

Deposition Testimony of:

Nick Watson

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Page 7:10 to 7:12

00007:10 NICK WATSON,
11 having been duly sworn, testified as follows:
12 EXAMINATION

Page 8:07 to 8:13

00008:07 Q. All right?
08 Okay. Are you still working for
09 Transocean?
10 A. Yes, sir.
11 Q. Okay. How long have you worked
12 for Transocean?
13 A. Three years.

Page 9:12 to 9:18

00009:12 A. So I had a total of three jobs.
13 Q. All right. Now, when you
14 applied for Transocean to -- I'm sorry. When
15 you applied for a position with Transocean,
16 did you apply for a specific job or was it
17 just applying for any employment?
18 A. Labor job, just a roustabout.

Page 11:24 to 12:13

00011:24 Q. Okay. All right. Tell us
25 generally: What does a roustabout do?
00012:01 A. He could do several things.
02 He -- he pretty much helps the rig. Anyone
03 that calls and needs help, my supervisor will
04 send us to go help that particular supervisor
05 out, because most everybody on the rig was
06 pretty much short, so we would go help out
07 everywhere, rig floor, anywhere, doesn't
08 matter.
09 Q. All right. Would you describe
10 it as general labor --
11 A. Yes.
12 Q. -- type of work?
13 A. Yes, sir.

Page 40:02 to 40:15

00040:02 Q. All right. In the months before
03 the explosion, were you aware of whether or
04 not there were any BP employees on the rig?
05 A. Yes. There's always BP
06 employees on the rig.
07 Q. Okay. And what instruction, if
08 any, did you receive from your employer about

09 the BP employees?
10 A. Could you rephrase that? I'm
11 not sure --
12 Q. Well, in other words, what did
13 they tell you about the BP individuals? Were
14 you supposed to respond to them or not
15 respond to them or --

Page 40:18 to 40:23

00040:18 A. Like I said, to keep a good
19 working environment, you -- whatever someone
20 needs, we help everybody out as a family.
21 And BP is just -- just like, you know, my
22 OIM. You know, they -- you know, they're the
23 boss and just -- just like both sides.

Page 40:25 to 41:03

00040:25 Q. Okay. That's -- you -- you said
00041:01 they're the boss.
02 A. Just like taking orders from my
03 OIM. I mean, it's --

Page 41:08 to 41:10

00041:08 Q. Okay. So what is it about BP
09 that made you believe that they were the
10 boss, as you put it?

Page 41:13 to 42:04

00041:13 A. Well, if you're taking -- if
14 we're in a safety meeting, the safety meeting
15 is pretty much ran by the OIM and the company
16 man. They tell us what the task is, what's
17 coming from town, what parts are coming in,
18 you know, what -- what has to be done today.
19 So --
20 EXAMINATION BY MR. BRUNO:
21 Q. Right.
22 A. -- you're taking direction from
23 the OIM and the company man.
24 Q. Who's the company man?
25 A. The company man would be the --
00042:01 I guess the on-site leader for BP.
02 Q. Okay. So the company man is the
03 BP employee?
04 A. Yes, sir.

Page 42:11 to 42:20

00042:11 Q. All right. So you would have
12 meetings from time to time?
13 A. Every morning.
14 Q. Every morning you'd have a
15 meeting?
16 A. Every morning.
17 Q. All right. And at every meeting
18 there was the company man, there was the BP
19 employee, and there was your OIM?
20 A. Yes.

Page 43:01 to 43:02

00043:01 Q. Okay. Now, how did you come to
02 believe that BP was the boss, as you put it?

Page 43:16 to 44:03

00043:16 Q. Let's -- can you answer the
17 question for me?
18 A. Well, I mean, they paid the
19 bills, so...
20 Q. Right. Well, but how did you
21 know they paid the bills?
22 A. They ran the rig. If they was
23 the client, we was always told whatever BP
24 wanted, you know -- I mean, they -- I mean,
25 pretty much, you know. It's just like if I
00044:01 was on the other rig and Shell was, you
02 know -- it's just pretty much they pay the
03 bills, simple as that.

Page 45:09 to 48:02

00045:09 Q. All right. So that through
10 working for Transocean, you learned that
11 there was a company man who would usually be
12 on the rig. Is that accurate?
13 A. Yes.
14 Q. Okay. And did you also learn
15 that this company man was paying the bills,
16 as you put it earlier in your testimony?
17 MS. BRANSCOME:
18 Object to form.
19 A. As far as -- all I -- all I
20 could say is I knew that they -- pretty much
21 whatever had to be did, it was at BP's
22 directive. As far as -- I mean, just each
23 stage they plan, you know, as the well site
24 leader, you know, each stage, you know, from
25 what I saw. I can't say what happened in
00046:01 meetings, you know. From what I saw in
02 safety meetings, you know, we took our lead

03 from BP.
04 Q. Okay. All right. At those
05 morning meetings, give me a sense of what
06 role the company man would play. I mean,
07 starting with, did he speak at all?
08 A. He spoke.
09 Q. He spoke?
10 A. Spoke about --
11 Q. Okay. And so what kinds of
12 things would the company man say at the
13 morning meeting?
14 A. He spoke about safety. Some
15 good ones. He spoke about safety, talked to
16 us individually sometimes, you know, that he
17 knew -- if there was going to be a tough job,
18 he would, you know, tell us about hand
19 placement. You know, he knew what jobs --
20 the OIM would do the same. You know, they
21 knew -- if there was a big job or the weather
22 was bad outside, you know, tell us it's
23 raining outside, you know, put something on,
24 you know, just concern, so...
25 Q. Well, would they describe the
00047:01 kinds of work that you would be doing during
02 the day?
03 A. If a boat was coming in, he
04 would have -- I can't remember his guy --
05 the -- the BP dispatchers will be -- he would
06 say, We have a boat coming from town, you
07 know, just letting -- just letting us know,
08 as roustabouts, we have, you know, something
09 coming in, and if it's a tool or something
10 coming in that has to be on the rig floor,
11 you know, get that particular one first. But
12 that would be at the directive of his
13 dispatcher. But, you know, he -- he talked
14 about safety is -- you know, he knew what was
15 going on, you know, just like the OIM.
16 They're pretty much safety conscious too, in
17 my mind.
18 Q. Was that the only thing that
19 you-all talked about at the morning meeting
20 was safety? They didn't talk about anything
21 else?
22 A. If we have a job, they would
23 talk about that.
24 Q. All right. So they would tell
25 you what work was to be expected of you
00048:01 during the day --
02 A. Yeah.

Page 50:13 to 50:23

00050:13 Q. All right. Who did you
14 understand was in charge of the whole

15 operation? Was it the company man or was it
16 the Transocean OIM?

17 A. You could -- you can change it
18 however you see fit, but I -- I mean, because
19 in those meetings the OIM, he would stand up
20 and say what he has to say, and the company
21 man would too, so...

22 Q. Okay. So which was -- who was
23 in charge? Was it BP or the OIM?

Page 51:01 to 51:09

00051:01 A. In my eyes, I always saw it as
02 being, you know, BP paid the bills and
03 what -- at some point, if he, you know, said
04 something goes a certain way, you know, I'm
05 figuring -- you know, I can't say what
06 happened behind closed doors, but I can -- in
07 my eyes, I just felt if he said something and
08 he wants it, it's going to be that way, you
09 know.

Page 52:21 to 53:02

00052:21 Q. Right. But, again, what I'm
22 trying to understand is whether or not the BP
23 company man overruled --

24 A. Yes, he overruled.

25 Q. -- the Transocean employees.

00053:01 Right?

02 A. Yes.

Page 86:12 to 87:06

00086:12 Q. Earlier you were discussing
13 your -- your training with Transocean?

14 A. Yes, sir.

15 Q. Did that occur right after you
16 got hired?

17 A. You have to have some type of --
18 know your job before. They have a school in
19 Amelia, which pretty much trains you for your
20 job before you go out there.

21 Q. And was that around 2007?

22 A. Yes, sir.

23 Q. And how long did that training
24 course last?

25 A. You pretty much -- you stayed
00087:01 there for 11 days to try to imitate the rig
02 life, being out there, gone from your family
03 so long. So it's about 11 days.

04 Q. And that training includes
05 safety training?

06 A. Yes, sir, safety training.

Page 88:08 to 88:21

00088:08 Q. Have you ever heard the term
09 "simultaneous operations"?
10 A. We -- we use that, because we're
11 doing -- because on that rig you could be
12 doing several things, you know. We -- we
13 split up. So that goes on a lot on that rig.
14 Q. Okay. And did you get any
15 training with respect to how performing
16 certain operations on the rig simultaneously
17 with others might impact drilling operations
18 on the rig?
19 A. I can't remember doing that
20 specific simultaneous operation. I can't
21 really say.

Page 89:01 to 89:04

00089:01 Q. For instance, movement of the
02 cranes, were you ever instructed on how
03 movement of the cranes might impact other
04 things that are going on on the rig?

Page 89:07 to 89:13

00089:07 A. Sometimes if the rig floor is
08 doing some type of test, it's an all stop,
09 you know, because the cranes -- you know,
10 even if -- you can't see it, but, you know,
11 they want them to get a accurate test. So you
12 pretty much all stop on deck to watch the
13 crane operation.

Page 89:15 to 90:08

00089:15 Q. Okay. And who would -- who
16 would instruct you to stop in those
17 situations?
18 A. Rig floor will call. You know,
19 like I said, you know, that could come from
20 anybody, you know. It would say, you know,
21 All stop. I don't want the cranes moving or
22 whatever.
23 Q. Would that call go to you or
24 would it go to one of your supervisors?
25 A. It -- it should go to the deck
00090:01 foreman. But, like I said, I'm on deck.
02 They see me with the op radio. They could
03 just, you know, call me or the crane
04 operator, whoever.

05 But lately they was going to
06 deck foreman. He would just say, Hey, you
07 know, call the crane operator. He tell me,
08 Crane operator call me. And we shut down.

Page 90:16 to 90:24

00090:16 Q. Okay. Are there any particular
17 tests or tasks that you know in your
18 experience on the rig that the cranes would
19 be told to -- to shut down so that these
20 could be performed?
21 A. I just can't remember the names
22 of them. It's been a while. I'd just be
23 throwing different tests out there, so I
24 can't really give you an accurate answer.

Page 93:11 to 93:22

00093:11 Q. Are you aware that somebody in
12 the mud room is monitoring the levels in the
13 pits?
14 A. Right. They -- most of the time
15 that's the derrick -- derrick hand. He's in
16 the pit room.
17 Q. Okay. And do you know why they
18 monitor the levels?
19 A. As far as I can understand it,
20 just keep that mud weight, you know, a
21 certain weight to keep, you know, pressure
22 down.

Page 94:11 to 94:23

00094:11 Q. Okay. You mentioned -- I think
12 you said the starboard crane had a cable that
13 needed to be replaced. Did I understand that
14 correctly?
15 A. Yes, sir.
16 Q. Okay. Was that actually
17 completed on April 20th? Did the repair
18 actually get completed?
19 A. Yes, sir.
20 Q. Do you know about what time that
21 was wrapped up?
22 A. It was -- like I said, it was
23 almost nighttime.

Page 96:06 to 97:20

00096:06 Q. Okay. While that was going on,
07 were any of the other cranes in use?
08 A. When we started working with

09 that crane once it was up?

10 Q. Let's talk about maybe from just
11 a little bit before dinner up until you left
12 the rig. Were the -- were any of the other
13 cranes being used to move any equipment?

14 A. When we shut down, that was it.
15 Those guys were still working on that
16 starboard crane. When I went to go eat, they
17 were still working on that starboard crane.

18 Q. Okay. And then in the -- in the
19 entire afternoon and in the early evening
20 that you were working on your shift, do you
21 happen to know if the other -- if any of the
22 other cranes asides from -- aside from the
23 one you were working with were put in motion
24 at all?

25 A. No. It's just that port crane
00097:01 that we were working with, those guys were
02 solely working to get that crane up. We were
03 being moved around with helping the rig
04 floor, just two guys helping the rig floor
05 and that boat.

06 Q. And you were moving equipment
07 and trash off of the rig onto the BANKSTON?

08 A. No. At this point we couldn't
09 get to the trash because the port crane is
10 here. The trash is way on the other side of
11 the rig, and that starboard crane was down.
12 So we was just messing around with supplies
13 or whatever, you know, backloading,
14 offloading, whatever needed to be did, and
15 making up tools. Had to go around back
16 helping the rig floor out.

17 Q. Okay. And at least some of that
18 work required use of the crane?

19 A. All of it required use of the
20 crane.

Page 98:24 to 99:09

00098:24 Q. You mentioned that there are
25 certain tests or tasks in which the crew will
00099:01 tell the crane crew to -- to stop work so
02 that they can be conducted; is that right?
03 You couldn't remember the names of the
04 specific tests. But did I understand
05 correctly that there have been instances
06 where the drilling crew will say, We need the
07 cranes to stop so that we can perform this
08 test?

09 A. Correct, to get an accurate --

Page 101:01 to 101:01

00101:01 Q. Okay. And I think my question

Page 101:04 to 101:08

00101:04 On April 20, 2010, were you
05 aware of any advanced plan that because some
06 other job would go going on somewhere else on
07 the rig that the crane crew would have to
08 temporarily stop doing anything?

Page 101:11 to 101:11

00101:11 A. No, I'm not.

Page 103:24 to 105:06

00103:24 Q. In your morning meeting on
25 April 20th, do you remember any kind of
00104:01 discussions or disagreements about any of the
02 jobs that were going to happen that day?

03 MR. JOHNSON:

04 Objection, form.

05 A. I don't remember. I just
06 remember, you know, a couple of times the
07 OIM, you know, maybe correcting that -- this
08 new BP company man. That was about it, you
09 know, about certain words he would say. And,
10 you know -- and Jimmy Harrell might say --
11 you know, say something. You know, it's like
12 he didn't, you know -- I don't know if he
13 was -- you know, didn't -- was familiar with
14 the rig or what we were doing. But, you
15 know, he may -- he may have done things a
16 certain way. And Jimmy Harrell was, like,
17 you know, That ain't the way, you know, we do
18 it, you know. So maybe -- it was another
19 safety meeting, not that particular day,
20 though.

21 EXAMINATION BY MR. PFEFFER:

22 Q. Uh-huh.

23 A. But I kind of felt -- because
24 the past company mans, you knew -- I knew
25 them, and they were on point. And this
00105:01 particular one here, I just didn't know him.
02 He just -- I don't know. I --

03 Q. Do you remember any specific
04 issues that came up in that same context
05 where the -- where Jimmy Harrell had a
06 disagreement with the BP company man?

Page 105:11 to 106:06

00105:11 A. I can't -- I just remember

12 certain -- certain things, you know. And
 13 Jimmy Harrell may -- I sensed -- I -- and
 14 before I knew Jimmy Harrell and those guys
 15 got along. You know, they would be coming
 16 down one off. But this guy, they -- I don't
 17 know. It seems, my opinion, that they -- you
 18 know, they would be tit for tat, you know,
 19 looked like they were trying to make one look
 20 like he didn't know what he was doing, and
 21 that never happened before.

22 And -- and Jimmy Harrell, you
 23 know, he -- he -- you know, I trusted him.
 24 And so everybody was -- you know, when --
 25 when the guy says something -- and, you know,
 00106:01 little things that we did, we knew how we did
 02 it. And, you know, we had no problem before,
 03 and he wanted to, you know, change something.
 04 And so, you know, Jimmy Harrell, you know,
 05 would say -- you know, would say something,
 06 so...

Page 106:15 to 106:17

00106:15 Q. Were the disagreements that
 16 occurred in your presence disagreements about
 17 how to conduct operations?

Page 106:20 to 107:06

00106:20 A. I would say it's tasks. I can't
 21 remember, you know. It's like, you know, if
 22 I do a certain task, it was probably, you
 23 know -- you know, not -- we don't do it that
 24 way. It was just like it was just -- I don't
 25 want to say the guy didn't know what he was
 00107:01 doing, but it was just company mans that
 02 were -- that -- the guy that -- the company
 03 man that just left, he was on point. He --
 04 he knew his -- you know, he -- you -- he knew
 05 his job. But this new guy just don't know,
 06 so...

Page 107:08 to 107:12

00107:08 Q. Okay. Do you know the -- the
 09 name of the company man that you're referring
 10 to?
 11 A. I want to say Donald. I can't
 12 remember. He was brand-new, so . . .

Page 107:25 to 108:15

00107:25 Q. Around the time of -- let's just

00108:01 talk about: On April 20th did you feel there
 02 was any pressure to speed up operations for
 03 any reason?

04 A. No. We knew that we were behind.
 05 Like I said, we like to be prepared. But,
 06 you know, no one said anything, you know. It
 07 was just a normal day. You know, everybody's
 08 just, you know -- I didn't know it was -- you
 09 know, I didn't -- I wasn't aware there was a
 10 problem or anything. It was just normal day,
 11 you know.

12 Even though we like to be ahead,
 13 you know, that was in my mind because we like
 14 to be ahead of them, but nobody said
 15 anything.

Page 112:23 to 113:21

00112:23 Q. When you started with the
 24 DEEPWATER HORIZON, were you on a 21-day
 25 hitch?

00113:01 A. Started off as 14 days, 14 days
 02 off.

03 Q. Okay. And when did that change?

04 A. I want to say upper leadership
 05 came in and -- and they asked us about it,
 06 and pretty much the -- no one wanted --
 07 wanted to change, but, you know, they changed
 08 it anyway.

09 Q. When you say upper leadership,
 10 who do you mean?

11 A. Some of the upper leadership. I
 12 think Daun Winslow was there and some people
 13 from BP also were there. And they just --
 14 they was there for other reasons, but we had
 15 a chance to ask them about it. And they said
 16 they were going to be talking about it, and
 17 they just -- but they pretty much did what
 18 they wanted to do anyway.

19 Q. And it's your understanding that
 20 Transocean made the decision to change to
 21 a --

Page 113:23 to 113:23

00113:23 Q. -- 21-day hitch?

Page 114:02 to 114:05

00114:02 A. I'm not certain who made the
 03 decision. I just -- he just -- we had the
 04 opportunity to ask him or, you know, try to
 05 not let it happen with -- while he was there.

Page 114:07 to 114:08

00114:07 Q. And when you say no one wanted
08 to make that change, why was that?

Page 114:11 to 114:12

00114:11 A. I'm -- to go from 14 to 21 days
12 is a long time.

Page 118:22 to 119:21

00118:22 Q. Okay. You testified earlier
23 that you report to the crane operator; is
24 that correct?
25 A. Yes, ma'am.
00119:01 Q. Now, you said there were two
02 crane operators typically on duty at a given
03 time; is that right?
04 A. Yes, ma'am.
05 Q. Do you report to one of them
06 specifically? How does that work?
07 A. I work for both, but if I'm
08 working with a particular one, I'm reporting
09 to him.
10 Q. Okay. And that was
11 Dale Burkeen?
12 A. Yes, ma'am.
13 Q. And who did Dale report to?
14 A. Deck foreman.
15 Q. And the deck foreman is a
16 Transocean employee, correct?
17 A. Yes, ma'am.
18 Q. And who does the deck foreman
19 report to, if you know?
20 A. I don't know. I'd just be
21 speculating.

Page 120:10 to 120:13

00120:10 Q. So do you understand who is in
11 charge of the rig if there's an emergency
12 situation?
13 A. I can't --

Page 120:16 to 120:17

00120:16 A. I can't -- I'd just be
17 speculating on that.

Page 121:11 to 121:25

00121:11 Q. And I'd like to talk a little
12 bit more about your job as a roustabout. If
13 you would turn to Tab 1 in that binder. I'll
14 mark this as Exhibit 3928.
15 (Exhibit No. 3928 marked for
16 identification.)
17 EXAMINATION BY MS. BRANSCOME:
18 Q. Now, this is a description --
19 A. Yes, ma'am.
20 Q. -- of a job of a roustabout from
21 the Transocean Web site. This is from 2011.
22 But if you would just take a minute and look
23 over it and see if there's anything that, you
24 know, jumps out at you as having changed
25 since you were a roustabout in April of 2010.

Page 122:03 to 124:11

00122:03 A. It's the same.
04 EXAMINATION BY MS. BRANSCOME:
05 Q. Okay. All right. I'll ask you
06 a few questions about some things on here.
07 So under the basic function, it says, "Carry
08 out cargo handling duties, general cleaning,
09 maintenance, and other manual labor as
10 assigned" and "directed"; is that correct?
11 A. Yes, ma'am.
12 Q. Now, we've talked a little bit
13 about your sort of cargo handling duties and
14 general cleaning, but we haven't talked much
15 about maintenance. And that's what I want to
16 ask you about.
17 What equipment were you
18 responsible for performing maintenance on the
19 rig?
20 A. We did PMSs on knucklebooms,
21 both cranes, starboard and port crane, and
22 also the gantry crane.
23 Q. You said a PMS. What is a PMS?
24 A. Preventive maintenance.
25 Q. Okay. So when -- when you say
00123:01 you did PMSs, would that PMSs on the
02 different cranes or did you do PMS on other
03 equipment?
04 A. On the cranes.
05 Q. Okay. Were you ever asked to
06 help someone with maintenance on another
07 piece of equipment?
08 A. A roustabout, like I said,
09 you're floaters. You go and help everybody.
10 Q. Did you ever help on any
11 maintenance tasks for the BOP?
12 A. Sometime they have what -- I
13 can't remember the term. Transocean had some

14 type of -- they're like -- a subsea has some
15 type of task -- I can't remember what they
16 call those guys, but they come in and they
17 help the subsea engineer. But you have rig
18 floor hands, and they want to learn how to be
19 subsea engineers. They may help. And
20 sometimes the subsea engineer still may need
21 another guy, and he may ask one of us to come
22 help him.

23 Q. And what kind of tasks would you
24 do if you were helping the subsea people with
25 BOP maintenance?

00124:01 A. Well, it could be just helping
02 him -- he could be taking it apart, cleaning
03 and stuff like that. I -- I don't get into
04 that. I just was helping him -- you know, he
05 has a crane inside. I could be helping him,
06 you know, maneuver it, but I didn't get into
07 all of that.

08 Q. And were you always helping a
09 Transocean employee with the BOP maintenance?

10 A. As far as I can remember, it was
11 Transocean.

Page 128:22 to 130:23

00128:22 Q. All right. Okay. So I'll ask
23 you about another sentence on this document.
24 You see down towards the bottom where it says
25 QHSE?

00129:01 A. Yes, ma'am.

02 Q. And, again, this is
03 Exhibit 3928. There's a statement,
04 "Participate in emergency drills and respond
05 to emergency situations as per designation
06 on" the "station bill"; is that correct?

07 A. Yes, ma'am.

08 Q. Did you participate in emergency
09 drills?

10 A. On Sundays. Everyone did drills
11 every Sunday.

12 Q. Okay. Did -- did you have any
13 role in emergency response?

14 A. No. Like you said, that station
15 bill tells you what your job bills, your
16 tasks and who -- the people that are in
17 charge, what are their jobs as well.

18 Q. Okay. So did you have any role
19 in firefighting?

20 A. Firefighting --

21 Q. You did?

22 A. -- as a roustabout, you would be
23 required to fight the fire.

24 Q. Okay. Would you explain that?
25 What was your role in firefighting?

00130:01 A. Firefighting, we -- the
02 Coast Guard would come aboard, and they would
03 make sure that we could put our suits on in a
04 timely manner. They came and expect -- and
05 expected you to put that suit on in a certain
06 speed. We would have to show that we could
07 use the hose, know how to use the hose,
08 certain functions, know how to turn it on as
09 far as firemen or whatever.
10 Q. Okay. And did you have -- how
11 did you know to go put your suit on to help
12 with the firefighting efforts? What would
13 alert you that a fire was somewhere on the
14 rig?
15 A. Well, Sundays you know it's
16 going to be a -- an alarm -- you're going to
17 have a safety -- I mean, there's going to be
18 an alarm, but the alarm will go off sounding,
19 fire, fire, and we would run -- go to our
20 station and suit up.
21 Q. Did you hear that alarm on
22 April 20, 2010?
23 A. No.

Page 132:22 to 133:18

00132:22 (Exhibit No. 3929 marked for
23 identification.)
24 EXAMINATION BY MS. BRANSCOME:
25 Q. And this is a set of safety
00133:01 drills. And you'll see that very first
02 safety drill right on the top there was on
03 April 17, 2010.
04 A. Yes, ma'am.
05 Q. And this was an abandon ship
06 drill. Is this one of the weekly Sunday
07 drills that you were just talking about?
08 A. If it was Sunday, it was
09 possibly a safety drill.
10 Q. Okay. And, now, who would be in
11 charge of an abandon ship drill?
12 A. The captain would be pretty much
13 directing everybody.
14 Q. Okay. And just for completeness
15 sake, if you'll flip over to where it says
16 page 4 of 4, does it show your name there
17 that you attended this drill?
18 A. Page 4. Okay. Yes, ma'am.

Page 134:11 to 135:09

00134:11 Q. Okay. Now, who -- who is in
12 charge of a fire drill?
13 A. Myself -- we -- we would work

14 with a toolpusher, the night toolpusher, and
15 the chief mate because -- it depends on who's
16 that particular -- leading that particular
17 training.

18 If you're getting ready to
19 leave, most of the time -- it depends on
20 how -- it's set up differently. If you're
21 getting ready to leave -- they're pretty much
22 are on the end of their crew, so they may not
23 have to deal -- you know, be with the chief
24 mate. So he's working on the new guys coming
25 in. Those guys already been here, so he's
00135:01 going to be with the guys coming in to get us
02 back with the flow of the rig. So we have
03 the probably chief mate and toolpusher with
04 us doing certain training specific, and those
05 guys may be doing training or it could be a
06 combined effort trying to get together.

07 Q. Okay. But it was always a
08 Transocean employee; is that correct?

09 A. Yes, ma'am.

Page 135:23 to 139:22

00135:23 Q. Okay. I'll turn you back to
24 that Tab 1, which is Exhibit 3928. Right
25 under the sentence we just talked about,
00136:01 which was participating in emergency drills,
02 it says, "Report any incidents, potential
03 hazards or abnormal situations to
04 supervisors." It's down at the bottom of the
05 page.

06 You see that?

07 A. Yes, ma'am.

08 Q. Did you ever -- did you -- did
09 you feel comfortable reporting safety issues
10 to your supervisors?

11 A. Yes, ma'am.

12 Q. Did you ever feel pressure not
13 to report a safety issue?

14 A. No, ma'am.

15 Q. Did you ever fear any
16 consequences if you were to report a safety
17 issue either to a Transocean employee or to
18 be a BP employee?

19 A. No, ma'am.

20 Q. Now, the sentence right below
21 that on Tab 1 says, "Attend the weekly safety
22 meetings. Actively participate in all
23 pre-job meetings as required."

24 Now, these weekly safety
25 meetings, are those the drills that we were
00137:01 talking about earlier or is it something
02 different?

03 A. Well, you have -- I don't

04 understand. I can't say what that meant.
05 But on our rig we had as a crew a safety
06 meeting amongst ourselves -- that might be
07 that weekly one -- to discuss issues or
08 incidents, whatever we may have seen or go
09 over incidents around the fleet and just
10 learn from those problems as a group. Daily,
11 just, you know, morning safety meetings.
12 Q. Okay. Getting back to the --
13 the possibly weekly safety meetings that you
14 just mentioned, who conducts those meetings?
15 A. We do it as a group. Anyone --
16 it can be myself or anyone can -- you know,
17 the crane operators sit in. They act as like
18 overseers. They let us, you know, take
19 charge. They just sit back, and they may
20 come in on an incident around the fleet, and
21 we just go and get incidents from off the
22 board and find what happened, bring it in
23 there. And we would read over them just to
24 learn from mistakes that may have happened.
25 Q. Okay. Who would attend these
00138:01 meetings?
02 A. Crew members, crane operators.
03 And the deck foreman could, you know, come in
04 there at -- you know, if it was day or night.
05 Sometime it would be nighttime, you know.
06 Q. Okay. You just talked about
07 getting incidents off the board. What --
08 what does that mean?
09 A. Things that may have happened
10 around the fleet or -- you know, it depends
11 on what happened. So, you know, whatever
12 happened. RSTC would put them on the board,
13 and we would just see what happened. We
14 would go over those same incidents in the
15 meeting -- daily meetings also. But we would
16 just get those off, go over them, talk about
17 them. In our paperwork the OIM would read
18 over them, and this would go probably to
19 the -- you know, from my understanding, even
20 the rig manager in town would, you know, see
21 that we went over those alerts or whatever
22 problems.
23 Q. Where was the board located?
24 A. It would be across from the
25 conference room -- well, the cinema room
00139:01 right outside by the galley. You have a --
02 THE REPORTER:
03 Assembly room?
04 A. It's like a cinema
05 room/conference room. So it would be right
06 across from it.
07 EXAMINATION BY MS. BRANSCOME:
08 Q. Okay. And who was responsible

09 for posting an incident on the board?
10 A. I'd just be speculating. But,
11 you know, sometimes if I needed something, I
12 would ask the safety man for Transocean or
13 maybe the RSTC.
14 Q. What kind of incidents would be
15 posted on the board?
16 A. Anything that happened around
17 the fleet, it would be on that board.
18 Q. If a kick were to occur on the
19 rig, would that be something that would be
20 posted on the board?
21 A. I'd just be speculating. I
22 don't know.

Page 144:21 to 144:23

00144:21 Q. I can focus that in.
22 Did you ever see any training
23 about Transocean's maintenance policies?

Page 145:01 to 145:08

00145:01 A. No, ma'am.
02 EXAMINATION BY MS. BRANSCOME:
03 Q. Okay. Did you ever receive any
04 form of well control training?
05 A. No, ma'am, that's just only if
06 you want to go that route. You know, guys
07 that want to go to the rig floor would go do
08 that -- go to school for that.

Page 150:21 to 151:15

00150:21 Q. Okay. Did you feel you had the
22 information and training necessary to perform
23 your job safely?
24 A. Yes, ma'am.
25 Q. Okay. Was there any additional
00151:01 information or training that you would have
02 liked to have had to perform your job?
03 A. No, ma'am.
04 Q. How would you describe the
05 safety culture of Transocean?
06 MR. JOHNSON:
07 Objection, form.
08 A. On my rig -- I can only just
09 talk about my rig. On my rig it was law
10 if -- like I said, that camera -- if the
11 OIMs -- you got up there and you didn't have
12 a harness on, you going to -- you know, the
13 driller's going to get a phone call. And it
14 was pretty much law. You know, it was

15 strict.

Page 154:04 to 156:08

00154:04 Q. Okay. All right. I'll turn you
05 to Tab 14. I will mark this as Exhibit 3933.
06 (Exhibit No. 3933 marked for
07 identification.)
08 EXAMINATION BY MS. BRANSCOME:
09 Q. This is actually a few documents
10 together, but if -- we'll look at the last
11 page first. It goes in -- in sort of reverse
12 order, so if you'll look at the last page of
13 the documents.
14 And this is an e-mail on
15 February 1, 2010, from John Guide to
16 Paul Johnson; is that correct?
17 A. Yes, ma'am.
18 Q. And this is talking about a
19 bonus that was awarded to the HORIZON rig
20 crew for safe delivery of the Kodiak well; is
21 that right?
22 A. Yes, ma'am.
23 Q. And in this e-mail from
24 John Guide, it talks about BP wanted to
25 reward both safety and performance. Do you
00155:01 see that?
02 A. Are you talking about the
03 \$2,000?
04 Q. Yes.
05 A. Yes, ma'am.
06 Q. And the last sentence of that
07 first paragraph, John Guide writes, "I am
08 extremely pleased with the HORIZONS
09 operational performance on Kodiak #2, more
10 over, the safety culture has taken the next
11 step to ensure every task is incident free."
12 Is that correct?
13 A. Yes, ma'am.
14 Q. And you received a \$2,000 bonus
15 from BP?
16 A. I received a lot of bonuses. I
17 can't really say. I mean, if it's here I
18 guess it's true.
19 Q. Well, sure. If you'd like to
20 look, it's on -- the page ending in 638,
21 about three-quarters of the way down, still
22 in the same tab.
23 A. So we're -- okay.
24 Q. And you understood when you
25 received that bonus from BP that they were
00156:01 awarding safe operations at the Kodiak well;
02 is that correct?
03 A. Yes, ma'am.
04 Q. And that the bonus could be

05 reduced if there were any safety violations
06 that occurred while you-all -- all were on
07 the Kodiak prospect; is that right?
08 A. Yes, ma'am.

Page 159:11 to 160:06

00159:11 Q. Okay. So you do not recall
12 receiving any additional training or
13 information as a result of the March 8th
14 kick?
15 A. The kicks that I am familiar
16 with or can remember, the OIM is going to
17 bring it up and he's going to, you know, say
18 something about it, you know.
19 Q. Now, you say the kicks that you
20 remember. What -- what kicks do you remember
21 on the DEEPWATER HORIZON?
22 A. I've been there -- I was there
23 three years. I mean, over that time period,
24 you know, we -- taking kicks is nothing, you
25 know. It's just life out there. So, you
00160:01 know, just -- just go on with the job. And,
02 you know, some -- you know, the OIM may
03 mention it and say, you know, We took a kick,
04 and they kind of pay more attention, you
05 know. You know, it's all I can say. I don't
06 know what happens up there from that point.

Page 161:11 to 162:05

00161:11 Q. I just have a few more questions
12 for you, Mr. Watson.
13 When you were on the rig, do you
14 understand that you had the authority to stop
15 a job if you were to see anything that was
16 unsafe about that job?
17 A. Yes, ma'am.
18 Q. Do you understand that to be an
19 obligation, that you actually should stop a
20 job, not just that you have the right to do
21 it?
22 A. I can't say I heard it in that
23 phrase, but I just know I have the right to
24 stop it.
25 Q. Well, I'll ask you personally.
00162:01 If you were to see a job being done and there
02 was any safety concerns in your mind about
03 the way the job was being done, would you
04 stop that job?
05 A. Yes, ma'am.

Page 163:01 to 163:23

00163:01 Q. Now, you've testified earlier
02 that you help out on a lot of different
03 activities around the rig. Would you feel
04 comfortable stopping one of the activities
05 you're observing because you thought
06 something was unsafe? So not just your job
07 but observing another job that was taking
08 place.
09 A. What you're asking me is just
10 like with the senior toolpusher. Say, he
11 come in the safety meeting. He would ask us,
12 Are you guys afraid of us to stop the job?
13 Nobody -- everybody say we're not afraid. So
14 I feel comfortable stopping the job.
15 Q. That was what I was going to ask
16 you. Do you -- do you feel comfortable
17 stopping jobs in terms of any response that
18 you might have from Transocean or any other
19 company on the rig?
20 A. There's nothing wrong with
21 anybody stopping the job. It's just the OIM,
22 he wants that, you know. His -- his behind
23 is on the line as well.

Page 164:10 to 164:14

00164:10 Q. Mr. Watson, my name is
11 Daniel Johnson. I represent Transocean.
12 Before we just went on the record, I think we
13 met for the first time; is that right?
14 A. Yes, sir.

Page 164:22 to 173:06

00164:22 Q. I gathered from your testimony
23 earlier, which I know was difficult, that you
24 knew Dale Burkeen pretty well?
25 A. Yes, sir.
00165:01 Q. Good man?
02 A. Very good man.
03 Q. Hard worker?
04 A. Yes, sir.
05 Q. Safety conscious worker?
06 A. Yes, sir.
07 Q. You spent, you know, half your
08 life out on that rig during the years that
09 you worked out there; is that right?
10 A. Three years. Yes, sir.
11 Q. So you were -- you were on the
12 rig half the time, and then you'd go home
13 half the time; is that right?
14 A. Yes, sir.
15 Q. So you'd get to know folks

16 pretty well?
17 A. Yes, sir.
18 Q. Get to know whether they were
19 hard working folks, whether they were safety
20 conscious; is that true?
21 A. Yes, sir.
22 Q. During a lot of the time that
23 you worked on the DEEPWATER HORIZON, you knew
24 Jimmy Harrell was as OIM, right?
25 A. Yes, sir.
00166:01 Q. And he was a safety conscious
02 OIM; isn't that true, sir?
03 A. Yes, sir.
04 Q. And do you know a gentleman by
05 the name of Randy Ezell?
06 A. Yes, sir.
07 Q. He was a senior toolpusher on
08 the rig; isn't that right?
09 A. Yes, sir.
10 Q. And during the time that you
11 worked on the rig, you -- you had occasions
12 where you worked around Mr. Ezell; isn't that
13 right?
14 A. I knew him personally.
15 Q. Well, not personally. What I'm
16 saying is he -- he worked on the rig during
17 the same time during the period that you were
18 out there?
19 A. Yes, sir.
20 Q. Okay. And as far as you know,
21 he was a safety conscious worker; isn't that
22 right?
23 A. Yes, sir.
24 Q. Did you know Jason Anderson?
25 A. Yes, sir.
00167:01 Q. Good man?
02 A. Yes, sir.
03 Q. Hard worker?
04 A. Yes, sir.
05 Q. Safety conscious?
06 A. Yes, sir.
07 Q. Nothing that he ever did and
08 nothing you ever heard ever indicated he was
09 the type of individual that would put the
10 lives of your co-workers in jeopardy; is that
11 true?
12 MR. HASSINGER:
13 Object.
14 A. That's true.
15 EXAMINATION BY MR. JOHNSON:
16 Q. Dewey Revette, did you know him,
17 sir?
18 A. Yes, sir.
19 Q. Good man?
20 A. Yes, sir.

21 Q. Safety conscious?
22 A. Yes, sir.
23 Q. You never saw him do anything
24 that you deemed was unsafe; is that true?
25 A. He was by the book.
00168:01 Q. I want to turn for a minute to
02 safety. And I know you've gotten some
03 questions about these today, and I just want
04 to follow up on a few things.
05 You were asked about the letters
06 TOFS. Do you remember that, TOFS?
07 A. Yes, sir.
08 Q. If I told you, sir, that the --
09 the -- the letters "TOFS" stood for "time out
10 for safety," does that sound like it's
11 something that would stand for to you, sir?
12 A. It does now.
13 Q. Okay. And you've heard the
14 phrase "time out for safety"; is that right?
15 A. Yes, sir.
16 Q. And I think you were just asked
17 some questions about the authority to stop a
18 job?
19 A. Yes, sir.
20 Q. And that's referred to as a time
21 out for safety on the rig; isn't that right?
22 A. Yes, sir.
23 Q. And that was a policy on the
24 rig, wasn't it, Mr. Watson?
25 A. Yes, sir.
00169:01 Q. That was something that you and
02 everybody else was empowered to do. If you
03 saw something was unsafe, you could call that
04 timeout for safety; isn't that right?
05 A. Yes, sir.
06 Q. And you had seen that be -- been
07 done by other people; isn't that true?
08 A. Yes, sir.
09 Q. And if you saw something unsafe,
10 you wouldn't hesitate to call a timeout for
11 safety; isn't that right?
12 A. Yes, sir.
13 Q. Now, I think we talked a -- a
14 little bit earlier. You were asked some
15 questions about a -- a weekly safety meeting;
16 is that right?
17 A. Yes, sir.
18 Q. And so that was a meeting that
19 took place once a week where y'all would -- I
20 think sometimes you said you would discuss
21 other incidents and maybe lessons learned.
22 Is that one of the things that you would
23 discuss?
24 A. Yes, sir.
25 Q. And the purpose of that weekly

00170:01 meeting would be to discuss safety issues; is
02 that right?

03 A. Yes, sir.

04 Q. Now, separate and apart from
05 that, there were morning meetings that took
06 place on the rig; is that right?

07 A. Yes, sir.

08 Q. And I understood you described
09 some of that earlier; isn't that true?

10 A. Yes, sir.

11 Q. And the OIM would speak, and
12 then the company man for BP would talk at
13 those meetings, right?

14 A. Yes, sir.

15 Q. And fair to say that safety was
16 a big topic that was emphasized in those
17 morning meetings?

18 A. Yes, sir.

19 Q. For example, those meetings
20 might be used to discuss what was going to
21 take place that day and to coordinate those
22 activities in a safe manner; isn't that true?

23 A. Yes, sir.

24 Q. Okay. Now, while you were on
25 the rig, there were regular emergency drills
00171:01 that were conducted on Sundays; isn't that
02 true?

03 A. Yes, sir.

04 Q. And on those drills there were
05 variations; isn't that right? So, for
06 example, there may be a fire in one location
07 during one drill and then they would change
08 that up for the next drill; isn't that right?

09 A. Yes, sir.

10 Q. And that way you'd be prepared
11 for different scenarios if an actual event
12 occurred; isn't that true?

13 A. Yes, sir.

14 Q. Okay. And people took those
15 drills seriously, didn't they, sir?

16 A. Yes, sir.

17 Q. And you took those drills
18 seriously; isn't that true?

19 A. Yes, sir.

20 Q. Okay. I think earlier we talked
21 about THINK plans. Do you recall that?

22 A. Yes, sir.

23 Q. Now, a THINK plan is something
24 that's different than the morning meetings we
25 were talking about, right?

00172:01 A. Yes, sir.

02 Q. And the -- and the purpose, as I
03 understand your testimony earlier of a THINK
04 plan, is to -- to make sure that whatever the
05 operation is that you're about to perform,

06 that it's -- that -- that that operation is
 07 well thought out and it's going to be
 08 conducted in a safe manner. Is that -- that
 09 true?
 10 A. Yes, sir.
 11 Q. Okay. And you -- you did THINK
 12 plans when you were on the rig; is that
 13 right?
 14 A. All the time.
 15 Q. And those were expected by the
 16 leadership on the rig, true?
 17 A. Yes, sir.
 18 Q. Okay. Now, in terms of the
 19 actual drilling process, Mr. Watson, I'm
 20 correct that that's -- that's not a part of
 21 your job, true?
 22 A. Yes, sir.
 23 Q. Okay. And on April the 20th,
 24 you weren't involved in the drilling
 25 operations, right?
 00173:01 A. Yes, sir.
 02 Q. All right. And so you're not
 03 aware of any of the details of what was done
 04 or -- or who did what during the drilling
 05 operations on that day; is that true?
 06 A. Yes, sir.

Page 174:02 to 174:16

00174:02 Q. Okay. And you mentioned earlier
 03 that you remember that there was a new BP
 04 company man?
 05 A. Yes, sir.
 06 Q. And was the first time that you
 07 had seen this new man during this particular
 08 tour on the rig right before the explosion?
 09 A. Yes, sir.
 10 Q. Okay. And I think you indicated
 11 that at one or more of the morning meetings
 12 that Jimmy Harrell had had to correct this
 13 new company man; is that right?
 14 MS. BRANSCOME:
 15 Object to form.
 16 A. Yes, sir.

Page 174:18 to 174:19

00174:18 Q. Do you -- do you remember what
 19 it was that Jimmy had to correct him about?

Page 174:22 to 175:03

00174:22 A. I can't remember, but it was

23 just the way we did things. He may have did
24 things different somewhere else, but it just
25 was -- it was just something -- I don't know
00175:01 if he was familiar with -- how we did things.
02 I just -- you know, I don't want to
03 speculate.

Page 176:04 to 176:06

00176:04 Q. Okay. But in any event, was
05 it -- was it your impression that he just
06 really didn't seem to know what he was doing?

Page 176:09 to 176:14

00176:09 A. I have to be honest, I -- my
10 personal opinion, I felt that way. But I
11 can't spec -- I mean, I can't say. I don't
12 know his job. But Jimmy having to correct
13 him, you know, it -- it kind of looks bad in
14 front of your personnel, so I don't know.

Page 177:01 to 177:13

00177:01 Q. Okay. But was there a real
02 difference in your mind between
03 Mr. Sepulvado, who had been the previous BP
04 company man, in other words, his competence,
05 as opposed to the new man who came out there?
06 MS. BRANSCOME:
07 Object to form.
08 A. The previous guy was, like I
09 said, spot-on, spectacular, and this guy here
10 didn't -- it wasn't -- the guy that he --
11 that replaced him just -- I guess he just --
12 I don't know if he wasn't familiar, I don't
13 know, with our tasks, I can't say.

Page 177:15 to 177:17

00177:15 Q. Okay. In any event, the
16 difference was something that you noticed,
17 correct?

Page 177:20 to 177:22

00177:20 A. Personally, I mean, just my
21 opinion, I, you know -- it's my opinion and
22 what I felt.

Page 177:24 to 177:25

00177:24 Q. Did there seem to be any tension
25 between Mr. Harrell and the new company man?

Page 178:03 to 178:06

00178:03 A. Personally I picked that up. I
04 don't know about anybody else. I just picked
05 that up with -- with them having those words
06 like that.

Page 179:08 to 180:14

00179:08 You were being asked about the
09 discussion that was had when you were on a
10 14-day-on and 14-day-off hitch. And you
11 testified about people coming to talk with
12 you about that before it changed.

13 A. Not come and talk, it was just
14 the crew -- you know, the -- I want to say
15 the leadership came to the rig and gave us a
16 chance to just, you know, try not -- you
17 know -- and he -- it -- he gave us a chance,
18 you know, to try to stop it, but -- you know,
19 just vent, but it's -- they did what they
20 wanted to do.

21 Q. Did you say that Daun Winslow
22 and people from BP came and spoke with you
23 about that?

24 A. Well, they were there for other
25 reasons, I can't remember what. But he
00180:01 talked about -- I mean, he was there, and
02 they gave us a chance to just ask him about
03 it.

04 Q. And was BP in the room when you
05 were asked about that?

06 A. We -- they came in one of our
07 morning safety meetings. And --

08 Q. Okay.

09 A. -- just pretty much we have a
10 lot of talks because we get together as a
11 group, and they were there.

12 Q. So BP was in the room at that
13 time?

14 A. Yes, ma'am.

Page 180:22 to 181:05

00180:22 I'd like to mark as exhibit next
23 in order 3935.
24 (Exhibit No. 3935 marked for
25 identification.)

00181:01 MS. ALAN:

02 It's a document that begins with

03 TRN-MDL-01316501. There's copies for you,
04 Counsel. It's a document that was produced
05 by Transocean.

Page 181:21 to 183:06

00181:21 Q. Okay. And you testified that
22 some of your courses you had in Houston.
23 You -- you went to Houston, right --
24 A. Yes, ma'am.
25 Q. -- from Transocean?
00182:01 I'd like you to turn to the page
02 that ends in 6521. It's about two-thirds
03 down or three-quarters down. And the top of
04 that appears to say TOPS course and right
05 below it "TOPS and IADC rig pass final exam."
06 Am I reading that correctly?
07 A. Yes, ma'am.
08 Q. Is that your handwriting on the
09 page in the various spaces?
10 A. As far as the test, I would say
11 yes. As far as everything else, I guess
12 that's the examiner's.
13 Q. Okay. So some of these courses
14 you took had actual written materials and --
15 and written tests that you would take at the
16 end; is that correct?
17 A. This looks like it was from that
18 school in '07, Amelia.
19 Q. Okay. And two pages after that
20 that ends in 523, is that also your
21 handwriting in the -- the names and in the
22 filling out the spaces below for the test?
23 A. Yes, ma'am.
24 Q. And that appears to be
25 International Safety Management Training
00183:01 Test?
02 A. Yes, ma'am.
03 Q. Okay. Did you feel like you got
04 sufficient training in safety during your
05 time at Transocean?
06 A. Yes, ma'am.

Page 193:06 to 193:09

00193:06 Q. Do you have any reason to
07 believe that any of the Halliburton employees
08 failed to perform their job duties in a
09 competent matter?

Page 193:14 to 193:19

00193:14 A. Like I said, you know, when --

15 when they're doing their job, it's all
 16 isolated, you know. They're in shacks. I
 17 can't see what's going on in their shack. It
 18 only was when it comes to tool or making up
 19 something. That's all I know.

Page 193:21 to 193:24

00193:21 Q. But I'm asking you, do you have
 22 any reason to believe that they did anything
 23 other than perform their duties in a -- in a
 24 competent manner?

Page 194:04 to 194:04

00194:04 A. I don't have any reason.

Page 194:06 to 194:09

00194:06 Q. Okay. And do you have any
 07 reason to believe that they performed their
 08 job duties in anything other than a
 09 safety-conscious manner?

Page 194:14 to 194:15

00194:14 A. Working with me on the deck,
 15 they were safe.

Page 203:16 to 205:15

00203:16 Q. Mr. Watson, in response to some
 17 of the questions by the other lawyers, you
 18 talked about a policy whereby you -- if you
 19 observed unsafe activities, you had the power
 20 to stop a job. Do you recall that testimony?

21 A. Yes, sir.

22 Q. All right. What I'm curious to
 23 know is, is whether or not the actual
 24 drilling of the well would be considered a
 25 job that you could stop.

00204:01 A. I can't say because I'm not -- I
 02 don't have those expertise to know what that
 03 driller knows, so I can't say that.

04 Q. Well, I understand that. But
 05 my -- my -- my first question is: If you
 06 observed something that you thought was
 07 unsafe in the drilling, could you stop the
 08 drilling process?

09 A. Like I said, I don't know, you
 10 know, what's -- would be a problem --

11 Q. Right.

12 A. -- you know, you've got
13 instruments in there --
14 Q. Uh-huh.
15 A. -- you have ADs, you have a
16 toolpusher in there. And I'm not qualified
17 to know, you know, what's the problem or
18 whatever.
19 Q. Right. So I hear you. What
20 you're saying to me is, is that you -- in
21 order to stop a job, you have to know enough
22 about the job to know that it's unsafe; isn't
23 that correct?
24 A. If you want to be -- not
25 cause -- you know, get someone hurt. You
00205:01 have to know -- you know, be familiar with
02 the -- I would want to be familiar with that,
03 you know, just . . .
04 Q. Right. You have to have enough
05 familiarity with the job in order to make a
06 judgment as to whether or not the job is
07 being done safely or unsafely --
08 A. Yes, sir.
09 Q. -- right? Okay.
10 And drilling is not one of those
11 activities that you felt competent enough to
12 make a judgment as to whether or not it was
13 being done safely or unsafely; isn't that
14 true?
15 A. Yes, sir.

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00209:15 Q. Okay. Let's -- let's --
16 let's -- now that we know who we're talking
17 about, I want you to describe for me
18 Mr. Sepulvado's style of work.
19 A. From what I've seen, he's in the
20 safety meeting, he's a hands-on guy. He --
21 you know, he takes control of that meeting,
22 you know, him -- you know, pretty much. But
23 he's on there -- I'm there at night, and the
24 OIM is not there. So he takes -- you know,
25 he's there, he's telling us what's going on,
00210:01 he runs the show.
02 Q. Right.
03 A. You know, you can -- if -- you
04 better have your -- your I's dotted when he's
05 on -- on tower.
06 Q. All right. So he's a commanding
07 person?
08 A. Commanding person.

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00210:12 Q. Okay. Did he appear to you to
13 know what he was doing?
14 A. Yes, sir.
15 Q. All right. Now, if you would
16 compare for me Mr. Vidrine, who I will
17 suggest to you is -- was the name of the man
18 who took Mr. Sepulvado's place, compare
19 Mr. Vidrine and Mr. Sepulvado. As between
20 the two men, who appeared to you to have more
21 skill in their job?

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00210:24 A. Sepulvado.

Page 211:01 to 211:03

00211:01 Q. Okay. And why is that? What --
02 what -- what -- what caused you to have
03 that -- to make -- to reach that conclusion?

Page 211:06 to 211:09

00211:06 A. Safety meeting, just, I guess,
07 saying things that -- you know, kind of
08 having Jimmy question certain things, you
09 know, so . . .

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00211:11 Q. All right. So it was your
12 observation that Jimmy Harrell questioned
13 Mr. Vidrine that caused you to think that
14 maybe Mr. Vidrine didn't really have as much
15 skill as Sepulvado, let's put it that way --

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00211:19 Q. -- is that accurate?
20 A. Yes, sir.

Page 212:04 to 212:08

00212:04 Q. Okay. All right. But, clearly,
05 in your mind Mr. Sepulvado was the more
06 skilled of the two men. Is that accurate?
07 A. I don't know his background or
08 his skills --

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00212:11 A. -- just from what I saw in the
12 safety meeting and from what I saw Sepulvado
13 over the years, you know, he was, you know --
14 a toolpusher, you better have it right, you
15 know.

CORRECTION PAGE

WITNESS NAME: NICK WATSON DATE: 07/14/2011

PAGE	LINE	CHANGE	REASON
8	13	Four years	wrong amount of time
57	21	boom to boat	incorrect word
77	18	drew to crew	incorrect word
82	110	Bridge guy asked	
107	11	I want to say Roberto	Wrong Company Man
122	20	We did PM	Wrong Acronym
131	23	Work under the Bosun	Wrong Word
134	13	Chief Mate and Tailpusher in charge.	Wrong word
159	23	I was there four years.	wrong amount of time
165	10	Four years	wrong amount of time
191	18	graduated years before I did.	wrong amount of time
208	15	Robert, I guess	Wrong Company Man
209	3	Robert	Wrong Company Man
207	3	Mr. Kaluza and Mr. Sepulvado	Wrong Company Man
208	1	Mr. Kaluza?	Wrong Company Man
208	11	Sepulvado, not Kaluza.	Wrong Company Man
210	16	Mr. Kaluza	Wrong Company Man
210	19	Mr. Kaluza and Mr. Sepulvado.	Wrong Company Man
211	13	Mr. Kaluza	Wrong Company Man
211	14	Mr. Kaluza	Wrong Company Man

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