

Deposition Testimony of:

Carl Taylor

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Page 7:08 to 7:10

00007:08 CARL BARRETT TAYLOR,
09 having been first duly sworn, testified as
10 follows:

Page 7:13 to 7:18

00007:13 Q. Would you state your full name
14 and your residence address for the record,
15 please.
16 A. Carl Barrett Taylor,
17 [REDACTED]
18 [REDACTED]

Page 12:01 to 15:08

00012:01 One of the questions that I've
02 had is what your job actually was when you
03 worked for Transocean. And we'll get into
04 some background. But what was your actual
05 job title?
06 A. Radio operator.
07 Q. But were you actually a radio
08 operator?
09 A. No. I did not have a radio.
10 Q. All right, sir. Did they -- can
11 you explain that to us. I mean, they just
12 gave you that name, and then brought you in
13 in another capacity; is that correct?
14 A. Well, the title radio operator
15 is consistent with all the rigs. The radio
16 operator holds a radio operator license --
17 Q. Okay.
18 A. -- and is radio operator in name
19 only. The radio operator handles the onboard
20 personnel as far as when they come on board
21 and generating a POB daily.
22 Q. What's a POB?
23 A. Personnel on board.
24 Q. Okay.
25 A. I do the payroll. I do
00013:01 whatever -- if the OIM -- whatever he may ask
02 me to do as far as paperwork, I do that. I
03 assign bunks, generate helicopter manifests
04 for personnel -- for Transocean personnel.
05 Q. All right, sir.
06 A. I make airline bookings and
07 hotel rooms for personnel coming and going
08 from the rig for Transocean. For personnel
09 on their days off going to training, I would
10 set up the hotel rooms and make travel
11 reservations for them going to training.
12 Q. All right, sir.

13 A. That's pretty much it.
14 Q. You can understand our curiosity
15 about them -- about your label as radio
16 operator. Do you know what the history of
17 that is? Was that originally -- this is
18 where --
19 A. Somewhat --
20 Q. -- I'm going to remind you about
21 our commitment to one another. I'm probably
22 talking too much, but let me finish my
23 question.
24 A. Oh, I'm sorry. I thought you
25 did.
00014:01 Q. That's okay. No, that's all
02 right.
03 Do you know the history of it?
04 Was it at one time actually a radio operator,
05 and then it became this person who had
06 responsibility for transportation and onboard
07 checklists and so forth?
08 A. As far as I know, the -- they
09 were -- we were called radio operators to
10 have another person on board with a radio
11 operator license. You know, I guess maybe
12 there is a certain number of personnel
13 required to be on the vessel with a radio
14 operator's license. And that was another way
15 of getting a licensed person on board.
16 Q. And so I guess you are a
17 licensed radio operator; is that correct?
18 A. I do have a license.
19 Q. Did you have that before you got
20 the job with Transocean?
21 A. No.
22 Q. So they trained you and you took
23 a test and you got your license; is that
24 correct?
25 A. That's correct.
00015:01 Q. All right. We'll get to that in
02 a moment.
03 Do you have another label on
04 the -- on the vessel? In other words, do
05 they sometimes call you something other than
06 radio operator, like travel agent or
07 something along those lines?
08 A. Well -- no, no.

Page 16:22 to 29:11

00016:22 educational background?
23 A. I'm a high school graduate and
24 several training certificates, you know,
25 that -- for the fire department in safety and
00017:01 hazardous material.
02 Q. Yes, sir. And we're going to

03 get to your work history in a moment.
04 But those training certificates
05 arose out of your work with the fire
06 department?
07 A. Yes.
08 Q. Which fire department was it?
09 A. Jackson Fire Department, City of
10 Jackson, Mississippi.
11 Q. Let's talk about your work
12 history. When you got out of high school,
13 did you go immediately into the job market?
14 A. Yes, I did.
15 Q. Just give us a thumbnail sketch
16 of -- I get the impression that you spent the
17 majority of your adult employment history as
18 a -- as a fireman and fire chief, correct?
19 A. Correct.
20 Q. But before that, is there
21 something else you did?
22 A. I worked -- before I went to
23 work for the fire department, I worked at --
24 for a flooring company at one time. I guess
25 that was the only permanent job I had, you
00018:01 know, which was a couple of years.
02 Q. Yes, sir.
03 A. And I went to work for the fire
04 department in 1970.
05 Q. In 1970. Okay.
06 And that was for Jackson?
07 A. Jackson, yes.
08 Q. And you stayed with Jackson
09 throughout until your retirement?
10 A. I did.
11 Q. And what year did you retire?
12 A. 1994.
13 Q. And what rank had you achieved
14 when you retired in 1994, sir?
15 A. I was captain, acting as the
16 district chief.
17 Q. Okay. And what district was
18 that?
19 A. District 1, and I also worked in
20 District 3.
21 Q. And that's a district
22 subdivision of the Jackson Fire District; is
23 that correct?
24 A. Correct.
25 Q. And so captain and district
00019:01 chief in District 1, but you also worked in
02 District 3?
03 A. Correct.
04 Q. And those -- how many years were
05 you a district chief, do you recall?
06 A. Probably three -- three years.
07 Q. Now, in '94 did you -- or

08 thereabout did you retire or did you change
09 careers? What happened?
10 A. Well, I continued to work part
11 time. You know, as most firemen, I always
12 had part-time jobs.
13 Q. Yes.
14 A. And I worked part time for
15 Continental Airlines, Ryder Truck Lines,
16 Continental Express, American Eagle,
17 AMR Corporation.
18 Q. Did any of those part-time jobs
19 while you were a fireman involve the oil
20 field or the oil exploration business?
21 A. No.
22 Q. Okay. So that when you went to
23 work for Transocean, was that your first job
24 in the oil field?
25 A. Yes.
00020:01 Q. All right. So between 1994 and
02 the time you went to work for Transocean,
03 were you working part-time jobs?
04 A. Yes, uh-huh.
05 Q. Was Transocean your first and
06 only job in the oil field?
07 A. Yes.
08 Q. What year did you go to work for
09 Transocean?
10 A. 2007.
11 Q. Tell me about how that came
12 about.
13 A. I have -- a friend's sister that
14 is a radio operator --
15 Q. Okay.
16 A. -- for Transocean. And she had
17 contacted my friend and want -- you know,
18 wanted to know if she knew of anyone that
19 might be interested, and more or less
20 explained what the radio operator did. And
21 my friend contacted me, and I filled out an
22 application.
23 Q. All right. Now, had you been a
24 ham operator or anything like that before?
25 A. No.
00021:01 Q. So this is just a completely new
02 career for you, correct?
03 A. Well, correct. Of course, I
04 knew going into it that -- that the position
05 of radio operator did not involve operating
06 radios on a daily basis.
07 Q. Okay. Understood.
08 A. Let's look -- let's magnify a
09 little bit on the work that you did for
10 Transocean, first of all, from 2007 through
11 whenever -- strike that.
12 A. Are you still working for

13 Transocean?
14 A. No, I don't --
15 Q. From 2007 until the time you
16 stopped working for Transocean, were you
17 always in this capacity that we've been
18 talking about now of radio operator?
19 A. I was.
20 Q. Okay. And what was your first
21 assignment as a radio operator?
22 A. On the ENTERPRISE. I was
23 training.
24 Q. Okay. How long?
25 A. Maybe a month, month and a half.
00022:01 Q. And where did you go from there?
02 A. To the HORIZON.
03 Q. What was the month that you
04 became a member of the crew of the DEEPWATER
05 HORIZON?
06 A. March of '07.
07 Q. You went there as radio operator
08 and continued through the time of her sinking
09 as radio operator; is that correct?
10 A. Correct.
11 Q. Did you ever leave the DEEPWATER
12 HORIZON to go to another assignment on
13 another vessel during --
14 A. No. Sorry.
15 Q. -- during those years?
16 A. No.
17 Q. Okay. See, I did it, too. It's
18 all right.
19 Do you remember who actually
20 hired you for your work at Transocean? For
21 example, did you go to Houston and interview
22 and --
23 A. I --
24 Q. Go ahead.
25 A. I did. Danny -- the person that
00023:01 actually hired me was Danny -- I can't
02 remember his last name.
03 Q. It's okay.
04 A. All right.
05 Q. And these are just details that,
06 you know, are designed to put my opponents
07 and my colleagues to sleep. But I just
08 wanted -- this is just for completeness'
09 sake. If you don't remember somebody, this
10 isn't a test of your memory.
11 A. Okay.
12 Q. We have more important things to
13 talk about.
14 So this Danny fellow actually
15 interviewed you, and then you got word that
16 you had been hired. Is that a fair
17 representation of what happened?

18 A. He was among two interviewers,
19 and I don't -- when I went to Houston, I
20 don't remember who the other one was. But I
21 went out there -- when I went out there, I
22 went out there for the interview and also a
23 physical.

24 Q. Now, when you first went aboard
25 the DEEPWATER HORIZON, do you remember what
00024:01 company she was working for?

02 A. BP.

03 Q. And was she working for BP
04 throughout the remainder of the time that you
05 were aboard her as a member of her crew?

06 A. Yes.

07 Q. Okay. You mentioned that you
08 received radio training. Did you also --
09 were you also requested and required to
10 receive your seaman's papers? Did you --
11 were you an able-bodied seaman or anything
12 like that?

13 A. No.

14 Q. Okay. In March of 2007, then,
15 you went aboard the DEEPWATER HORIZON. Do
16 you remember who was your immediate
17 supervisor for Transocean?

18 A. The OIM.

19 Q. We know that Jimmy Harrell was
20 the OIM at the time of the explosion and
21 sinking. Was he also the OIM that you went
22 to work for in '07?

23 A. He was one of them, yes.

24 Q. Of course. Who were the others?

25 A. The other one was Van Williams.

00025:01 Q. And Mr. Williams did not -- did
02 he continue to work, or did he get replaced
03 by someone else?

04 A. He was replaced by Rodney Ryan.

05 Q. All right. And was -- were
06 there any other OIMs that you recall other
07 than Mr. Harrell and Williams and Ryan?

08 A. No.

09 Q. Okay. Now, did you actually
10 work hand in glove -- let me -- did you work
11 side by side with the OIMs for Transocean, or
12 did you work with someone else?

13 A. Actually, I worked on my own.
14 They were my supervisors.

15 Q. Yes.

16 A. And I answered to them.

17 Q. All right. We'll get back to
18 that in a moment.

19 You know, the radio training
20 that you talked about, do you remember where
21 you took that training?

22 A. Orlando.

23 Q. Okay. The job that you
24 described, it sounds like you were fairly
25 much a jack-of-all-trades, at least in one
00026:01 general area. You dealt with transportation
02 a lot, correct?
03 A. Correct.
04 Q. Did you actually book helicopter
05 transportation to and from the rig?
06 A. No. I would complete a manifest
07 for the personnel for Transocean personnel --
08 Q. Okay.
09 A. -- and turned it over to BP.
10 Q. So who would communicate with
11 you as a radio operator who had these other
12 functions? Who with TO would communicate
13 with you to tell you who you needed to add to
14 the manifest?
15 A. Well, on a regular basis the
16 Transocean personnel -- I would know the crew
17 change, and I would automatically add them.
18 If someone extra had to be added, usually the
19 OIM would, you know, tell me that, or either
20 the rig manager would call and have people --
21 want people added to the manifest for
22 Transocean.
23 Q. Who was the rig manager?
24 A. John Keeton was the rig manager
25 when I first went out there. Paul Johnston
00027:01 was the last rig manager.
02 Q. And who did he work for?
03 A. Transocean.
04 Q. When you went aboard the
05 DEEPWATER HORIZON for the first time, do you
06 remember where she was operating?
07 A. I don't.
08 Q. Can you give me a sketch? Not a
09 test of your memory. Of course, these are
10 things that can be demonstrated empirically
11 from records. But can you give me a general
12 sketch about the locations that you were in
13 while you were aboard and doing your job for
14 the DEEPWATER HORIZON?
15 A. The different wells? Is that
16 what --
17 Q. Yeah.
18 A. Kodiak and, of course, the last
19 one. There was more than that. I just -- I
20 don't recall the names of them.
21 Q. That's no problem. The one
22 right before Macondo was Kodiak? Do you
23 recall?
24 A. It could have been, yes.
25 Q. Okay. What kind of hitches did
00028:01 you have? Were you working 14 on and 14 off,
02 7 and 7? What were your --

03 A. 21 days on, 21 off.
04 Q. 21 and 21.
05 Now, your -- your Transocean
06 drilling crew and other employees, were they
07 also on a 21 and 21, or were they on a 14 and
08 14?
09 A. Everybody was 21 and 21.
10 Q. Okay. Was there a code radio
11 operator? Were there other guys that you
12 traded tours with? In other words, did you
13 work 12 hours and then somebody else would
14 come on and work 12, or were you the only
15 one?
16 A. I was the only one at the time.
17 Or, you know, on my 21-day hitch I was the
18 only radio operator.
19 Q. Understood. So what were your
20 hours?
21 A. 6:00 a.m. to 6:00 p.m.
22 Q. Okay. So based on what you've
23 described to us, these do seem like kind of
24 regular hours type jobs that you had. Is it
25 fair to say that there was just no need for a
00029:01 second radio operator, that things got done
02 during those 12 hours?
03 A. Yes.
04 Q. Okay. Who were the other radio
05 operators that traded shifts with you -- I'm
06 sorry -- hitches with you; that is, the
07 21-day hitches?
08 A. Andy Williams, Herman Williams,
09 was my relief man.
10 Q. Do you know where he lives?
11 A. He lives in Mississippi now.

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00030:10 Did you actually have an office
11 as the radio operator aboard the DEEPWATER
12 HORIZON --
13 A. I did.
14 Q. -- a physical office?
15 A. Yes.
16 Q. Okay. And can you show us just
17 generally where that office was.
18 A. Okay. It was right -- right
19 there -- actually, it was -- there should be
20 a room here --
21 Q. Yes, sir.
22 A. -- that should be -- as you come
23 into the -- what we call the ready room,
24 which was -- the personnel when they'd come
25 off the helicopter would assemble in the
00031:01 ready room to sign in, you know, and my
02 bedroom would have been right next door to

03 it.
04 Q. Now, I was asking about where
05 you officed, not where you were quartered.
06 Your office and your bedroom were in the same
07 location. Is that correct?
08 A. Not in the same room but the
09 same location, yes.
10 Q. Why don't you just draw a circle
11 around it. Again, I'm just trying to get a
12 general idea about where you worked and where
13 you quartered.
14 A. Okay. That -- that would be my
15 office.
16 Q. Yes, sir. Now, what about where
17 you slept?
18 A. The room right next to it would
19 be my --
20 MR. PALMINTIER: Let the record reflect
21 that what we're going to introduce as Exhibit
22 3686, a rough schematic of the rig, is -- the
23 witness has drawn two circles.
24 (Exhibit 3686 was marked.)
25 Q. (BY MR. PALMINTIER) And if you
00032:01 would, Mr. Taylor, I'm going to draw a line
02 out to -- if counsel doesn't mind, and here.
03 Which one of those two -- is this the office?
04 A. Correct, that's the office.
05 MR. ITKIN: Why don't you just write
06 "office" in there.
07 Q. (BY MR. PALMINTIER) That's -- I
08 was --
09 A. Okay.
10 Q. -- going to get you to do that.
11 MR. ITKIN: And then write where the
12 quarters.
13 Q. (BY MR. PALMINTIER) Now, the
14 office that's in 3686, was that where you
15 spent the majority of your time, or did you
16 work elsewhere aboard the DEEPWATER HORIZON?
17 A. The office in 3686?
18 Q. I'm sorry. That's the exhibit
19 number.
20 A. Oh, okay. No. I spent -- I
21 worked in the office --
22 Q. Okay.
23 A. -- 12 hours.
24 Q. Okay.
25 A. Well, I mean, I would leave the
00033:01 office, but -- I didn't sit there the whole
02 time.
03 Q. Understood. I mean, among other
04 things, you would go to mess to have meals,
05 correct?
06 A. Correct, uh-huh.
07 Q. Did you ever go to the drill

08 floor?
09 A. Occasionally I would.
10 Q. Based on your previous
11 testimony, I'm assuming that you are not
12 trained in drilling, correct?
13 A. I am not.
14 Q. And that you are not trained in
15 well control; is that correct?
16 A. No, I am not.
17 Q. Nor have you received training
18 in blowout preventers?
19 A. No.
20 Q. Analysis of mud?
21 A. No.
22 Q. Cement and the cementing process
23 of cementing casing and so forth, none of
24 that?
25 A. No.
00034:01 Q. Okay. Yours was a different
02 function than had to do with the drilling
03 components of this vessel, correct?
04 A. Correct.
05 Q. All right. So if you did find
06 yourself in some of the drilling areas, some
07 of the areas where work pertaining to
08 drilling and well control and so forth took
09 place, that would just be a casual visit of
10 that kind; is that correct?
11 A. Yes.
12 Q. However, did you make
13 friendships and develop relationships with
14 many of the men who did have well control and
15 drilling jobs?
16 A. Yes.
17 Q. All right. And we'll get to
18 that in a moment. And I apologize about
19 asking things that are going to be, of
20 course, emotional, but we have to go through
21 this and we will, as briefly as we can.
22 But suffice it to say that your
23 work was largely centered in the area where
24 the office and your living quarters are in
25 Exhibit 3686?
00035:01 A. Yes.
02 Q. Did you -- when you had a
03 helicopter coming in, did you go up to the
04 heliport area to receive it?
05 A. No.
06 Q. That wasn't part of your job?
07 A. No.

Page 36:07 to 41:01

00036:07 when we went off the record we were talking
08 about generally some of the personnel that

09 you knew. One of the things that I'd asked
10 you about was whether or not there was
11 another radio operator, and you mentioned
12 him. I wanted to ask you about some other
13 fellows and ladies, maybe, who worked aboard
14 the DEEPWATER HORIZON.

15 One of the areas I'm interested
16 in -- and I've spent a lot of time taking
17 testimony from fellows who were wellsite
18 leaders. Are you familiar with BP's category
19 of employee known as wellsite leaders?

20 A. Yes.

21 Q. Did you know some of those
22 fellows during the time that you worked as a
23 radio operator, some of the wellsite leaders?

24 A. Yes, I knew them.

25 Q. Okay. For example, did you know
00037:01 the Sepulvado brothers, you know, who
02 definitely have made their -- a strong
03 impression on us throughout these
04 proceedings, Murry and Ronnie Sepulvado?

05 A. I did.

06 Q. Okay.

07 A. I knew them.

08 Q. Now, did you continue to --
09 strike that.

10 Did you have a social
11 relationship with, for example, Murry
12 Sepulvado and Ronnie Sepulvado --

13 A. No.

14 Q. -- before the explosion?

15 A. No.

16 Q. Okay. Have you gotten -- do you
17 have a social relationship with them now, the
18 Sepulvado brothers?

19 A. No.

20 Q. One of the persons I deposed is
21 a fellow named Phillip Earl Lee. Do you know
22 Mr. Lee?

23 A. Yes, I do.

24 Q. And do you have a personal
25 friendship or relationship to Mr. Lee?

00038:01 A. No.

02 Q. Any -- is there any of the --
03 are there any of the BP wellsite leaders who
04 you do consider to be a personal friend
05 today?

06 A. Well, I guess I could consider
07 them friends, but not personal -- not close
08 friends, no.

09 Q. Okay. And it's -- by nature
10 this discussion is somewhat ambiguous. You
11 know, it's -- I could define for you, for
12 example, if you -- would you -- would you
13 consider it to be -- strike that.

14 Do you see any of them more
15 than, say, two or three times a year?
16 A. Now?
17 Q. Socially, yes.
18 A. No.
19 Q. Before, did you see -- before
20 the explosion -- let's use April 20th, 2010,
21 as the cutoff point.
22 Before the explosion did you see
23 any of them more than two or three times a
24 year socially?
25 A. No.
00039:01 Q. Was there anybody aboard the
02 DEEPWATER HORIZON who didn't work for BP or
03 who was a wellsite leader who you did
04 consider to be a personal friend, let's say,
05 seeing them more than two or three times a
06 year socially?
07 A. No.
08 Q. Okay. Did you know the trainee,
09 Lee Lambert?
10 A. Yes.
11 Q. Did you ever work with him?
12 A. Not -- I don't want to -- you
13 mean was he on the rig at the same time as I
14 or --
15 Q. That's a good clarification.
16 Yes, sir.
17 A. Yes.
18 Q. In fact, on the occasion of the
19 explosion and sinking of the DEEPWATER
20 HORIZON he was aboard, was he not?
21 A. Yes, as far as I know.
22 Q. Did you get to know other BP
23 workers? Don Vidrine. Did you know
24 Mr. Vidrine?
25 A. I do.
00040:01 Q. And you've already said that you
02 didn't have a personal relationship with any
03 of these fellows before or after, but you
04 knew him as a -- in his capacity working
05 aboard the vessel?
06 A. Yes.
07 Q. Did you know Bob Kaluza?
08 A. I knew the name and the
09 position, I guess. I didn't know much about
10 him.
11 Q. Was he new on the -- on the
12 DEEPWATER HORIZON, as far as you knew?
13 A. As far as I know, uh-huh.
14 Q. Okay. Another trainee, Vincent
15 Price. Did you know Vincent?
16 A. No.
17 Q. Okay. Well, I'm not going to go
18 over the entire roster of employees for BP.

19 I'll leave that to someone else, if they wish
 20 to do so.
 21 Suffice it to say that you had a
 22 working relationship with the men aboard the
 23 vessel, but no personal friendships with
 24 anyone on the rig?
 25 A. Not outside the work
 00041:01 environment, no.

Page 44:14 to 46:17

00044:14 Q. And the same with regard to
 15 other events leading up to April 20th.
 16 Difficulties with tools trapped in the --
 17 down the hole and other things like that, you
 18 wouldn't be able to testify about those,
 19 would you?
 20 A. I would not.
 21 Q. But you were generally aware
 22 that there were difficulties with the well,
 23 were you not?
 24 A. Generally, yes.
 25 Q. Did you ever hear anyone talk
 00045:01 about it, sort of the well from hell or a
 02 dangerous well or anything like that?
 03 MR. BOLES: Object to the form.
 04 A. Yes, I heard that term.
 05 Q. (BY MR. PALMINTIER) When did
 06 you begin hearing about that, if you recall?
 07 A. I would probably think when we
 08 were on the way. I think maybe the MARIANAS
 09 might have coined that phrase, you know, is
 10 what I'm thinking.
 11 Q. All right, sir. Can you
 12 remember for us who may have actually said
 13 that to you?
 14 A. No, I don't.
 15 Q. Do you remember if that was
 16 someone from BP?
 17 A. No, I don't remember.
 18 Q. One way or the other, you don't
 19 remember where that --
 20 A. No.
 21 Q. -- those words came from, but
 22 you remember hearing them?
 23 A. I do.
 24 Q. Tell me what you recall about
 25 the MARIANAS and why the DEEPWATER HORIZON
 00046:01 was moved into her form of position.
 02 A. From what I know, the MARIANAS
 03 sustained some damage, maybe Hurricane Ike,
 04 one of the hurricanes, and had to move off or
 05 go through extensive repair. And we were
 06 sent over to finish the well.
 07 Q. Understood. On the hitch that

08 you came on in which eventually the explosion
09 and fire and sinking occurred, do you
10 remember when you came on?

11 This happened on April 20th,
12 2010. Do you remember when you would have
13 come aboard?

14 A. I come aboard that Wednesday,
15 that Wednesday prior to that, which would
16 have been, what, the 15th or 14th, whatever
17 that Wednesday was.

Page 47:12 to 47:14

00047:12 Q. And when you -- when you
13 arrived, did you immediately learn that there
14 were difficulties with the well?

Page 47:16 to 47:20

00047:16 A. I -- yes. I -- you know, my
17 relief and I, you know, have hand-over
18 notes -- or hand-over conversations and, you
19 know, he probably -- I'm sure he informed me
20 that there was problems.

Page 48:06 to 52:20

00048:06 Q. Those five or six days, do you
07 remember them being especially active in
08 terms of your job function or just routine?

09 A. I guess maybe they were
10 especially active in getting rid of
11 personnel, you know, off the rig, getting
12 people off the rig.

13 Q. All right. And tell me who you
14 remember having been removed from the rig.

15 A. Schlumberger.

16 Q. I was going to ask you about the
17 Schlumberger crew in particular. Do you
18 remember that, the event of the Schlumberger
19 crew leaving?

20 A. The event or the day? I don't
21 understand what you mean "the event."

22 Q. This is good. This is what I
23 want you to do. That was a poorly asked
24 question. I will ask it better, I hope.

25 Schlumberger left. Do you
00049:01 remember that?

02 A. Yes.

03 Q. You were asked to put them on a
04 helicopter, were you not?

05 A. Yes. Well, actually, BP's
06 dispatcher would have put Schlumberger on the

07 helicopter.

08 Q. I understand. But you learned
09 about it because of what?

10 A. Well, I have to take them off
11 the personnel onboard list. And of course,
12 anytime a big group like that leaves, it
13 frees up bed space. And you start looking
14 down the road of who might be coming, you
15 know, so you can see if we're going to have
16 bed space for whoever might be coming.

17 Q. And that was one of your jobs,
18 to make sure that there was sleeping quarters
19 for new folks coming on board?

20 A. Yes.

21 Q. Now, Schlumberger -- when you --
22 when you were participating, at least
23 understanding that they were leaving, what
24 did you learn was the reason they were
25 leaving?

00050:01 A. I just understood they were
02 through with their part of the job. You
03 know, they were through doing their job.

04 Q. Understood. Were there any
05 other crews that were specialty crews that --
06 like Schlumberger that may have been leaving
07 that you recall?

08 A. It could have been Weatherford.
09 You know, there were several what we call
10 third-party people that were leaving over
11 that weekend.

12 Q. Do you recall any Halliburton
13 hands, either Halliburton or Sperry-Sun,
14 coming or going during your five or six days?

15 A. I think they were going in, too.
16 Some of the Halliburton people were going in.

17 Q. Now, did you learn about why any
18 of those individuals -- other than just
19 normal departures, why any of those
20 individuals were leaving?

21 A. No, I did not.

22 Q. Do you know what a standby
23 vessel is?

24 A. Yes.

25 Q. Do you know -- tell me what your
00051:01 understanding of what a standby vessel is.

02 A. Well, my understanding, it's --
03 it's a work boat or any -- I guess any vessel
04 that would be standing by in case it was
05 needed. It would be easier to have them
06 there than to try to bring them out to the
07 rig in case it were needed, is my
08 understanding.

09 Q. Now, was it ever your
10 responsibility to call in a standby vessel
11 for whatever reason?

12 A. No.
 13 Q. Whose job was that? Was it the
 14 wellsite leader or was it the OIM or -- whose
 15 job?
 16 A. I would say it was the BP
 17 dispatcher on instructions from the wellsite
 18 leader.
 19 Q. Understood. Now, in the week
 20 that you were there, five or six days before
 21 the explosion, do you remember there being a
 22 standby vessel specifically assigned as a
 23 standby vessel?
 24 A. I remember the vessel being
 25 there -- the vessels being there, the
 00052:01 BANKSTON being one of them. Whether it was
 02 assigned or not, I wouldn't have seen that
 03 paperwork. But I just know that the vessel
 04 was there.
 05 Q. The DAMON BANKSTON, correct?
 06 A. Uh-huh.
 07 Q. And which is a vessel that
 08 eventually helped get you out of the water --
 09 A. Correct.
 10 Q. -- after the explosion and fire,
 11 correct?
 12 A. Uh-huh.
 13 Q. But there were no other vessels
 14 there other than the DAMON BANKSTON on the
 15 night of the explosion, were there?
 16 A. I don't know. I don't recall
 17 that.
 18 Q. That wasn't in your job to see
 19 to it that there was such a vessel, correct?
 20 A. Correct.

Page 53:11 to 53:14

00053:11 Q. What about seeing to it that
 12 equipment was moved off and on? Was that
 13 outside of your job function?
 14 A. Yes.

Page 54:02 to 55:22

00054:02 Q. Who was the BP dispatcher at the
 03 time that we're talking about now, the five
 04 or six days prior to the explosion?
 05 A. Nick Wilson.
 06 Q. Did you -- you know, the word
 07 "interface" -- did you communicate with him,
 08 interface with him on a regular basis?
 09 A. Yes.
 10 Q. Now, one of the reasons for that
 11 would be that you would be in the know about

12 whether there was a helicopter coming in?
 13 A. There would be occasions, you
 14 know, if we had essential personnel coming
 15 out, that BP would, you know, come to me and
 16 say we had to get rid of three of our
 17 nonessential personnel.
 18 Q. Okay.
 19 A. And of course, that happened
 20 quite often when we would have a big group,
 21 like Schlumberger or Cameron or somebody like
 22 that, come out.
 23 And of course, I'd have to take
 24 it to the OIM and take a list of our possible
 25 nonessential personnel, and he would okay the
 00055:01 maybe three or four people that I had picked
 02 or, you know, either he'd add to them and
 03 take them away.
 04 And I'd take it back to BP to
 05 say, okay, this is who we can get rid of.
 06 Q. Okay. Did you participate in
 07 the decision as to who it would be, or merely
 08 bring the information essentially as a
 09 messenger between the OIM and the BP
 10 personnel?
 11 A. I was just a -- yeah, the
 12 messenger.
 13 Q. But it was important for you to
 14 have that information because an essential --
 15 and the essential part of your job was to see
 16 whether there was quartering and
 17 transportation for those people, correct?
 18 A. Right.
 19 Q. All right. So your interface
 20 with Mr. Wilson included these occasions when
 21 there was removal of nonessential personnel?
 22 A. Yes.

Page 56:13 to 59:16

00056:13 Did you attend meetings --
 14 routine meetings as a member of the crew of
 15 the vessel?
 16 A. Yes.
 17 Q. Describe those for us, please.
 18 What meetings would you attend?
 19 A. I would do pretour meetings in
 20 the morning at 11:00 o'clock. And I did not
 21 make every one. It would depend on what I
 22 had going on also, if I could get away to do
 23 it, because the pretour meetings really
 24 didn't have anything to do with my job. You
 25 know, they wasn't going to discuss what I was
 00057:01 going to do, but I would go to them. And I
 02 went to safety meetings on Saturdays.
 03 Q. Who would attend the pretour

04 meetings that you went to?
05 A. Usually it was the drill crew,
06 the crane crew, people from the marine
07 department, from the bridge which would be in
08 it.
09 Q. Were there ever -- do you know
10 whether or not the wellsite leaders, for
11 example, attended those meetings, or were
12 these only for Transocean personnel?
13 A. No, it was wellsite leaders
14 also.
15 Q. And the pretour meetings were
16 daily?
17 A. Well, there was -- they had them
18 at night and the day. Crews changed at
19 midnight and 12:00, at noon.
20 Q. Okay.
21 A. So they would have a pretour
22 meeting 11:00 in the morning, say, and then
23 11:00 at night.
24 Q. Okay. What kinds of things
25 would be discussed at the pretour meetings?
00058:01 A. The daily activity on the next
02 12 hours that you would be possibly -- those
03 crews would be doing.
04 Q. Now, do you remember the pretour
05 meetings that you attended in the week prior
06 to the explosion, in those five or six days?
07 A. I remember I went to some of
08 them, yeah.
09 Q. All right. Let me ask you -- if
10 you can't remember, I'll understand. But let
11 me ask you whether you remember the last
12 pretour meeting that you went to?
13 A. Yes.
14 Q. Describe it for me. What was
15 the subject of discussion, who was there and
16 so forth?
17 A. The last one I went to, well,
18 I -- you know, they had the OIM and the drill
19 crew and the wellsite leader, and I know you
20 had several third-party people. And they
21 were discussing what was going to take place.
22 Q. And do you remember any
23 discussion of difficulties with well control?
24 A. No.
25 Q. Do you remember any discussions
00059:01 about difficulties with a cementing job?
02 A. No.
03 Q. Do you remember the day of this
04 meeting?
05 A. I think it was the 19th. I
06 don't think I attended the 20th.
07 Q. Okay. And the one that you
08 would have attended would be the morning?

09 A. Correct, uh-huh.
 10 Q. And not the 11:00 o'clock at
 11 night one?
 12 A. No.
 13 Q. Do you remember anything else
 14 that was discussed at that last pretour
 15 meeting that you went to?
 16 A. No.

Page 60:01 to 60:19

00060:01 writings that you may have kept in your job
 02 function.
 03 A. Well, we had what we call a bunk
 04 list which was kept daily and -- which is put
 05 up on the POB, personnel onboard list. And
 06 of course, that was kept not only in the
 07 computer but also a hard copy.
 08 Any paperwork that generated a
 09 personnel action or something like that, we
 10 had a file -- hard copy file for that.
 11 Muster list, which the muster
 12 list is generated from the POB.
 13 Q. What's a muster list?
 14 A. It's a -- in case of an
 15 emergency, you have -- you have muster lists
 16 placed to lifeboats and on the bridge, and --
 17 Q. All right, sir.
 18 A. -- that way you'll account for
 19 everybody.

Page 61:11 to 62:05

00061:11 Q. Are there any other lists that
 12 the radio operator for Transocean aboard the
 13 DEEPWATER HORIZON was responsible for?
 14 A. Well, there again, the POB, the
 15 bunk assignment.
 16 As far as lists, I guess that
 17 would -- oh, core well and manifest, I guess,
 18 could be a list.
 19 Q. The what?
 20 A. The manifest.
 21 Q. You've mentioned the manifest.
 22 Describe it for me, please.
 23 A. Actually, it's just a -- it's a
 24 list of names. You've got -- on one side you
 25 have the list coming out and you have the
 00062:01 list going in. And Transocean's people are
 02 on it. So are BP's. So are third-party
 03 personnel.
 04 Q. All right.
 05 A. So is catering personnel.

Page 63:12 to 64:24

00063:12 Do you remember where you were
13 when you first realized something was
14 happening?
15 A. Yes.
16 Q. Where was that?
17 A. I was asleep in bed -- well, I
18 was -- I guess when I realized it I was
19 awake, but I was in bed.
20 Q. Okay. So you were awakened from
21 a sound sleep?
22 A. Correct.
23 Q. And you were in the living area
24 that is described in Exhibit 3686?
25 A. I was.
00064:01 Q. Okay. What did you do -- well,
02 first of all, you were awakened. Describe
03 what awoke you.
04 A. Well, I guess it was the first
05 explosion. And simultaneously almost, the
06 DPO got on the speaker and said there was a
07 fire on the rig floor and for everybody to
08 assemble in the galley.
09 Q. Who was the DPO?
10 A. Yancy Keplinger.
11 Q. Okay. And what does DPO stand
12 for?
13 A. Dynamic positioning operator.
14 Q. Why would the DPO be sending
15 that message?
16 A. That was who was on duty on the
17 bridge. That was his --
18 Q. So that wasn't out of the
19 ordinary?
20 A. No.
21 Q. That is, for having Yancy
22 Keplinger, the DPO, giving the alert to
23 assemble in the galley?
24 A. Correct.

Page 65:01 to 67:15

00065:01 exercises that anticipated such a situation
02 before? Drills, we'll call them.
03 A. Drills, yes.
04 Q. What is your recollection of how
05 routinely you-all perform your drills?
06 A. It was every week, every Sunday.
07 Q. All right. And can you just
08 describe generally for me what the drills
09 were like.
10 A. Well, it was simulated fires
11 or -- and in, you know, different areas of

12 the rig. We did an abandonment drill, you
13 know, all together.
14 Q. Now, what kind of participation
15 was there aboard the vessel when those drills
16 took place? I mean, was it all aboard or
17 was -- was it broken down into groups? How
18 did that happen?
19 A. Well, everybody participated in
20 the drill. Everyone is assigned to a primary
21 and an alternate lifeboat.
22 Q. Yes, sir.
23 A. Usually on the fire drill you
24 would assemble in the galley and the cinema
25 room.
00066:01 Q. Okay.
02 A. On the abandonment drill you
03 would assemble at either 1 and 3 or 2 and 4
04 lifeboats.
05 Q. And so this was a fire drill and
06 not an abandonment drill at first?
07 A. At that time, yes.
08 Q. Okay.
09 A. I would -- yes.
10 Q. At least as far as what you were
11 asked to do is concerned --
12 A. Uh-huh.
13 Q. -- by the DPO?
14 Did you go to the galley?
15 A. No. My -- my duty is not to go
16 to the lifeboat or the galley at first. My
17 job -- I go to the bridge, and I'm the one
18 that receives the muster count from the
19 lifeboats or the assembly points.
20 Q. So no matter what kind of alert
21 you get, whether fire or abandon ship or
22 what, you -- your job as a radio operator was
23 to go to the bridge?
24 A. Correct.
25 Q. And -- and to at that time --
00067:01 no, that's good.
02 At that time when you went to
03 the bridge, your function was to pull the
04 muster sheet?
05 A. Yes.
06 Q. Okay. And that's the same
07 muster list that you talked about earlier in
08 your testimony, correct?
09 A. Correct.
10 Q. The one that's especially for
11 emergency circumstances?
12 A. Correct.
13 Q. And you did that on this
14 occasion?
15 A. I did.

Page 68:02 to 107:14

00068:02 Q. (BY MR. PALMINTIER) But with
03 your finger, if you could just show us
04 generally where you went. From your quarters
05 that you testified you were in when you were
06 awakened, where did you go?
07 A. Okay. My quarters is directly
08 across from the ready room that I've
09 mentioned. All right. There's a stairwell
10 from the ready room to the bridge.
11 Q. Okay, sir.
12 A. So I went -- I then went across
13 the hallway, into the ready room, up the
14 stairwell to the bridge.
15 Q. I have a marker that is bright
16 pink.
17 A. Okay.
18 Q. I wonder if -- I wonder if you
19 could kind of outline with a straight -- you
20 know with a line, not a dotted line --
21 A. Uh-huh.
22 Q. -- show us generally the route
23 you took to get to the bridge.
24 A. Uh-huh.
25 Q. Take your time.
00069:01 A. Okay. I don't see the inside
02 stairwell which -- okay.
03 Q. Again, we're not going to hold
04 you to this except generally, but --
05 A. Okay. I go in -- all right.
06 Then I'll jump to this level --
07 Q. Yes, sir.
08 A. -- here. This looks like that
09 stairwell, but if -- when you compress this
10 together, you know, all sitting on top --
11 Q. Is what you're saying that the
12 drawing there is basically sliced and doesn't
13 actually represent the actual spatial
14 configuration that exists on the rig;
15 instead, it's moved apart?
16 A. Right. Correct.
17 Q. Kind of opened up?
18 A. Uh-huh. Because I would have
19 gone out of my quarters, into the ready room,
20 and then went straight up -- there's a
21 stairwell going up to the bridge right here.
22 Q. All right, sir.
23 A. Okay.
24 Q. Yes. All right. Could you
25 pencil or draw a line to the bridge and
00070:01 write -- not with the pink pen but with
02 another one -- and just a line to the bridge?
03 A. From --
04 Q. Just as we did --

05 A. Oh, from the bridge?
06 Q. Yes. Just point out where the
07 bridge is. I'm sorry.
08 A. All right. I'll --
09 Q. Just as you did with your
10 quarters and the --
11 A. Okay. The bridge. Okay.
12 Q. All right. Good. So let the
13 record reflect the witness drew a circle
14 around the bridge.
15 Now, when you got to the bridge,
16 who was there?
17 A. The two DPOs; Yancy Keplinger;
18 Andrea Fleytas -- Fleytas, the captain; two
19 BP VIPs, which was O'Bryan and -- I can't
20 think of the other guy's name; Nick Wilson,
21 the BP dispatcher.
22 Q. Okay.
23 A. And that's who was on -- that's
24 who I recall on the bridge when I got there.
00071:01 Q. Yes, sir. And let's break down,
02 though, the experience of going from your
03 quarters --
04 A. Uh-huh.
05 Q. -- to the -- to the bridge.
06 First, did you notice any fire
07 or debris or other things out of the ordinary
08 as you were moving from your quarters to the
09 bridge?
10 A. Oh, yes. Well, the lighting had
11 gone out. The atmosphere was almost like
12 breathing sand. It was that -- I could smell
13 gas.
14 Q. Yes, sir.
15 A. The second explosion, I guess,
16 is what actually blew me out of the bed. And
17 I was able to -- I did -- I was able to get
18 on my clothes. I come out into the hallway.
19 Q. Yes, sir.
20 A. And it was very dark and people
21 running, hollering. I remember people saying
22 that the stairwell from the lower quarters to
23 the galley was no longer there. Of course, I
24 went on across the hallway and made my way to
25 the bridge, and -- and I guess that was the
00072:01 first time I actually saw the plume of fire.
02 Q. All right. Where did you --
03 from what perspective did you see the fire
04 plume?
05 A. From the bridge. From the -- I
06 mean, you could see it from the bridge.
07 Q. Of course. All right. So you
08 get to the bridge and you see the fire plume.
09 What do you do?
A. Well, I got the emergency muster

10 book and -- it was all happening so fast. It
11 was so obvious, though, that in the chaos
12 that there was no way we were going to get a
13 muster before we got off that boat -- before
14 we got off that rig.

15 Q. If you had been able to get a
16 muster, describe to us what that would have
17 been like. Would it -- was it literally sort
18 of like a military muster where everyone was
19 in place and being accounted for?

20 A. Correct. Yeah. The -- whoever
21 would have been taking the muster down at the
22 lifeboat, it's all done with numbers instead
23 of names.

24 Q. Yes, sir.

25 A. They would have called up to me
00073:01 with the numbers, and I would have marked
02 those personnel off by number --

03 Q. All right.

04 A. -- to see who was accounted for
05 and who was not accounted for.

06 Q. Yes, sir. Were you able to get
07 a muster from any of the locate -- muster
08 locations?

09 A. Not while we were on the rig,
10 no.

11 Q. All right. So how would you
12 have learned that you couldn't get a muster?
13 Would you have gotten -- let me ask you
14 specifically. Did you get a radio message
15 from the person who was in charge of the
16 muster that it couldn't be accomplished, or
17 was it just something that you had to
18 conclude on your own?

19 A. I concluded on my own. You
20 know, there could have been some radio
21 communication, but like I said, it was sheer
22 panic, you know. People were scrambling
23 for -- to get in the lifeboats. Nobody
24 was -- you know, there was just no way to
25 take a muster.

00074:01 Q. Understood.

02 A. I mean, the guys just wasn't
03 going to --

04 Q. Now, the muster is what you had
05 drilled for -- you as a crew had drilled for
06 many times, correct?

07 A. Correct.

08 Q. All right. But in the reality
09 of the explosion and fire and the smoke that
10 you've described -- I mean, the fumes that
11 you've described and everything, that drill
12 broke down. Is that a fair statement?

13 A. Yes.

14 Q. All right. Among others, Pat

15 O'Bryan was in that area with you, correct?
16 A. Uh-huh.
17 Q. What did Mr. O'Bryan do, at
18 least as far as your observations are
19 concerned? Did he -- was he giving orders to
20 you and other TO members, or was he working
21 on a radio? Describe what you saw
22 Mr. O'Bryan doing.
23 A. I saw him at -- I did not see
24 him doing anything.
25 Q. Was he seated? Was he standing?
00075:01 A. Standing.
02 Q. Was he looking out the bridge
03 window or what? Describe with a little more
04 detail what you saw.
05 A. Okay. It was Mr. O'Bryan, Nick
06 Wilson and -- there again, I cannot think of
07 the guy's name. If I could see the POB, it
08 would --
09 Q. Yeah. Let me get you a -- just
10 a chart of -- I'm going to want this back.
11 I'm not going to make it a -- does that give
12 you some assistance?
13 A. David Sims. And actually, what
14 I observed was Mr. O'Bryan and Mr. Wilson
15 trying to convince David Sims that he had to
16 go to the lifeboat.
17 Q. Okay. Why was Mr. Sims not
18 wanting to go to the lifeboat? Was he afraid
19 to go out?
20 A. He was.
21 Q. All right. So did Mr. O'Bryan
22 have to literally physically remove Mr. Sims
23 from the bridge?
24 MR. BOLES: Objection; form.
25 A. He did not physically pick him
00076:01 up. They physically, I guess, led him out to
02 the lifeboat.
03 Q. All right. And what was David
04 Sims saying?
05 A. He was just saying, I'm not
06 going out there, you know. I'll burn up.
07 Q. All right. You heard him say
08 that?
09 A. I did.
10 Q. What was your feeling about your
11 own well-being at that moment?
12 A. It was really -- I didn't know.
13 At that moment I don't think any of us knew
14 if we were going to make it or not.
15 Q. Yes, sir. What about Nick
16 Wilson? What was he doing while you were in
17 the bridge and while this exchange between
18 Sims and O'Bryan -- was Wilson helping
19 O'Bryan?

20 A. He was.
21 Q. And helping him get David Sims
22 out of the bridge?
23 A. Yes.
24 Q. All right. Now, who was the
25 first -- if you recall, who was the first man
00077:01 or woman to leave the bridge to head toward
02 the lifeboats?
03 A. I would have to say it was
04 Mr. O'Bryan, Mr. Wilson and -- and Mr. Sims.
05 Q. Okay. Now, did they -- were
06 they having to assist Mr. Sims out of the
07 bridge compartment?
08 A. Yes.
09 Q. Describe what you saw.
10 A. Well, they were leading him out.
11 Nick was in front and Mr. O'Bryan was behind
12 him, and they were leading him out.
13 Q. All right. And did they have
14 him by his arms?
15 A. Yes.
16 Q. Was he struggling against them
17 to prevent himself from being removed?
18 A. I wouldn't say that, no.
19 Q. All right.
20 A. He wasn't fighting it. He just
21 felt like he couldn't go out.
22 Q. Was he saying anything that you
23 could hear by the time they were heading out
24 of the bridge?
25 A. No.
00078:01 Q. Okay. Who else? Who came next?
02 Who left next?
03 A. Well, there were several people
04 that come in -- come in the bridge from the
05 engine room, I guess, several different
06 people.
07 Q. All right.
08 A. Some of them left to try
09 different things or to -- I don't know if
10 they were going to the lifeboat or not. I
11 don't think they were. Those people that
12 left -- I heard one say he was going to jump.
13 I heard another one say that he was going to
14 try to start the emergency generator. One
15 guy was bleeding real bad and -- I don't
16 remember who -- somebody was helping him,
17 trying to -- I guess he would have been the
18 next one to the lifeboat.
19 Q. Right.
20 A. Brent Mansfield, I think, is who
21 it was. They were trying to get him to the
22 lifeboat.
23 Q. Do you remember Mr. Mansfield's
24 position aboard the vessel?

25 A. He was a mechanic, chief
00079:01 mechanic, maybe, or something like that.
02 Mechanical -- no, he wasn't mechanical
03 supervisor. I think he was probably chief
04 mechanic.
05 Q. Okay. And he was bleeding. And
06 who helped him out?
07 A. I honestly don't know. I don't
08 remember.
09 Q. Well, you were standing in the
10 bridge observing these things happening?
11 A. Uh-huh.
12 Q. I know that time probably lost
13 all meaning to some extent. I can only
14 imagine.
15 A. Yeah.
16 Q. But you -- while you were
17 observing these things that you've now talked
18 about -- and we'll get whatever else you
19 remember seeing -- what were you doing?
20 A. Well, I got the radio, and I was
21 standing by the telephone just in case
22 somebody contacted me from the muster area.
23 And that's basically what I was doing.
24 Q. That's the job that you had
25 drilled for; is that correct?
00080:01 A. Correct, uh-huh.
02 Q. All right. And that call never
03 came?
04 A. No.
05 Q. When did you decide that that
06 function of your job to await the muster area
07 call -- when did you decide that that was no
08 longer worth pursuing?
09 A. Well, everything was happening
10 so fast. I mean, it was a matter of seconds,
11 maybe minutes, you know, very few minutes.
12 And I could see from the bridge the -- that
13 everybody was getting on the lifeboat. And I
14 knew there wasn't going to be a muster. And
15 then I guess the captain said, you know,
16 we're getting out, we're abandoning, so --
17 Q. All right, sir. Now, when the
18 captain -- give us the captain's name, for
19 the record.
20 A. Curt Kuchta.
21 Q. Okay. And Curt actually ordered
22 an abandon ship in the bridge or --
23 A. In the bridge, yes. I remember
24 him saying, we're abandoning, inside the --
25 you know, the personnel there on the bridge.
00081:01 Q. Now, was that an abandon ship
02 order, or was it just a "let's leave the
03 bridge" order?
04 A. I never heard an abandon ship

05 order. I heard him -- it could have
06 happened. I didn't hear it.

07 Q. In the bridge, at least as far
08 as you're concerned, you did not hear an
09 abandon ship order, correct?

10 A. Not that would have went out
11 ship-wide.

12 Q. And were you in a position to
13 have seen the captain give that abandon ship
14 order if it had occurred?

15 A. I should have been, yeah.

16 Q. You mentioned that Mr. O'Bryan,
17 Wilson, and Sims, those gentlemen left the
18 bridge?

19 A. Uh-huh.

20 Q. You mentioned that others were
21 helping to remove an injured man, Brent
22 Mansfield?

23 A. Uh-huh.

24 Q. Were there any other groups of
25 people that you saw leave before you and the
00082:01 captain and others left?

02 A. Those personnel, and I guess
03 next would have been myself and the DPOs and
04 the captain.

05 Q. Okay. When that group left,
06 were there any -- was there anyone else left
07 in the bridge?

08 A. No, not that I know of.

09 Q. Okay. Did you go with the DPOs
10 and the captain to a particular location, or
11 did everyone sort of every man for himself?

12 A. More or less every man for his
13 self. I think I was probably the first one
14 of those four to leave the bridge.

15 Q. Okay. All right. Where did you
16 go?

17 A. I went to lifeboat 2.

18 Q. All right. Do you see a
19 representation of the general area where
20 lifeboat 2 was on your Exhibit 3686?

21 A. Yes.

22 Q. Before you draw the line, just
23 what -- and what we're going to do is, just
24 so that we have a clean piece of evidence
25 there, point out to me where -- and to us
00083:01 where that was -- where you were going.

02 A. Right here, lifeboat 2.

03 Q. All right, sir. And -- and your
04 trip from the bridge to lifeboat 2, I'm going
05 to get you to go ahead and draw it in with
06 the brightly colored pen there.

07 A. Okay. There again, this is
08 split level --

09 Q. Yes, sir.

10 A. -- the way it's drawn. We would
11 have come out -- before I draw it, I'm going
12 to get it in my mind --
13 Q. Please do.
14 A. -- before.
15 All right. We would have come
16 out this stairwell right here, which is on
17 the outside. And with this sitting on top of
18 this bottom part --
19 Q. Yes, sir.
20 A. -- this stairwell would have
21 come out right through here into this level
22 here. Okay. So I would have come out of the
23 bridge.
24 Q. Go ahead and draw it in. That's
25 fine.

00084:01 A. Come out of the stairwell. And
02 then this would have met up right here to
03 lifeboat 2.
04 Q. All right. So it was a direct
05 path from the bridge down the stairwell and
06 to the area where lifeboat 2 was, correct?
07 A. Well, it wasn't direct, but it
08 was -- it was -- it was a pathway. I mean,
09 it was the way -- it was the way to get
10 there. There wasn't -- there was no other
11 way.
12 Q. Understood. Was there any
13 debris or were there any obstacles to your
14 being able to complete that path?
15 A. The main obstacle would have
16 been the fire plume because -- it's hard to
17 tell from this diagram, but it was -- you
18 could feel the heat.
19 Q. Yes, sir.
20 A. It was -- the heat was almost
21 blistering because you had to go -- actually,
22 when you got on this level right here --
23 Q. Which is just outside of the
24 bridge?
25 A. Right. And as you come down
00085:01 onto this deck level here before you go down
02 to this level, you had to walk along a little
03 walkway and then go down this stairway. And
04 it was extremely hot.
05 Q. Yes, sir.
06 A. It was hot. It was hot down
07 here, too.
08 Q. And by "down here," you mean --
09 A. At the lifeboats.
10 Q. -- at the lifeboat itself?
11 A. Uh-huh.
12 Q. Okay.
13 A. Very hot. That's the only -- if
14 you want to say "obstacle," that --

15 Q. Yes, sir. Now, when you got to
16 the lifeboat area, what did you do?
17 A. Well, actually, they had closed
18 the door. So I started kicking on the door,
19 hollering to let me in.
20 Q. Yes.
21 A. And they opened it up, and I got
22 in.
23 Q. Now, when you got in, were
24 there -- was there a full contingency of
25 people in there, or was -- or --
00086:01 A. Yeah. It was -- it probably
02 wasn't to capacity, but it was full of
03 people.
04 Q. Had they closed the door to
05 protect against the heat, or were they
06 planning to leave before a full group had
07 arrived?
08 A. I don't know what they were
09 planning.
10 Q. Okay.
11 A. I just know the door was closed.
12 Q. And in response to your kicking
13 on the door, they opened it?
14 A. Uh-huh.
15 Q. That's a yes?
16 A. That's a -- oh, I'm sorry.
17 That's a yes.
18 Q. Believe me, that's all right.
19 And then what did you do?
20 A. I got into the lifeboat, and the
21 door was closed behind me, and we immediately
22 went down.
23 Q. Did the mechanism for lowering
24 of this craft operate correctly, to the best
25 of your recollection?
00087:01 A. As far as I know, it did, yeah.
02 Q. All right. And then when you
03 got to the water, you noticed that -- well,
04 strike that.
05 You noticed the change in the
06 feel of the -- the little craft when you hit
07 the water, correct?
08 A. Yes.
09 Q. Can you describe that to us,
10 please.
11 A. Well, you know, you go -- you
12 know when you're just going down -- and it's
13 a pretty good bump when you hit the water.
14 Q. Yes, sir.
15 A. And of course, luckily the seas
16 were calm. We were able to open up the
17 hatches once we got in the water to get a
18 little circulation of air.
19 Q. All right.

20 A. And we were beginning to pull
21 away from the rig.
22 Q. Now, do you remember who was
23 operating the lifeboat?
24 A. I think it was the boatswain,
25 Richard -- I'm sorry. I don't remember the
00088:01 last name.
02 Q. He was the boatswain?
03 A. Yes.
04 Q. Was he actually the one that was
05 assigned that task in the drills and
06 otherwise, the boatswain, to actually operate
07 the controls of life craft?
08 A. Yes, one lifeboat. And the
09 other lifeboat, a junior DPO would have
10 operated that.
11 Q. Okay. So at least as far as who
12 was operating the controls of the boat, that
13 part of the drill plan was fulfilled,
14 correct?
15 A. Yes.
16 Q. Do you remember who was in the
17 lifeboat with you?
18 A. No. The only person -- Troy
19 Hadaway is the one that opened the door for
20 me. I know he was there. I remember his
21 face when he opened the door. And it was
22 dark in there and noisy.
23 Q. Okay.
24 A. A lot of -- a lot of hollering.
25 Q. Understood. Now, what --
00089:01 according to the drill, what should have
02 happened next after the door was closed, the
03 lifeboat was lowered and the boatswain was at
04 the control? What was the drill for the next
05 move?
06 A. Well, the next move would
07 have -- had there not been a boat standing by
08 or another boat in the vicinity, you would
09 have stayed in the capsule --
10 Q. Okay.
11 A. -- until, you know, a rescue
12 boat or whatever came.
13 Q. Yes, sir. And -- but in this
14 case, the DAMON BANKSTON fortunately was
15 nearby; is that correct?
16 A. Correct.
17 Q. And so did the boatswain then
18 maneuver the lifeboat to the DAMON BANKSTON,
19 or did the DAMON BANKSTON come to you?
20 A. No. We went to the BANKSTON,
21 both lifeboats.
22 Q. Were you -- just for purposes of
23 the record, this is a capsule-type lifeboat,
24 correct?

25 A. Correct.

00090:01 Q. It has a covering and a water --

02 cooling system on the outside; is that

03 correct?

04 A. Not --

05 Q. No cooling system?

06 A. -- not that I'm aware of, no.

07 Q. Okay. But it has a covering?

08 A. Yes. It's completely enclosed.

09 Q. All right. As you mentioned,

10 though, after you-all got into the water, you

11 opened the hatches, correct?

12 A. As we -- when we pulled away

13 from the rig, we started opening the hatches

14 to get fresh air.

15 Q. For ventilation purposes. And I

16 take it that you -- strike that.

17 Did you go to where you could

18 see what was going on outside of the capsule?

19 A. I could see some of it. I mean,

20 I was -- there was very little movement that

21 you could move around in there. You know, I

22 could catch a glimpse of the rig as the boat

23 would turn -- or as the lifeboat would turn

24 in different positions.

25 Q. Do you remember that on its

00091:01 course to the DAMON BANKSTON whether the

02 lifeboat picked up anyone?

03 A. Not that I'm aware of.

04 Q. Do you remember there having

05 been a man overboard alarm sounded before

06 you-all left?

07 A. I do not remember that alarm.

08 Q. All right. Do you know whether

09 or not the DAMON BANKSTON powered toward your

10 craft as well as the lifeboat powering toward

11 the DAMON BANKSTON?

12 A. I did not know that, no.

13 Q. I understand -- go ahead.

14 Sorry.

15 A. Well, I was just going to say I

16 do know that -- I remember -- and it could

17 have been the boatswain saying that the

18 BANKSTON had boats in the water, picking up

19 people that had jumped.

20 Q. All right. I understand you're

21 saying that you didn't have a really good

22 view of what was going on outside, but could

23 you describe to us what you did see.

24 A. I saw girders of iron burning

25 like a stove would. You know, I think the

00092:01 crown fell. And the derrick just -- it

02 looked like stacked stove wood on -- you

03 know, that's what it looked like. It looked

04 like firewood burning.

05 Q. In his testimony before the
06 Marine Board of Inquiry, the captain of the
07 DAMON BANKSTON said he saw three people jump
08 from the rig -- you know, from the rig into
09 the water and could see them silhouetted
10 against the flames. Did you see those folks
11 jump?

12 A. I heard about it, but I did not
13 see them jump, no.

14 Q. Okay. Those people were
15 eventually picked up, to the best of your
16 understanding, correct?

17 A. Oh, yes, uh-huh.

18 Q. All right. So between the time
19 you got to the water in the lifeboat and the
20 time that you are pulled out of the lifeboat
21 and onto the DAMON BANKSTON, is there
22 anything else that you can think of that
23 comes to mind that you could tell us about
24 that difficult trip?

25 A. It was just -- it was still
00093:01 chaos. I mean, you know, we had people
02 hollering and had hurt people in there, and
03 it was --

04 Q. All right. So in -- within
05 the -- this enclosed capsule or lifeboat
06 itself, there was still chaos?

07 A. Yes.

08 Q. Was anyone administering first
09 aid to the injured people?

10 A. As much as possible as far as,
11 you know, trying to control bleeding and
12 monitoring the people that were injured.

13 Q. Okay. Now, do you remember,
14 were there any people that left the bridge
15 before you who were actually in that capsule?

16 A. I believe Brent Mansfield ended
17 up in there. I remember him in there. Of
18 course, his head had been wrapped. Somebody
19 had wrapped it with gauze. I don't know if
20 anybody else in there was injured or not.

21 Q. Did you see the BP group, the
22 Pat O'Bryan, David Sims, and Mr. Wilson? Did
23 you see them in there?

24 A. I did not.

25 Q. Okay. Did you eventually learn
00094:01 how they got off of the rig?

02 A. They went -- they -- I did not
03 see them in my lifeboat. I don't know if
04 they were in that one or the other one. I
05 know they were in a lifeboat, one of the two.

06 Q. Understood. And again, that
07 lifeboat that you actually entered and that
08 you pointed out to us in Exhibit 3686, that
09 lifeboat was No. 2, lifeboat No. 2?

10 A. Uh-huh.
11 Q. That's a yes?
12 A. Yes.
13 Q. No problem. You're doing fine.
14 How were you disembarked from
15 the lifeboat onto the DAMON BANKSTON? Did
16 you have to walk a gangplank? Did you -- did
17 they lift you out with a crane?
18 A. No. It was kind of like a rope
19 ladder is what I remember. I guess it would
20 have been a rope ladder. It was very limber,
21 very flimsy, and you had to climb up it.
22 And of course, the injured
23 people -- there were people already on the
24 BANKSTON; I guess maybe they were crew
25 members -- had been -- got the injured out
00095:01 first. And then --
02 Q. Okay.
03 A. -- the rest of us climbed up the
04 ladder to the BANKSTON.
05 Q. Now, once aboard the DAMON
06 BANKSTON, where did you go?
07 A. I went -- there was nowhere to
08 go. Well, I did -- I guess I went to the
09 bridge again for muster. But I ended up
10 having to leave the bridge to take the
11 muster. And we went down on deck and
12 probably took a total of three, maybe four
13 musters over the next hour, hour and a
14 half --
15 Q. Yes, sir.
16 A. -- to make sure we had it right.
17 Q. Now, again, so that was your
18 job --
19 A. Yes.
20 Q. -- correct, to actually take the
21 muster?
22 A. Uh-huh.
23 Q. Correct?
24 A. Yes. Forgive me.
25 Q. Forgive us for having to ask you
00096:01 about this.
02 What I am interested in, though,
03 is did you -- had you held on to your muster
04 list?
05 A. Yes.
06 Q. Okay. So you took that with you
07 from the bridge all the way to the DAMON
08 BANKSTON?
09 A. Yes.
10 Q. That was part of your function?
11 A. Yes.
12 Q. And that's something that you
13 had exercised during the drills?
14 A. Well, no, that's not -- I mean,

15 we never would go that far on the drill,
16 other than, you know, we would always take
17 the muster on board, on the rig.

18 Q. Yes, sir.

19 A. But I just -- I knew that I had
20 to have a list, I guess. In the back of my
21 mind, I knew I had to take that muster list.

22 Q. So as you mentioned, you may
23 have taken three or four of them.

24 Let's go back. You arrive on
25 the DAMON BANKSTON. Did someone say to you,
00097:01 you need to go to the bridge, or did you
02 realize that's what you needed to do?

03 A. Well, I realized I needed to go
04 up there and -- because that's normally on
05 the rig where I would go. But there was --
06 under the circumstances, there was no way I
07 could stay up on the bridge and take a muster
08 from the bridge. So I would -- I went out on
09 deck to do it.

10 Q. So your -- normally you would
11 have taken a report of muster from the
12 assigned individual down in the muster area,
13 correct?

14 A. Correct.

15 Q. You would have taken it by
16 radio?

17 A. Correct.

18 Q. But on this evening you took it
19 upon yourself to go to the actual place and
20 organize a muster, or had someone on the deck
21 of the DAMON BANKSTON -- or had someone else
22 organized the muster?

23 A. I organized the muster.

24 Q. All right, sir. How did you do
25 that? Did you just shout it out, or did you
00098:01 use the captain's bullhorn? How did you do
02 it?

03 A. Actually, I guess I shouted it
04 out.

05 What we -- because we had to
06 have everybody that was assigned to
07 lifeboat 1, you know, in one area and
08 lifeboat 2 in another. And then we had our
09 injured that we had to account for that was
10 being attended by medics and being evacuated
11 by the Coast Guard, so we had to account for
12 those.

13 And, I mean, everybody was
14 excited. And, you know, you'd come by and
15 you'd take the person's name. You'd mark it
16 off, and you might tell them, Okay. You need
17 to leave this area. And the next thing you
18 know, we'd have three or four people still
19 standing in the muster line that we had

20 already accounted for.
21 So it took a while, you know, to
22 make, I guess, everybody understand that, you
23 know, you had to -- once you were accounted
24 for on the muster list, you had to stay in a
25 particular area over here so we --

00099:01 Q. From your previous testimony, I
02 got the impression it was a numbered muster?
03 Am I wrong about that, that people had
04 numbers?
05 A. Correct.
06 Q. So each one needed to know his
07 own -- go ahead. I won't --
08 A. I'm sorry. Okay. No. All
09 right. The numbering system -- okay. If
10 you're on the lifeboat area taking the muster
11 or getting the muster down there --
12 Q. Yes, sir.
13 A. -- they would call out the name,
14 and he would -- they would check No. 1,
15 No. 2, No. 3, No. 4. And then when they
16 would call the muster up to me, the only
17 thing I would get would be the number, and I
18 would check it off on my master muster list.
19 And the name would be there, but the only
20 thing I would get would be a number.
21 Q. All right.
22 A. Because they transpose the name
23 to a number when they would -- we'd give the
24 muster at the lifeboats.
25 Q. Now, that's in the drill?

00100:01 A. Correct.
02 Q. Now, the drill had broken down,
03 as you've said, and now we're on the back of
04 the DAMON BANKSTON. Were you just taking
05 people's names?
06 A. Yes.
07 Q. Okay. And your muster sheet
08 showed all those names?
09 A. Yes.
10 Q. All right. So my -- in my
11 imagination, what I would see happening is
12 your first muster, you would actually be
13 looking, and maybe you've got, you know, 20,
14 30 people. And then the next muster, you've
15 got a larger number. Am I correct in that
16 assumption or --
17 A. Well, I would -- I guess the
18 first muster we got a larger number of people
19 missing or unaccounted for.
20 Q. Okay. Do you remember the
21 number breakdown there?
22 A. Before we got to the 11, it
23 might have been -- might have been 18 or
24 something, maybe, on that first muster.

25 Q. Okay.
00101:01 A. And then, of course, we would
02 have to take another muster, you know, and --
03 Q. By the 11, you're talking about
04 the 11 men who were never accounted for?
05 A. Correct.
06 Q. That died in the explosion and
07 fire?
08 A. Yes.
09 Q. Who were never found?
10 A. Correct.
11 Q. But before you got to that
12 number, you had an incrementally larger --
13 you know what I mean -- larger, growing
14 number of people accounted for --
15 A. Uh-huh.
16 Q. -- that --
17 A. I had a -- I had a larger number
18 of people not accounted for, and we had --
19 and what I had to do, I had to make sure that
20 I had it right.
21 Q. All right. Explain that to me.
22 A. Well, I guess on that first
23 muster -- and we had several people that had
24 the same last name. And I would -- I don't
25 remember the name, but I do remember one
00102:01 person that -- and it could have been
02 Anderson -- that I showed both Jason and this
03 other guy as being not accounted for. But I
04 saw him, you know. It was stuff like that.
05 The first muster, you had people
06 saying, Well, I hadn't seen -- I hadn't seen
07 so-and-so. He's not here. He's not here.
08 We just had to keep doing it until we got it
09 right and got it organized so we would know
10 exactly.
11 Q. Understood. And you -- that
12 wasn't your normal job function, but that's
13 what you did?
14 A. I did.
15 Q. All right. Now, after those two
16 or three, four, however many muster
17 experiences that you had -- I'm going to ask
18 you some more about it so we can understand
19 it a little better -- but you eventually got
20 to where there were 11 that never were
21 accounted for, correct?
22 A. Correct.
23 Q. All right. As you approached
24 that final muster, you were keeping a list,
25 correct?
00103:01 A. Correct.
02 Q. Do you have physically that list
03 today?
04 A. I --

05 Q. Did you hold on to it?
06 A. I did not.
07 Q. Who did you give it to?
08 A. Paul Johnston when I got to
09 New Orleans, which is the rig manager.
10 Q. Yes.
11 A. I turned the book over to him.
12 Q. Would that book, though, have
13 the names written by you, or would they --
14 into the muster list as it eventually evolved
15 to the --
16 A. To the missing personnel?
17 Q. Yeah. Up to the point where you
18 realized 11 were missing?
19 A. Yes.
20 Q. In your handwriting?
21 A. Yes. And also by the
22 checkmarks, you know, by the name. The first
23 muster, you know, I would check off the
24 people that was there.
25 Q. Yes, sir.
00104:01 A. You know, the second muster, I
02 kept it in line. And then once I found out
03 the 11, I wrote the names down and took it to
04 the bridge.
05 Q. Okay. And who did you bring it
06 to on the bridge?
07 A. Actually, I gave it to Mr. Sims
08 and to the -- not the captain of the
09 BANKSTON -- or either -- well, okay. I guess
10 it was the cocaptain. I don't know what his
11 title was. He could have been a captain.
12 Q. Yes, sir.
13 A. But he would -- he called the
14 name in by radio, called the names in, the
15 number missing and the names in.
16 Q. So this is an officer aboard the
17 DAMON BANKSTON?
18 A. Correct.
19 Q. Who you saw and heard call in
20 the names of the missing?
21 A. Uh-huh.
22 Q. Correct?
23 A. Correct.
24 Q. And meanwhile, you have Mr. Sims
25 in the -- found his way to the bridge on the
00105:01 DAMON BANKSTON, correct?
02 A. Uh-huh.
03 Q. And what about Pat O'Bryan? Was
04 he up there, too?
05 A. He was up there.
06 Q. And Mr. Wilson? Was Mr. Wilson
07 in there or --
08 A. He was.
09 Q. Okay. Were there any other BP

10 officials in the -- on the bridge that you
11 know of?

12 A. There were several of those
13 trainee personnel -- I don't remember their
14 names -- that were out there. The engineers,
15 I guess trainee engineers, they were up
16 there. A captain from the HORIZON was up
17 there. And the rest of them, I guess, would
18 have had to be the BANKSTON crew.

19 Q. Okay. Where was the OIM during
20 that time?

21 A. Sometimes he was up there. Most
22 of the time he was not.

23 Q. Did he assist you in your
24 muster, in your accounting for the missing?

25 A. No, he did not.

00106:01 Q. Did anyone assist you in this
02 muster function that you developed on the
03 deck of the DAMON BANKSTON?

04 A. Yes. The guys that would have
05 normally called the muster in to me on the
06 rig --

07 Q. Yes, sir.

08 A. -- one of them was Patrick
09 Morgan, Pat -- Patrick Morgan, and the other
10 one, I think, was Jerry Pitts. They assisted
11 me.

12 Q. Okay. Did they come up to the
13 bridge with you when you brought the list, or
14 was it just you?

15 A. Just me.

16 Q. After you delivered the
17 muster -- and let me make sure I understand
18 that. You delivered it to Mr. Sims, and he
19 gave it to the officer from the DAMON
20 BANKSTON, who then radioed the news in,
21 correct?

22 A. Actually, I made copies of it
23 and gave the -- you know, gave copies to
24 Mr. Sims and to the crew of the BANKSTON, and
25 I kept the original in the master muster
00107:01 book.

02 Q. Is -- literally, a copy machine
03 was up there on the bridge?

04 A. Uh-huh.

05 Q. Okay. So you made those
06 copies --

07 A. Uh-huh.

08 Q. -- kept the original, and gave
09 copies to the captain -- the assistant
10 captain, the DAMON BANKSTON officer who made
11 the call?

12 A. Uh-huh.

13 Q. And then to David Sims?

14 A. Yes.

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00107:19 Q. What was he doing? How was he
20 behaving on the bridge of the DAMON BANKSTON?
21 A. He appeared to be in charge.
22 Q. Okay. What about Mr. O'Bryan?
23 What was he doing on the bridge of the DAMON
24 BANKSTON?
25 A. I don't recall Mr. O'Bryan
00108:01 really doing anything on the BANKSTON. I
02 think -- as far as BP's role, I think David
03 Sims was the one that was in contact with
04 the -- as far as I know, with the home office
05 or land.

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00108:16 Q. After you delivered the copies
17 of the muster list, holding on to your own
18 original, where did you go and what did you
19 do? Let's walk through the chronology of
20 what you did next.
21 A. Well, after the final muster was
22 taken, you know, and the injured had been
23 evacuated, we sat there for about five hours.
24 Q. Do you know why you-all were
25 held there for -- strike that.
00109:01 Do you know why you-all were
02 there for five hours?
03 A. I don't think it was to watch
04 our buddies burn, but that's what we did.
05 Q. Yes, sir.
06 A. The -- I asked -- you know, at
07 some point on the way to Fourchon, the Coast
08 Guard boarded. And of course, me going back
09 and forth to the bridge, you know, people
10 would, you know, ask me, say, you know, Find
11 out why are we sitting here. Why are we
12 having to watch this thing burn?
13 Q. Yes.
14 A. I was told, I guess, maybe by
15 Sims, that the BANKSTON was the command
16 vessel, and the Coast Guard would not release
17 it, you know. It had to stay there to be in
18 command of the firefighting, I guess, of the
19 HORIZON. But by that time there was -- it
20 was just wrapped up with different
21 firefighting ships.
22 And I asked the -- I don't know
23 his name, but he was a Coast Guard member
24 that had boarded us. And they had taken our
25 statements, you know, and asked questions.
00110:01 I asked him, Well, why do we
02 have to sit there and watch it? Why couldn't

03 the command be transferred to another ship?
04 And he said, It could have.
05 I said, Well, why wasn't it?
06 He said, It was BP's call.
07 Q. Okay. I want you to -- let's go
08 back to your previous testimony. You said
09 that you believed it was Mr. Sims who told
10 you that it was the Coast Guard's call? Is
11 that a fair statement?
12 A. Correct.
13 MR. BOLES: Object to the form.
14 Q. (BY MR. PALMINTIER) Do you
15 remember actually having spoken to David Sims
16 about this?
17 A. Yes. On the bridge I asked.
18 Q. All right. And do you remember
19 having heard Mr. O'Bryan or any other
20 official tell you that the reason why you
21 were having to sit there and watch the fire
22 was because the Coast Guard was requiring you
23 to do that?
24 A. I do not recall anybody else
25 saying that.
00111:01 Q. And as you've said, by that time
02 Sims had regained his composure, at least as
03 far as you could tell, correct?
04 A. Correct.
05 Q. And he was giving commands and
06 communicating with Houston?
07 MR. BOLES: Object to the form.
08 A. Correct.
09 Q. (BY MR. PALMINTIER) Did you
10 hear anyone else ask Mr. Sims or anyone else
11 why you-all had to sit there all that time?
12 A. No.
13 Q. Okay. Have you had an
14 opportunity since this occasion to ask
15 Mr. Sims again why you had to sit there like
16 that?
17 A. I have not.
18 Q. All right. Let's go back down
19 to the BANKSTON. You've completed your
20 muster. You've fulfilled that part of your
21 job. You mentioned that the injured were
22 evacuated?
23 A. Uh-huh. Yes.
24 Q. Tell us -- see, I'm beginning to
25 forget, too.
00112:01 Tell us, then, what -- how were
02 the injured evacuated?
03 A. Coast Guard helicopter.
04 Q. Okay. Do you recall how many of
05 your muster list were actually evacuated by
06 helicopter? I mean, we can get that
07 information. Just -- I'm curious.

08 A. Probably roughly 15 to 20.

Page 113:18 to 116:23

00113:18 Now, but you did see and even experience the
19 Coast Guard doing an investigation, correct?

20 A. Yes.

21 Q. Tell us what, first of all,
22 occurred between you and the Coast Guard
23 official who did your interview.

24 A. Actually, it wasn't the Coast
25 Guard official that did my interview that I
00114:01 asked that question. It was -- we were in
02 the galley, I guess, of the BANKSTON, and
03 there were several of us sitting around
04 there. I think the OIM was one of them. I
05 don't recall who else -- when I asked him
06 that question.

07 Q. When you asked the Coast Guard
08 representative that?

09 A. Yes, uh-huh.

10 Q. And "that question," you mean,
11 Why are we having to sit here and watch this?

12 A. Right.

13 Q. Jimmy Harrell was there when you
14 asked that question? The OIM was there?

15 A. I do recall him being there.

16 Q. Who else might have been there?

17 A. Maybe Patrick Morgan, possibly
18 Jerry Pitts.

19 Q. Okay. Do you remember -- I'm
20 sorry.

21 A. That's all I can think of.

22 Q. Do you remember the reaction of
23 the OIM, Mr. Harrell, to the Coast Guard
24 statement that, It was BP's call that we
25 stayed?

00115:01 MR. BOLES: Object to the form.

02 A. I guess. I mean, I guess the
03 reaction was disbelief, you know, like all of
04 us. Just -- what he may have said -- I don't
05 recall what was -- he would have said. But I
06 think all of us was in awe that they would
07 have done that to us.

08 Q. (BY MR. PALMINTIER) Okay. Now,
09 did you actually give an interview to another
10 Coast Guard official or representative?

11 A. I did.

12 Q. All right. Do you remember --
13 first of all, do you remember that Coast
14 Guard officer's name?

15 A. It was a female. I do not
16 remember the name.

17 Q. Okay. And did she have you fill
18 out a form?

19 A. Yes.
 20 Q. All right. And -- but she did
 21 do a verbal interview with you before she had
 22 you fill out a form?
 23 A. After. You fill -- everyone
 24 filled out the forms, and then everyone was
 25 verbally interviewed.
 00116:01 Q. Okay. Now, after you had filled
 02 out the form and this female representative
 03 of the Coast Guard interviewed you -- well,
 04 strike that.
 05 After you filled out the form,
 06 you actually did this verbal interview with
 07 the Coast Guard official you've just talked
 08 about, the lady?
 09 A. Yes, yes.
 10 Q. Now, did she do a tape recording
 11 of that interview, or did -- do you recall
 12 her taking notes? Was there some way in
 13 which she memorialized your discussion?
 14 A. I don't recall being audio
 15 taped. She was taking notes.
 16 Q. Okay. All right. And do you
 17 believe -- based on your observations on the
 18 DAMON BANKSTON that evening or morning, do
 19 you remember that similar forms and
 20 interviews were going on with regard to the
 21 other members -- the other people who had
 22 been aboard the DEEPWATER HORIZON?
 23 A. Yes.

Page 117:09 to 121:04

00117:09 Mr. Taylor, when we went off the record, I
 10 was asking you questions about interviews.
 11 And you told us about the Coast Guard form
 12 that you had to fill out. I'm going to ask
 13 you to look in your book, this little
 14 booklet, at Exhibit 7.
 15 A. Okay. I think you took my book.
 16 Q. Tab 7. There you go. Look at
 17 Tab 7. Is that the U.S. Coast Guard witness
 18 statement you were talking about?
 19 A. Yes.
 20 Q. We'll go ahead and offer that as
 21 the next exhibit.
 22 (Exhibit 3687 was marked.)
 23 Q. (BY MR. PALMINTIER) We had kind
 24 of an influx of some documents late yesterday
 25 afternoon. Not being critical of anyone, but
 00118:01 we got -- among other things, I saw for the
 02 first time another document. I have copies
 03 of them I'm going to circulate. I may not
 04 introduce it. I'm going to ask you to look
 05 at that -- thank you -- if you could tell

06 me -- look at that real quick, Carl.
07 A. This is what she had me sign at
08 the funeral.
09 (Discussion held off the record.)
10 Q. (BY MR. PALMINTIER) What I'm
11 trying to do is -- Mr. Taylor, is just to
12 kind of get a list of any written or recorded
13 or -- any kind of statement that you gave at
14 any time from the 20th of April, 2010, to
15 today.
16 A. Okay.
17 Q. And so among others,
18 Exhibit 3687 -- is that your handwriting in
19 3687?
20 A. Yes.
21 Q. All right. I'm going to give
22 you that one. Not the one I just handed you,
23 but 3687, which I've marked as an exhibit. I
24 apologize. Is that your handwriting?
25 A. Yes.
00119:01 Q. All right. That -- is that the
02 U.S. Coast Guard form that you mentioned that
03 you filled out before you gave your actual
04 interview to the lady who was a Coast Guard
05 official?
06 A. Yes.
07 Q. Okay. Let me organize these
08 things real quickly. If you will, look with
09 me at the three lines that are written in the
10 lower third of the document. It begins: I
11 was asleep.
12 You wrote that, correct?
13 A. I did.
14 Q. And basically, it's saying that
15 you were asleep when the explosion occurred,
16 went to the bridge and got the emergency
17 muster book.
18 From there I went to lifeboat
19 No. 2 and onto the BANKSTON.
20 Did I roughly read that
21 correctly?
22 A. Yes.
23 Q. All right, sir. And does
24 that -- I mean, that's basically what you
25 said to us this morning. Is that what you
00120:01 meant to say when you filled this report out?
02 A. Yes.
03 Q. Okay. What are those lower
04 three items that have lines on them that
05 begin with: Boom, power loss in room,
06 et cetera.
07 Do you know what that is?
08 A. I do not.
09 Q. That's not in your handwriting?
10 A. No, it's not.

11 Q. Okay. Have you ever seen this
12 document before, Exhibit 37 -- I mean 3687,
13 other than when you signed it? I'm sorry.
14 A. No.
15 Q. Let me ask that better. I've
16 shown it to you. I've made it an exhibit.
17 Obviously, you have testified that's your
18 handwriting. But since the time that you
19 filled this out, did you -- have you seen it?
20 A. I have not.
21 Q. Now, other than that
22 Exhibit 3687 report that you filled out and
23 the interview that you gave to the Coast
24 Guard personnel, the lady who took your
25 testimony -- I mean, your statement after
00121:01 this form, did you, while you were on the
02 BANKSTON, give any other statement or
03 interview, written, recorded or otherwise?
04 A. No.

Page 124:14 to 128:07

00124:14 Q. Okay. When did -- strike that.
15 Where did the DAMON BANKSTON
16 eventually take you?
17 A. Fourchon.
18 Q. Okay. Port of Fourchon in south
19 Louisiana?
20 A. Uh-huh.
21 Q. And did -- and they went to the
22 docks at Fourchon?
23 A. Yes.
24 Q. And what happened next?
25 A. Of course, it took -- that was
00125:01 29 -- 25 to 29 hours after the explosion we
02 got to Fourchon. As we come off, we had to
03 immediately take a drug test. We lined up
04 for that. They passed out -- some people
05 didn't have clothes. You know, they passed
06 out shoes, underwear, stuff like that.
07 Q. Who asked you to take a drug
08 test?
09 A. I have no idea. I just know
10 they told -- well, it was BP personnel that
11 met us and, I guess, told us that we had to
12 take a drug test before we could, you know,
13 go any further.
14 Q. Did anybody object to that?
15 A. I don't think anybody objected.
16 There were several people, you know, in
17 disbelief that we would have had to line up
18 and go through that at this point.
19 Q. Yes, sir. By that time, the 25
20 to 29 hours later, had you had an opportunity
21 to communicate with your family and loved

22 ones?
23 A. No.
24 Q. Do you recall anyone asking why
25 you weren't able to communicate with your
00126:01 family and loved ones?
02 A. I asked.
03 Q. What did you -- who did you ask?
04 A. There again, I asked David Sims.
05 You know, he seemed to be in charge. I was
06 told that -- that all radio and telephone
07 lines had to be kept open for their use.
08 Q. Okay. This was even when you
09 reached Fourchon?
10 A. Yes. The only way I got in
11 touch with my wife, some people was able to
12 get off with a cell phone. And, you know, we
13 were almost in Fourchon before we had any
14 service.
15 Q. Okay.
16 A. And only thing I was able to do
17 at that time was leave a message because it
18 had been 15 hours or more. She didn't know,
19 you know, if I was dead or alive.
20 Q. All right, sir.
21 A. And she had -- was on an
22 airplane and wasn't able to get that message
23 until, you know, she was -- landed and was
24 able to cut her phone back on. She knew of
25 the incident, but she didn't know my status.
00127:01 Q. Y'all have been married 43
02 years?
03 A. 43, 44, something.
04 Q. We can take that off the record,
05 if you want.
06 Anyway, I read about it
07 somewhere. She came -- she flew into
08 New Orleans or where?
09 A. No. By the time she was able to
10 get the flight back, we were, you know,
11 coming into New Orleans. So she -- rather
12 than her come, my daughter and my son met me.
13 Q. All right. And did they drive
14 you home?
15 A. Yes.
16 Q. Okay. Now, while you were on
17 the docks at Fourchon, any statements taken
18 from you, whether it's news media, state
19 police, anybody at all take a statement from
20 you?
21 A. No, uh-huh.
22 Q. Okay. When were you finally
23 allowed -- let me rephrase that.
24 When were you able to leave the
25 docks at Fourchon?
00128:01 A. We were bused -- after the drug

02 test, you know, and they -- you know, there
 03 was some food there and some personal items,
 04 you know, clothing. And we were able to --
 05 we got on a bus. And it was, I don't know,
 06 probably a couple of hours from Fourchon to
 07 the Crown Plaza in New Orleans.

Page 128:13 to 130:10

00128:13 Q. Now, however, let's go back to
 14 the scene of the explosion and fire. In the
 15 process between the time that you got down in
 16 the water and aboard the DAMON BANKSTON until
 17 the time you got to the Crown Plaza here, did
 18 you talk to anyone about what happened?
 19 A. Yes. I -- of course, I didn't
 20 understand any of the technical language, but
 21 it was all a daze. I don't remember anybody
 22 going into detail as to what caused it or
 23 anything other than it happened.
 24 Q. Okay. And again, we established
 25 earlier that you're not an expert in any of
 00129:01 the drilling or well control areas. But
 02 generally, did you get an impression about
 03 what happened?
 04 MR. BOLES: Object to the form.
 05 A. As to what caused it or as to
 06 what happened?
 07 Q. (BY MR. PALMINTIER) Both.
 08 Let's begin with what caused it.
 09 MR. BOLES: Same objection.
 10 MR. KOHNKE: I may have an objection,
 11 depending on how he answers.
 12 MR. PALMINTIER: Kohnike is an
 13 opportunistic objector.
 14 A. With my limited knowledge, I
 15 don't know if -- if I was told, I don't know
 16 if I understood what happened. So I don't
 17 know. You know, you hear a lot of stuff
 18 since then in the news media and stuff as to
 19 what happened. But at that time, I don't
 20 think I knew what happened --
 21 Q. (BY MR. PALMINTIER) Okay.
 22 A. -- other than it exploded and
 23 caught on fire.
 24 Q. I'm going to accept that as an
 25 answer to both, you know, what caused it and
 00130:01 what happened.
 02 A. Okay.
 03 Q. Is that -- is that an accurate
 04 response to your answer? Is that correct?
 05 You neither know what happened in terms of
 06 technical nor why it happened?
 07 A. Correct.
 08 Q. Except for the explosion, of

09 course?
10 A. Uh-huh.

Page 132:16 to 134:22

00132:16 Q. If you could look at that, and
17 specifically the second paragraph. I'm going
18 to read it out loud. It says: I was on
19 board the DEEPWATER HORIZON on April 20th,
20 2010, when, as a result of an incident, it
21 became necessary to evacuate the rig. The
22 evacuation was ordered about 2145 a.m. or
23 p.m. At the time of the evac -- at the time
24 the evacuation was ordered, I was bridge and
25 was getting the emergency evacuation
00133:01 notebook.

02 Did I read that correctly?

03 A. Yes.

04 Q. Is that exactly what happened?
05 Was an evacuation order ever announced from
06 the bridge as you were on the DEEPWATER
07 HORIZON?

08 A. I don't recall a rig-wide
09 evacuation order announced.

10 Q. Okay.

11 A. It was announced on the bridge.

12 Q. Is that your handwriting or is
13 that Mr. Shuman's?

14 A. That's mine.

15 Q. Okay. How long did you meet
16 with Mr. Shuman that day?

17 A. At the most, five minutes.

18 Q. Had Mr. Shuman tried to contact
19 you at some point before finding you in a
20 church -- at a church at a funeral?

21 A. Yes.

22 Q. How many times did he -- had he
23 tried to contact you?

24 A. Well, I guess the day before he
25 had called me and said he wanted to get --
00134:01 you know, he needed something, some
02 information from me and wanted to get it
03 wrapped up, and that he was going to be in
04 Carthage that next day.

05 Q. And is that where the funeral
06 took place?

07 A. Uh-huh.

08 Q. Did you tell him or ask him to
09 meet you at the funeral?

10 A. I did not. I told him I was
11 going to be at the funeral and I would call
12 him, you know, when it was over and we could
13 meet somewhere.

14 Q. Okay. Was the funeral still
15 going on when he came up to you?

16 A. No. It was over.
17 Q. It was over.
18 Did he try to -- to your
19 knowledge, did he talk to any other people
20 that happened to be at the funeral at that
21 time?
22 A. Not to my knowledge.

Page 135:03 to 138:16

00135:03 Q. The only other subject I have
04 any questions about is I know you mentioned
05 Mr. O'Bryan and Mr. Sims were aboard the
06 DEEPWATER HORIZON on April 20th, 2010?
07 A. Yes.
08 Q. Do you know on what date they
09 boarded the DEEPWATER HORIZON?
10 A. April 20th.
11 Q. What time did they arrive?
12 A. Roughly 11:00 a.m.
13 Q. And you said they arrived on the
14 DEEPWATER HORIZON with two Transocean
15 employees; is that correct?
16 A. Yes.
17 Q. Who were those employees, if you
18 know?
19 A. Buddy Trahan. There again, I
20 would have to look at the POB to -- I can't
21 remember the name of the other.
22 Q. Okay. What's Mr. Trahan's job
23 position, job title?
24 A. I think he's assets manager.
25 Q. Did you make the flight
00136:01 arrangements for them or helicopter
02 arrangements for them to come aboard the
03 DEEPWATER HORIZON?
04 A. No. If I recall, they flew in
05 on a -- on a crew change helicopter.
06 Q. Okay. Do you recall any special
07 arrangements being made prior to their
08 arrival?
09 A. Arrangements as far as?
10 Q. Preparations of the -- of the
11 rig itself.
12 A. I moved some people around to
13 try to assure that each one had a private
14 living quarters.
15 Q. How long -- I know they ended up
16 leaving on April 20th, but when they came
17 aboard, how long was -- were they intending
18 to stay aboard the DEEPWATER HORIZON, if you
19 know?
20 A. I don't know.
21 Q. Okay. And they were there to
22 present an award; is that correct?

23 A. Yes.
 24 Q. And when was the presentation,
 25 if you know?
 00137:01 A. I don't know. I wasn't present
 02 at the presentation, so I don't know.
 03 Q. It did occur, though, the
 04 presentation itself?
 05 A. I don't know.
 06 Q. Or do you know?
 07 A. I don't know.
 08 Q. You don't know. Okay.
 09 Do you recall anybody -- any of
 10 your coworkers talking about them coming
 11 aboard and it being a big deal or anything of
 12 that nature?
 13 MR. BOLES: Object to the form.
 14 A. Well, I guess it's always a big
 15 deal when a VIP comes aboard. You know, it
 16 was -- other than -- the only thing I knew,
 17 they were coming aboard for the presentation
 18 or the award presentation for the no lost
 19 time.
 20 Q. (BY MR. KRAUS) Do you know of
 21 any Transocean employees that were taken away
 22 from their regular job duties to do anything
 23 in preparation for their arrival?
 24 MR. BOLES: Object to the form.
 25 A. No.
 00138:01 Q. Did you -- other than the
 02 conversations that you've already testified
 03 to regarding Mr. Sims, did you speak to
 04 Mr. O'Bryan, Mr. Sims or Mr. Trahan about
 05 anything that you haven't previously
 06 testified to?
 07 A. Other than to assign bunks, you
 08 know, and just general conversations, just
 09 greeting.
 10 Q. Okay. I know you said they
 11 arrived at 11:00. Did you see them -- other
 12 than the greeting you just testified to, did
 13 you see them or interact with them at any
 14 time from 11:00 o'clock a.m. until you
 15 encountered them on the bridge?
 16 A. No.

Page 139:22 to 167:19

00139:22 Q. Let me show you what we have now
 23 marked as 3689, and the tab number is -- I
 24 believe it's Tab 35, for everybody who's got
 25 the CDs.
 00140:01 (Exhibit 3689 was marked.)
 02 Q. (BY MR. BOLES) And I'll be
 03 referring to what we call Bates numbers in
 04 the lower right-hand corner.

05 Let me hand you Exhibit 3689.
06 Are you looking at a POB dated April 14th,
07 2010?
08 A. I am.
09 Q. And in the lower right-hand
10 corner of the first page, does it have the
11 alphanumeric number TRN-MDL-00030381?
12 A. It does.
13 Q. Can you tell me what this is,
14 sir.
15 A. What that numerical number is?
16 Q. No, what the document is.
17 A. It is a POB.
18 Q. Did you create this document?
19 A. It would -- all right. If I
20 came to the rig on the 14th -- and which I
21 can't remember -- if the 14th was on
22 Wednesday, I created it.
23 Q. How did you do it, sir?
24 A. We have a program -- computer
25 program, and I have to add the people that
00141:01 are coming on board into the program, and the
02 computer generates the POB.
03 Q. Do you also subtract the people
04 who are leaving?
05 A. Correct.
06 Q. When do you generate a POB for a
07 certain date? And let's make that more
08 concrete. Let me ask you, do you know if --
09 for this Exhibit 3689, dated April 14th,
10 2010, when would you have generated or when
11 would your counterpart, if it wasn't you,
12 have generated this document?
13 A. Usually we do it when we know
14 that everyone has come and gone from the rig.
15 There is times we have to revise it because
16 if someone has to be sent in and we've
17 already generated a POB, then we would have
18 to revise the POV -- POB to reflect that.
19 Sometimes they could be sent
20 in -- someone could be sent in by boat for
21 one reason or another, and we would have
22 already generated that POB. We wouldn't have
23 known about that person at the time. We
24 thought the transition was complete. And we
25 would have to revise the POB.
00142:01 Q. For -- and this may vary. You
02 can tell me if it does. But, for example,
03 for a POB dated April 14th --
04 A. Uh-huh.
05 Q. -- would that actually be
06 generated by you and the computer on the
07 14th, or would it be done the day before?
08 A. No. It would be done the day of
09 the 14th.

10 Q. Where do you get your -- do you
11 do these on a daily basis?
12 A. Yes.
13 Q. Why do you generate these?
14 A. Probably -- I mean, I would
15 think it's a Coast Guard requirement because
16 at all times, you know, you need to know
17 who -- what personnel are on board in case of
18 an emergency. And of course, the muster list
19 is automatically generated from the POB.
20 Q. Where do you -- where -- are
21 there different kinds of sources that you
22 have for getting that information about who's
23 coming on board and who's leaving that you
24 put into the computer to generate a POB?
25 A. Yes.
00143:01 Q. What -- can you tell me what
02 some of those are.
03 A. I usually handle the Transocean
04 side of it and the personnel. The BP
05 dispatcher would handle BP's and third-party
06 personnel. And I usually would get -- I
07 would -- I would fill out my manifest and
08 give it to BP. They would put their people
09 on it. And then I would take the final
10 manifest and generate the POB.
11 Q. Now, what is the manifest? Is
12 that a document showing who's coming on board
13 and who's leaving?
14 A. Correct, uh-huh.
15 Q. Where do you get the information
16 about TO personnel for the TO part of the
17 manifest?
18 A. Well, normally it's -- the --
19 it's set. You've got your regular crew
20 change. You know, like on Wednesday you've
21 got -- or on Monday you might have the marine
22 department, and I know who's coming and
23 going. On Wednesday you've got the drill
24 crew. On Thursday you've got the crane crew.
25 And I have those crew members.
00144:01 And if there are any exceptions,
02 I had -- there's a blackboard in the -- in my
03 office. Let's just say if one individual
04 wasn't coming out, and he had somebody
05 working for him, then that information is
06 supposed to be put on that blackboard so I
07 would know that that person is not coming to
08 the rig, and -- and so-and-so is coming for
09 him, or the person going in is not going to
10 go in. He's going to work for him.
11 Q. Who would put that on the
12 blackboard for you?
13 A. All right. I would put it on
14 there, usually instructed by a supervisor,

15 you know, for -- for that individual, because
16 they had to check with the supervisor --
17 their supervisor to make it official.
18 Plus, there was a form that was
19 used to fill out if someone was swapping
20 duties and which OIM -- their supervisor and
21 the OIM would have to approve.
22 Q. And would it be fair to say part
23 of your job at -- on the DEEPWATER HORIZON
24 was keeping track of who was on board the
25 vessel using these POBs?
00145:01 A. Yes.
02 Q. If you look at that one that
03 we've just shown you, Exhibit 3689, does that
04 look like a -- like the POB that would have
05 been generated by the computer for
06 April 14th, 2010?
07 A. It does.
08 Q. Where do you get the
09 information, sir, about -- if you look, for
10 example, at the first page of 3689, at the
11 bottom it says: Halliburton.
12 A. Uh-huh.
13 Q. Where do you get the information
14 about who's on board the vessel for
15 Halliburton, for example?
16 A. From BP. BP dispatcher.
17 Q. And it -- would that be true for
18 all of the other third parties and
19 contractors other than BP and TO?
20 A. Except for Transocean
21 third-party personnel.
22 Q. Okay. Who would those be?
23 A. Well, Clean Blast, just looking
24 at it, which are -- would be someone ordered
25 by Transocean. Of course, Art Catering is
00146:01 Transocean's --
02 Q. All right. We're done with that
03 one, so I'll -- might want to -- we'll hand
04 that to our court reporter so that she can
05 keep them cross-stacked since I didn't staple
06 them or clip them ahead of time.
07 Let me hand you what we've
08 marked as Exhibit 3690.
09 (Exhibit 3690 was marked.)
10 MR. BOLES: This is Tab 36.
11 Q. (BY MR. BOLES) Does this appear
12 to be the POB for the DEEPWATER HORIZON of
13 April 15th, 2010, sir?
14 A. It does.
15 Q. Do you see on the second-to-last
16 page, the page number ending -- page with the
17 number ending 394 in the lower right-hand
18 corner?
19 A. Yes.

20 Q. Five lines from the bottom it
21 says: Radio operator, Carl Barrett Taylor.
22 A. Yes.
23 Q. That's you?
24 A. It is.
25 Q. So would you -- does that mean
00147:01 you would have been on board on April 15th?
02 A. Yes, and I'm -- yes.
03 Q. So would you have generated this
04 document?
05 A. I would have.
06 Q. Now we'll go to Tab 37, which
07 I've marked as 3691.
08 (Exhibit 3691 was marked.)
09 Q. (BY MR. BOLES) Is that another
10 DEEPWATER HORIZON POB?
11 A. It is.
12 Q. Would you have generated this
13 document, sir?
14 A. Yes.
15 Q. Turning to Tab 38, which we've
16 marked as Exhibit 3692.
17 (Exhibit 3692 was marked.)
18 Q. (BY MR. BOLES) Sorry to be so
19 tedious, but is this another DEEPWATER
20 HORIZON POB?
21 A. It is.
22 Q. Did you generate this?
23 A. I did.
24 Q. Then turning to Tab 39, which
25 we've marked as 3693.
00148:01 (Exhibit 3693 was marked.)
02 Q. (BY MR. BOLES) Is this the
03 April 18th DEEPWATER HORIZON POB?
04 A. It is.
05 Q. And you generated that?
06 A. I did.
07 Q. And behind 40 is a document that
08 we've marked as 3694.
09 (Exhibit 3694 was marked.)
10 Q. (BY MR. BOLES) Handing that to
11 you, sir. Is that the DEEPWATER HORIZON POB
12 for April 19th?
13 A. It is.
14 Q. Did you generate that?
15 A. I did.
16 Q. And then behind Tab 41, we've
17 marked the document Exhibit 3695.
18 (Exhibit 3695 was marked.)
19 Q. (BY MR. BOLES) Do you have that
20 in front of you, sir?
21 A. I do.
22 Q. Is that the DEEPWATER HORIZON
23 POB for April 20, 2010?
24 A. It is.

25 Q. Did you generate that?
00149:01 A. I did.
02 Q. And for all of these POBs that
03 we've been talking about, beginning with
04 Exhibit 3689, do the -- does the basic
05 description you've already given for the
06 process and the purpose for generating this
07 apply to all of them equally?
08 A. It does.
09 Q. And now, last in this series, I
10 want to show you what's behind Tab 42,
11 Exhibit 3696.
12 (Exhibit 3696 was marked.)
13 Q. (BY MR. BOLES) It's another POB
14 with a date April 21st. Would you have
15 generated this one, sir?
16 A. No.
17 Q. It's obvious because the -- of
18 the incident that took place on the 20th?
19 A. Uh-huh.
20 Q. Would it be possible on the 21st
21 to -- for someone else to print out a POB
22 that would have -- that would bear a date of
23 the 21st, based on data that was in the
24 computer prior to that?
25 A. It could be possible. I don't
00150:01 know.
02 Q. Do you know where the data from
03 which the -- which you described the
04 inputting of and the downloading of, where
05 that actually resided in terms of computer
06 memory?
07 A. It's on -- it was on my computer
08 in my office, and it was also stored in -- in
09 Houston or in town.
10 Q. Was it sort of stored in Houston
11 in town by some sort of a realtime
12 transmittal of reconciling or synchronizing
13 databases?
14 A. Okay. The POB from one day to
15 the next, unless I change it or someone
16 changes it, would remain the same.
17 Q. I see.
18 A. It remains the same until I
19 change it.
20 Q. Was -- do you know if there was
21 some kind of a synchronization of data --
22 well, strike that.
23 When you put in the data to
24 create these POBs or to update the database
25 of personnel on the DEEPWATER HORIZON --
00151:01 A. Uh-huh.
02 Q. -- did you put that into your
03 laptop or what kind of computer?
04 A. Main computer. My -- no, this

05 was a desktop computer.

06 Q. And do you know how often that

07 synchronized with the database in Houston?

08 A. I do not.

09 Q. Is it possible that Exhibit 3696

10 was printed based on data as of April 20th

11 that just didn't get changed for obvious

12 reasons after April 20th?

13 A. Yes.

14 Q. Do you have any other

15 explanation as to why there's an April 21st

16 POB for the DEEPWATER HORIZON?

17 A. I have no explanation. I don't

18 have any idea.

19 Q. Sir -- that's all I have for

20 those. In your earlier testimony today you

21 were asked about some BP wellsite leaders.

22 Do you remember that?

23 A. Uh-huh.

24 Q. The Sepulvado brothers, Don

25 Vidrine and others?

00152:01 A. Uh-huh.

02 Q. Did you ever personally take

03 direction from a BP wellsite leader?

04 A. As far as the manifest, I either

05 take it from him or through the BP

06 dispatcher.

07 Q. So that was input they gave you

08 by way of information about which BP people

09 were going to be on the vessel?

10 A. Correct.

11 Q. Did -- in any other way, did a

12 BP wellsite leader ever act as your boss?

13 A. Not directly, no.

14 Q. And anybody else from BP who

15 ever directed how you did your work?

16 A. No. Only the wellsite leader or

17 either the BP dispatcher.

18 Q. And when you say "the wellsite

19 leader," that's by way of giving you the

20 manifest that you talked about earlier?

21 A. Yeah, either sending people in

22 or bringing them out.

23 Q. But not in any other way did

24 they give you direction or direct your work?

25 A. No.

00153:01 Q. You also -- you've mentioned the

02 phrase "well from hell" this morning. Do you

03 remember that?

04 A. Uh-huh.

05 Q. And you said you might have

06 heard about that -- well, when -- you

07 mentioned the MARIANAS in conjunction with

08 that, and I just want to clarify that.

09 Were you rotating on and off the

10 Macondo well as a radio operator when it was
11 being drilled by the rig, MARIANAS?
12 A. No, I was not.
13 Q. Do you remember -- and you don't
14 remember who used the phrase "well from
15 hell"?
16 A. Not individual. I mean, that
17 was just -- that was anybody you run into, I
18 guess, mainly would say that. Well, we're
19 going to the well from hell, or we're on the
20 well from hell or -- you know, it was just a
21 phrase.
22 Q. About the Macondo well?
23 A. Correct.
24 Q. Did any of those people, sir,
25 ever say to you, in the same or another
00154:01 conversation prior to the incident, that
02 because of that, they thought the well
03 shouldn't be drilled?
04 A. No.
05 Q. Sir, are you familiar with
06 something called the stop authority?
07 A. I am.
08 Q. What is that?
09 A. It's that anyone can stop an
10 unsafe job. Has the ability to speak up and
11 stop the job.
12 Q. Anybody on board the Transocean
13 DEEPWATER HORIZON has that authority?
14 A. If they're working in an unsafe
15 position or condition.
16 Q. If they think that there's
17 something unsafe going on on the rig?
18 A. Uh-huh.
19 Q. If you thought there was
20 something unsafe going on on the rig, did you
21 have that stop authority?
22 A. I don't know if I would or not
23 because I wouldn't have any -- any background
24 or technical knowledge, maybe, to know if it
25 was unsafe or not, so I don't know.
00155:01 Q. Well, if you heard somebody who
02 had that kind of technical knowledge or
03 background say to you anything about the
04 Macondo well that suggested to you that there
05 was a safety risk with the well, would you
06 have tried to exercise the stop authority and
07 stop the well from being drilled?
08 A. No.
09 Q. You would have let the well
10 continue to be drilled?
11 A. Like I said, I don't have -- I
12 don't have the knowledge to -- to tell an OIM
13 or a wellsite leader, Hey, this is wrong or
14 that's wrong. I just don't have that

15 information or the knowledge, too, that they
16 would take me seriously.

17 Q. If you heard an OIM say
18 something to you that made you think that the
19 well posed a safety risk in the way it was
20 being drilled, would you try to set about
21 having a stop authority exercised so that the
22 well was no longer being drilled?

23 MR. ITKIN: Objection; form.

24 A. I don't -- you know, I don't
25 know. I don't think I could. I don't think
00156:01 I -- I still don't think I would have the
02 knowledge to do it, to -- as many people that
03 are qualified and technical experts that we
04 have that's between the OIM and my level, you
05 know, I very seldom even went outside.

06 Q. (BY MR. BOLES) So some of
07 those -- I'm sorry. I didn't mean to cut off
08 your answer.

09 A. That's all right. That's good.
10 I'm through.

11 Q. Okay. Some of those people that
12 you mentioned having technical knowledge or
13 technical expertise in terms of the well and
14 its safety, would that include the OIM?

15 A. Sure.

16 Q. Would that include drillers on
17 the DEEPWATER HORIZON?

18 A. Yes.

19 Q. And I'm sure there are others as
20 well that you would regard as having that
21 kind of technical expertise that were on the
22 DEEPWATER HORIZON?

23 A. Yes.

24 Q. Did any of them ever say to you
25 prior to the incident, We should stop
00157:01 drilling this well, it's too dangerous?

02 A. No.

03 Q. Did anybody ever say to you
04 anything to that effect prior to the
05 incident?

06 A. No.

07 Q. Did anybody ever say that
08 this -- this well cannot be drilled safely,
09 in words or substance?

10 A. No.

11 Q. Did anybody from Transocean ever
12 say to you, We're rushing this too much,
13 we're not -- we're doing this job too
14 quickly, it's not being done right?

15 A. No.

16 Q. Did you ever get that impression
17 from what you observed on the DEEPWATER
18 HORIZON?

19 A. No.

20 Q. You mentioned the pretour
21 meetings that you occasionally attended?
22 A. Uh-huh.
23 Q. Am I correct, sir, that the last
24 one you believe you attended was on the
25 morning of April 19th?
00158:01 A. Yes.
02 Q. So you did not attend the
03 pretour meeting on the morning of April 20th?
04 A. I don't recall going to it, no.
05 Q. Or the evening of April 19th?
06 A. No, huh-uh.
07 Q. Did you ever observe any
08 disagreements between a BP wellsite leader or
09 someone else at BP and a Transocean person in
10 any of those pretour meetings over how the
11 well should be drilled?
12 A. No.
13 Q. Or about any other procedures
14 being done with respect to the Macondo well?
15 A. No.
16 Q. When you were asked about the --
17 when you -- on the evening of the 20th or the
18 night of the 20th, you were awakened by the
19 first explosion, I believe?
20 A. Uh-huh.
21 Q. And knocked out of bed by the
22 second explosion?
23 A. Yes, that's -- yeah.
24 Q. In between the two explosions,
25 did you hear any alarms go off on the rig?
00159:01 A. I don't recall the alarm. I
02 recall the announcement that there was a fire
03 on the rig floor and to muster in the galley.
04 Q. Was that after the -- I'm sorry.
05 Go ahead. I --
06 A. Yeah. That was -- that was
07 immediately following, I guess, the
08 explosion, yeah.
09 Q. The first or the second?
10 A. I recall it as the first.
11 Q. Have you ever heard the -- of
12 something called a general alarm on the
13 DEEPWATER HORIZON?
14 A. I've heard an alarm, yeah,
15 uh-huh.
16 Q. Have you ever heard that general
17 alarm go off?
18 A. Yes.
19 Q. What does it sound like?
20 A. Well, let's see. Abandonment is
21 like, you know, three bursts and then three
22 more bursts. The general alarm, I guess,
23 sounds kind of like a police car, you know, a
24 siren.

25 Q. Is it loud enough to wake people
00160:01 up who are sleeping on the rig?
02 A. Yes, uh-huh.
03 Q. Do you think it would have woken
04 you -- has it ever woken you up before when
05 you were sleeping on the rig?
06 A. Yes.
07 Q. You mentioned that after the
08 second explosion you went up to the bridge,
09 right?
10 A. Correct.
11 Q. And you saw the three BP
12 visitors on the bridge?
13 A. Two BP visitors.
14 Q. Okay. I have Mr. O'Bryan, Nick
15 Wilson and David Sims?
16 A. Nick Wilson wasn't a visitor.
17 He was assigned to the rig. He was the BP
18 dispatcher.
19 Q. And David Sims wasn't -- was
20 he -- he was visiting the rig at the time?
21 A. Yes.
22 Q. His job with respect to the
23 DEEPWATER HORIZON, as far as you know, didn't
24 station him on the rig itself; is that
25 correct?
00161:01 A. No.
02 Q. Is that correct?
03 A. That's correct.
04 Q. Okay. And you -- I think you
05 said that things happened pretty quickly at
06 that point, right?
07 A. Yes.
08 Q. After those three left, how
09 quickly did the next people leave the bridge?
10 A. It was a matter of seconds. You
11 know, just a short period of time.
12 Q. And who were the next people to
13 leave after that?
14 A. It was some people that had come
15 in on the backside of the bridge from the
16 engine room. You know, one was them was
17 injured. Matter of fact, more than one,
18 really. I know of at least two that was
19 injured. I think Brent Mansfield was one of
20 them and a Williams -- I can't think of his
21 name -- was injured.
22 Q. Do you have any estimate of the
23 interval of time between when the three BP
24 people left the bridge and when you yourself
25 left, as in seconds or minutes or anything --
00162:01 any kind of estimate?
02 A. Could have been two to three
03 minutes.
04 Q. The three BP people,

05 Mr. O'Bryan, Mr. Williams, Mr. Sims, didn't
06 have duties on the bridge at that time, did
07 they?
08 A. No.
09 Q. So they were all three there
10 to -- or at least Mr. O'Bryan and Mr. Sims
11 had come on board to present an award,
12 correct?
13 A. As far as I know, yes.
14 Q. So their leaving when they did
15 didn't create a risk to anybody else on the
16 DEEPWATER HORIZON, did it?
17 A. No.
18 Q. Didn't displace anybody from a
19 lifeboat, as far as you know?
20 A. No.
21 Q. Nothing wrong with their having
22 left first, as far as you're concerned?
23 A. Oh, no.
24 Q. You mentioned that when you got
25 on the DAMON BANKSTON, you were held there
00163:01 for a number of hours. I think you said five
02 hours?
03 A. I would think at least five
04 hours.
05 Q. And then you said it was 24 or
06 29 hours before you actually reached
07 Fourchon?
08 A. That was total hours, including
09 the five.
10 Q. Okay. And you -- have you ever
11 heard of something called the Marine Board of
12 Inquiry, or MBI?
13 A. I don't recall that, no.
14 Q. Have you -- have you heard that
15 there was a jointly conducted set of hearings
16 by the Coast Guard and the former Minerals
17 Management Service called the MBI that, in
18 the months after the incident, had witnesses
19 come and testify?
20 A. Yes.
21 Q. Were you -- were you aware that
22 the Coast Guard officers testified under oath
23 at the MBI hearing that it was the Coast
24 Guard and not BP that gave the directive and
25 was responsible for holding the DAMON
00164:01 BANKS [sic] for five hours on that same
02 location after survivors were picked up?
03 A. I was not aware of that, no.
04 Q. Did you -- do you know the DAMON
05 BANKSTON's captain or have you ever met him?
06 A. I've met him. Not prior to the
07 incident, but I've met him.
08 Q. Did he ever tell you why he held
09 the DAMON BANKSTON on location for five

10 hours?

11 A. I don't know -- I don't know if
12 he ever told me or not. I know that we -- I
13 asked about it. He was up there when I
14 asked. And Mr. Sims said that -- that they
15 were -- that the BANKSTON was the command
16 ship, and they couldn't -- we could not
17 release command to another ship.

18 Q. Did Mr. Sims tell you whether it
19 was the Coast Guard that had given the
20 directive that the ship had to stay on that
21 location?

22 A. Yes, Coast Guard. He said the
23 Coast Guard gave it.

24 Q. Are you aware that the DAMON
25 BANKSTON's captain testified under oath at
00165:01 the MBI hearing that it was the Coast Guard
02 that ordered the DAMON BANKSTON to stay on
03 location for five hours after the survivors
04 were picked up?

05 A. No, I'm not aware of that
06 testimony.

07 Q. Did you -- you know Mister --
08 the OIM at the time of the incident,
09 Mr. Harrell, I take it?

10 A. Uh-huh, yes.

11 Q. Is he an honest man, from what
12 you know?

13 MR. PALMINTIER: Object to the form.

14 A. As far as I know.

15 Q. (BY MR. BOLES) Are you aware
16 that in his closing comments at the MBI
17 hearing, he told the Coast Guard examiner
18 that he thought it was wrong for them to have
19 kept the DAMON BANKSTON on location for five
20 hours after the incident?

21 A. I'm not aware of the testimony,
22 no.

23 Q. Would you agree that it would
24 be -- if you were going to form an opinion --
25 and I'm not saying you have -- but if you
00166:01 were going to form an opinion about who was
02 responsible for keeping the DAMON BANKSTON on
03 the same location for five hours after
04 survivors were picked up, you would want to
05 know things like what the DAMON BANKSTON
06 captain testified to, what Coast Guard
07 officers testified to. That would be
08 important to you in making up your own
09 judgment on that, wouldn't it?

10 MR. PALMINTIER: Object to the form.

11 A. Yes.

12 Q. (BY MR. BOLES) And as you sit
13 here today, you don't have a belief one way
14 or the other as to who was responsible for

15 holding the DAMON BANKSTON on location for
 16 five hours after survivors were picked up?
 17 MR. PALMINTIER: Objection; form.
 18 A. Yeah, I have an opinion.
 19 Q. (BY MR. BOLES) What's your
 20 opinion?
 21 A. I was told by one of the Coast
 22 Guard members that had boarded us that --
 23 when I asked him why we were having to sit
 24 there and that, I was told that the Coast
 25 Guard would not release the BANKSTON because
 00167:01 it was in command. He said that wasn't our
 02 call. We can't transfer command to another
 03 ship, and that was BP's call.
 04 Q. And do you know what rank that
 05 Coast Guard person was?
 06 A. I do not.
 07 Q. You don't know if he was an
 08 officer?
 09 A. He was in uniform.
 10 Q. You don't know if he was an
 11 officer or an enlisted man?
 12 A. I have no idea.
 13 Q. Is that the only thing that
 14 you're aware of, that conversation you had
 15 with that one Coast Guard person, that leads
 16 you to believe or that indicated to you that
 17 BP might have been responsible for holding
 18 the DAMON BANKSTON on location?
 19 A. Yes.

Page 168:13 to 171:05

00168:13 Q. Let me show you what -- a
 14 document behind Tab 16 which we've marked as
 15 Exhibit 3697.
 16 (Exhibit 3697 was marked.)
 17 Q. (BY MR. BOLES) It's bearing the
 18 beginning Bates No. TRN-INV-00004674 --
 19 A. Uh-huh.
 20 Q. -- through 4682. I don't have
 21 any reason to believe you've seen this
 22 before --
 23 A. I haven't.
 24 Q. -- Mr. Taylor, but I'll ask
 25 you --
 00169:01 A. No, I have not seen it.
 02 Q. Okay. Do you see where it says
 03 at the top: Confidential Interviewing Form?
 04 A. Yes.
 05 Q. And the date of June 22, 2010,
 06 halfway down the first page?
 07 A. Yes.
 08 Q. Where it says Interviewers
 09 Present, do you see the line above that says

10 Simon Watson and Diane Willey?
 11 A. Uh-huh.
 12 Q. Do you recognize those names?
 13 A. No.
 14 Q. Were you interviewed by someone
 15 from Transocean or representing Transocean
 16 around June 2010?
 17 A. Not that I recall.
 18 Q. Okay. Since you haven't seen
 19 this before, I'm just going to direct your
 20 attention to Page 7. Actually, let me -- at
 21 the bottom of Page 6, the last paragraph
 22 where it says: Once they arrived on the
 23 BANKSTON.
 24 Do you see that?
 25 A. Uh-huh. Uh-huh.
 00170:01 Q. Do you see the reference to
 02 yourself in the second sentence there?
 03 A. Uh-huh.
 04 Q. Okay. Now, let's go to the top
 05 of Page 7. And I'm going to read the second
 06 paragraph on Page 7 beginning with: Per
 07 Billy.
 08 Do you see that?
 09 A. Yes.
 10 Q. So read along with me silently
 11 while I read that, please.
 12 Per Billy, the BANKSTON remained
 13 in the same location for approximately 10
 14 hours and watched the HORIZON burn. Billy
 15 was asked if, during this time, the crew
 16 received any information at all. Billy said,
 17 "Not really." Billy said that they asked
 18 crew members of the BANKSTON if they could
 19 use the phone to call their families, but
 20 were told no. The crew was told that the
 21 Coast Guard required them to provide a
 22 urinalysis immediately upon arriving onshore.
 23 Do you see that?
 24 A. Uh-huh.
 25 Q. Now, do you have reason to
 00171:01 believe that Billy is mistaken when he says
 02 that the Coast Guard was the one who required
 03 the urinalysis of DEEPWATER HORIZON crew
 04 members when they arrived on the shore?
 05 A. No.

Page 172:04 to 180:11

00172:04 Q. Have you ever heard of something
 05 called a forward plan -- a daily forward plan
 06 with respect to the well?
 07 A. I'm not familiar with that, no.
 08 Q. Let me show you one and see if
 09 that jogs your memory. This is behind

10 Tab 44. It's been marked already as
11 Exhibit 2337. So I'll hand that to you, sir.
12 There is a lot of technical stuff there,
13 so -- and I'm not going to be asking you
14 about the details. But it appears on the
15 cover e-mail that halfway down the list of
16 many addressees, it says: DWH radio
17 operator.
18 A. Uh-huh.
19 Q. Would that have -- were you the
20 DWH radio operator on April 16th?
21 A. I was.
22 Q. Would you have received this
23 forward plan, do you believe?
24 A. Yes.
25 Q. Do you remember seeing it?
00173:01 A. I probably saw it. I don't
02 remember the contents because they -- you
03 know, it didn't mean anything to me, and I
04 didn't understand half of what was written on
05 them anyway, so --
06 Q. I don't, either.
07 A. I very seldom read them.
08 Q. I'm sure you understand them
09 more than I do.
10 A. I wouldn't know what they were
11 talking about.
12 Q. So do you -- do you have an
13 understanding that these so-called forward
14 plans were generated by the BP wellsite
15 leader on a regular basis?
16 A. Yes.
17 Q. And would you have received them
18 on a regular basis?
19 A. Yes.
20 Q. Now, if this e-mail system works
21 like some others, someone could have -- any
22 recipient here could have hit reply to all
23 and -- and commented on this forward plan,
24 right?
25 A. I would assume so.
00174:01 Q. Did you ever get any -- receive
02 any feedback by way of e-mail replies to a BP
03 wellsite leader's forward plan like this?
04 A. Not that I recall, no.
05 Q. Did you have -- ever have any
06 discussions with anybody at -- any BP
07 personnel on board the rig about the drilling
08 plan for the Macondo well?
09 A. No.
10 Q. Or the drilling progress?
11 A. No.
12 Q. Or difficulties with drilling?
13 A. No.
14 Q. Or well conditions?

15 A. No.
16 Q. Did you ever discuss those kind
17 of technical or drilling subjects with
18 anybody from Halliburton?
19 A. No.
20 Q. Anybody from Transocean?
21 A. No.
22 Q. Do you -- have you heard the
23 term "float valve"?
24 A. No.
25 Q. What about "circulating mud
00175:01 bottoms-up"? Does that phrase ring a bell?
02 A. I've heard of that, yes.
03 Q. Do you remember any discussions
04 about that subject with respect to the
05 Macondo well?
06 A. No.
07 Q. What about "lost circulation
08 material" or "LCM"?
09 A. I don't know.
10 Q. What about a "negative pressure
11 test"?
12 A. I don't know.
13 Q. You never --
14 A. Huh-uh.
15 Q. So I should probably clarify my
16 question. Have you heard that expression
17 before?
18 A. No, not prior to this. But --
19 Q. You've heard about it subsequent
20 to the incident?
21 A. Yes.
22 Q. Anybody talk to you about the
23 negative pressure test on the DEEPWATER
24 HORIZON?
25 A. No.
00176:01 Q. Or on the Macondo well?
02 A. No.
03 Q. What about "displacement
04 procedures"?
05 A. No.
06 Q. Never heard of that expression?
07 A. No.
08 Q. Did you ever have any
09 conversations with anybody about cementing
10 the Macondo well?
11 A. No.
12 Q. Did you ever see any -- I
13 guess -- did you ever see any written
14 communications about the subject of cementing
15 the Macondo well in your job as radio
16 operator?
17 A. No.
18 Q. Or see any written
19 communications about any other aspect of

20 the -- of the drilling, the technical aspects
21 of the drilling?
22 A. No.
23 Q. Or well control problems?
24 A. No.
25 Q. On April 20th did you hear any
00177:01 discussion about whether or not to activate
02 the blowout preventer on the DEEPWATER
03 HORIZON?
04 A. No.
05 Q. Are you familiar with the term
06 "blowout preventer"?
07 A. Yes.
08 Q. Or "BOP"?
09 A. Correct, yes.
10 Q. Did you hear any discussions
11 about a blowout preventer, or BOP, on
12 April 20th?
13 A. No.
14 Q. What about the -- have you heard
15 of something called the "EDS"?
16 A. Emergency disconnect? I would
17 think that's what that is.
18 Q. Yes, sir, that's my
19 understanding.
20 A. Yeah. And what's the question?
21 Q. The question is -- well, first,
22 if you're familiar with that phrase or that
23 subject or have heard of it?
24 A. I've heard the term, yes.
25 Q. Was -- did you hear any
00178:01 discussion on the bridge or any time on
02 April 20th about the EDS, or the emergency
03 disconnect system?
04 A. Yeah. I believe it was Chris
05 Pleasant asked permission to hit the
06 emergency disconnect.
07 Q. Was this on the bridge?
08 A. It was on the bridge.
09 Q. And you were there?
10 A. I was there.
11 Q. Who's Chris Pleasant?
12 A. Subsea -- subsea supervisor.
13 Q. How long had you been on the
14 bridge when he said that, roughly?
15 A. A few minutes. It was just
16 before we evacuated or left the bridge.
17 Q. When you say "a few minutes,"
18 would it have been more than five?
19 A. From the time that I was on the
20 bridge to that?
21 Q. (Nods.)
22 A. It could have been around five,
23 maybe.
24 Q. And who -- do you know who he

25 addressed that question to?
00179:01 A. The OIM and the captain were
02 both up there. I think it was the OIM. I'm
03 not -- I don't know.
04 Q. Do you have an understanding as
05 to who was in charge of decisions for the
06 DEEPWATER HORIZON at that moment?
07 A. Should have been the captain.
08 Q. But you don't know whether the
09 question about the EDS was directed to the
10 captain or the OIM?
11 A. I don't know who was --
12 Q. Did someone respond?
13 A. Yeah. I think I remember the
14 captain saying, Hit it.
15 Q. What happened then?
16 A. To my knowledge, nothing.
17 Q. But, I mean, did someone try to
18 hit a button or turn a knob or a switch?
19 A. Yeah. I think Chris Pleasant
20 tried to hit the button and, from what I
21 remember, you know, may have -- it was
22 probably him, you know, said, Well, you know,
23 nothing is happening, nothing is working, or
24 something like that.
25 Q. Did you see him do something
00180:01 with the control panel along those lines?
02 A. No. I wasn't close enough to.
03 Q. And when he said, Nothing is
04 happening, did anybody say anything more on
05 that?
06 A. Not that I recall.
07 Q. Is there anything else you
08 remember being discussed at that time or
09 before or afterward about the EDS, or
10 emergency disconnect?
11 A. No.

Page 185:22 to 186:08

00185:22 Q. In particular, there was a group
23 of people from Schlumberger that left the
24 rig. Do you recall that?
25 A. Yes.
00186:01 Q. Do you know why the Schlumberger
02 employees were on the rig during that time
03 period?
04 A. The only thing I know is they
05 are a mud logging, I guess, group. I have no
06 way to know. I don't have any technical
07 information or knowledge as to why they were
08 there.

Page 187:12 to 188:18

00187:12 Q. Andrea Fleytas was one of your
 13 colleagues on the DEEPWATER HORIZON, correct?
 14 A. Yes.
 15 Q. She worked for Transocean?
 16 A. Uh-huh, yes.
 17 Q. And Ms. Fleytas was on the rig
 18 April 20th, 2010, correct?
 19 A. Yes.
 20 Q. What was her position with
 21 Transocean?
 22 A. Dynamic positioning operator.
 23 Q. And you saw her on the bridge
 24 after the explosions when you went up to the
 25 bridge, correct?
 00188:01 A. Yes.
 02 Q. What was she doing on the
 03 bridge?
 04 A. She was doing -- I mean, she was
 05 at the computer, you know, the -- you know,
 06 and she gave the mayday. I guess she was
 07 performing whatever duties that a DPO would
 08 perform.
 09 Q. Did she have duties regarding
 10 the various emergency systems on the rig?
 11 A. I have no idea. I don't have
 12 any knowledge of what her -- all her duties
 13 were.
 14 Q. Did you witness interactions
 15 between Ms. Fleytas and Captain Kuchta?
 16 A. Yes.
 17 Q. Were those angry or hostile
 18 interactions?

Page 188:20 to 190:02

00188:20 A. Angry.
 21 Q. (BY MS. WILLIAMS) So you
 22 witnessed angry interactions between Andrea
 23 Fleytas and Captain Kuchta?
 24 A. Yes.
 25 Q. Can you please --
 00189:01 A. Controversial, maybe.
 02 Q. Can you please describe what you
 03 witnessed.
 04 A. Just before we evacuated, Andrea
 05 gave the mayday on the radio. And I heard
 06 the captain holler, you know, Why did you do
 07 that? Who told you to do that? Something of
 08 that nature. And that was basically what I
 09 heard.
 10 Q. Anything else?
 11 A. No.
 12 Q. Did she respond to the captain?
 13 A. Not that I heard.

14 Q. What happened next?
15 A. We evacuated the bridge.
16 Q. And who gave the evacuation
17 order or --
18 A. To evacuate the bridge? The
19 captain.
20 Q. So after he yelled at
21 Ms. Fleytas for giving the mayday order, he
22 told you-all to evacuate the bridge?
23 A. Yes.
24 Q. Okay. Anything else about the
25 interaction between Ms. Fleytas and
00190:01 Captain Kuchta?
02 A. No.

Page 192:11 to 197:16

00192:11 You indicated that there were
12 two explosions. Can you estimate how much
13 time elapsed -- and I know you weren't timing
14 it, so it's not --
15 A. Uh-huh.
16 Q. -- it would be an estimate at
17 best --
18 A. Uh-huh.
19 Q. -- between the first and second
20 explosion?
21 A. To me it seemed like a matter of
22 seconds because I wasn't even out of bed
23 completely when the second explosion
24 occurred.
25 Q. Okay. The first explosion, did
00193:01 it knock out the lights?
02 A. Yes.
03 Q. Okay. So you were in -- you
04 probably were getting ready to go to bed.
05 Was your room dark anyway?
06 A. Yes, it was -- I was in bed.
07 Q. And how would you have known,
08 therefore, if your room was dark, that it
09 knocked out the lights?
10 A. Well, it was dark. I don't know
11 that I would have known that.
12 Q. Okay. It may have been the
13 second explosion that knocked out the lights,
14 perhaps?
15 A. Possible, yeah.
16 Q. Okay. But you did hear after
17 the first explosion a PA announcement to --
18 for the crew to evacuate to the galley?
19 A. To muster in --
20 Q. To muster?
21 A. -- in the galley, yes.
22 Q. In the galley.
23 And you were in the process of

24 getting out of bed to respond to that -- to
25 put on clothes and respond to that when the
00194:01 second occurred -- the second explosion
02 occurred?
03 A. Yes.
04 Q. Okay. Were you still in bed,
05 were you getting out of bed, were you out of
06 bed when it happened? If you can be a little
07 bit more specific.
08 A. Actually, I had -- I was -- I
09 had raised up. I was still in the bed. And
10 after that explosion, I was out of bed then.
11 Q. Did it knock you, or did it just
12 sort of propel you in the direction you were
13 moving anyway, getting up and out?
14 A. When I got up, it was -- I was
15 over next to my locker.
16 Q. Okay. Had you hit any part of
17 your body; for example, your head?
18 A. Not that I was aware of.
19 Q. Okay. So there was no loss of
20 consciousness or reduced consciousness
21 because of any head injury at that time?
22 A. Not that I'm aware of. I was
23 disoriented somewhat and dazed.
24 Q. Okay. Was there any reason why
25 your -- your judgment and your perception of
00195:01 the events would have been impaired by that
02 second explosion?
03 A. Repeat.
04 Q. I'm trying to find out if the
05 second explosion was of a magnitude to cause
06 you to have impaired judgment, whether you
07 were able to see and perceive the events
08 without any impairment?
09 A. I was somewhat disoriented.
10 Q. Okay. Did that disorientation
11 carry through to when you were on the bridge
12 and you were observing the events that you
13 testified to today?
14 A. No.
15 Q. Or had that cleared up?
16 A. It was pretty much clear by the
17 time I got to the bridge.
18 Q. You mentioned that the OIM was
19 also on the bridge. That's Jimmy Harrell,
20 correct?
21 A. Uh-huh, at one point he was,
22 yeah.
23 Q. Did you notice Jimmy -- in that
24 reduced light, did you notice his face was
25 bleeding and he was covered in some sort of
00196:01 material from the blast?
02 A. I noticed everybody was --
03 Q. Okay.

04 A. -- you know, that had come from
05 the quarters, yeah.
06 Q. But -- but as Jimmy -- was he
07 dazed? Could you tell if he was dazed?
08 A. He appeared dazed.
09 Q. Okay. The people who had been
10 on the bridge, namely Captain Kuchta, would
11 not have been affected. The people on the
12 bridge were not affected by the explosion in
13 terms of being knocked about, as far as you
14 could see?
15 A. As far as I know, yeah.
16 Q. And did you have any difficulty
17 with Captain Kuchta's decision to respond to
18 Chris Pleasant, Yes, go ahead and EDS? Did
19 you feel that that was appropriate --
20 MR. BOLES: Objection; form.
21 Q. (BY MR. KOHNKE) -- based on
22 what you observed?
23 MR. BOLES: Object to the form.
24 A. Yes, as far as I know, yeah.
25 Q. (BY MR. KOHNKE) Okay. As far
00197:01 as you know.
02 And the decision to abandon the
03 bridge that Captain Kuchta gave, that
04 announcement or those words, did you have any
05 difficulty or any disagreement with that --
06 A. No.
07 Q. -- that decision?
08 A. No.
09 Q. Okay. You indicated that you
10 and several others left at a -- in a certain
11 order. The last to leave would have been
12 Captain Kuchta, the last to leave the bridge?
13 A. Yes, as far as I know.
14 Q. Okay. And did you think that
15 that was appropriate on his part?
16 A. Yes.

Page 198:01 to 199:01

00198:01 Q. All right. Mr. Taylor, my name
02 is Brad Coffey. I represent Cameron in this
03 matter. I'm not going to take up too much of
04 your time. I do appreciate you being here
05 today.
06 You discussed earlier or you
07 testified earlier about some of your job
08 duties in creating helicopter manifests and
09 travel arrangements for Transocean employees?
10 A. Uh-huh.
11 Q. Did you ever have any reason to
12 make travel arrangements or prepare
13 helicopter manifests for any personnel from
14 Cameron?

15 A. No.
16 Q. Did you ever, at any time during
17 your experience on the DEEPWATER HORIZON,
18 ever have any opportunity to take direction
19 or have a Cameron personnel supervise your
20 job duties?
21 A. No.
22 Q. Anybody at Cameron -- any
23 Cameron personnel or anybody from Cameron
24 ever act as your boss in any way in carrying
25 out your job duties on the DEEPWATER HORIZON?
00199:01 A. No.

Page 199:22 to 200:18

00199:22 Q. Are you familiar with the BOP
23 equipment and controls?
24 A. No.
25 Q. Were you trained to operate a
00200:01 BOP?
02 A. No.
03 Q. Have you ever been involved in
04 any testing or maintenance of the BOP on the
05 DEEPWATER HORIZON?
06 A. No.
07 Q. You testified just a while back
08 about Chris Pleasant asking permission to
09 activate the emergency dispatch.
10 Do you recall that?
11 A. Yes.
12 Q. Can you estimate how much time
13 elapsed between when you were awoken by the
14 explosion and when you heard Mr. Pleasant ask
15 permission to activate the emergency
16 dispatch?
17 A. Maybe six or seven minutes. I
18 just don't know.

CORRECTION PAGE

WITNESS NAME: CARL BARRETT TAYLOR DATE:

07/14/2011

PAGE LINE CHANGE

REASON

61 17 I DO NOT KNOW THE TERM "CORE WELD"
136 5 SHOULD BE "ON A NON CREW CHARGE HELICOPTER"

PURSUANT TO CONFIDENTIALITY ORDER