

Deposition Testimony of:

Vincent Price

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Page 6:06 to 6:07

00006:06 VINCENT PRICE,
07 having been first duly sworn, testified as follows:

Page 6:09 to 6:16

00006:09 BY MR. PALMINTIER:
10 Q. Good morning, Mr. Price. I'm Mike Palmintier.
11 I represent the Plaintiffs' Steering Committee in the
12 MDL 2179, and I have some questions for you today.
13 Would you state your full name and your business
14 address -- sorry, your residence address for the record.
15 A. It's Vincent Price. I live at [REDACTED]
16 [REDACTED]

Page 9:03 to 9:15

00009:03 Q. And you were not aboard the Deepwater Horizon
04 when the explosion and fire happened; is that correct?
05 A. That is correct.
06 Q. When was the last time you had been aboard it
07 prior to -- if at all, prior to the explosion and fire?
08 A. Two Sundays before the accident. I don't
09 recall the exact date.
10 Q. Understood. Okay. Now, in relationship to
11 this explosion and fire and all that it entailed, did
12 you ever give a formal statement, either written or
13 verbal, recorded or not recorded, electronic, or in any
14 way, any statement to anyone?
15 A. No.

Page 13:14 to 13:16

00013:14 Q. And are you still involved in training, or are
15 you now a well site leader?
16 A. I'm now a well site leader.

Page 15:21 to 16:05

00015:21 Q. Do you recall what dates of morning reports
22 you looked at?
23 A. The days that I was on the -- the actual rig.
24 Q. Okay. And what dates were those?
25 A. I don't remember that.
00016:01 Q. I won't hold you to any particulars, but...
02 A. You know, I think end of March, first of April
03 of 2010 to about the 11th --
04 Q. Okay.
05 A. -- of 2010.

Page 20:22 to 21:04

00020:22 What is -- what is your educational
 23 background?
 24 A. As far as?
 25 Q. High school, college?
 00021:01 A. I have a Bachelor's of Science from Texas A&M
 02 in College Station.
 03 Q. And what is the B.S. in?
 04 A. Agricultural systems management.

Page 22:12 to 23:18

00022:12 Q. Okay. And where did you go first in the
 13 oilfield?
 14 A. To BP.
 15 Q. And you've been with BP ever since, or did you
 16 interrupt that tenure and do something else?
 17 A. No, I've been with BP ever since.
 18 Q. What year was that?
 19 A. That would have been October of 2006.
 20 Q. And what was your year of graduation, I'm
 21 sorry, from A&M?
 22 A. 2003.
 23 Q. What was your first job with BP?
 24 A. Well Site Leader of the Future.
 25 Q. Now, that's a program that BP began in order
 00023:01 to bring young talent into its well site leader pool; is
 02 that correct?
 03 A. That is correct, it's a developmental program.
 04 Q. Developmental program. And we have -- I'm
 05 going to ask you some more specific questions about it.
 06 BP has been kind enough to provide us with some
 07 documents pertaining to you and that program. But you
 08 entered that as your first entry level job for BP,
 09 correct?
 10 A. Yes.
 11 Q. Now, how long was that program intended to
 12 last; do you know?
 13 A. I do not remember.
 14 Q. Okay. How long were you in the Well Site
 15 Leader of the Future program?
 16 A. I do not remember exact -- the exact time
 17 frame. It was 14 months, 12 months, something around --
 18 you know, a little over a year, but I don't remember.

Page 24:23 to 26:15

00024:23 Q. (BY MR. PALMINTIER) I apologize. All right.
 24 I understand that you entered the program in October of
 25 2006, correct?
 00025:01 A. That's correct.
 02 Q. And you left -- I'm sorry, and you have
 03 indicated that you know that a water-based program began
 04 in August of '09?

05 A. Correct.
 06 Q. Did you enter the water program in August of
 07 '09?
 08 A. I did.
 09 Q. Until that time, then, almost three years, you
 10 had been in the land-based well site leader program,
 11 correct?
 12 A. That is not correct.
 13 Q. Tell me.
 14 A. Through December of '07 I was in the
 15 land-based program. From January of '07 through August
 16 of '09 I was a well site leader on a land rig.
 17 Q. You were actually a well site leader on a
 18 well?
 19 A. That's correct.
 20 Q. And, I'm sorry, you said December. Would that
 21 be January of '08 that you started?
 22 A. Yes, January of '08.
 23 Q. Until you went back to -- to the leadership
 24 program?
 25 A. That is correct.
 00026:01 Q. Okay. And that would, as you've said, have
 02 been in August of '09, so nearly two years, a year and
 03 three quarters of a year you actually were getting
 04 real-time work experience as a well site leader on land,
 05 correct?
 06 A. Correct.
 07 Q. But then you returned to your educational
 08 process in the Well Site Leaders of the Future on water.
 09 Is it fair to say that there is a substantial
 10 distinction between the requirements for Well Site
 11 Leaders of the Future of land and that of water?
 12 A. Yes.
 13 Q. And is it also correct to say that the Well
 14 Site Leaders of the Future on the water were focused on
 15 deepwater?

Page 26:17 to 26:23

00026:17 Q. (BY MR. PALMINTIER) Their training and
 18 education was focused on deepwater, or was it also
 19 looking at work on the shelf?
 20 A. We didn't look at any shelf type work because
 21 BP doesn't have any in the Gulf currently.
 22 Q. So it was all deepwater?
 23 A. All of my training was for deepwater, yes.

Page 28:09 to 29:19

00028:09 Q. So you went to the Deepwater Horizon first?
 10 A. Yes.
 11 Q. But then you went to the DD3 and then where --
 12 then where did you go?
 13 A. The Enterprise.

14 Q. All right. And how long did you stay on the
 15 Enterprise; do you know?
 16 A. I do not remember. I think through maybe
 17 February, March time frame of 2010.
 18 Q. Okay. How long were you on the Deepwater
 19 Horizon the first time?
 20 A. Do not remember. It was less than one hitch.
 21 Q. Okay. Which would be less than two weeks?
 22 A. That is correct.
 23 Q. And from the Enterprise did you go back to the
 24 Deepwater Horizon, or did you have another stint?
 25 A. I think we went to town to do some -- some
 00029:01 training courses.
 02 Q. Back to Houston?
 03 A. That is correct.
 04 Q. Now, what was that intervening training, more
 05 classroom work?
 06 A. That's correct.
 07 Q. Do you remember what it was specifically? Did
 08 you have to go get well control certified during that
 09 time, or what was the nature of that?
 10 A. I don't remember what the -- we go to so many
 11 classes, I don't recall which ones those were.
 12 Q. Okay. After being in town where did you go?
 13 A. To the Deepwater Horizon.
 14 Q. Do you remember the date?
 15 A. I want to say it was, like we talked about
 16 earlier, March 31st, April 1st time frame, something
 17 like that, through, I guess it would be the 11th of
 18 April, somewhere around. Within a day or two. Don't
 19 hold me to that.

Page 30:03 to 31:10

00030:03 Q. What was your purpose for going out to the
 04 Deepwater Horizon on that occasion in March of 2010?
 05 A. To get some more on-the-job training and to --
 06 to help them manage some of their -- they were having
 07 some issues as far as health-related issues with well
 08 site leaders. So I kind of helped the guys out.
 09 Q. Did you say "health-related issues"?
 10 A. Yes.
 11 Q. Okay. Who was it that was having health
 12 problems?
 13 A. Murry Sepulvado.
 14 Q. And Mr. Sepulvado was needing to take it
 15 easier on the rig or go on -- go on in?
 16 A. He needed some time off.
 17 Q. Needed some time off. When you got out there
 18 in March of -- the end of March of 2010 who were the
 19 full-fledged well site leaders at the time? Was one of
 20 them Earl Lee?
 21 A. Yes, Mr. Earl Lee.
 22 Q. All right, sir. And who was the other one?
 23 Was it Mr. Vidrine, or who was it?

24 A. Mr. Vidrine went in for days off. The other
 25 would have been Murry Sepulvado.
 00031:01 Q. So Murry Sepulvado was actually out there --
 02 A. He was not.
 03 Q. So it was just you and Earl Lee?
 04 A. That is correct.
 05 Q. So they sent you out there as a Well Site
 06 Leader of the Future trainee?
 07 A. Uh-huh.
 08 Q. And you were there with Earl Lee only,
 09 correct?
 10 A. That is correct.

Page 32:15 to 32:21

00032:15 Q. Understood. But in March there was only one
 16 well site leader, full-fledged well site leader on. So
 17 were you working 24 hours a day? When did you get to
 18 rest?
 19 A. I worked straight nights during that hitch.
 20 Q. Okay. So essentially they put you in the role
 21 of well site leader on your own on nights, correct?

Page 32:23 to 33:12

00032:23 A. I was not on my own.
 24 Q. (BY MR. PALMINTIER) All right. Who was
 25 working with you?
 00033:01 A. Mr. Earl Lee was out there. There was, you
 02 know, a whole support team in town. There was, you
 03 know, lots of, you know, seasoned people on the rig.
 04 Q. All right. Let's talk about BP people on the
 05 rig. Obviously, Mr. Lee, you saw him as a seasoned
 06 veteran of deepwater drilling, right?
 07 A. I saw him as a seasoned veteran of drilling in
 08 general in BP.
 09 Q. Okay. But did you know whether or not he had
 10 any experience in deepwater?
 11 A. I knew that he had some limited experience in
 12 deepwater.

Page 36:04 to 37:20

00036:04 Q. (BY MR. PALMINTIER) Let me -- let me ask you,
 05 then, after the explosion -- I'm not going to get into
 06 too many details yet about what you have done in
 07 particular, but if I understand the record that has been
 08 provided to us by BP in your custodial file, you
 09 continued to work for BP, correct?
 10 A. Correct.
 11 Q. Did you take some time off after the
 12 explosion?
 13 A. I did not.

14 Q. Did you continue to work within the trainee
 15 program that they call "Well Site Leaders of the
 16 Future"?
 17 A. I did.
 18 Q. And where are you now in that program?
 19 A. I've completed that program.
 20 Q. All right, sir. And have you taken a job on a
 21 rig?
 22 A. I have.
 23 Q. And what rig do you work on?
 24 A. I work on the Thunder Horse PDQ.
 25 Q. How long have you been working on the Thunder
 00037:01 Horse?
 02 A. Since I completed the Well Site Leader of the
 03 Future deepwater program.
 04 Q. And when was that?
 05 A. The final review was in -- I don't remember,
 06 the March, April time frame of this year.
 07 Q. All right, sir. So you've made a few hitches
 08 on the Thunder Horse as an actual well site leader?
 09 A. I have been working in the office.
 10 Q. Oh, okay. Tell me about that. There's --
 11 there are jobs for well site leaders in Houston at the
 12 BP campus?
 13 A. Not usually.
 14 Q. Well, why have you been working in the office?
 15 A. Due to the moratorium and the not drilling on
 16 the rigs, all of our equipment is sitting, more or less,
 17 idle. So we brought the well site leaders to the office
 18 as part of our restart to help, you know, filter
 19 checklists and develop different things and help work
 20 the plan to go back to work.

Page 39:17 to 40:05

00039:17 Q. Okay. Now, you mentioned that you worked
 18 aboard one of the ROV boats. What is an ROV boat?
 19 A. It's just a construction boat with remotely
 20 operated vehicles and cranes and different things used
 21 for subsea installation and construction.
 22 Q. And, of course, that -- those ROV boats were
 23 participating in the attempt to stop the flow of
 24 hydrocarbons into the Gulf of Mexico, correct?
 25 A. That is correct.
 00040:01 Q. And do you remember which one, which ROV you
 02 were working on?
 03 A. Which ROV or which boat?
 04 Q. Sorry, which ROV boat you were working on?
 05 A. The Boa Sub C.

Page 40:08 to 40:15

00040:08 Q. When you were out there on the Boa what did
 09 you do?

10 A. I was a BP representative on location.
11 Q. And what was entailed in that task? Was it
12 just communication with Houston or --
13 A. Communication with Houston and -- and the
14 employees on the vessel and logistics, just coordination
15 of everyday activities.

Page 47:09 to 47:14

00047:09 Q. I -- I take it from your previous testimony
10 that you -- you said this was drilling, just drilling,
11 that you didn't find it, then, to be a particularly
12 challenging well, the Macondo on the Deepwater Horizon?
13 A. It's a deepwater exploration well. They're
14 all challenging.

Page 58:12 to 59:19

00058:12 Q. Understood. Now, you mentioned that you were
13 going to go to the school and that you had been
14 instructed instead to come in and so forth. Let's talk
15 about the -- the schools that you went to during your
16 training. First, was it a requirement of your training
17 as a Well Site Leader of the Future to be certified in
18 well control?
19 A. I think that's just an industry requirement as
20 a whole. If you're going to be a well site leader, you
21 have to be certified. It was not, you know -- that's
22 just understood.
23 Q. So that's yes, it was required?
24 A. I don't recall seeing it required anywhere in
25 the actual Well Site Leader of the Future, you know,
00059:01 protocols or documents, but, you know, like I said, the
02 industry as a whole, you can't be --
03 Q. Okay.
04 A. -- without --
05 Q. I understand your reticence. You don't know
06 whether it was an actual formal requirement or not?
07 A. Not for the Well Site Leader of the Future,
08 no.
09 Q. But you did get certified; is that correct?
10 A. Yes.
11 Q. All right. You hesitated. Why?
12 A. I was certified before I came into the
13 deepwater program.
14 Q. Understood. While you were in the land
15 program you got certified, correct?
16 A. Twice, yes.
17 Q. Because there's a requirement, what, every two
18 years?
19 A. Two years, that's correct.

Page 60:03 to 60:18

00060:03 Q. Where did you go to get your certification?
 04 A. At which time?
 05 Q. First time.
 06 A. The first time I went to Randy Smith in
 07 Houston, Texas.
 08 Q. And then the second time?
 09 A. WCS in Lafayette, Louisiana.
 10 Q. And those are the only two times -- you?
 11 A. No, I've been again.
 12 Q. A third time? Where was that?
 13 A. Wild Well Control in Houston, Texas.
 14 Q. That was fairly recent?
 15 A. It would have been in March, April, something
 16 like that, 2010.
 17 Q. Of 2010?
 18 A. (Nodding head.)

Page 62:04 to 63:16

00062:04 Q. Well, there is a label called -- I mean, it's
 05 well control certification, correct?
 06 A. That is correct.
 07 Q. And that is -- well, let me just tell you what
 08 a layperson would think it would be. It's the
 09 prevention of the escape of hydrocarbons into the --
 10 into the environment, whether it be in deepwater or on
 11 land, controlling the well, making sure that it doesn't
 12 make that kind of release. Am I being overly simplistic
 13 in my view?
 14 A. I wouldn't think so. I'd say that's a fair
 15 statement.
 16 Q. So -- but then, of course, below that label is
 17 a huge number of factors that you have to train for and
 18 in order to get certified have to know about, correct?
 19 A. I wouldn't say a huge number. I mean, there
 20 are some factors, yes, and you have to be aware of them.
 21 Q. Would, for example, just the concept of
 22 cementing fall under well control?
 23 A. No.
 24 Q. Would the concept of mud logging and other
 25 review of well activities be -- fall under well control?
 00063:01 A. I wouldn't consider it. It's a tool but --
 02 Q. Okay. Would the -- what does fall under the
 03 broader category of well control?
 04 A. It's -- the course is more -- that I've been
 05 to, have been more structured around control of the well
 06 after the -- you know, after the kick. So, you know,
 07 the BOPs, you know, theories and principles as far as,
 08 you know, managing pressures in the well and that type
 09 of thing.
 10 Q. Okay. So in the certification course that you
 11 went to in -- in early 2010 one of the things you-all
 12 studied was blowout preventers, correct?
 13 A. I wouldn't say we, you know, studied them.

14 There are only so many in the industry. People are
15 pretty well aware of what they are and what they do. We
16 did talk about them.

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00065:21 Q. Okay. And if I understood you correctly,
22 cementing wouldn't have been something that y'all would
23 have considered because you don't -- it wasn't
24 considered -- it's not considered well control?
25 A. It just depends on how you're using it.
00066:01 Q. In your training, then -- let me -- since --
02 given your answer, I would ask, in your training did you
03 learn anything, for example, about nitrogen-infused
04 cementing?
05 A. No.
06 Q. Okay. Have you ever trained in special cement
07 slurries such as those which would be nitrogenated?
08 A. I have not.
09 Q. You're aware, though, that nitrogen-infused
10 cement was used in the temporary abandonment that
11 eventually led to the explosion and fire, correct?

Page 66:13 to 66:18

00066:13 A. Nitrified cement was not used in the temporary
14 abatement.
15 Q. (BY MR. PALMINTIER) Okay. What was it used
16 in?
17 A. It was used in the setting of the production
18 long string.

Page 67:04 to 67:11

00067:04 Q. Have you ever heard of that type of cement
05 being used in deepwater?
06 A. Yes.
07 Q. What example do you have?
08 A. When I was drilling, when you're setting your
09 shallower strings of pipe we used it.
10 Q. Okay. So that was in deepwater?
11 A. That's correct.

Page 67:14 to 67:16

00067:14 Q. And would that have been before or after the
15 explosion?
16 A. That was before the explosion.

Page 68:18 to 69:11

00068:18 Q. But technically speaking, though, the well

19 site leader is BP's highest-ranking official aboard a
 20 vessel when -- aboard a drill vessel that's doing
 21 exploration, correct?
 22 A. That is correct.
 23 Q. And so in terms of who would have final say,
 24 that -- for something that's going on on the rig that
 25 doesn't require involvement of -- of Houston, he would
 00069:01 be the highest-ranking official to give final say,
 02 correct?
 03 MR. LANCASTER: Object to form.
 04 A. I -- I wouldn't say that. BP operates and all
 05 of our partners, contractors, operate under a policy of
 06 stop the job. And anybody on that vessel at any time,
 07 if they're not comfortable, has the -- you know, the
 08 right and the -- you know, the expectation to -- to stop
 09 right there and we'll -- we'll regroup and we'll figure
 10 out what we need to do to make everybody, you know,
 11 convinced that it's right and we're on the same page.

Page 70:02 to 70:10

00070:02 Q. Well, you just got through training on it. I
 03 mean, do you know or not know whether it's a violation
 04 of company policy to let something unsafe go on without
 05 stopping the job?
 06 A. Company policy hasn't been nailed down. It's
 07 all changed since the incident. You know, prior to
 08 the -- the rollout or whatever is coming down the line
 09 that -- yeah, that's a -- in direct conflict with what's
 10 been laid out to us.

Page 71:25 to 72:09

00071:25 Q. Before the change, among other things, a well
 00072:01 site leader would be guided in -- in the performance of
 02 his job by certain written directives; is that fair?
 03 A. I would say so, yeah.
 04 Q. Would he follow such things as the DWOP, thing
 05 they call the DWOP?
 06 A. Yes.
 07 Q. Which is technically the drilling and well
 08 operations practice manual, correct?
 09 A. Uh-huh.

Page 73:25 to 74:19

00073:25 Q. All right. Who has higher responsibility from
 00074:01 BP's standpoint for well control higher than the well
 02 site leader?
 03 A. I mean, there's -- there's all kinds of people
 04 involved with it. There's a team, you know. We have,
 05 you know, the team on the rig, you know. They may not
 06 necessarily be BP employees, but we're all -- they're

07 all held to that same level of responsibility for
 08 maintaining, you know, control of the well and what's
 09 happening, you know.
 10 Q. Right, but I didn't ask about others. I meant
 11 about BP. And we -- we won't beat this horse too much
 12 longer, but I just wanted to know whether your training
 13 led you to understand that BP's well site leader has the
 14 ultimate responsibility for well control, and I think
 15 your answer is no as -- as --
 16 A. I would say that's correct.
 17 Q. Okay. That -- that -- your answer is no,
 18 that's correct?
 19 A. Yes.

Page 76:20 to 76:21

00076:20 Q. And simultaneous operations affect adversely
 21 the logging operations; is that correct?

Page 76:23 to 77:05

00076:23 A. That is not correct.
 24 Q. (BY MR. PALMINTIER) All right. Well, tell
 25 me --
 00077:01 A. You have to differentiate what the operations
 02 are.
 03 Q. All right.
 04 A. There's lots of things that can happen
 05 simultaneously that won't affect the job.

Page 78:21 to 79:11

00078:21 Q. Are you aware that there -- there is a -- a
 22 computerized capture of data from the various sensors
 23 that is reviewed by mud loggers and others?
 24 A. They do have computers, and they do monitor
 25 data. I don't know if it's captured or what happens to
 00079:01 it from there.
 02 Q. All right. And did -- have you been trained
 03 in how to monitor that data that comes from the mud
 04 logging sensors?
 05 A. Not formally, no.
 06 Q. So if you are on an exploratory drilling well
 07 next week and drilling is actually happening, you
 08 wouldn't be able to look at the monitors in the mud
 09 logger's unit or the ones that are in your office and be
 10 able to analyze those various factors that -- that
 11 are -- which have data generated from the sensors?

Page 79:13 to 79:13

00079:13 A. I would be able to analyze the data, yes.

Page 79:15 to 79:15

00079:15 A. But I haven't been trained yet.

Page 80:20 to 82:06

00080:20 Q. (BY MR. PALMINTIER) What's the purpose of
 21 monitoring those various factors that the sensors read?
 22 A. Just, you know, different reasons. The main
 23 thing is just to help you -- you know, the well's
 24 talking to you. It's ac- -- another way to help you
 25 understand, you know, what it's saying.

00081:01 Q. One of the things it might say to you is, "I'm
 02 losing return," correct?
 03 A. It might, yeah.
 04 Q. And if it tells you that, what is your answer?
 05 A. It's losing returns? Just depends on how bad
 06 they are.

07 Q. And if they're bad enough, they indicate a
 08 possible well control problem, correct?
 09 A. Losing returns can lead to well control
 10 problems, yes.

11 Q. All right. Because they indicate what?
 12 Substantial enough loss of return indicates what?
 13 A. I -- it doesn't indicate anything. If you
 14 have a substantial loss of returns, I mean, it's obvious
 15 you're going to lose your hydrostatic.

16 Q. Okay. And there are lots of reasons why you
 17 might be losing hydrostatic pressure, correct?
 18 A. There's only one.
 19 Q. What is it?
 20 A. Loss of returns.
 21 Q. Understood. And there are lots of reasons why
 22 loss of returns might happen?
 23 A. Yes.

24 Q. But what you would do as a well site leader is
 25 if you got a loss of return, you go and you look at why
 00082:01 that's happening?
 02 A. Yes.
 03 Q. That's the responsibility of the well site
 04 leader, isn't it?
 05 A. That's the responsibility of everybody out
 06 there.

Page 82:08 to 82:09

00082:08 explain. That is the -- that is the responsibility of
 09 the well site leader, isn't it?

Page 82:14 to 82:16

00082:14 Q. -- and trying to figure out why they're
 15 happening is the responsibility of the well site leader,

16 isn't it?

Page 82:18 to 83:16

00082:18 A. No.
 19 Q. (BY MR. PALMINTIER) Okay. So he doesn't even
 20 have to look at the mud logging monitor; is that what
 21 you've been trained?
 22 A. That is not what I've been trained.
 23 Q. You are supposed to look. Then what is your
 24 responsibility relative to the results that you see on
 25 the data screen?
 00083:01 A. Just to monitor the well.
 02 Q. All right. So you see a loss of return.
 03 A. Uh-huh.
 04 Q. Let's think hypothetically about what Vincent
 05 Price would do if he sees a substantial loss of return
 06 in reviewing and looking at the mud logger's monitor.
 07 What does he do?
 08 A. Pick up the phone and call the rig floor.
 09 Q. Okay. So if you didn't do that, you wouldn't
 10 be doing your job, would you?
 11 A. I'd be sitting in a bread line somewhere.
 12 Q. So the answer is you wouldn't be doing your
 13 job, right?
 14 A. That's -- I wouldn't be doing what I think is
 15 my job. Now, whether or not that's someone else's
 16 stance, I can't say.

Page 84:02 to 84:25

00084:02 Q. Can -- can -- on a deepwater rig, that is, one
 03 of dynamic positioning, do you understand what I'm
 04 getting at --
 05 A. Uh-huh.
 06 Q. -- because a deepwater rig using dynamic
 07 positioning technology can be affected by the movement
 08 of heavy equipment aboard the vessel, can't it?
 09 A. Yes.
 10 Q. I mean, it's a floating apparatus --
 11 A. That's correct.
 12 Q. -- and, although, the thrusters are powerful,
 13 it -- it -- it's floating, and so movement of the weight
 14 to one side or another of the -- of the vessel itself
 15 can affect the level of the vessel in the water,
 16 correct?
 17 A. Correct.
 18 Q. In turn, that can affect the level of fluids
 19 in the mud pits which are being analyzed by sensors,
 20 correct?
 21 A. Correct.
 22 Q. And so if a dynamic positioning vessel is
 23 offloading heavy equipment on one side, that can affect
 24 the mud pits and their readings in another?

25 A. Yes.

Page 85:20 to 87:08

00085:20 A. That's two different questions. One question
21 was, would it be advantageous to stop the drilling. The
22 other question was, would it be advantageous to stop the
23 simultaneous operations. So which -- which is the --
24 Q. (BY MR. PALMINTIER) I'll ask you about each
25 one. You'll find that that's tend -- tends to be what
00086:01 I'll do when you -- when you bifurcate my question like
02 that. I -- I -- what I'm asking is both.
03 Would it be advantageous to stop the
04 simultaneous operations and continue to drill, is the
05 first question?
06 A. I mean, it's a drilling rig. I'm a drilling
07 guy. That's what we're all there for. If there's
08 something going on with the crane, working a boat or
09 something, it's messing up what we're doing, yeah, we --
10 we can shut down the crane.
11 Q. Now, let's look at it from the other side of
12 that coin. If you -- I take it from your answer that
13 you would disagree with this -- with the stopping of
14 drilling and the raising of the bit in order to complete
15 the sim- -- the simultaneous operations that affected
16 pit volume -- pit levels?
17 A. Depends on what that simultaneous operation
18 was.
19 Q. If it was crucial enough, that is, the
20 simultaneous operation, you would agree that it would be
21 wise to stop drilling, right?
22 A. It just -- yeah, depends on the operation,
23 whichever is, you know -- depends, you know. But, yes,
24 I would agree, if there's something more critical than
25 drilling going on, it would be perfectly okay to stop
00087:01 drilling until you get to a point where...
02 Q. And the reason underlying both of those,
03 whether it's to stop the SimOps or stop the drilling, is
04 to enhance safety aboard the vessel; isn't that true?
05 A. To -- to reduce confusion. It -- it -- it may
06 be something minimal. It may not have anything to do
07 with safety. It could be just two people needing one
08 piece of equipment.

Page 87:22 to 88:21

00087:22 Q. Okay. Have you ever performed a negative
23 pressure test?
24 A. I have.
25 Q. And that was during the time that you were in
00088:01 the land-based program, correct?
02 A. That is correct.
03 Q. What's a negative pressure test?
04 A. It -- it's a controlled reduction of

05 hydrostatic on the well to test for an inflow.
 06 Q. For an inflow?
 07 A. (Nodding head.)
 08 Q. Meaning that pressures from outside the
 09 wellbore are coming into it?
 10 A. That's correct.
 11 Q. And that's not a good thing, correct?
 12 A. Only if you're in production.
 13 Q. Right. While you're drilling, you don't want
 14 hydrocarbons coming up the wellbore, correct?
 15 A. I -- I do not.
 16 Q. Because that presents grave risks for the well
 17 itself, correct?
 18 A. Yes.
 19 Q. It presents, of course, grave risk for the
 20 fellows who are on the drill floor, correct?
 21 A. Yes.

Page 89:22 to 89:25

00089:22 Q. (BY MR. PALMINTIER) Would you agree that a
 23 well site leader needs to understand the implications of
 24 a negative pressure test?
 25 A. No.

Page 90:17 to 90:22

00090:17 I'm wondering whether or not you would agree
 18 that well site leaders have to understand what a
 19 negative pressure test means, especially if it's failed;
 20 you disagree with that?
 21 A. I personally think I would like to have an
 22 understanding of a negative pressure test going into it.

Page 94:05 to 94:09

00094:05 Q. (BY MR. PALMINTIER) All right. So if called
 06 upon to testify, you're going to have to testify that
 07 you don't know the process of negative pressure testing
 08 in deepwater?
 09 A. That is correct.

Page 99:21 to 101:06

00099:21 Q. I ask you to look at tab No. 6 in your book.
 22 Take a moment to look that over, please, sir.
 23 Are you familiar with that document?
 24 A. Not this version, per se. Yeah, I'm familiar
 25 with the DWOP.
 00100:01 Q. Tell -- tell us what that is, the DWOP.
 02 A. This is the drilling and well operations
 03 practices manual for BP.
 04 Q. As a well site leader what does it mean to

05 you?
 06 A. This is kind of our bible, you would say,
 07 for --
 08 Q. Understood.
 09 A. -- for BP policies.
 10 Q. Yes sir. And see at the bottom of that first
 11 page, this is -- by the way, for purposes, this is
 12 Exhibit 2223 already introduced, the DWOP. But see at
 13 the bottom where it says "the operating management
 14 system?"
 15 A. Uh-huh.
 16 Q. The DWOP is part of an overall plan called the
 17 operating management system; is that correct?
 18 A. That is my understanding, yes.
 19 Q. All right. Let's talk about your
 20 understanding, but we won't go too deeply into it. The
 21 operating management system is -- tell -- tell me what
 22 the operating management system is from your perspective
 23 as a new well site leader.
 24 A. The only lessons I hold is, it's very new to
 25 the drilling site in the Gulf of Mexico. So I really
 00101:01 don't have enough exposure to it to -- to talk to that.
 02 Q. Okay. Can you tell me generally what it is,
 03 though?
 04 A. No.
 05 Q. Not even generally?
 06 A. No.

Page 105:03 to 105:05

00105:03 is.
 04 A. What are your -- what are your questions?
 05 Q. Well, yeah. You -- have you had a chance to

Page 105:07 to 105:17

00105:07 A. Yeah.
 08 Q. Okay. Do you -- does this document enable you
 09 to refresh your memory as to what the actual training
 10 course is about on this occasion in October of '09?
 11 A. Yes.
 12 Q. Tell me.
 13 A. This is a confirmation letter saying I was
 14 enrolled in the Deepwater Drilling Course on
 15 September 28th through October the 2nd of '09.
 16 Q. Okay. And do you remember that course?
 17 A. Vaguely. There was several courses pertaining

Page 105:19 to 105:22

00105:19 Q. Is it specific to deepwater?
 20 A. This particular course, yes.
 21 Q. Okay. I mean, it says it in the --

22 A. It says "Deepwater Drilling Course."

Page 106:13 to 106:17

00106:13 A. Not -- not that I can recall. I mean, they
14 were just drilling courses.
15 Q. Okay. When you're certified in well control,
16 do you actually get a certificate that -- that
17 recognizes that certification?

Page 106:19 to 106:21

00106:19 Q. And what is it -- I mean, I -- I don't have a
20 copy of it, but it's a certification that you have
21 completed a program of study on well control?

Page 113:22 to 114:21

00113:22 Q. Let me -- let me turn that question around for
23 you, and I'm really just looking for explanations,
24 because I think I -- I may have a misunderstanding of
25 the terminology involved in what the Sperry mud loggers
00114:01 actually did. Did they serve more than one purpose
02 aboard the vessel?
03 A. Yes.
04 Q. What were those job functions? How did they
05 break down?
06 A. I would say their primary function was
07 sampling of the formation, you know, and using those
08 samples for creation of the mud log and then, you know,
09 maintaining control of that knowledge, if you will, you
10 have a collection of knowledge.
11 Q. Yes.
12 A. That's their primary function. And in
13 addition to that they also monitor our rig systems,
14 similar to the monitoring systems that the rig itself
15 uses to -- to, you know, listen to the well and watch
16 what's going on in the operations.
17 Q. Okay.
18 A. To track, if you will.
19 Q. Yes, sir. Anything else?
20 A. That's -- that's my main two expectations of
21 them.

Page 119:14 to 119:20

00119:14 Q. Okay. And in your training you understood why
15 the centralizers were important, didn't you?
16 A. I understood the theory of why we run
17 centralizers, yes.
18 Q. And that's, what, in order to make certain
19 that the casing is centered in the annulus prior to
20 cementing?

Page 119:22 to 119:23

00119:22 A. There is all kind of reasons to run
23 centralizers. It's to help with your cement jobs.

Page 120:10 to 120:14

00120:10 Q. (BY MR. PALMINTIER) But if a casing is not
11 centered properly in the annulus, what's the potential
12 problem there?
13 A. I don't know, I guess you can compromise your
14 cement job, but you can always fix it later.

Page 121:20 to 121:22

00121:20 Q. As a well site operator -- I mean, as a well
21 site leader, one of your jobs is to keep an eye on those
22 results, isn't it?

Page 121:24 to 122:03

00121:24 A. What -- what results in particular are you
25 concerned with?
00122:01 Q. (BY MR. PALMINTIER) Anything pertaining to
02 the testing of cement, Mr. Price.
03 A. I --

Page 122:05 to 123:14

00122:05 A. (Continuing) That is not correct.
06 Q. (BY MR. PALMINTIER) All right. What is it
07 that you do have to pay attention to?
08 A. The slurries in town are -- are designed by,
09 you know, powers that be. I don't know who designs
10 them.
11 Q. Understood.
12 A. You know, they're -- they know the -- you
13 know, they're engineers. They know why they design
14 things that way. The only two things I'm concerned with
15 are pump time and the strength of the cement.
16 Q. Okay. So at least with regard to the general
17 test results that you would evaluate, you would look for
18 pump time and strength, correct?
19 A. That is correct.
20 Q. And you're interested in that because if --
21 because the pump time, for example, is important in
22 whether or not the job properly sets before you move on,
23 correct?
24 A. That is not correct.
25 Q. Tell me.
00123:01 A. Pump time is important to make sure it doesn't

02 go off early and set inside the pipe.
 03 Q. Which would be a pretty bad situation,
 04 correct?
 05 A. Go ahead and pack your bag, head to the house,
 06 yes.
 07 Q. All right. And then what was the second one
 08 that you talked about?
 09 A. Compressive strength.
 10 Q. Compressive strength. And what do you look
 11 for in compressive strength evaluations?
 12 A. I don't have enough experience to -- to say.
 13 Kind of goes back to the engineering and what the design
 14 was and what the idea is behind it.

Page 123:23 to 124:04

00123:23 Q. What do you have to do?
 24 A. With the compressive strength?
 25 Q. Yes.
 00124:01 A. I mean, nothing. I'm --
 02 Q. Then why do you look at it?
 03 A. I'm just a curious kind of individual. I just
 04 like to see how hard it's going to get.

Page 124:21 to 125:06

00124:21 Q. (BY MR. PALMINTIER) If that wasn't clear to
 22 you, let me make it clear. I'm talking about, of
 23 course, after the blowout you acknowledge -- you
 24 recognize that hydrocarbons were flowing into the
 25 environment, correct?
 00125:01 A. Yes.
 02 Q. Unrestrained, no blow out preventer stopping
 03 it, nothing preventing it from pouring out into the Gulf
 04 of Mexico, correct?
 05 A. I wouldn't say "unrestrained," but, yeah, it
 06 was pouring out.

Page 130:14 to 130:18

00130:14 BY MR. THIBODEAUX:
 15 Q. Good afternoon, Mr. Price.
 16 A. Afternoon.
 17 Q. My name is Paul Thibodeaux, and this is Mary
 18 K. Klinefelter. We represent Transocean.

Page 133:25 to 134:12

00133:25 Q. Okay. I just want to get kind of straight the
 00134:01 amount of time that you actually spent on the Deepwater
 02 Horizon prior to April 20th --
 03 A. Okay.
 04 Q. -- 2010. If I understand your previous

05 testimony, you spent about a half a hitch in February of
06 2010?
07 A. No.
08 Q. Okay. Can you clear that up for me, please?
09 A. I spent less than a full hitch sometime in the
10 October, November time frame of 2009.
11 Q. Okay. And how long is a hitch, 14 days?
12 A. That is correct.

Page 134:20 to 134:23

00134:20 Q. Okay. And why were you specifically on the
21 rig in October and November of 2009?
22 A. Just to begin some of my on-the-job training
23 for the Well Site Leader of the Futures program.

Page 135:06 to 135:09

00135:06 Q. Okay. So you left after somewhere between
07 seven and 14 days in October or November of 2009, and
08 then returned end of March 2010; is that right?
09 A. That is correct.

Page 135:15 to 135:21

00135:15 Q. Did you also go out at the end of March 2010
16 to see specific operations that were going on?
17 A. Not particularly, no.
18 Q. Okay. Why were you sent out at the end of
19 March?
20 A. To help them with their personnel issues
21 around Murry Sepulvado not being able to come out.

Page 136:04 to 136:07

00136:04 Q. Okay. How long were you on the rig for?
05 A. I was on the rig for -- I believe it was the
06 11th, through April the 11th; but he had come back by
07 that time.

Page 136:11 to 136:14

00136:11 Q. Okay. And when Murry came back, what -- what
12 were your duties then?
13 A. Just to be training and -- and learning, you
14 know, on-the-job training.

Page 136:17 to 138:24

00136:17 A. I did.
18 Q. Okay. In your time on the -- on the Deepwater
19 Horizon, you had an opportunity to get to know some of

20 the Transocean personnel on the rig, correct?

21 A. That's correct, yeah.

22 Q. Did you know Paul Johnson?

23 A. Name doesn't -- doesn't strike -- ring a bell

24 with me.

25 Q. You didn't know Paul Johnson. Do you know

00137:01 Jimmy Harrell?

02 A. I do.

03 Q. And -- and who was Jimmy?

04 A. He was the -- one of the OIMs.

05 Q. Okay. Do you know Randy Ezell?

06 A. I know the name. I've never met the guy.

07 Q. Do you know what his job was?

08 A. If I'm not mistaken, he was a tool pusher,

09 senior tool pusher, something like that.

10 Q. Do you know Jason Anderson?

11 A. I just know the name. I never met him.

12 Q. Never met him. Do you know Dewey Revette?

13 A. I do.

14 Q. What was his job?

15 A. He was a driller.

16 Q. Do you know Stephen Curtis?

17 A. I do.

18 Q. What was his job?

19 A. He was an assistant driller.

20 Q. Do you know Don Clark?

21 A. Yes.

22 Q. What was his job?

23 A. Assistant driller.

24 Q. Do you know Captain Kuchta?

25 A. "Curt," is that --

00138:01 Q. Yeah.

02 A. Yes.

03 Q. "Captain Curt." Okay. In your time that you

04 spent on the Deepwater Horizon, you were comfortable

05 with the comp- -- competency of the rig crew, correct?

06 A. I was.

07 Q. You didn't have any complaints about the --

08 the gentlemen I just mentioned, correct?

09 A. The ones that I know, I didn't have any

10 complaints. The ones that I haven't met, I don't have

11 an opinion one way or the other.

12 Q. Okay. As a well site leader, in fact, if you

13 weren't comfortable with the competency of anyone on

14 board the Deepwater Horizon, you could have shut the job

15 down, correct?

16 A. As a Well Site Leader of the Future on board

17 the Deepwater Horizon, yes.

18 Q. As a well site leader or a Well Site Leader of

19 the Future, you could do that, correct?

20 A. Yes.

21 Q. And, in fact, you had a duty, if you had a

22 problem with any of the rig crew, to report that problem

23 to town, correct?

24 A. No.

Page 139:10 to 139:20

00139:10 that stuff. We're all grown men.

11 Q. Okay. And you never raised any issues with --
12 with anybody from Transocean regarding any of the rig
13 crew, correct?

14 A. I did not.

15 Q. No member of the Transocean rig crew while you
16 were on board the Deepwater -- Deepwater Horizon
17 exhibited behavior that led you to believe that they
18 were callus or indifferent as to the safety of
19 individuals or the environment, correct?

20 A. That is correct.

Page 140:06 to 140:12

00140:06 A. No.

07 Q. Okay. You never told anyone from BP, you
08 know, that was with an investigation process or that was
09 looking into maybe what might have caused the April 20
10 incident that key members of the rig crew needed to be
11 trained and demonstrate competency, did you?

12 A. I did not.

Page 141:14 to 141:19

00141:14 A. I was not.

15 Q. Okay. So when you left the rig on
16 approximately April 11th, 2010 you weren't aware of any
17 outstanding safety critical audit items that had not
18 been addressed yet, correct?

19 A. That's correct.

Page 142:13 to 143:18

00142:13 Q. In your duties as a Well Site Leader of the
14 Future did you ever call John Guide to report any
15 problems you were having?

16 A. I did.

17 Q. And what were the nature of those problems?

18 A. Lost circulation.

19 Q. And when was that?

20 A. That was somewhere around 1st or 2nd of April,
21 2010.

22 Q. Was that the lost circulation event that
23 occurred on the Deepwater Horizon?

24 A. It was one of them.

25 Q. Okay. That occurred on April 3rd, correct?

00143:01 What was the first part of that?

02 A. I don't know the date. It was right around,
03 like I say, the first part. It was early in the hitch.
04 So I presume it was April the 3rd.

05 Q. And this was prior to drilling the final

06 hundred feet of the well, correct?
07 A. Yes.
08 Q. And what did you report to John Guide about
09 that lost circulation event?
10 A. That we had some losses and that we had some
11 OCM material, you know, material mixed and ready to go
12 and I was concerned about the effects that OCM might
13 have on the MWD and the logging tools that were in the
14 hole.
15 Q. And what was the nature of those concerns?
16 A. Just that, you know, it would plug up the
17 small orifices in the tools and prevent them from
18 working.

Page 144:08 to 146:13

00144:08 Q. (BY MR. THIBODEAUX) Are you familiar with the
09 concept of a drilling margin?
10 A. Well define it for me.
11 Q. Are you familiar with the fracture gradient?
12 A. I am.
13 Q. Do you know -- do you know that the MMS
14 requires there to be a .5 ppg margin between the
15 fracture gradient and the mud weight that's being
16 utilized?
17 A. I did not.
18 Q. Do you -- you're not aware that MMS requires
19 that, or you're not aware of it at all?
20 A. I'm not aware that it was an MMS requirement.
21 Q. You are aware that it is a BP policy to -- to
22 maintain that .5 ppg margin, correct?
23 A. That's not correct.
24 Q. Okay. What's wrong about what I said?
25 A. I'm just not aware of it.
00145:01 Q. Well, what do you -- what -- what do you
02 think -- is there a drilling margin that BP requires you
03 to maintain?
04 A. If there is, I don't know what it is.
05 Q. Have you had -- ever had any training with
06 respect to drilling margins?
07 A. I have not.
08 Q. Are you aware of any DWOP or other policies BP
09 has regarding drilling margins?
10 A. I am not.
11 Q. How did you become familiar with drilling
12 margins and fracture gradients?
13 A. I understand the concept of fracture gradients
14 and pore pressure through my training and through my
15 experience. As far as maintaining a margin away from
16 the pore pressure, you know, I can pretty easily deduce
17 that concept but policies and official -- you know,
18 language I'm not -- I don't know what the requirements
19 are around that, that subject.
20 Q. You've just never -- you've never been
21 instructed by anyone at BP or told that a certain margin

22 has to be maintained between the fracture gradient and
 23 the mud weight; is that right?
 24 A. That is correct.
 25 Q. What about between -- what about the margin
 00146:01 between the pore pressure and the mud weight, have you
 02 ever heard of any -- has anyone from BP ever told you
 03 that a certain margin needed to be maintained between
 04 the mud weight and the pore pressure?
 05 A. They have not.
 06 Q. Were you aware that on April 17th,
 07 approximately six days after you left, Mr. Guide, the
 08 wells team leader, reported to Mr. Sims -- you know
 09 Mr. Sims?
 10 A. I know the name. I don't know the person.
 11 Q. Well, his boss, Mr. Sims, that the well site
 12 leaders on the Macondo well were at their wit's end and
 13 were flying -- quote, flying by the seat of their pants?

Page 146:15 to 146:15

00146:15 A. I was not.

Page 153:25 to 154:01

00153:25 Are there specific DWOP policies that BP
 00154:01 requires you to know?

Page 154:03 to 154:18

00154:03 A. There is a lot in that book. I think it's
 04 understood -- in my personal opinion, I understand it
 05 that as you're overseeing or working through BP's
 06 operations, it's -- it's your responsibility to
 07 determine your compliance with that book.
 08 Q. (BY MR. THIBODEAUX) As a well site leader,
 09 you're responsible for knowing what's in the DWOP
 10 procedures, correct? Or policies, sorry.
 11 A. What pieces apply to me, not the whole thing.
 12 Q. Okay. And how do you determine what pieces
 13 apply to you?
 14 A. By reviewing the manual, reading it. you
 15 know, I bounce a lot of stuff off the senior personnel
 16 that have a lot more experience than I do.
 17 Q. So you're not provided with any formal
 18 training; you simply ask your mentor well site leaders?

Page 154:20 to 154:25

00154:20 A. That's how I -- I do it. You know, I don't
 21 know what the, you know, others in my situation do.
 22 Q. (BY MR. THIBODEAUX) In your time at BP since
 23 2006, you've never had any formal training with respect
 24 to DWOP policies and procedures; is that right?

25 A. That is correct.

Page 155:04 to 156:10

00155:04 Q. Have you been to any post April 20th, 2010
 05 conferences or meetings or seminars where changes to any
 06 BP policy was discussed?
 07 A. I have.
 08 Q. Okay. What were the nature of those?
 09 A. Just the -- the -- the conferences or the
 10 nature of the changes?
 11 Q. Both.
 12 A. Normally when we had a well site leader
 13 meeting in, I believe it was January of 2011, February,
 14 somewhere around in there; and then we had the one in
 15 May and just, you know, real high level, just kind of
 16 more or less letting us know that there's something
 17 coming. But as far as, you know, what the changes were
 18 or what the policies were, that's at a lot higher level
 19 than the well site leader level.
 20 Q. Okay. What do you mean by they were letting
 21 you know that something was coming?
 22 A. Just that, you know, the policies are being
 23 revised and there's a lot of things that were going to
 24 have to happen before we start back up to work.
 25 Q. And by "policies" you mean there's DWOP
 00156:01 policies that are going to be revised?
 02 A. They didn't specifically say DWOP. They're
 03 just policies.
 04 Q. Okay. And were you told that BP is going to
 05 issue those new policies to the well site leaders?
 06 A. No. Just that the policies will be coming.
 07 There was no discussion about who was getting them or
 08 how they were going to be issued or rolled out.
 09 Q. And when are they coming?
 10 A. I do not know.

Page 157:01 to 160:11

00157:01 A. No, there weren't.
 02 Q. Regarding the negative pressure test, have you
 03 had any training regarding negative pressure tests?
 04 A. I have not.
 05 Q. BP doesn't provide what -- their well site
 06 leaders with any training regarding negative pressure
 07 tests?
 08 MR. LANCASTER: Object to the form.
 09 A. Not that I know of, they don't. They -- they
 10 didn't provide any to me.
 11 Q. (BY MR. THIBODEAUX) So you've become a full
 12 well site leader without having any training at all as
 13 far as a negative pressure test?
 14 A. That is correct.
 15 Q. Have you ever been instructed on how to -- how

16 to line one up?

17 A. I -- that all depends. Are we talking about

18 land or offshore?

19 Q. Let's assume we're talking about offshore,

20 deepwater.

21 A. I have not.

22 Q. Have you ever been on a -- a deepwater rig and

23 witnessed a negative pressure test?

24 A. No, I haven't.

25 Q. So if you needed to do a negative pressure

00158:01 test tomorrow, you couldn't do it, correct?

02 A. All depends on where I was.

03 Q. Why would -- why would it depend on that?

04 A. If it was on land, I could do it. If it were

05 in a subsea stack, I would probably need some help.

06 Q. All right. So if you were in deepwater on a

07 "MODU," you couldn't do a negative pressure test, right?

08 A. Not alone.

09 Q. Excuse me, I'm sorry.

10 A. I said "not alone."

11 Q. Not alone.

12 In the -- in the time that you spent on the

13 Deepwater Horizon before April 20th, was there a written

14 procedure for the negative pressure test on the rig?

15 A. I was not aware of one.

16 Q. You never saw one posted anywhere on the rig?

17 A. I didn't. Just because I didn't see it,

18 doesn't mean it wasn't there...

19 Q. Did Murry Sepulvado ever talk to you about --

20 Murry or Ronnie Sepulvado ever talk to you about a

21 negative pressure test procedure that was on the rig?

22 A. No, they didn't.

23 Q. No one -- nobody else from BP ever talked to

24 you about that?

25 A. No, not that I can remember.

00159:01 Q. Earlier this morning you testified that

02 1400 psi on the drill pipe might be okay during a neg --

03 negative pressure test, I think if the pressure is

04 trapped or the pumps are on; is that right?

05 A. Uh-huh. That is, you know, a fair statement,

06 yeah.

07 Q. Okay. If a drill pipe -- if a -- if a

08 negative pressure test is being conducted on a drill

09 pipe --

10 A. Uh--huh.

11 Q. -- and the pipe is bled down to zero --

12 A. Uh-huh.

13 Q. -- and subsequently the pressure rises to 1400

14 psi, that would be an indication of a failed test,

15 correct?

16 A. It all depends on what else was going on

17 during the test. It could be an indicator of a lot of

18 things?

19 Q. Like what?

20 A. I can't speak to a -- a deepwater negative

21 test. I don't have enough experience to -- to pick it
 22 apart and say what it could or couldn't be.
 23 Q. But you do know if a drill pipe is bled off to
 24 zero and then is being monitored specifically to
 25 determine if there's any flow and the actual test is
 00160:01 being conducted, if you have a pressure rise, then
 02 that's an indication that there may be com --
 03 communication with the well, correct?
 04 A. There may be.
 05 Q. Right. And if there may be communication with
 06 the well, that's a failed negative test, correct?
 07 A. Not necessarily. You don't know -- you kind
 08 of -- like I said, I can't speak to, you know, a
 09 deepwater environment but, you know, there's other
 10 possibilities as to why there could be flow from the
 11 drill pipe.

Page 160:14 to 160:19

00160:14 Q. Well, certainly if there's other
 15 possibilities, then you would investigate those
 16 possibilities to try to determine why you had 1400 psi
 17 out in the drill pipe, right?
 18 A. Based on my previous experience on land, yes,
 19 I would.

Page 161:17 to 162:06

00161:17 A. I'm sorry, can you ask that again?
 18 Q. In your time with BP were you taught that in
 19 conducting a negative pressure test, that you should
 20 calculate the bleed-back volumes and expected pressures
 21 that you'll see during that test?
 22 A. Yes.
 23 Q. You were?
 24 A. Yes.
 25 Q. And who taught you that?
 00162:01 A. I just -- just learned it from watching other
 02 well site leaders in my land experience.
 03 Q. Is that something that you do, that you would
 04 do as a standard practice in conducting a negative --
 05 negative pressure test?
 06 A. When I was on land, it was.

Page 163:07 to 163:13

00163:07 A. I would assume that -- you know, that -- all
 08 the decisions made at BP are a group effort, you know.
 09 I'm one of the younger employees. I don't know how that
 10 would -- would shake out in the decision.
 11 Q. You would assume that that risk assessment had
 12 been done, if you were being asked to run an LCM as a
 13 spacer?

Page 163:16 to 163:20

00163:16 A. No, I -- I would assume that the decisions to
17 do that, that comes from a lot higher than -- than me as
18 a well site leader.
19 Q. (BY MR. THIBODEAUX) You would expect somebody
20 else to make that decision?

Page 163:22 to 164:25

00163:22 A. That is correct.
23 Q. (BY MR. THIBODEAUX) All right. You were on
24 the Deepwater Horizon when the final hundred feet was
25 drilled on or about April 9th, right?
00164:01 A. That's correct.
02 Q. At any point was there any discussion on the
03 rig about it being unsafe to drill that final hundred
04 feet?
05 A. No, there wasn't.
06 Q. Were there any discussions about not having
07 sufficient mud weight to drill that final hundred feet?
08 A. Not that I can remember.
09 Q. Do you recall any concerns being raised
10 regarding drilling that final hundred feet?
11 A. There were some concerns around lost
12 circulation.
13 Q. And what were those concerns?
14 A. We'd just been having a lot of problems. You
15 know, the well was tender footed, and trying to --
16 trying to maintain returns was tough.
17 Q. And so what specifically were the concerns?
18 A. Lost returns.
19 Q. Whether you would be able to drill the final
20 hundred feet or not?
21 A. Just the returns, losing the returns was the
22 biggest concern.
23 Q. Okay. And how was that problem solved?
24 A. I guess, you know, take it easy. It was
25 scratched out very slowly.

Page 165:08 to 165:13

00165:08 they do -- do in town regarding that.
09 Q. (BY MR. THIBODEAUX) Are you aware of
10 operations being suspended for any amount of time in
11 order to assess whether or not the final hundred feet
12 could be drilled pursuant to MMS regulations?
13 A. No, I wasn't.

Page 166:03 to 166:25

00166:03 Q. (BY MR. THIBODEAUX) Have you received any
04 training from BP regarding surface depths?

05 A. I have not.
 06 Q. What about the timing of setting a surface
 07 plug, have you received any training regarding whether a
 08 surface plug should be set before a final negative
 09 pressure test is run in a production casing zone?
 10 A. I have not.
 11 Q. Are you aware of any policies that BP now has
 12 post April 20th regarding the timing of setting a
 13 surface plug?
 14 A. No, I'm not.
 15 Q. Have you been told by anybody that a surface
 16 plug should be set before the well is displaced?
 17 A. No.
 18 Q. Do you know that BP has any policy for when a
 19 plug should be set with respect to a final displacement
 20 of the well?
 21 A. I do not.
 22 Q. Does BP have any policies regarding the
 23 utilization of drill strings and drill collars to set
 24 lock-down sleeves?
 25 A. Not that I'm aware of.

Page 168:04 to 168:07

00168:04 Q. Are you aware of any policies regarding -- any
 05 BP policies regarding setting a lock-down sleeve before
 06 displacing the well?
 07 A. No, I'm not.

Page 168:22 to 169:03

00168:22 Q. Are you aware of any BP policies that require
 23 the running of a full bottoms up prior to a production
 24 casing cement job in deepwater?
 25 A. No.
 00169:01 Q. You haven't been told that you -- that you
 02 need to or must do a full bottoms up prior to running
 03 the production casing cement?

Page 169:05 to 169:05

00169:05 A. No, I haven't.

Page 170:04 to 171:23

00170:04 A. Not that I can remember.
 05 Q. If you don't mind, take a look at Tab 1. It's
 06 BP_HZN_2179MDL00779762 through 794. Have you ever seen
 07 this document before?
 08 A. I have.
 09 Q. Okay. When did you see it?
 10 A. I do not recall. It was e-mailed to me
 11 somewhere along my way in the Well Site Leader of the

12 Future deepwater program.
 13 Q. Was it e-mailed to you before April 20th,
 14 2010?
 15 A. I'm not sure of the exact date. I really
 16 don't remember.
 17 Q. Okay. It's entitled "Deepwater Cementing
 18 Guidelines." Is it your understanding that this
 19 document is to be used as a guidance document in
 20 deepwater cementing?
 21 A. That is not my understanding.
 22 Q. Okay. What's your understanding?
 23 A. As it says in the Executive Summary, "This
 24 document has been prepared to aid in the planning and
 25 execution of deepwater drilling." It clearly states the
 00171:01 word "aid."
 02 Q. And that would be aid BP personnel, correct?
 03 A. I -- I would guess.
 04 Q. Okay. You wouldn't disregard something in
 05 this document, correct?
 06 A. If it pertained to my job, no. It just
 07 depends on the situation, you know. There is a lot of
 08 different situations and a lot of different
 09 circumstances.
 10 Q. So --
 11 A. This particular document is not a policy, per
 12 se.
 13 Q. It's not a policy, per se. What do you mean
 14 by that?
 15 A. It's a guideline, as you can see on the front
 16 page where it's a guideline. It's within group
 17 parlance. It's, you know, kind of Post-it notes to help
 18 you along the way, but it's not mandatory.
 19 Q. So you don't think you need to follow --
 20 A. I didn't say --
 21 Q. -- a document called "BP Deepwater Cementing
 22 Guidelines"?
 23 A. Guidelines. They help guide you.

Page 172:02 to 172:07

00172:02 Q. (BY MR. THIBODEAUX) Somebody reduced this to
 03 writing and circulated it to well site leaders like
 04 yourself?
 05 A. Uh-huh.
 06 Q. So it would be something that you would
 07 follow, correct?

Page 172:09 to 172:10

00172:09 A. It would -- it would be something to help
 10 guide us.

Page 172:14 to 172:23

00172:14 Q. (BY MR. THIBODEAUX) Who sent you this
15 document?
16 A. You know, I don't recall.
17 Q. Do you recall when it was sent to you?
18 A. I do not.
19 Q. Do you recall ballpark, a year?
20 A. I really -- I mean, when I was in the Well
21 Site Leader of the Future deepwater program, but as far
22 as where it came from or pre April 20th or post, I
23 really don't -- don't remember.

Page 173:11 to 175:01

00173:11 Q. (BY MR. THIBODEAUX) Did you read it?
12 A. I scanned it, but...
13 Q. Have you received -- you received any training
14 from BP regarding the types of test results you should
15 have in hand as a well site leader before cementing
16 operations begin?
17 A. No, I have not.
18 Q. Are you aware of any policies that are in
19 place regarding what type cement test results should be
20 in hand of the well site leader before the cement job
21 starts?
22 A. No, I'm not.
23 Q. Okay. I think you testified earlier that
24 you're interested in looking at pump times and
25 compressive strengths; is that right?
00174:01 A. That's correct.
02 Q. Okay. And on the pump time -- on the pump
03 times, I think you said you -- you want to look at that
04 to ensure that you don't get your cement in your drill
05 string or whether that it's placed in the correct
06 location, correct?
07 A. That's correct. Like to set up in a correct
08 location.
09 Q. Regarding the compressive strengths, I think
10 what you told us is that you don't really know why you
11 look at that?
12 A. I said my preference. I like to look at it
13 just to see how hard the cement is going to get.
14 Q. Okay. It's not -- you look at it and see how
15 hard it's going to get. Do you look at that as a
16 function of time, or do you just want to see generally
17 how hard it's going to be?
18 A. Just generally that it will set up, you know.
19 Q. Okay. You don't understand compressive
20 strengths to be important with respect to -- to the
21 amount of time that should be given for the cement to
22 set up?
23 A. They're taken at different times, yes.
24 Q. Okay. When -- after a cement job is run when
25 is it okay to then proceed with pressure operations in
00175:01 the well, for example, a positive pressure test?

Page 175:04 to 175:08

00175:04 A. That's not a decision that a well site leader
 05 would make.
 06 Q. (BY MR. THIBODEAUX) That's not a decision a
 07 well site leader would make?
 08 A. No, it's not.

Page 175:10 to 176:03

00175:10 THE VIDEOGRAPHER: Five minutes.
 11 Q. (BY MR. THIBODEAUX) Do you know what
 12 compressive strengths the cement must reach before
 13 pressure operations are performed on a well after a
 14 cement job?
 15 A. I do not.
 16 Q. You've never been taught that by anyone at BP?
 17 A. I have not.
 18 Q. Does the term of art "wait on cement time"
 19 mean anything to you?
 20 A. Can you say that again?
 21 Q. Wait on cement time.
 22 A. What about it?
 23 Q. Does that mean anything to you?
 24 A. I -- just what it says, wait on cement.
 25 Q. Are there any BP policies in place regarding
 00176:01 the amount of time you should wait on cement before
 02 moving forward with operations?
 03 A. Not that I'm aware of.

Page 176:05 to 176:15

00176:05 Q. (BY MR. THIBODEAUX) Are there any BP policies
 06 in place regarding running a cement bond log after a
 07 production casing cement job is run in deepwater?
 08 A. Not that I'm aware of.
 09 Q. Have you ever been told that it's mandatory to
 10 run a CBL after such cement is run?
 11 A. Not that I can remember.
 12 Q. Are you aware of any post April 20th policies
 13 that have been implemented at BP regarding replacing mud
 14 in a rathole that is lighter than the cement above it in
 15 the shoe track?

Page 176:17 to 176:17

00176:17 A. I have not.

Page 176:25 to 177:10

00176:25 A. I did not.

00177:01 Q. Are you aware if there are any BP procedures
 02 or policies for conducting an MOC when a well site
 03 leader is going to be changed out?
 04 A. At that time I was not.
 05 Q. You -- are you aware of it now?
 06 A. I believe there is one now, yes.
 07 Q. So post April 20th there is a new policy in
 08 place where an MOC must be performed when a well site
 09 leader is going to change out?
 10 A. It is my understanding.

Page 184:23 to 184:24

00184:23 BY MR. HILL:
 24 Q. Good afternoon, Mr. Price, my name is Gavin

Page 188:02 to 188:20

00188:02 When plaintiff's counsel this morning was discussing
 03 with you the effects of inadequate centralization and do
 04 I understand your testimony that you agree that
 05 inadequate well centralization can cause channeling?
 06 A. There is a lot of things that can cause
 07 channeling.
 08 Q. I appreciate that. My question is whether or
 09 not you would agree that inadequate centralization can
 10 cause channeling?
 11 A. Based upon my limited experience I don't -- I
 12 don't have enough experience with the subject to give an
 13 accurate answer.
 14 Q. Okay. So as well site -- you're a
 15 full-fledged well-site leader now, correct?
 16 A. That's correct.
 17 Q. And you've already gone through all the
 18 training for a well site leader of the future program,
 19 correct?
 20 A. Yes.

Page 189:03 to 189:18

00189:03 A. I don't know.
 04 Q. So you're BP's well site leader going to be
 05 sent out in the Gulf of Mexico to drill holes, you don't
 06 have any appreciation for whether or not channeling can
 07 be caused by lack of centralization?
 08 A. That's correct.
 09 Q. Well, you also said that a cement job -- in
 10 the context of that same discussion you're quote -- I
 11 think I wrote this down, and you tell me if I'm wrong.
 12 You said you can always fix it later. Do you recall
 13 saying that?
 14 A. Yes.
 15 Q. Do I understand that answer to mean that when

16 a cement job does not isolate hydrocarbons, that you can
17 go back and do a remedial job?
18 A. That is correct.

Page 190:11 to 190:14

00190:11 Q. All right. My under- -- do you -- would you
12 agree with me that to the extent a primary cement job
13 channels, you can go back and do a remedial job?
14 A. Based on my limited experience, yes.

Page 191:02 to 191:15

00191:02 Q. So the fact you can do a primary cement job
03 and not isolate hydrocarbons, you can remediate that
04 with a remedial job, correct?
05 A. That's the hope.
06 Q. And the hope is that you actually remediate it
07 such as it does isolate hydrocarbons, correct?
08 A. That would be the objective, yes.
09 Q. All right. Now you can always go back and, I
10 want to get it right, you can always fix it later, all
11 right.
12 A. Yes.
13 Q. That presupposes that BP and the rig crew is
14 going to be able to maintain well control, correct?
15 A. Yes.

Page 191:24 to 192:01

00191:24 Q. Yeah. Would you agree with me that the
25 inability of a primary cement job to isolate
00192:01 hydrocarbons does not immediately equal a blowout?

Page 192:03 to 192:03

00192:03 A. I would agree with you.

Page 193:16 to 193:23

00193:16 Q. Okay. We're going in circles now, so let me
17 ask, did you not say that you can remediate a squeeze
18 job if hydrocarbon actually communicates through a
19 primary cement job?
20 A. Yes, you can.
21 Q. Okay. And you cannot do that without
22 maintaining well control, can you?
23 A. No, you cannot.

Page 194:21 to 195:08

00194:21 Q. Okay. I mean, you've been on the rig floor,

22 right?
 23 A. On which rig floor?
 24 Q. The Deepwater Horizon rig floor.
 25 A. I have.
 00195:01 Q. And so you know that there -- there is a
 02 driller's chair, correct?
 03 A. Yes.
 04 Q. How many monitors in front of the driller?
 05 A. I don't remember.
 06 Q. Three, does that sound right?
 07 A. Three, four, something like that. There are a
 08 few.

Page 195:12 to 195:13

00195:12 Q. Are you aware of whether or not Transocean has
 13 its own monitors for purposes of monitoring sensors?

Page 195:15 to 196:05

00195:15 A. I'm not sure how the sensors were laid out
 16 down in the actual hole.
 17 Q. (BY MR. HILL) Have you ever heard of the
 18 high-tech system?
 19 A. I have.
 20 Q. Okay. What is your understanding of that?
 21 A. That's a rig-owned monitoring system.
 22 Q. Okay. And do you understand that Transocean,
 23 the driller's primary responsibility is to monitor the
 24 well?
 25 MR. THIBODEAUX: Object; form.
 00196:01 A. The driller's primary responsibility is to
 02 monitor the well, yes, that's correct. That's why he's
 03 in that chair.
 04 Q. (BY MR. HILL) Okay. And would you agree
 05 that Sperry is basically provided as a backup set of

Page 196:07 to 196:14

00196:07 MR. THIBODEAUX: Object; form.
 08 A. I would not.
 09 Q. (BY MR. HILL) Okay. What would you think
 10 Sperry's job is?
 11 A. The primary responsibility is to monitor that
 12 well.
 13 Q. All right. You think it's Sperry's primary
 14 job is to monitor the well?

Page 197:03 to 197:12

00197:03 well.
 04 Q. Okay. So your testimony here today is you
 05 think that Tran- -- that Sperry is primarily responsible

06 for monitoring the well?
 07 A. Their primary responsibility inside of that
 08 shack is to monitor the well.
 09 Q. Okay. Then just curious, do you have any idea
 10 what the high-tech sensors provide, what -- what data it
 11 provides to the driller?
 12 A. Yeah, it provides all of the well data.

Page 201:15 to 202:11

00201:15 Q. Maintenance.
 16 I'm going to hand you what has been discussed,
 17 but I don't think we've actually marked it as an
 18 exhibit, so I'm going to do that now. This is the
 19 Deepwater Cementing Guidelines document. I'm going to
 20 mark it as Exhibit 3058, and I believe it's tab 5. Look
 21 right here. Let me hand it to you.
 22 This was the document you were discussing with
 23 Transocean's counsel --
 24 A. Uh-huh.
 25 Q. -- previously, correct?
 00202:01 A. Yes.
 02 Q. Now, is it fair of me to say that -- I think I
 03 heard you say that this was sent to you while you were
 04 actually a well site leader candidate in the -- in the
 05 deepwater program, correct?
 06 A. This is correct.
 07 Q. Okay. And is it -- is it fair for me to say
 08 that this was sent to you as part of an effort to
 09 further your understanding of deepwater cementing
 10 operations?
 11 A. I'd say it's a fair statement.

Page 202:23 to 203:06

00202:23 A. Someplace in the North Sea.
 24 Q. Okay. I'd like to ask you to turn to the
 25 second page of the Executive Summary, and I think you
 00203:01 actually pointed this out before, that it's your
 02 understanding that this document has been prepared to
 03 aid in the planning and execution of deepwater drilling,
 04 correct?
 05 A. Correct.
 06 Q. And it says that in the first sentence, right?

Page 203:14 to 204:25

00203:14 Q. I don't expect you to memo- -- memorize it.
 15 There's no way we can all memorize documents, but one
 16 thing I want to ask you is there are statements in here
 17 I want to find out if you recall reading them. One of
 18 them is the last sentence of the first paragraph, it
 19 says, "No slurry, however well designed or 'high-tech,'

20 will avoid the need for good mud displacement." Do you
 21 see that?
 22 A. Yes.
 23 Q. Did I read it correctly?
 24 A. Yes.
 25 Q. Do you agree with the statement?
 00204:01 A. That's opinion, probably by, you know, an
 02 expert in cementing, and I don't have enough experience
 03 to -- you know, in my five years with the company to
 04 attest one way or the other.
 05 Q. So with your lack of experience, you'd
 06 necessarily have to defer to who you said was an expert
 07 who prepared this document?
 08 A. Not necessarily this document, but somebody
 09 with more experience than myself, yes.
 10 Q. Do you have any reason to dispute that
 11 statement?
 12 A. I don't have a reason to.
 13 Q. Okay. You understand the importance of good
 14 mud displacement to a cement job, correct?
 15 A. I do.
 16 Q. All right. And, in fact, some of the things
 17 that contribute to good mud displacement are circulation
 18 prior to a cement job, correct?
 19 A. Yes.
 20 Q. All right. In fact, the purpose of
 21 circulating cement prior to a cement job is to, I guess,
 22 obtain uniform viscosity of the mud throughout the
 23 wellbore, correct?
 24 A. I just -- you know, to prepare the wellbore
 25 for the job.

Page 207:05 to 207:16

00207:05 necessarily think of it that way, no.
 06 Q. Why do you do bottoms-up circulation? Why
 07 does anybody circulate prior to a cement job?
 08 A. To prepare the wellbore.
 09 Q. Tell -- tell the Court what that means.
 10 A. In my mind, my personal opinion, that, you
 11 know, you want to get your mud properties right. You
 12 want to make sure there is no trip gas or anything like
 13 that left on the bottom that could interfere with the
 14 job.
 15 Q. Okay. So --
 16 A. So there's no -- no --

Page 207:22 to 208:23

00207:22 A. (Continued) You know, just getting the
 23 welding condition for a cement job.
 24 Q. (BY MR. HILL) Okay. What does it mean --
 25 let's back up. There are several reasons you want to
 00208:01 circulate prior to a cement job, right?

02 A. That's correct.
03 Q. Bring "tailings" up from the bottom of the
04 wellbore, right?
05 A. Yes.
06 Q. And you bring those to the rig for evaluation,
07 right?
08 A. Just to get them out of the hole.
09 Q. Get them out of the hole. One of the reasons
10 is you might want to see what type of gas might be
11 drafted in the mud, right?
12 A. That's correct.
13 Q. In fact, that would let you know whether or
14 not you got formation fluids or hydrocarbons seeping
15 into the mud as it sits, right?
16 A. It can, yes.
17 Q. And one of the things you'd want to make sure
18 you do is determine based on how much mud might -- how
19 much gas might be in that mud, whether you have to
20 adjust mud weight, right?
21 A. Oh, you know, either mud weight or cement
22 properties or whatever. But yeah, if there's gas in
23 there, you're going to make some adjustments.

Page 209:20 to 211:06

00209:20 Q. Do you know what an op SEM report is?
21 A. No, I don't.
22 Q. Okay. Let's turn to Page 6. And I am looking
23 at -- there is a paragraph on Page 6 about in the middle
24 that begins "Hole conditions." Do you see that?
25 A. Uh-huh.
00210:01 Q. All right. The last sentence of that
02 paragraph says -- well, let's just read it. The last
03 sentence says, "Unfortunately for the operator, the
04 slurry design is the main source of revenue for the
05 cementing service contractor who frequently has little
06 real control over the issues around achieving good mud
07 displacement."
08 Did I read that correctly?
09 A. Yes, you did.
10 Q. Do you disagree with that statement?
11 A. Do I disagree?
12 Q. Yes.
13 A. Yes.
14 Q. Why?
15 A. You know, opinions are laid out and concerns
16 are -- you know, BP has an environment that if there is
17 a concern or an issue with, you know, the good mud
18 displacement or previous circulating, you know, we
19 welcome those -- those concerns and those -- I don't
20 know how you -- those recommendations from our
21 contractors.
22 Q. Recommendations about what?
23 A. You know, if there is a concern for something,
24 you know. It's saying right here that the cementing

25 contractor has little control over issues achieve --
 00211:01 around achieving good mud displacement.
 02 Q. Right.
 03 A. My experience has been in the BP world, if
 04 you're a contractor, I've hired you, and there's
 05 concerns with the job I'm asking you to do, I expect you
 06 to voice those concerns and we'll discuss them.

Page 211:08 to 212:22

00211:08 A. So he -- so you do have control.
 09 Q. You think that Halliburton has some -- has
 10 control over the mud -- mud properties?
 11 A. They -- if there is a concern -- yeah, they
 12 know what they are. They get the reports.
 13 Q. That wasn't my question. My question was, do
 14 you think that Halliburton had control over the mud
 15 properties at Macondo?
 16 A. They get a copy of those properties, and, you
 17 know, if they don't voice concerns over them, how -- how
 18 are we to know?
 19 Q. Okay. Do -- how is -- how does B -- how does
 20 Halliburton have control over those mud properties?
 21 A. Because they know what they are.
 22 Q. Knowing what they are doesn't necessarily mean
 23 control over them, does it?
 24 A. That gives you -- with BP as the organization,
 25 they have the expectation to stand up.
 00212:01 Q. Okay.
 02 A. If you have a concern -- if you see something
 03 and you're Halliburton, you have a concern, you don't
 04 agree with it --
 05 Q. All right. Let's --
 06 A. -- that -- that's your control.
 07 Q. And this is what you were talking about about
 08 stop work authority, right?
 09 A. That's correct.
 10 Q. All right. Let's back up a minute. Stop work
 11 authority, let's talk about that a little bit. Do you
 12 have -- do you have an appreciation for whether or not
 13 pre-cement circulation of mud is necessary or promotes a
 14 good cement job?
 15 A. Yes.
 16 Q. It does?
 17 A. Yes.
 18 Q. Okay. Do you think that the inability to
 19 effectively displace mud has a potential to cause
 20 channeling?
 21 A. The inability to effectively displace mud
 22 causes channeling. It can, yes.

Page 213:03 to 213:21

00213:03 Q. Have you ever heard -- do you know about the

04 possibility of cement pushing past gelled mud?
05 A. Yes.
06 Q. Okay. And this is what I was trying to ask
07 you about earlier with -- if you have a mud of gel --
08 that doesn't have the gel strength broken and the cement
09 can push past it, it can create channeling, correct?
10 A. Yes, it can.
11 Q. Okay. And so the cir- -- pre-cement job
12 circulation of mud actually promotes a good gel,
13 correct?
14 A. It can help, yes.
15 Q. Now, you understood that as a well site
16 leader -- you understood that as a Well Site Leader of
17 the Future, correct?
18 A. Yes.
19 Q. And you understand that now as a well site
20 leader full-fledged at BP, right?
21 A. Yes.

Page 213:25 to 214:02

00213:25 As a well site leader, if you found out that
00214:01 somebody was doing less than a bottoms-up circulation,
02 would you exercise stop work authority?

Page 214:04 to 214:15

00214:04 A. If I found out that somebody was doing less
05 than a bottoms-up -- bot- -- bottoms-up to where?
06 Q. (BY MR. HILL) Bottoms-up circulation, to me,
07 I -- that's the bottom of the casing all the way to the
08 rig floor.
09 A. Would I -- would I object, no.
10 Q. Okay. How about -- by "bottoms-up" I assume
11 you're talking about different definitions. A full
12 length of casing, would you exercise stop work authority
13 in that situation?
14 A. It -- it depends on the situation, what's
15 happening.

Page 219:03 to 219:13

00219:03 Q. Do you think the well site leaders are
04 critical employees on rigs?
05 A. I think so, yes.
06 Q. Okay. Do you think that they ought to be
07 expected to have an understanding of the typical
08 operations that occur on a rig?
09 A. Yes.
10 Q. Do you think centralizers, anything less than
11 a typical -- that the decision about how many
12 centralizers to use is anything less than a typical
13 operational decision on a rig?

Page 219:15 to 220:11

00219:15 A. That type of decision doesn't happen on a rig.
 16 That decision is not made by a well site leader.
 17 Q. (BY MR. HILL) Do you have any input into the
 18 decision as a well site leader?
 19 A. As a well site leader with my level of
 20 experience, no, I do not.
 21 Q. Okay. Do you have any input into how much mud
 22 is going to be circulated prior to a cement job?
 23 A. Again, as a well site leader of my experience
 24 level, not -- not much, no.
 25 Q. Have you seen other well site leaders have
 00220:01 input in the decisions about how much the volume of mud
 02 to circulate prior to a cement job?
 03 A. I have.
 04 Q. All right. So you understand that when you
 05 actually become a well site leader, this is one of the
 06 things that you're going to have input into, right?
 07 A. Not at my experience level.
 08 Q. Okay. Please turn to Page 7 of Exhibit -- oh,
 09 wait, did we mark that? I'm sorry. Give me that number
 10 again.
 11 A. 3058. Thank you.

Page 221:06 to 221:23

00221:06 Q. -- whoever authored it, lists some common
 07 misperceptions, right?
 08 A. Yes.
 09 Q. All right. Now, I want you to look at the
 10 last one, please.
 11 A. Uh-huh.
 12 Q. It says, "Slurry design is more important than
 13 getting the optimum wellbore conditions for cementing -
 14 good hole, good fluid (mud) properties, good
 15 centralization, good displacement (physical &
 16 chemical)."
 17 Did I read that right?
 18 A. Yes, you did.
 19 Q. So whoever authored this document was
 20 communicating to whoever was reading it that one of the
 21 misperceptions is that slurry design is more important
 22 than optimum well conditions for cementing, correct?
 23 A. That is correct.

Page 222:04 to 222:07

00222:04 Q. Do you agree or disagree that it is a
 05 misconception that slurry design is more important than
 06 getting the optimum wellbore conditions for cementing?
 07 A. I disagree.

Page 222:23 to 223:02

00222:23 Q. Did you tell your mentor, or whoever your
24 coach was in the program, that you disagreed with some
25 of the material that was sent to you for purposes of
00223:01 furthering your learning?
02 A. I did not.

Page 223:21 to 224:13

00223:21 Q. (BY MR. HILL) I've handed you a document
22 that's entitled Gulf of Mexico Recommended Practice for
23 Cement Design and Operations in Deepwater GoM, correct?
24 A. That's correct.
25 Q. We've marked that as Exhibit --
00224:01 A. 3059.
02 Q. Thank you, sir, 3059. Have you ever seen this
03 document before?
04 A. I have not.
05 Q. Okay. While you were in the Well Site Leader
06 of the Future program, did you ever hear that BP had
07 hired somebody to prepare a cementing best practices
08 document for BP?
09 A. I had not.
10 Q. Did you ever attend any types of training in
11 connection with your Well Site Leader of the Future
12 program specific to cementing jobs and operations?
13 A. I did.

Page 224:24 to 225:01

00224:24 Q. Okay. Have you ever heard of the name of
25 Robert Beirute?
00225:01 A. No.

Page 225:04 to 225:19

00225:04 Q. Okay. Now, do you have an understanding for
05 how technical guidance documents -- and I'm talking
06 about it could be ETPs or recommended practices or
07 anything, how those documents are actually prepared,
08 approved, and disseminated within BP?
09 A. No.
10 Q. Okay. Have you ever seen ETPs?
11 A. I haven't.
12 Q. And you understand that there is this box down
13 here at the bottom of it that identifies someone who
14 prepared it, someone who reviewed it, someone who
15 approved it?
16 A. If there is a document control box, yes.
17 Q. Okay. Is that -- that's what it's -- that's
18 what it's called?
19 A. That's what I call it.

Page 226:10 to 226:21

00226:10 Q. (BY MR. HILL) But I want to find out if you
11 know anything about that.
12 A. If I know anything about this document --
13 Q. Yes.
14 A. -- being issued?
15 Q. Yeah.
16 A. I do not.
17 Q. Okay. Do you know any -- do you know anything
18 about documents that BP may have been preparing to train
19 drilling engineers or well site leaders about cementing
20 best practices?
21 A. I do not.

Page 227:01 to 227:25

00227:01 Do you understand that --
02 A. What page?
03 Q. Looking at Page 6 of 36, but I'm just going to
04 ask you about principles as opposed to documents since
05 you don't know, you've never seen the document.
06 For purposes of zonal isolation, do you have
07 any appreciation for whether or not a cement job ought
08 to isolate not only hydrocarbon-bearing sands, but also
09 water-bearing sands?
10 A. So I have an abridged version of the question,
11 do I have an appreciation for that cement should provide
12 isolation? The answer is yes.
13 Q. Okay. And when we say provide isolation, do
14 you agree that cement ought to isolate not only
15 hydrocarbon-bearing sands but even water-bearing sands?
16 A. Yes.
17 Q. I mean, the purpose of the cement is to
18 isolate formation fluids, not just hydrocarbon, correct?
19 A. Yes.
20 Q. Okay. I have seen in several documents a
21 phrase, and I wonder if you have heard it and can
22 explain it to me. It's called zones of interest. What
23 is your understanding of what zones of interest is, if
24 you have an understanding?
25 A. I do not.

Page 228:06 to 228:24

00228:06 Q. Do you know as a well site leader what BP's
07 recommended practice was prior to April 20th, 2010
08 regarding the volume of mud that should be circulated
09 prior to a cement job?
10 A. I do not.
11 Q. Have you ever heard the term bottoms up
12 circulation?
13 A. I have.

14 Q. Do you have an un- -- any -- do you know
15 whether or not BP ever had a recommended practice for
16 circulating at least one full bottoms up?
17 A. I do not know.
18 Q. How about two full bottoms up?
19 A. I don't know.
20 Q. Has there ever -- have you ever been part of
21 any discussions in connection with your training as a
22 Well Site Leader of the Future program discussing how
23 much mud should be circulated prior to a cement job?
24 A. I have not.

Page 229:14 to 229:21

00229:14 Q. Okay. Do you think before you go out on a rig
15 in the Gulf of Mexico to do deepwater drilling, that you
16 would like some additional training on how much mud
17 should be circulated prior to a cement job?
18 A. I'm a young guy within this company. I'll
19 take all the training they want to give me.
20 Q. Okay. But you haven't had it yet, right?
21 A. I have not.

Page 230:02 to 230:09

00230:02 Q. All right. In this document that I -- that
03 has a BP logo on it that we -- Exhibit 3059, there's
04 a -- there is a phrase in there that says, "It's best to
05 circulate a minimum of two bottoms up before starting to
06 pump the cement job." Have you ever heard of anybody at
07 BP ever tell you that you ought to circulate two bottoms
08 up prior to a cement job?
09 A. I have not.

Page 232:21 to 233:05

00232:21 In your -- and I'm asking this -- since the
22 incident, you have been both a Well Site Leader of the
23 Future candidate as well as a well site leader, correct?
24 A. That is correct.
25 Q. All right. So anytime since the incident on
00233:01 April 20th, 2010, have you been in -- received any type
02 of instruction that is labeled lessons learned or
03 something to that effect, where the lessons of Macondo
04 have been discussed?
05 A. I have not.

Page 234:22 to 235:03

00234:22 A. It doesn't, no.
23 Q. So onshore, wherever you happen to be before
24 get on a rig, you haven't received any instruction on
25 lessons learned or things that -- that we could have

00235:01 learned at Macondo to avoid another Macondo-like
02 incident happening again, have you?
03 A. I have not.

Page 241:06 to 241:22

00241:06 A. That's fine.
07 Q. Okay. Mr. Price, I -- I understand that you
08 had a limited amount of involvement in connection with
09 the Macondo well during, I guess it was early April of
10 2010, and that was for about a ten-day period; is that
11 correct?
12 A. That's correct.
13 Q. Mr. Price, during that period did you -- or
14 during any other period did you have any con- -- contact
15 or communicate with anyone from MOEX?
16 A. No, I didn't.
17 Q. Okay. Are you aware of anyone else having any
18 communications with MOEX regarding the Macondo well?
19 A. I don't know.
20 Q. I take it, then, that you're not aware of any
21 data being communicated to MOEX regarding the Macondo
22 well; is that correct?

Page 248:22 to 249:17

00248:22 Q. During that last hitch that you were on the
23 Deepwater Horizon on Macondo, you -- there was a -- an
24 experience of a significant loss of returns, I think
25 you've testified to. Am I wrong about that?
00249:01 A. No.
02 Q. Okay. What did that indicate to you -- and I
03 apologize to you if I'm repeating anything. What did
04 that indicate to you was going on?
05 A. The mud weight was too high.
06 Q. Okay. And that was causing an -- an -- a
07 overbalance?
08 A. Overbalance is not a term we use when
09 describing lost returns.
10 Q. Okay.
11 A. I would -- you know, too much hydrostatic for
12 the formation, you know.
13 Q. And what -- why was that bad?
14 A. Because the -- couldn't keep the hole full.
15 You know, the weight of the fluid would just break down
16 the rock and you'd lose -- we were losing the drilling
17 mud.

Page 250:16 to 251:02

00250:16 Q. (BY MR. PALMINTIER) You testified earlier
17 today that as we sit here today you're anticipating
18 substantial changes in procedures and operations in the

19 Gulf of Mexico in your role as well site leader in --
 20 in -- for BP, correct?
 21 A. That's my personal opinion, yes.
 22 Q. And -- but you didn't just come up with that
 23 opinion in the absence of facts. The fact is that
 24 there, for example, have been communications with you
 25 from higher up that things are going to change with the
 00251:01 new leadership at BP?
 02 A. That is correct.

Page 251:15 to 251:20

00251:15 Q. You haven't heard that safety is -- is taking
 16 a more predominant role in the analysis, for example, of
 17 job performance?
 18 A. In my own observations of working for the
 19 company, I think safety has always taken a dominant
 20 role.

Page 252:02 to 252:09

00252:02 speak for those guys.
 03 Q. (BY MR. PALMINTIER) I'm not asking you to
 04 speak for them. I'm asking you to tell the Court what
 05 you have observed as a result of your position with BP.
 06 What have you observed, a change in safety or not,
 07 increased concern for safety or not?
 08 A. They have increased their personnel in the
 09 safety area, yes.

Page 252:24 to 253:02

00252:24 Q. There has been a change?
 25 A. No. The respect for human life and risk
 00253:01 associated with it has been paramount in our decisions
 02 from the day I walked in the door at BP.

Page 263:25 to 265:09

00263:25 know, a different segment of the business.
 00264:01 Q. Okay. And so the reverse is true, that you
 02 really didn't look at the Deep- -- the -- in your
 03 training, you didn't look at the Texas City disaster?
 04 A. We have looked at it, but just very briefly.
 05 Q. Okay. Are you aware that there was loss of
 06 life and -- and injury --
 07 A. Yes.
 08 Q. -- in that accident?
 09 A. Yes.
 10 Q. Are you aware that there was an environmental
 11 impact of that -- an adverse environmental impact as a
 12 result of that?
 13 A. No, I was not.

14 Q. Okay. And were you made aware that there
 15 were -- there was a six-point plan that BP made a
 16 commitment to follow after the 2005 event?
 17 A. I don't recall a six-point plan, no.
 18 Q. So no one has -- in your training has ever
 19 taught you about the six-point plan?
 20 A. They may have. I just don't remember.
 21 Q. One of the aspects of the six-point plan was a
 22 promise to focus on staff training and development in
 23 safety operations. You haven't been made aware of that
 24 promise, obviously?
 25 A. Like I said, I don't remember being made aware
 00265:01 of it.
 02 Q. Do you know what an MAR is?
 03 A. A what?
 04 Q. MAR?
 05 A. MAR? No, I don't.
 06 Q. Okay. Are you aware of what became of the
 07 six-point plan as time passed since its inception?
 08 A. No, I'm not. That -- that happened before my
 09 employment, so...

Page 266:08 to 266:11

00266:08 can only speak to what little bit I know about.
 09 Q. Okay. Well, I mean, did they make a
 10 commitment to increase staff training and development in
 11 safety operations; do you know?

Page 267:17 to 268:07

00267:17 me, and I'm not referring to anything except language.
 18 What I'm getting at is there's really been no
 19 change in the -- in the culture for safety based on your
 20 experience as a trainee and then as -- now as a
 21 full-time well site leader, has there?
 22 A. I think me personally, I haven't changed my
 23 goals. I've always held safety in a high regard.
 24 Q. Okay.
 25 A. The group as a whole -- you know, I don't
 00268:01 speak for London, I don't -- don't speak for Houston. I
 02 don't know what kind of changes or where -- where they
 03 held safety previous to the incident.
 04 Q. But you do know that changes are coming and
 05 that one of the focuses of those changes is going to be
 06 increased safety?
 07 A. I'd say that's a fair statement.

Page 268:21 to 269:09

00268:21 Q. Okay. And I'm going to get you to look at
 22 that which we -- we will offer as a -- we will label
 23 exhibit next, which I think is 3060. Ask you to -- and

24 I'm going to place the exhibit stamp on the Document
25 Produced Natively sheet, which is just above the
00269:01 document number, which is BP_HZN_2179MDL02311658.
02 And I'm going to ask you to look at these
03 pages. There's seven of them. They're marked in globo.
04 And glance at them and then tell me whether this is a
05 reflection of your communication with various
06 individuals, especially, I think, Michael Olinger during
07 a period of time reflected in the -- in one of the
08 margins.
09 A. I'd say that's a fair statement, yes.

Page 274:08 to 274:16

00274:08 it's for anybody to speculate what the motives are.
09 Q. Yes, but your response was in response to him
10 saying that it's a political theater was "dog and pony
11 show"?
12 A. That's correct.
13 Q. So you agreed with him that this had -- that
14 test -- that testifying before the Commission or before
15 the Marine Board was merely theater, correct?
16 A. I agree with him that Tony Hayward before

Page 277:09 to 277:20

00277:09 Q. Okay. All right. Now Matt says, "Pretty hard
10 to believe that it went 40 minutes unchecked." What was
11 he talking about there, if you know?
12 A. In the Bly report I believe there was a
13 determination made by the people in the report that the
14 well flowed for 40 minutes before anybody noticed.
15 Q. And you agreed with him that it was pretty
16 hard to believe, didn't you?
17 A. Based on my previous experience, that's a long
18 time. But then, again, you know, I wasn't there that
19 night. So I'm not -- you know, I don't have the -- the
20 authority to point fingers.

Page 278:06 to 278:23

00278:06 Q. Yes. And when -- then the next line is Matt
07 again initiating saying, "The report said it probably
08 just flowed through the seal assembly." Do you see
09 that? He goes on --
10 A. Uh-huh.
11 Q. -- to complete the sentence: "Since it wasn't
12 locked down due to thermal expansion and closed when the
13 flow stopped." Do you see that?
14 A. Yes.
15 Q. All right. And then you say in response --
16 would you read your response?
17 A. "Seems like everyone is pointing to the shoe

18 track and float collar now."
 19 Q. Okay. And what does Matt say in response to
 20 that?
 21 A. Let's see. I'm mixed up here.
 22 Yea -- "Yeah the real question is why
 23 didn't they work or why didn't they catch it?"

Page 282:04 to 283:09

00282:04 now -- now what is the event we're talking about?
 05 Q. No, I'm -- I mean before the Macondo well,
 06 because after it, of course, things changed, as you
 07 pointed out. I mean before the well blew out, was there
 08 a way for BP -- did BP have a plan for dealing with the
 09 release of hydrocarbons into the Gulf? Do you know?
 10 A. I do not know.
 11 Q. And as a well site leader, you were not
 12 informed of whether there was a plan for mitigating such
 13 a disaster, were you?
 14 A. I was not informed.
 15 Q. Now, in the next series of notes, Matt and you
 16 are discussing, I believe, the blowout preventer. If
 17 you would look at beginning with the 1:39 message where
 18 it says, from Matt, I guess you saw where [sic] the
 19 solenoid valve on the yellow pod was mentioned.
 20 A. Yes.
 21 Q. Okay. Well, first of all, what -- what is the
 22 solenoid on the yellow pod?
 23 A. I'm not sure which -- which solenoid valve
 24 that's in reference to. There's a lot of them on there.
 25 Q. Okay. But you -- you say you saw it. In
 00283:01 response you say, "Yeah."
 02 A. Yes, I do say "Yeah."
 03 Q. Right. And then he says, Now that they
 04 released that information I can tell you it was true
 05 although they were generous -- they were generous with
 06 the non OEM comment. Do you know what that means?
 07 A. I do not.
 08 Q. Doesn't it reflect that he knew that this
 09 solenoid valve on the yellow pod was defective?

Page 283:11 to 283:20

00283:11 A. I don't have any knowledge of what he -- he
 12 was or was not privy to post Macondo or prior --
 13 pre-Macondo.
 14 Q. (BY MR. PALMINTIER) Well, then, why did you
 15 say, "Now that they have the whole stack on surface I
 16 don't think it will be long before they start to figure
 17 out it wasn't up to snuff"? You felt that the BOP stack
 18 was not up to snuff; isn't that true?
 19 MR. LANCASTER: Object to form.
 20 A. That's true.

Page 284:03 to 284:06

00284:03 What was Matt Akins' role? Was he a well site
04 leader or what?
05 A. He was another Well Site Leader of the Future
06 classmate.