXAMINATION BY MR. HARTLEY:
00136:01 Q. So all -- all the Fann 35 testing is
02 done at atmospheric pressure?
03 A. Yes.
04 Q. Okay. What is the highest
05 temperature you can heat the mud up to when you
06 are testing it with a Fann 35 viscometer?

Page 136:09 to 136:16

00136:09 A. I'm not exactly sure how high the
10 thermal cup goes up to.
11 EXAMINATION BY MR. HARTLEY:
12 Q. What's the highest you've ever used?
13 A. I think 150 was the highest I ever
14 used.
15 Q. Do you know whether downhole
16 temperatures ever exceed that -- that amount?

Page 136:19 to 137:01

00136:19 A. Depends on the well.
20 EXAMINATION BY MR. HARTLEY:
21 Q. Some wells there may be higher
22 temperature than that?
23 A. Sure.
24 Q. Similarly with -- with the Fann 70,
25 do you know what the highest pressure that can be
00137:01 applied is?

Page 137:10 to 137:10

00137:10 A. Don't know.

Page 140:10 to 141:11

00140:10 Q. Have you seen this document,
 11 Exhibit 698, "A Tandem Form-A-Squeeze Form-A-Set
 12 AK Mixing and Spotting Procedure," dated
 13 February 22, 2009?
 14 A. I've seen a procedure. I'm not
 15 exactly sure if this is the exact one.
 16 Q. Have you drafted procedures like
 17 this one that's Exhibit 698?
 18 A. Yes.
 19 Q. Okay. This Tandem Form-A-Squeeze
 20 Form-A-Set AK Mixing and Spotting Procedure looks
 21 to be utilizing Form-A-Squeeze and Form-A-Set AK
 22 as a tandem pill.
 23 Is that your understanding?
 24 A. Yes.
 25 Q. Is that similar to what you were
 00141:01 doing on the DEEPWATER HORIZON in -- in or about
 02 March of 2010?
 03 A. Yes.
 04 Q. In the middle paragraph on that
 05 first page, the last sentence reads: "Any
 06 synthetic fluid would contaminate the Form-A-Set
 07 AK pill."
 08 Do you see that sentence?
 09 A. Yes.
 10 Q. Is that consistent with your
 11 experience and training with M-I?

Page 141:14 to 141:14

00141:14 A. No.

Page 141:19 to 142:05

00141:19 Q. Had you ever heard that synthetic
 20 fluid would contaminate Form-A-Set AK?
 21 A. No.
 22 Q. Do you have any idea of what effect
 23 that contamination would or wouldn't have on the
 24 pill?
 25 A. No.
 00142:01 Q. Do you know whether there would be
 02 any sort of chemical interaction or chemical
 03 reaction if you were to combine the Form-A-Set AK
 04 and Form-A-Squeeze rather than pumping them in
 05 tandem?

Page 142:08 to 142:08

00142:08 A. No, I do not.

Page 142:10 to 142:14

00142:10 Q. Have you seen anything at M-I Swaco,
11 any reports, studies, analyses, about the
12 combination of Form-A-Set AK and Form-A-Set --
13 Form-A-Squeeze?
14 A. No, I haven't.

Page 143:04 to 143:07

00143:04 Q. Have you had any conversations with
05 any of the other M-I drilling fluids specialists
06 about contamination with mud acting as a
07 crosslinking agent?

Page 143:10 to 143:10

00143:10 A. No.

Page 144:18 to 144:23

00144:18 Q. Since the blowout, in talking to
19 your colleagues at M-I, excluding people like
20 Ms. Scofield, your attorneys, have you come to an
21 understanding of why Form-A-Set AK and
22 Form-A-Squeeze were used as a spacer on the
23 Macondo well?

Page 145:01 to 145:08

00145:01 A. I -- I haven't talked about it at
02 all, so --
03 EXAMINATION BY MR. HARTLEY:
04 Q. Have you read anything --
05 A. No.
06 Q. -- that would suggest why they were
07 used?
08 A. No.

Page 146:16 to 147:05

00146:16 Q. How long were you a drilling fluids
17 specialist working in deep water in the Gulf?
18 A. I guess about two years.
19 Q. And before that, you were a
20 compliance specialist working in deep water in
21 the Gulf?
22 A. Yes.
23 Q. For how many years?
24 A. About two years.
25 Q. So in your four years of experience
00147:01 in the Gulf of Mexico in deep water, two as a
02 compliance specialist, two as a drilling fluids
03 specialist, working on about ten wells or so, is

04 that comment consistent with your experience
05 about testing fluids at downhole conditions?

Page 147:08 to 147:09

00147:08 A. Like I said, I have -- cement, I
09 have nothing to do with cement.

Page 147:13 to 147:15

00147:13 Q. So we're going to limit it
14 specifically to spacer fluids, which you have
15 experience with, right?

Page 147:18 to 147:19

00147:18 A. I -- I had really not much
19 experience with spacer fluids either.

Page 148:05 to 148:07

00148:05 Q. In the course of your experience in
06 the Gulf of Mexico, have you ever tested either
07 spacer or drilling fluids at downhole conditions?

Page 148:10 to 148:10

00148:10 A. No.

Page 148:12 to 148:18

00148:12 Q. I think you may have been asked
13 earlier, and if so, I apologize.
14 But how many rigs have you worked on
15 where BP was the operator?
16 A. Just that one.
17 Q. Just the HORIZON?
18 A. Just the HORIZON.

Page 152:03 to 152:06

00152:03 Q. And you've actually been involved
04 in -- in running the static sheen test or
05 performing it?
06 A. I've ran static sheen tests.

Page 152:13 to 152:17

00152:13 Q. What is that static sheen test?
14 A. It's a test where you test to see if

15 the fluids are going to leave a sheen on top of
16 the water.
17 Q. How do you do that?

Page 152:20 to 152:21

00152:20 A. By inserting the fluid into the
21 water to see if it leaves a sheen.

Page 152:23 to 153:01

00152:23 Q. Do you know what the purpose of the
24 static sheen test is?
25 A. To see if there's going to be a
00153:01 sheen.

Page 153:03 to 153:04

00153:03 Do you under -- do you know why it's
04 important to know whether it will leave a sheen?

Page 153:07 to 153:08

00153:07 A. It leaves a sheen, that means
08 there's basically oil on top of the water.

Page 153:10 to 153:13

00153:10 Q. And then you can't discharge
11 overboard until you take a sample that does not
12 leave a sheen?
13 A. Correct.

Page 155:09 to 155:10

00155:09 Q. Do you know who decides whether the
10 fluid is discharged overboard?

Page 155:13 to 155:14

00155:13 A. That would have -- have to come down
14 through the operator.

Page 160:23 to 162:12

00160:23 Q. I think you testified earlier
24 that -- that you know who Joe Keith is?
25 A. It sounds familiar. It's -- it's
00161:01 been a while.
02 Q. All right. Do you recall working

03 with Mr. Keith?
04 A. I -- I don't think I worked with
05 him. I think he worked opposite of me.
06 Q. Okay. Is a part of your job
07 keeping -- keeping track of the mud on the rig?
08 A. Yes.
09 Q. And how often do you -- do you check
10 the mud volumes?
11 A. I checked them a lot, you know. Any
12 time you moved mud and any time anything was
13 going on while drilling, you know, you kept up
14 with your volumes all the time.
15 Q. Why is that?
16 A. Because that's a indicator of where
17 your mud is, where's it going.
18 Q. Okay. Would you have meetings with
19 anybody at the -- at the end of your tower about
20 mud volumes, sort of compare notes, figure out
21 how much mud was used during a -- during a tower
22 of a day?
23 A. Yeah.
24 Q. Okay. Who would you meet with?
25 A. You would talk to Sperry and -- and
00162:01 whoever else.
02 Q. Okay. And what was the purpose of
03 those meetings?
04 A. To see if everybody was -- had the
05 same output, you know what I mean? It was -- was
06 it from the rig listing from the waves or
07 whatnot.
08 Q. To -- to keep an accurate accounting
09 of how much mud was used on the rig and whether
10 there were losses or gains?
11 A. Yes.
12 Q. Was that contained in a report?

Page 162:15 to 162:15

00162:15 A. Yes.

Page 162:17 to 162:20

00162:17 Q. What report would those numbers be
18 contained in?
19 A. It's on a mud report.
20 Q. Who are the mud reports sent to?

Page 162:23 to 162:24

00162:23 A. A distribution list of whoever's
24 involved in the well.

Page 163:01 to 163:07

00163:01 Q. Were you ever responsible for
02 distributing the mud reports?
03 A. Yes.
04 Q. And how would you come up with your
05 numbers for the -- with mud used during a given
06 day or tower?
07 A. Well, it's --

Page 163:10 to 163:12

00163:10 A. -- pretty simple. You have -- you
11 have this amount when you start, you have this
12 amount when your -- your day's up.

Page 163:14 to 164:02

00163:14 Q. Okay.
15 A. There's your difference.
16 Q. Was this based on an actual physical
17 strapping of the --
18 A. Physical --
19 Q. -- pits?
20 A. -- strap, yes.
21 Q. Okay. Did you rely on any numbers
22 displayed through either the Transocean or Sperry
23 system?
24 A. No, I didn't.
25 Q. Okay. So when you had your meeting,
00164:01 you were relying on a physical --
02 A. Physical strap.

Page 164:10 to 164:19

00164:10 Q. Who does that physical strapping?
11 A. I do. Well, I did on my -- on my
12 towers.
13 Q. Okay. You'd go down to each pit in
14 the active system that was used during that day
15 and at the beginning of your tower and at the end
16 of the tower record those straps?
17 A. Yes.
18 Q. Do you know what data the other
19 people with whom you were meeting relied on?

Page 164:22 to 164:22

00164:22 A. No.

Page 164:24 to 164:25

00164:24 Q. Do you know where they got the

25 numbers when you were comparing notes?

Page 165:03 to 165:03

00165:03 A. No.

Page 165:05 to 165:09

00165:05 Q. If there was a discrepancy, which
06 number would you use?
07 A. Mine.
08 Q. Why?
09 A. Because I strapped it.

Page 165:18 to 165:21

00165:18 You talked a little bit about SIMOPS
19 earlier. Does -- do SIMOPS on a rig impact your
20 ability to keep track of the mud volumes and
21 what's going on in the pits?

Page 165:24 to 165:24

00165:24 A. No.

Page 168:11 to 168:22

00168:11 Q. Okay. So, therefore, you weren't
12 involved in mixing any pill that would have been
13 used for displacement, correct?
14 A. Correct.
15 Q. Okay. The only pill you were
16 involved with was the February or March one that
17 was pumped downhole?
18 A. For loss circulation.
19 Q. Right.
20 A. (Moving head up and down.)
21 Q. Is that correct?
22 A. Correct.

Page 175:16 to 175:16

00175:16 Q. Okay. I have some questions about

Page 176:04 to 176:08

00176:04 It's a fair statement to say,
05 in the entire four or five years that you were
06 out there, that you never saw materials like this
07 used as spacers like Form-A-Set and -- and
08 Form-A-Squeeze or a mixture of the two?

Page 176:11 to 176:12

00176:11 A. The first time I've seen these
12 products was on this rig.