

 And from January 1, 2009, up ...

DS-0519-0002223

2 SEGMENTS (RUNNING 00:02:24.336)



1. PAGE 22:23 TO 23:22 (RUNNING 00:00:45.190)

23 Q. And from January 1, 2009, up
24 through and including the date of the sinking
25 of the DEEPWATER HORIZON on April the 22nd
00023:01 you were the chief operating officer for BP
02 Exploration & Production; is that right?
03 A. Yes, that was my title, yes.
04 Q. Now, as I understand it, since
05 then the chief executive officer of BP, PLC,
06 Tony Hayward, has been replaced; is that
07 right?
08 A. Tony has left the company, yes.
09 Q. All right. The chief executive
10 officer of BP Exploration & Production, Andy
11 Inglis, has left the company?
12 A. That's correct.
13 Q. And you as the chief operating
14 officer of BP Exploration & Production have
15 left the company?
16 A. I retired at the end of March,
17 yes.
18 Q. Okay. And I just wanted to ask
19 you: At the time that you retired, you were
20 the ripe old age of 50 years old; is that
21 right?
22 A. Yes, I was.

2. PAGE 495:17 TO 497:04 (RUNNING 00:01:39.146)

17 Q. Okay. Now, we'll go back to
18 your time at BP as -- your -- your -- your
19 official title after April 20th was senior
20 representative in the Unified Area Command;
21 is that right? Does that sound right?
22 A. Well, I was BP's representative
23 on -- on Unified Area Command. I don't know
24 that we gave it a -- I don't recall it having
25 a specific title. I was -- I was just the BP
00496:01 representative at -- the member of the
02 Unified Area Command.
03 Q. You -- you were the senior-most
04 BP official?
05 A. I was the senior -- I was the
06 Unified Area commander from BP.
07 Q. Okay.
08 A. That was my job.
09 Q. How were you selected to be the
10 Unified Area representative for BP?
11 A. Well, before when they -- the --
12 the spill first happened and I got -- or the
13 accident first happened, I -- I went into the
14 BP office. And on the morning of April 21st,
15 Tony Hayward spoke with me and -- as he and
16 Andy Inglis were in London at the time and
17 asked if I could lead the response. Then
18 after Admiral Landry called me and said that
19 she was -- she was activating Unified Area

20 Command, I had a discussion, if I recall
21 correctly, with Andy Inglis about who was the
22 best -- at that point I had deployed Dave
23 Rainey before then to New Orleans to Admiral
24 Landry's office here.
25 And at that point we had
00497:01 discussion would it -- who would be the best
02 person to do that job, and given my
03 experience, the decision was made that I
04 should -- I should take that role.

 **Suttles, Doug (Vol. 11) - 05/20/2011**

1 CLIP (RUNNING 00:07:43.766)

 Yes, it was. ...

DS-0520-0054709

7 SEGMENTS (RUNNING 00:07:43.766)



1. PAGE 547:10 TO 547:21 (RUNNING 00:00:38.959)

10 Q. Okay. Now -- and prior -- I'm
11 going to be focusing on -- on the time around
12 April 20, 2011, perhaps some after that.
13 But during the period January 1,
14 2000 -- excuse me -- 2010 through, say,
15 April 30 of 2010, you were the chief
16 operating officer or COO of which company?
17 A. I -- of BP Exploration &
18 Production, the -- the actual -- I believe my
19 paycheck came from BP North America, but --
20 Q. Okay.
21 A. -- I worked for --

2. PAGE 548:02 TO 549:24 (RUNNING 00:01:34.999)

02 A. Could you repeat the question?
03 EXAMINATION BY MR. GODWIN:
04 Q. I'll be happy to, sir. I want
05 to establish who it was that you worked for
06 insofar as your title as COO of E&P. And
07 that stands for Exploration & Production,
08 does it not?
09 A. That's correct.
10 Q. Okay. Which company were you
11 the chief operating officer of prior to the
12 time that you retired on March 31, 2011?
13 A. The -- the organizational
14 structure of BP Group had what we refer to as
15 two major segments: One was Exploration &
16 Production and the other was Refining &
17 Marketing. Then it had a -- a third element
18 which was the other businesses, things like
19 alternative energy.
20 Q. What I'm after, just the name of
21 the company, sir. I'll go into, if I need,
22 how they were divided up and what they did.
23 I just want to know: The company that you
24 were the chief operating officer of for E&P,
25 what was the name of that company up to the
00549:01 time that you retired?
02 A. Okay. I'm -- I'm trying to do
03 my best to answer that.
04 Q. I don't need you to name --

05 answer it except give me the name of a
06 company is all I need, sir. I'm trying to
07 get through it. I have a -- I'm limited in
08 my time.
09 A. Okay.
10 Q. I just need the name of a
11 company, please.
12 A. Well, my paycheck came from, I
13 believe, BP North America, Inc., but I -- my
14 role involved -- I reported to the chief
15 executive officer of Exploration &
16 Production.
17 Q. And -- and who was that, sir?
18 A. Andy Inglis.
19 Q. Mr. Inglis. Okay.
20 And are you able to tell us here
21 today the name of the company that you were
22 the COO, the chief operating officer, of
23 prior to the time you retired on -- on
24 March 31, 2011?

3. PAGE 550:03 TO 551:23 (RUNNING 00:01:20.999)

03 Q. Go ahead, sir.
04 A. Yes. I -- and I am trying to do
05 my best to answer your question. I -- the --
06 the corporate structure of the company
07 involved a number of subsidiaries around the
08 world which I had some responsibility and
09 relationship to, so I -- I actually don't
10 know how to answer your question other
11 than --
12 Q. Okay.
13 A. -- to tell you --
14 Q. Okay. Let -- let me rephrase
15 it, then.
16 I understand the company, BP, is
17 divided -- the main primary company in London
18 is divided into companies around the world.
19 And I'm talking about Doug Suttles who was
20 the COO for earning -- or E&P earnings --
21 Exploration & Production.
22 A. Uh-huh.
23 Q. I simply want to know the name
24 of the company that you were the chief
25 operating officer of. I'm not interested in
00551:01 sales and marketing or legal or any other
02 aspect of the company. I want to know the
03 company that you believe you were the COO of,
04 if you know.
05 A. I'm sorry. I -- I -- I can't
06 answer your question. I -- I just don't know
07 the --
08 Q. Okay.
09 A. -- answer to that.
10 Q. All right. And -- okay. And I
11 believe you said that you reported prior to
12 your retirement while you were the COO in
13 most recent times to Mr. Andy Inglis,
14 correct?
15 A. That's correct, yes.
16 Q. And -- and tell us, if you will,
17 please, he was the CEO?
18 A. He -- his -- his title -- at
19 least my understanding of his title was the
20 chief executive officer of Exploration &
21 Production.

22 Q. Okay. Of -- of Exploration &
23 Production of which company?

4. PAGE 552:02 TO 552:02 (RUNNING 00:00:00.999)

02 Q. Is that a company?

5. PAGE 552:05 TO 552:07 (RUNNING 00:00:03.580)

05 A. It's not -- I mean, I don't
06 know -- I don't know the -- the legal entity
07 status. I'm sorry.

6. PAGE 552:20 TO 556:01 (RUNNING 00:03:24.430)

20 Q. Okay, sir. Do you know the name
21 of the company that as of April 20, 2010,
22 Mr. Andy Inglis was the CEO of?

23 A. He -- all -- what I understood
24 was he was the chief executive officer for
25 Exploration & Production and those activities
00553:01 across the company. I do not know -- I do
02 not believe that was structured under one
03 legal entity.

04 Q. Okay, sir. And -- and as of
05 April 20, 2010, to whom did Mr. Andy Inglis
06 report, if you know?

07 A. My understanding is his boss was
08 Tony Hayward who is the chief executive
09 officer of the BP Group.

10 Q. Okay. And did you at any time
11 in the 2010 time frame report direct to Tony
12 Hayward on any matters?

13 A. Not to my knowledge, no.

14 Q. Okay. Because after the event
15 on April 20, I understand you were in charge
16 of the response effort?

17 A. My role was --

18 Q. Is that correct, sir?

19 A. Well, there were -- there were
20 two roles I played. Tony Hayward on the 21st
21 of April asked me to lead BP's group crisis
22 response initially because --

23 Q. Right.

24 A. -- because he and Andy Inglis
25 were in London at the time. And then a day
00554:01 or two later, I was asked to be BP's member
02 of Unified Area Command, which put me as the
03 senior BP person inside of the Unified Area
04 Command spill response.

05 Q. Okay. Now, in those two roles
06 that you played that you were requested to do
07 by Mr. Tony Hayward, to whom did you report?

08 A. Internally within BP I consulted
09 on -- Tony granted me authority -- BP
10 authority to make the decisions I needed to
11 make inside of that role. It's a difficult
12 question to answer because I didn't think of
13 it in that way.

14 I would consult with Tony
15 Hayward on issues, with Andy Inglis on
16 issues, and with Bob Dudley on issues amongst
17 many others, but I --

18 Q. Okay.

19 A. -- I didn't -- I didn't --
20 they -- they didn't put constraints on me
21 which required me to go back to them to take
22 decisions.

23 Q. Okay. So in terms of, though,
24 in the corporate hierarchy --
25 A. Yes.
00555:01 Q. -- as of April 21, 2010, and up
02 until the -- up until the time when you no
03 longer were involved with the HORIZON --
04 A. Right.
05 Q. -- well -- HORIZON matters, I
06 understand you were in charge as -- as
07 delegated to you by Mr. Tony Hayward,
08 correct, with the response effort?
09 A. Yes, he -- well, he spoke with
10 me about -- he's the person who asked me to
11 lead -- initially lead BP through crisis
12 response. It was Andy Inglis, I believe, who
13 asked me to be the Unified Area commander for
14 BP.
15 Q. Okay, sir. And -- and as I
16 understand it, during the time that you were
17 in those two roles you've just named, you
18 would consult direct with Tony Hayward from
19 time to time as -- as the necessity arose?
20 A. Yes, I did on -- on a number of
21 occasions.
22 Q. And you would also consult
23 direct with Mr. Andy Inglis as needed as the
24 occasion arose after you were put into those
25 two positions as of April 20, 2010?
00556:01 A. That's correct.

7. PAGE 817:04 TO 817:21 (RUNNING 00:00:39.800)

04 Is this the company you worked
05 for, BP Exploration & Production, Inc.?
06 A. As -- as I described earlier, I
07 worked for the organizational entity called
08 BP Exploration & Production. I'm just not
09 familiar with the -- the -- the legal entity
10 structure.
11 Q. Well, is there an organization
12 called the BP Exploration & Production and a
13 company called BP Exploration & Production,
14 Inc.?
15 A. The -- the -- the organizational
16 unit that -- that looks after BP's
17 exploration and production activities
18 globally is called BP Exploration &
19 Production. There are a huge number of legal
20 entities, and I would assume this is one of
21 those.

TOTAL: 2 CLIPS FROM 2 DEPOSITIONS (RUNNING 00:10:08.102)