

Deposition Testimony of:

Allen Seraile

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Page 7:08 to 7:17

00007:08 ALLEN SERAILE,
09 having been first duly sworn, testified as
10 follows:
11 EXAMINATION
12 BY MR. WHITLEY:
13 Q. Please state your name for the record.
14 A. Allen Seraile.
15 Q. Mr. Seraile, we met moments ago, but my
16 name is Josh Whitley. I'm an attorney on behalf
17 of the Plaintiffs' Steering Committee. I'm not

Page 8:03 to 9:02

00008:03 A. Lafayette -- Duson, Louisiana.
04 Q. And how old are you, sir?
05 A. I'm accompanied by my counsel-man. I
06 plead the Fifth Amendment.
07 Q. Yes, sir. I understand.
08 When did you start working for
09 Transocean?
10 A. Same answer.
11 Q. What did you do prior to joining
12 Transocean?
13 A. Same answer.
14 Q. Isn't it true that you have held the
15 following positions at Transocean; you've been a
16 derrick, a roustabout, a roughneck and an
17 assistant driller?
18 A. Same answer.
19 Q. And isn't it true you were an assistant
20 driller on the DEEPWATER HORIZON rig at the time
21 of the explosion on April 20th, 2010?
22 A. Same answer.
23 Q. And isn't it true you had been an
24 assistant driller on the DEEPWATER HORIZON for
25 approximately one year prior to the April 20th
00009:01 explosion?
02 A. Same answer.

Page 9:09 to 9:09

00009:09 (Exhibit 4800 was marked.)

Page 9:14 to 10:02

00009:14 me. Am I reading it correctly that the assistant
15 driller reports to the driller?
16 A. Same answer.
17 Q. And the assistant driller supervises the
18 derrick hand, pump hand and floor hand.
19 Isn't that correct?

20 A. Same answer.
21 Q. The basic function of the assistant
22 driller is to: Assist the driller in operating
23 drilling and mud circulating equipment as
24 instructed in the well program and in accordance
25 to company policies and procedures.
00010:01 Isn't that correct?
02 A. Same answer.

Page 10:07 to 11:09

00010:07 Q. And as part of your duties and
08 responsibilities, it lists that you have to:
09 Read and interpret various gauges and meters
10 relating to the drilling operations.
11 Isn't that correct?
12 A. Same answer.
13 Q. And so reading and interpreting those
14 gauges, it's your basic job duty and
15 responsibility to detect kicks; isn't that
16 correct?
17 A. Same answer.
18 Q. And further, part of your duties and
19 responsibilities was to: Assist the driller
20 during an emergency or well control situation.
21 Isn't that correct?
22 A. Same answer.
23 Q. And you were responsible for: Assisting
24 and running and cementing casing strings, running
25 and retrieving BOPs and risers and monitoring mud
00011:01 systems.
02 Correct?
03 A. Same answer.
04 Q. And finally, the last duty I want to
05 recognize is you were responsible for: Knowing
06 the client rules and company procedures for well
07 control and blowout prevention.
08 Isn't that correct?
09 A. Same answer.

Page 11:12 to 11:17

00011:12 Q. When it states that your responsibility
13 was to operate the drilling and mud circulating
14 equipment as instructed in the well program,
15 isn't it true that BP dictates what that well
16 program is, and you are simply implementing BP's
17 design program?

Page 11:19 to 12:02

00011:19 A. Same answer.
20 Q. (BY MR. WHITLEY) For instance, you

21 understand that BP takes a survey of the site and
22 BP engineers the well, designs the well; isn't
23 that correct?
24 A. Same answer.
25 Q. It's BP that dictated what type of casing
00012:01 you as part of the drilling team used at the
02 Macondo site; isn't that correct?

Page 12:04 to 12:08

00012:04 A. Same answer.
05 Q. (BY MR. WHITLEY) And BP dictated what
06 type of cement program was used at Macondo; isn't
07 that correct?
08 A. Same answer.

Page 12:16 to 12:21

00012:16 Q. (BY MR. WHITLEY) And even though per
17 this job description an assistant driller like
18 you, you're supposed to be monitoring the mud
19 gauges and supervising the pump hand, it is BP
20 who dictates the mud weight to be used; isn't
21 that correct?

Page 12:23 to 13:06

00012:23 A. Same answer.
24 Q. (BY MR. WHITLEY) And it's BP that
25 determines the mud flow; isn't that correct?
00013:01 A. Same answer.
02 Q. And you as an assistant driller working
03 in the mud program, you depended on BP's
04 calculations regarding the mud weight and the mud
05 flow; isn't that correct?
06 A. Same answer.

Page 13:08 to 13:11

00013:08 Q. (BY MR. WHITLEY) And you as an assistant
09 driller did not have any authority to change BP's
10 dictate on the mud weight or mud flow; isn't that
11 correct?

Page 13:13 to 13:18

00013:13 A. Same answer.
14 Q. (BY MR. WHITLEY) Isn't it true to the
15 best of your knowledge that Transocean was never
16 consulted regarding the calculations of maximum
17 anticipated surface pressure, fracture gradient
18 and margins in the BP well design?

Page 13:20 to 13:23

00013:20 A. Same answer.
21 Q. (BY MR. WHITLEY) And it's BP who
22 dictated how many centralizers were used in the
23 wellbore at the Macondo site; isn't that correct?

Page 13:25 to 13:25

00013:25 A. Same answer.

Page 14:02 to 14:05

00014:02 Q. (BY MR. WHITLEY) And isn't it true that
03 BP makes the decision of whether to perform a
04 complete bottoms-up circulation before cementing,
05 correct?

Page 14:07 to 14:14

00014:07 A. Same answer.
08 Q. (BY MR. WHITLEY) And even though you are
09 a driller, it was BP that dictated the depth of
10 the well; isn't that correct?
11 A. Same answer.
12 Q. And it was BP that dictated the rate of
13 penetration into the -- into the well; isn't that
14 correct?

Page 14:16 to 14:22

00014:16 A. Same answer.
17 Q. (BY MR. WHITLEY) Indeed, when there were
18 losses of fluid to the formation in early April
19 of 2010, it was BP that changed the total depth
20 from 20,200 feet to 18,360 feet; isn't that
21 correct?
22 A. Same answer.

Page 15:08 to 15:11

00015:08 Q. (BY MR. WHITLEY) And so you as an
09 assistant driller, you are implementing the well
10 program designed by BP; isn't that correct?
11 A. Same answer.

Page 15:16 to 15:20

00015:16 Q. Isn't it true to your knowledge that as
17 an assistant driller, BP controlled the timing

18 and whether -- and whether or not to conduct a
19 negative pressure test?
20 A. Same answer.

Page 16:05 to 16:10

00016:05 Q. (BY MR. WHITLEY) And it was BP's well
06 team site leader, John Guide, and not you or your
07 drilling bosses at Transocean that decided to
08 send Schlumberger home on the morning of
09 April 20th and not run a cement bond log test;
10 isn't that correct?

Page 16:12 to 16:17

00016:12 A. Same answer.
13 Q. (BY MR. WHITLEY) Isn't it true that the
14 decision to displace the well during temporary
15 abandonment procedures and leaving in place only
16 one barrier against the influx of hydrocarbons
17 was BP's and BP's call alone?

Page 16:19 to 16:19

00016:19 A. Same answer.

Page 17:05 to 17:11

00017:05 Q. As part of your responsibilities, you
06 were involved and charged with shutting in a well
07 if you suspected a kick; isn't that correct?
08 A. Same answer.
09 Q. And you would implement certain
10 procedures in accordance with BP policies for
11 shutting in a well; isn't that correct?

Page 17:13 to 19:23

00017:13 A. Same answer.
14 Q. (BY MR. WHITLEY) And if you suspected --
15 well, you would agree with me, would you not,
16 that gains and losses in fluids are a bad thing,
17 would you not?
18 A. Same answer.
19 Q. And you -- you would agree that kicks and
20 loss returns could indicate well control issues,
21 correct?
22 A. Same answer.
23 Q. And you would agree that a loss of well
24 control could cause a blowout; is that not true?
25 A. Same answer.
00018:01 Q. And you would agree that blowouts are

02 bad?

03 A. Same answer.

04 Q. As an assistant driller, part of your job
05 is to help in identifying kicks and loss of
06 circulation issues so that you can prevent
07 blowouts; isn't that correct?

08 A. Same answer.

09 Q. And isn't it true that when drilling a
10 hole for the safety of those in the drilling room
11 and the entire rig, the earlier you detect a kick
12 or loss returns, the easier it is to prevent a
13 blowout?

14 A. Same answer.

15 Q. Isn't it true that as an assistant
16 driller, you want to make sure to monitor that
17 you are getting the same amount of fluids out of
18 the hole as you are putting into the hole?

19 A. Same answer.

20 Q. And isn't it true that if you are not
21 getting the same amount of fluids out of the well
22 as you are putting into it, you have a well
23 control issue?

24 A. Same answer.

00019:01 Q. And isn't it true that flow in versus
02 flow out is the easiest way to monitor a well?

02 A. Same answer.

03 Q. And you as an assistant driller were
04 charged with communicating with those in the mud
05 pit on this very issue; isn't that correct?

06 A. Same answer.

07 Q. And if you saw a gain in mud volume over
08 what is being put into the well, that indicates
09 possible hydrocarbons coming up the wellbore;
10 isn't that correct?

11 A. Same answer.

12 Q. And likewise, if you see less mud coming
13 out than what you are putting in, that indicates
14 loss returns into the formation which could cause
15 the well to be underbalanced and, there again,
16 hydrocarbons could come up to the lower pressure;
17 isn't that correct?

18 A. Same answer.

19 Q. So upon either a detection of gains or
20 losses in fluids, you as an assistant driller
21 would shut in the well in accordance with BP's
22 policies for shutting in a well; isn't that
23 correct?

Page 19:25 to 20:22

00019:25 A. Same answer.

00020:01 Q. (BY MR. WHITLEY) And to shut in the
02 well, the first thing you do is pick the drill
03 off the bottom; isn't that correct?

04 A. Same answer.

05 Q. And then you shut down the rotary; isn't
06 that correct?

07 A. Same answer.

08 Q. And then you shut off the mud pumps to
09 cease the flow of mud that you are putting into
10 the well, correct?

11 A. Same answer.

12 Q. And then you monitor to see if there is
13 any further flow which indicates it's
14 hydrocarbons coming up; isn't that correct?

15 A. Same answer.

16 Q. And if there is flow, you shut in the
17 annular; isn't that correct?

18 A. Same answer.

19 Q. And then at that point the well is shut
20 in and you seek higher authority, BP, to
21 determine whether or not to kill the well; isn't
22 that correct?

Page 20:24 to 21:04

00020:24 A. Same answer.

25 Q. (BY MR. WHITLEY) And the way you
00021:01 determine whether or not to kill the well or the
02 way BP will determine will be based upon the
03 pressures you read after you shut in the well;
04 isn't that correct?

Page 21:06 to 21:16

00021:06 A. Same answer.

07 Q. (BY MR. WHITLEY) Prior to April 20th it
08 was BP and not the drilling team that made the
09 decision to convert the lower annular to a
10 stripping annular, reducing its effective psi
11 rating from 10,000 to 5,000; isn't that correct?

12 A. Same answer.

13 Q. And isn't it true that BP replaced the
14 sealing elements of the upper annular, reducing
15 its effective psi rating on a 5-1/2-inch drill
16 pipe to 7500 psi?

Page 21:18 to 21:18

00021:18 A. Same answer.

Page 22:04 to 22:22

00022:04 Q. Isn't it true, sir, that there were
05 annular preventer maintenance performance
06 problems in the 30 days leading up to April 20th,
07 2010?

08 A. Same answer.

09 Q. In fact, there were pieces of rubber
10 found in the mud pits that you worked directly
11 with which would indicate deterioration of -- or
12 damage to the gaskets or annulars; isn't that
13 correct?

14 A. Same answer.

15 Q. Isn't it true that you want to drill with
16 pipe that is capable of being sheared by the BOP
17 in emergency circumstances such as those on
18 April 20th, 2010?

19 A. Same answer.

20 Q. And isn't it true that BP and not you or
21 the drilling team decide what type of pipe you
22 use to drill a well?

Page 22:24 to 23:03

00022:24 A. Same answer.

25 Q. (BY MR. WHITLEY) Isn't it true that BP
00023:01 was running pipe that was not capable of being
02 sheared by the blind shear rams on April 20th,
03 2010?

Page 23:05 to 23:05

00023:05 A. Same answer.

Page 24:10 to 24:17

00024:10 Q. Thus, sir, you were involved in the
11 process known as temporary abandonment of the
12 Macondo well; isn't that correct?

13 A. Same answer.

14 Q. And you are -- are aware as an assistant
15 driller that BP in the days leading up to
16 April 20th, 2010, changed that temporary
17 abandonment procedure several times?

Page 24:19 to 24:19

00024:19 A. Same answer.

Page 25:09 to 25:17

00025:09 Q. On Page 123, Lines 5 through 7, you
10 testified that: They was getting ready to do the
11 last cement plug -- surface plug.

12 Did I read that correct?

13 A. Same answer.

14 Q. Isn't it true that under BP's plan they
15 were going to displace the drilling fluid with
16 seawater before setting the second cement barrier

17 against BP's own policies?

Page 25:19 to 25:19

00025:19 A. Same answer.

Page 27:06 to 27:19

00027:06 Q. In your testimony there is no mention of
07 hearing an alarm, before the explosion or
08 otherwise, did you?

09 A. Same answer.

10 Q. And it is your understanding that the
11 DEEPWATER HORIZON was equipped with alarms that
12 were -- you were trained would alert you and your
13 fellow crew members of the presence of
14 combustible gas; isn't that correct?

15 A. Same answer.

16 Q. Yet you heard gas but heard -- you heard
17 gas but heard no alarm before the explosion;
18 isn't that correct?

19 A. Same answer.

Page 28:17 to 29:05

00028:17 On this report it notes that you saw
18 water and mud coming out of the rotary, that you
19 heard the sound of gas, that you heard
20 explosions, that you saw the rig was on fire and
21 so forth, which is all consistent with your Coast
22 Guard testimony.

23 My question to you, sir, is, again, there
24 is no mention of hearing any alarms to alert you
25 to the presence of combustible gas; is that

00029:01 correct?

02 A. Same answer.

03 Q. And even though you could clearly hear
04 gas, you never heard an alarm, did you?

05 A. Same answer.

Page 30:21 to 30:23

00030:21 Q. Isn't it true that you were familiar with
22 BP's drilling and well operations manual, or
23 DWOP, which is Exhibit 93 in this case?

Page 30:25 to 31:04

00030:25 A. Same answer.

00031:01 Q. (BY MR. DART) Isn't it true that BP's
02 DWOP Section 15.2.17 required that a well control
03 bridging document be created between BP and

04 Transocean for the Macondo well?

Page 31:06 to 31:06

00031:06 A. Same answer.

Page 31:14 to 31:16

00031:14 Q. Isn't it true that no such well control
15 bridging document existed between BP and
16 Transocean that applied to the Macondo well?

Page 31:18 to 31:21

00031:18 A. Same answer.
19 Q. (BY MR. DART) Isn't it true that there
20 was no clear understanding of responsibilities
21 regarding well control at the Macondo well?

Page 31:23 to 31:23

00031:23 A. Same answer.

Page 33:09 to 33:13

00033:09 Q. (BY MR. DART) Isn't it true that the
10 task-specific think plans, or TSTPs, were
11 required to be made for all safety critical
12 procedures on the rig?
13 A. Same answer.

Page 33:18 to 33:25

00033:18 Q. Isn't it true that a TSTP was required to
19 be done for the final long string cement job on
20 the Macondo well?
21 A. Same answer.
22 Q. Isn't it true that a TSTP was not done
23 for the final long string cement job on the
24 Macondo well?
25 A. Same answer.

Page 34:09 to 34:17

00034:09 Q. (BY MR. DART) Isn't it true that a TSTP
10 was required to be done for the negative pressure
11 test run on April 20th, 2010, on the Macondo
12 well?
13 A. Same answer.
14 Q. Isn't it true that a TSTP was not done
15 for the negative pressure test run done on

16 April 20th, 2010, on the Macondo well?

17 A. Same answer.

Page 34:24 to 35:07

00034:24 Q. (BY MR. DART) Isn't it true that a TSTP

25 was required to be done for the displacement of

00035:01 the well to seawater on April 20th, 2010, on the

02 Macondo well?

03 A. Same answer.

04 Q. Isn't it true that a TSTP was not done

05 for the displacement of the well to seawater on

06 April 20th, 2010, on the Macondo well?

07 A. Same answer.

Page 36:09 to 36:12

00036:09 Q. (BY MR. DART) Isn't it true that

10 Transocean did not follow its own safety

11 management system in the drilling and temporary

12 abandonment of the Macondo well?

Page 36:14 to 36:14

00036:14 A. Same answer.

Page 36:22 to 37:06

00036:22 Q. (BY MR. DART) Isn't it true that the

23 DEEPWATER HORIZON had never been in dry dock

24 since it was put into service in 2001?

25 A. Same answer.

00037:01 Q. Isn't it true that there were numerous

02 safety-critical pieces of equipment, such as gas

03 detection equipment, alarms, mud gas separator

04 equipment and BOP equipment, which needed to be

05 repaired and/or replaced on April 20th, 2010, on

06 the DEEPWATER HORIZON?

Page 37:08 to 37:08

00037:08 A. Same answer.

Page 37:23 to 38:04

00037:23 Q. (BY MR. DART) Isn't it true that

24 critical parts of the DEEPWATER HORIZON's BOP

25 equipment, including the ram bonnets, had not

00038:01 been recertified in accordance with MMS API

02 and/or manufacturer requirements as of

03 April 20th, 2010?

04 A. Same answer.

Page 38:18 to 38:21

00038:18 Q. (BY MR. DART) Isn't it true that the
19 SEMs on the blue and yellow pod of the DEEPWATER
20 HORIZON's BOP were broken on April 20, 2010?
21 A. Same answer.

Page 39:04 to 39:07

00039:04 Q. (BY MR. DART) Isn't it true that
05 Transocean did not follow its own maintenance
06 procedures to keep the DEEPWATER HORIZON in good
07 working condition?

Page 39:09 to 39:09

00039:09 A. Same answer.

Page 41:21 to 42:03

00041:21 Q. (BY MR. DART) Isn't it true that
22 ModuSpec conducted rig condition assessments in
23 2005 and on April 1st through 12th, 2010, to
24 assess the condition of the DEEPWATER HORIZON?
25 A. Same answer.
00042:01 Q. Isn't it true that this -- these audits
02 found a number of deficiencies in the condition
03 of the DEEPWATER HORIZON?

Page 42:05 to 42:05

00042:05 A. Same answer.

Page 44:07 to 44:15

00044:07 Q. (BY MR. DART) Isn't it true that Det
08 Norske Veritas, or DNV, conducted an annual ISM
09 document of compliance audit on April 14th and
10 15th of 2009 to assess Transocean's compliance
11 with flag state documentation requirements?
12 A. Same answer.
13 Q. Isn't it true that this audit found a
14 number of deficiencies in Transocean's company
15 management system?

Page 44:17 to 44:17

00044:17 A. Same answer.

Page 46:17 to 47:17

00046:17 Q. (BY MR. DART) Isn't it true that BP
18 conducted a rig audit in 2009 and a follow-up rig
19 audit on September 13th through 17th, 2009, on
20 the DEEPWATER HORIZON?
21 A. Same answer.
22 Q. Isn't it true that these audits found a
23 number of deficiencies on the DEEPWATER HORIZON?
24 A. Same answer.
25 Q. Isn't it true that some of the
00047:01 deficiencies mentioned in those rig audits
02 included: Transocean's risk assessment and
03 management system, the TSTP was not being used on
04 the rig, the rig crew was not knowledgeable of
05 BP's DWOP or its engineering technical practices,
06 ETPs, the statement of the master's authority is
07 not clearly stated in the company's safety
08 management system, control of work deficiencies
09 were observed in the failure to use the think
10 planning process, there were 390 overdue
11 maintenance jobs, BOP ram bonnets were past their
12 five-year recertification requirements, there was
13 no competence assurance program in place for rig
14 workers, and maintenance history was substandard
15 with missing information and poor quality
16 reports.
17 Is that correct?

Page 47:19 to 47:19

00047:19 A. Same answer.

Page 49:01 to 49:06

00049:01 Q. (BY MR. DART) Isn't it true that
02 Transocean was made aware of the aforementioned
03 DNV, ModuSpec and BP audits sufficiently in
04 advance of April 20, 2010, to correct the
05 deficiencies noted in those audits before the
06 disastrous well blowout on April 20th, 2010?

Page 49:08 to 49:11

00049:08 A. Same answer.
09 Q. (BY MR. DART) Isn't it true that the
10 DEEPWATER HORIZON was behind schedule for
11 completion of the work on the Macondo well?

Page 49:13 to 49:16

00049:13 A. Same answer.
14 Q. (BY MR. DART) Isn't it true that BP and

15 Transocean were in a hurry to finish the Macondo
16 well because it was behind schedule?

Page 49:19 to 49:23

00049:19 A. Same answer.
20 Q. (BY MR. DART) Isn't it true that BP and
21 Transocean planned to move the DEEPWATER HORIZON
22 to the Nile well immediately after completing its
23 work on the Macondo well?

Page 49:25 to 50:03

00049:25 A. Same answer.
00050:01 Q. (BY MR. DART) Isn't it true that BP was
02 facing a short deadline from the MMS for
03 completing its work on the Nile well?

Page 50:05 to 50:05

00050:05 A. Same answer.

Page 50:13 to 50:17

00050:13 Q. (BY MR. DART) Isn't it true that BP well
14 site leaders encouraged you to cut corners in
15 order to finish the DEEPWATER HORIZON's work on
16 the Macondo well in time to get to the Nile well
17 and meet the MMS deadline?

Page 50:19 to 50:23

00050:19 A. Same answer.
20 Q. (BY MR. DART) Isn't it true that you did
21 cut corners by not following Transocean's safety
22 management system in the operation of the
23 DEEPWATER HORIZON on the Macondo well?

Page 50:25 to 50:25

00050:25 A. Same answer.

Page 51:19 to 51:24

00051:19 Q. (BY MR. DART) Isn't it true that the
20 OIM, the driller, the assistant driller and the
21 senior toolpusher who were on tour on the evening
22 of the blowout on April 20, 2010, had a duty to
23 monitor the Macondo well during the hour before
24 drilling mud and hydrocarbons hit the rig floor?

Page 52:01 to 52:06

00052:01 A. Same answer.
02 Q. (BY MR. DART) Isn't it true that the
03 OIM, the driller and the assistant driller did
04 not properly monitor the Macondo well during the
05 hour before mud and hydrocarbons hit the rig
06 floor?

Page 52:08 to 52:14

00052:08 A. Same answer.
09 Q. (BY MR. DART) Isn't it true that had the
10 OIM, the driller, the assistant driller and
11 senior toolpusher properly monitored the Macondo
12 well during the hour before mud and hydrocarbons
13 hit the rig floor, the well could have been shut
14 in?

Page 52:16 to 52:22

00052:16 A. Same answer.
17 Q. (BY MR. DART) Isn't it true that had the
18 OIM, the driller, the assistant driller and
19 senior toolpusher properly monitored the Macondo
20 well during the hour before mud and hydrocarbons
21 hit the rig floor, the disastrous blowout on
22 April 20th of 2010 would have been prevented?

Page 52:24 to 52:24

00052:24 A. Same answer.

Page 56:01 to 56:03

00056:01 Q. And you had a chance to work with the
02 Halliburton mud loggers. Isn't that right?
03 A. Same answer.

Page 56:17 to 57:02

00056:17 Q. And you never had any problem with either
18 of the mud loggers with regards to them not doing
19 their job; isn't that right?
20 A. Same answer.
21 Q. You'd agree with me, wouldn't you, that
22 the drilling crew has primary responsibility for
23 kick detection?
24 A. Same answer.
25 Q. And you'd agree with me that the mud
00057:01 loggers are merely a second set of eyes to the

02 drill crew in monitoring data downhole?

Page 57:04 to 57:04

00057:04 A. Same answer.

Page 58:01 to 58:05

00058:01 Q. And you'd agree with me that it's much
02 easier for the drilling crew to detect a kick
03 than it is for a mud logger because the drilling
04 crew is aware of all of the major events taking
05 place on the rig, while the mud loggers are not?

Page 58:07 to 58:07

00058:07 A. Same answer.

Page 59:09 to 59:13

00059:09 Q. So you'd agree with me that it's
10 important for the mud loggers to know what's
11 going on to properly interpret the data and spot
12 trends; isn't that right?
13 A. Same answer.

Page 59:23 to 60:01

00059:23 Q. And you'd agree with me that the drilling
24 crew had the mud logger data plus their own
25 through Transocean's sensors; isn't that right?
00060:01 A. Same answer.

Page 60:18 to 60:21

00060:18 Q. It was the drilling crew's responsibility
19 to monitor during the negative pressure test;
20 isn't that true?
21 A. Same answer.

Page 61:01 to 61:08

00061:01 Q. And it was the drilling crew's
02 responsibility to monitor while displacing the
03 riser to seawater; is that right?
04 A. Same answer.
05 Q. And one of the responsibilities is to
06 shut in the well as quickly as possible if a kick
07 is indicated or suspected; isn't that right?
08 A. Same answer.

Page 62:20 to 64:06

00062:20 Q. (BY MR. SCHWARTZ) So I just asked you
21 whether one of the responsibilities is to shut in
22 the well as quickly as possible if a kick is
23 indicated or suspected, right?

24 A. Same answer.

00063:01 25 Q. But you testified before the MBI -- or
you testified during the MBI hearing that you
02 didn't have the authority to activate the EDS;
03 isn't that right?

04 A. Same answer.

05 Q. Would you agree with me that early
06 recognition of the warning signals and rapid
07 shut-in are keys to effective well control?

08 A. Same answer.

09 Q. And you understand that a driller must
10 shut in the well as quickly as possible if a kick
11 is suspected or indicated; isn't that right?

12 A. Same answer.

13 Q. But you have no role as an emergency
14 disconnect at the time of the DEEPWATER HORIZON
15 blowout; isn't that right?

16 A. Same answer.

17 Q. Another key responsibility from your --
18 from a driller's key responsibilities is to
19 constantly monitor the speed, pump strokes,
20 pressure, pit volume, trip tank penetration, mud
21 weight and rotary torque to detect anything
22 unusual or out of the ordinary; isn't that right?

23 A. Same answer.

24 Q. The driller must constantly monitor the
25 well; isn't that right?

00064:01 A. Same answer.

02 Q. And if anything impedes the ability of
03 the driller to monitor the well, the job or
04 operation should be stopped immediately; isn't
05 that right?

06 A. Same answer.

Page 64:13 to 64:16

00064:13 Q. And -- but would you agree with me that
14 it was unusual to have this much activity going
15 on at the same time as the temporary abandonment?

16 A. Same answer.

Page 65:05 to 65:09

00065:05 Q. (BY MR. SCHWARTZ) And you never saw
06 anything in writing assessing possible risks or
07 hazards arising out of simultaneous operations,
08 did you?

09 A. Same answer.

Page 65:13 to 66:22

00065:13 Q. And you'd with me that Halliburton had no
14 involvement with drafting the displacement
15 procedures; isn't that right?

16 A. Same answer.

17 Q. And you'd also agree with me that
18 Halliburton did not offer any comments on the
19 displacement procedures; isn't that right?

20 A. Same answer.

21 Q. Mr. Seraile, I'm going to hand you a
22 document, and this is Tab 6 in our materials.
23 This has been previously marked as Exhibit 3473,
24 Mr. Seraile. If you would look at it for a
25 second. I'm going to ask you some questions

00066:01 about it.

02 Now, if you'd look at this Exhibit 3473.
03 Go to the second page, which is titled: Negative
04 Test While Displacing.

05 No. 8 says, quote: Monitor for pressure
06 buildup, 15 minutes.

07 Did I read that correctly, Mr. Seraile?

08 A. Same answer.

09 Q. And wouldn't you agree with me that any
10 detection of flow or pressure buildup on any of
11 the lines, whether it be the choke, kill or drill
12 pipe, would be considered a failed test; isn't
13 that right?

14 A. Same answer.

15 Q. And the drilling crew is responsible for
16 monitoring the returns during the negative test;
17 isn't that right?

18 A. Same answer.

19 Q. And the drilling crew is also responsible
20 for monitoring the line to the cement manifold
21 and choke and kill lines; isn't that right?

22 A. Same answer.

Page 67:05 to 67:08

00067:05 Q. And if you saw 1,400 psi pressure on the
06 drill pipe and 0 psi on the kill line, this would
07 have raised concerns in your mind about the
08 accuracy of the negative test; isn't that true?

Page 67:10 to 67:13

00067:10 A. Same answer.

11 Q. (BY MR. SCHWARTZ) And you wouldn't have
12 interpreted such readings as a successful
13 negative test, would you?

Page 67:15 to 67:18

00067:15 A. Same answer.
16 Q. (BY MR. SCHWARTZ) And you'd agree with
17 me that Halliburton had no involvement with the
18 negative test; is that right?

Page 67:20 to 67:20

00067:20 A. Same answer.

Page 77:23 to 77:23

00077:23 (Exhibit 4803 was marked.)

Page 78:15 to 78:25

00078:15 Q. If you would, sir, go to TRN-INV -- and
16 that's 4451 if you look in the bottom right-hand
17 corner. If you would, sir, look at the third
18 group down. The third paragraph says: Bob asked
19 Allen what he thought had happened -- I'm sorry.
20 It says: Bob asked Allen what he thought
21 happened. Allen said he thinks the seal assembly
22 gave way and it came through, and the guys on the
23 rig floor didn't have a chance.
24 Did I read that correctly?
25 A. Same answer.

Page 79:15 to 79:18

00079:15 You'd agree with me BP made numerous
16 cost-saving decisions that increased the chance
17 of a well blowout without running formal risk
18 assessments; isn't that true?

Page 79:20 to 80:01

00079:20 A. Same answer.
21 Q. (BY MR. SCHWARTZ) And isn't it true that
22 in the days preceding the blowout, many -- many
23 of BP's decisions regarding the well were
24 affected by the fact that the well was
25 over-budget and running out of time to be
00080:01 completed?

Page 80:03 to 80:07

00080:03 A. Same answer.
04 Q. (BY MR. SCHWARTZ) And because of that,
05 in the days preceding the blowout, BP made many

06 decisions that were cost-driven; isn't that
07 right?

Page 80:09 to 80:12

00080:09 A. Same answer.
10 Q. (BY MR. SCHWARTZ) And with these
11 decisions, many of them were without any formal
12 risk assessments; isn't that true?

Page 80:14 to 80:14

00080:14 A. Same answer.

Page 80:20 to 80:23

00080:20 Q. (BY MR. SCHWARTZ) And you know that BP
21 decided not to wait for more centralizers to be
22 delivered to the rig for the final production
23 casing job; isn't that true?

Page 80:25 to 81:02

00080:25 A. Same answer.
00081:01 Q. (BY MR. SCHWARTZ) And this saved BP
02 time, didn't it?

Page 81:04 to 81:06

00081:04 A. Same answer.
05 Q. (BY MR. SCHWARTZ) And it saved BP money;
06 isn't that true?

Page 81:08 to 81:12

00081:08 A. Same answer.
09 Q. (BY MR. SCHWARTZ) And as you discussed
10 today, BP decided not to run a cement evaluation
11 log after the cementing of the production casing;
12 isn't that true?

Page 81:14 to 81:16

00081:14 A. Same answer.
15 Q. (BY MR. SCHWARTZ) And this decision
16 saved BP time, didn't it?

Page 81:18 to 81:20

00081:18 A. Same answer.

19 Q. (BY MR. SCHWARTZ) And it saved BP money;
20 isn't that true?

Page 81:22 to 82:01

00081:22 A. Same answer.
23 Q. (BY MR. SCHWARTZ) And BP decided to use
24 spacers made from combined lost circulation
25 materials to avoid disposal cost issues; isn't
00082:01 that true?

Page 82:03 to 82:05

00082:03 A. Same answer.
04 Q. (BY MR. SCHWARTZ) And this decision
05 saved BP time; isn't that right?

Page 82:07 to 82:09

00082:07 A. Same answer.
08 Q. (BY MR. SCHWARTZ) And it saved BP money;
09 isn't that true?

Page 82:11 to 82:15

00082:11 A. Same answer.
12 Q. (BY MR. SCHWARTZ) And BP decided not to
13 perform additional tests regarding well integrity
14 given the dubious negative test results; isn't
15 that right?

Page 82:17 to 82:19

00082:17 A. Same answer.
18 Q. (BY MR. SCHWARTZ) And this decision
19 saved BP time; isn't that right?

Page 82:21 to 82:23

00082:21 A. Same answer.
22 Q. (BY MR. SCHWARTZ) And this decision
23 saved BP money?

Page 82:25 to 82:25

00082:25 A. Same answer.

Page 85:20 to 85:23

00085:20 Q. (BY MR. SCHWARTZ) You'd agree with me

21 that without running a cement bond log, BP had no
22 way to verify whether there was any channeling in
23 the cement; isn't that right?

Page 85:25 to 86:03

00085:25 A. Same answer.
00086:01 Q. (BY MR. SCHWARTZ) But running a cement
02 bond log would require more time and money; isn't
03 that true?

Page 86:05 to 86:08

00086:05 A. Same answer.
06 Q. (BY MR. SCHWARTZ) And that's the reason
07 why BP decided that the cement bond log was not
08 necessary?

Page 86:10 to 86:13

00086:10 A. Same answer.
11 Q. (BY MR. SCHWARTZ) And not running the
12 cement bond log saved BP tens of thousands of
13 dollars; isn't that right?

Page 86:15 to 86:23

00086:15 A. Same answer.
16 Q. (BY MR. SCHWARTZ) You'd agree with me
17 that reduced pipe centralization increases the
18 risk of poor mud displacement, wouldn't you?
19 A. Same answer.
20 Q. It increases the risk that mud channels
21 will compromise zonal isolation; isn't that
22 right?
23 A. Same answer.

Page 87:20 to 87:23

00087:20 Q. (BY MR. SCHWARTZ) And even after the
21 circulation was established, there were doubts
22 that the float collar had actually converted;
23 isn't that right?

Page 87:25 to 87:25

00087:25 A. Same answer.

Page 88:07 to 88:10

00088:07 Q. (BY MR. SCHWARTZ) Isn't it true that BP

08 was drilling too fast to allow for full testing
09 of pore pressure variations from predictive pore
10 pressure?

Page 88:12 to 88:12

00088:12 A. Same answer.

Page 88:17 to 88:19

00088:17 Q. And you'd agree with me that BP made the
18 decision not to conduct the full bottoms-up prior
19 to the final cement job?

Page 88:21 to 88:21

00088:21 A. Same answer.

Page 89:05 to 89:08

00089:05 Q. (BY MR. SCHWARTZ) And isn't it true that
06 as late as April 12th, 2010, you did not have a
07 temporary abandonment procedure in place?
08 A. Same answer.

Page 89:14 to 89:16

00089:14 Q. (BY MR. SCHWARTZ) You'd agree with me
15 that BP has a history of choosing cost savings
16 over safety; isn't that true?

Page 89:18 to 89:18

00089:18 A. Same answer.

Page 90:22 to 104:05

00090:22 Q. You've worked for Transocean for more
23 than five years, correct?

24 A. Same answer.

25 Q. And you had been employed by Transocean
00091:01 as an assistant driller for approximately a year
02 at the time of the incident?

03 A. Same answer.

04 Q. Are you currently still employed by
05 Transocean?

06 A. Same answer.

07 Q. If I continue to ask questions about your
08 employment history, are you going to continue to
09 assert your Fifth Amendment privilege against
10 self-incrimination?

11 A. Same answer.
12 Q. Now, as an assistant driller for
13 Transocean, you received training specific to
14 that job position of assistant driller, correct?
15 A. Same answer.
16 Q. I'd like to show you a document I'm going
17 to mark as Exhibit 4804.
18 (Exhibit 4804 was marked.)
19 Q. (BY MR. STEPHANY) And you recognize
20 training certificates that you've received during
21 your time as an employee of Transocean; is that
22 correct?
23 A. Same answer.
24 Q. If you'd please turn to the second page
25 of Exhibit 4804, Bates number ending --
00092:01 MR. STEPHANY: And this is Tab 3 for
02 counsel.
03 Q. (BY MR. STEPHANY) -- Bates number ending
04 in 34546. That is a certificate from an IADC
05 well control accreditation program, a well CAP,
06 with your name; is that correct?
07 A. Same answer.
08 Q. And that course was completed on
09 December 4th, 2009; is that correct?
10 A. Same answer.
11 Q. And the certificate is valid for two
12 years and expires on December 4th, 2011; is that
13 correct?
14 A. Same answer.
15 Q. Now, this course was a supervisor level
16 course; is that correct?
17 A. Same answer.
18 Q. And it included drilling and well
19 completion work-over with stacked qualification
20 of surface and subsea; is that correct?
21 A. Same answer.
22 Q. Now, as part of that training for the
23 IADC well control accreditation program, you were
24 taught the importance of monitoring the well at
25 all times; is that correct?
00093:01 A. Same answer.
02 Q. And you were taught the importance of
03 responding to kick indicators in a timely
04 fashion?
05 A. Same answer.
06 Q. You were taught that you want to minimize
07 the influx of any hydrocarbons in the well?
08 A. Same answer.
09 Q. And you were taught that the consequences
10 of not responding in a timely fashion include the
11 kick can become a blowout?
12 A. Same answer.
13 Q. There can be pollution?
14 A. Same answer.
15 Q. There is a potential for fire?

16 A. Same answer.
17 Q. And there is the potential for loss of
18 life?
19 A. Same answer.
20 Q. The training also provided you with
21 instruction regarding the use of diverters?
22 A. Same answer.
23 Q. And it provided you with instruction
24 regarding the proper use of the mud gas
25 separator?
00094:01 A. Same answer.
02 Q. It taught during -- during your IADC well
03 control accreditation program, you were taught
04 during a well control event you should divert
05 overboard, not to the mud gas separator, correct?
06 A. Same answer.
07 Q. And that's because volumes during a well
08 control event can overwhelm the mud gas
09 separator, correct?
10 A. Same answer.
11 Q. I'd like you to turn to Page -- in that
12 same exhibit, Exhibit 4804, ending in Bates
13 number 4573.
14 A. 4573?
15 Q. Correct. 4573.
16 A. There it is.
17 Q. Do you recognize that as a Transocean
18 certificate noting your successful completion of
19 all the requirements set forth by the Transocean
20 training organization for the assistant driller
21 OJT module? Correct?
22 A. Same answer.
23 Q. And that was completed -- I'm sorry.
24 Strike that.
25 An OJT module is the on-the-job training
00095:01 module for assistant drillers, correct?
02 A. Same answer.
03 Q. And down in the bottom left-hand corner,
04 you see that the date you completed that training
05 was July 2nd, 2005; is that correct?
06 A. Same answer.
07 Q. As part of that training, you were taught
08 the Transocean shut-in procedures while drilling,
09 correct?
10 A. Same answer.
11 Q. And you were taught Transocean shut-in
12 procedures while tripping?
13 A. Same answer.
14 Q. And you're required as part of that
15 training to understand the diverter control
16 system and diverter procedures; is that correct?
17 A. Same answer.
18 Q. I'd like to show you what's been
19 previously marked as Exhibit 3469. And you
20 recognize that as a list of the Transocean

21 personnel assigned to the deepwater that are
22 required to hold well control certificates?
23 A. Same answer.
24 Q. And if you look approximately two-thirds
25 of the way down, you'll see your name listed as
00096:01 assistant driller. Do you see that?
02 A. Same answer.
03 Q. And that reflects the dates that we
04 looked at on your well control certificate
05 accreditation from IADC, December 4th, 2009; is
06 that correct?
07 A. Same answer.
08 Q. And yourself, as well as the other
09 individuals listed in this document,
10 Exhibit 3469, were personnel employed by
11 Transocean that were required to hold valid well
12 control certificates; is that correct?
13 A. Same answer.
14 Q. If I continue to ask questions about your
15 well control training or your training as an
16 assistant driller, are you going to continue to
17 assert your Fifth Amendment privilege against
18 self-incrimination?
19 A. Same answer.
20 Q. I'd like to talk to you a little bit
21 about safety training.
22 In your position as an assistant driller
23 and in your positions prior to becoming assistant
24 driller, you received safety training as part of
25 your job with Transocean?
00097:01 A. Same answer.
02 Q. And you participated in safety drills?
03 A. Same answer.
04 Q. I'd like to show you what's been
05 previously marked as Exhibit 571.
06 Now, you conducted safety drills while
07 you were on board the DEEPWATER HORIZON at the
08 Macondo well, correct?
09 A. Same answer.
10 Q. And you participated in a well control
11 safety drill on March 21st, 2010, correct?
12 A. Same answer.
13 Q. I'd like to ask you to turn to the page
14 of Exhibit 571 that ends in Bates number 7566.
15 A. All right.
16 Q. You've got that in front of you?
17 A. (Witness nods.)
18 Q. And you recognize this is a safety drill
19 report dated March 21st, 2010?
20 A. Same answer.
21 Q. And the drill duration listed in the
22 upper left-hand corner was 30 minutes?
23 A. Same answer.
24 Q. If you look down to the section labeled
25 Comments, you'll see the second sentence there:

00098:01 Discuss the roles and responsibilities of each
02 crew member for a well control event.
03 A. Same answer.
04 Q. And if you flip over the page to the
05 Bates ending in 7567, your name is listed as the
06 fifth name down: Seraile, Allen, assistant
07 driller.
08 Correct?
09 A. Same answer.
10 Q. And if you flip back to the page ending
11 in 7566, that is a list of personnel that were in
12 attendance for this safety drill, correct?
13 A. Same answer.
14 Q. You also participated in a well control
15 safety drill on April 18th?
16 A. Same answer.
17 Q. I'd ask you to please turn to the page
18 ending in Bates 7544. You recognize that as a
19 safety drill report dated April 18th, 2010,
20 correct?
21 A. Same answer.
22 Q. And again, in the upper left-hand corner,
23 the duration of that drill lasted 30 minutes,
24 correct?
25 A. Same answer.

00099:01 Q. And if you look down to the section
02 labeled Attendance, you see that chart of
03 personnel that were in attendance carries over to
04 the next page ending in Bates 7545. And again,
05 you'll see your name listed there as assistant
06 driller, correct?
07 A. Same answer.
08 Q. And that reflects that you were in
09 attendance at that safety drill on April 18th,
10 2010?
11 A. Same answer.
12 Q. And again, if you look under the
13 comments, starting with the second sentence, it
14 indicates: Discussed well control
15 responsibilities with each crew member.
16 The next sentence: Discussed the
17 procedures for shutting in on casing.
18 And then the next sentence: The
19 immediate priority is to shut in the well.
20 Do you recall discussing those statements
21 during your safety drill on April 18th, 2010, in
22 which you participated?
23 A. Same answer.
24 Q. Prior to April 20th, 2010, you were
25 personally aware that kicks can occur while

00100:01 cementing as a result of reducing the hydrostatic
02 pressure during the operation, correct?
03 A. Same answer.
04 Q. And prior to April 20th, 2010, you were
05 personally aware that wells had been lost due to

06 improperly designed cement slurries and spacers?
07 A. Same answer.
08 Q. As of April 20th, 2010, you knew the
09 risks of a kick occurring during a cement job?
10 A. Same answer.
11 Q. Prior to April 20th, 2010, you would
12 expect that the Transocean drilling crew that you
13 worked with on board the DEEPWATER HORIZON also
14 to know that wells could have been lost or had
15 been lost due to improperly designed cement
16 slurries or spacers, correct?
17 A. Same answer.
18 Q. Because of this knowledge, you knew it
19 was important to monitor the well carefully
20 during the cement operations to watch for a kick?
21 A. Same answer.
22 Q. And you also knew that it was important
23 to monitor the well carefully after cement
24 operations to watch for a kick?
25 A. Same answer.
00101:01 Q. You would agree with me that it's
02 important to monitor pit volume totals during a
03 drilling operation, correct?
04 A. Same answer.
05 Q. And part of your job as assistant driller
06 is to record all the pit volume totals, correct?
07 A. Same answer.
08 Q. And as the assistant driller, you helped
09 the driller perform that task or you performed
10 that task yourself, correct?
11 A. Same answer.
12 Q. And you understood that the purpose of
13 performing that task was to carefully monitor the
14 well to watch for potential indications of a
15 kick?
16 A. Same answer.
17 Q. If I continue asking you questions about
18 your safety training and experience with safety
19 drills on board the DEEPWATER HORIZON, are you
20 going to continue to assert your Fifth Amendment
21 privilege against self-incrimination?
22 A. Same answer.
23 Q. I'd like to talk to you briefly about
24 your responsibility as an assistant driller for
25 monitoring the well.
00102:01 As an assistant driller, your basic
02 function is to operate and monitor all drilling
03 systems and equipment and to assist in drill crew
04 work activities, correct?
05 A. Same answer.
06 Q. As an assistant driller, one of your
07 responsibilities was to continuously monitor the
08 well?
09 A. Same answer.
10 Q. You'd monitor the volumes and the

11 pressures?
12 A. Same answer.
13 Q. And another responsibility of an
14 assistant driller is to take well control action,
15 correct?
16 A. Same answer.
17 Q. And in that capacity you served as a
18 crucial backup to the driller?
19 A. Same answer.
20 Q. And you're responsible for having a
21 comprehensive understanding of well control?
22 A. Same answer.
23 Q. And you were responsible for being able
24 to detect and recognize the signs of a kick or
25 blowout before it turned into an emergency
00103:01 situation?
02 A. Same answer.
03 Q. You were to assist the driller in
04 monitoring the high tech and Sperry-Sun drilling
05 data?
06 A. Same answer.
07 Q. And you were responsible for recognizing
08 and controlling well conditions?
09 A. Same answer.
10 Q. As part of your responsibility, you would
11 monitor the pit volumes?
12 A. Same answer.
13 Q. And occasionally that included actually
14 going to pits and checking in with the derrick
15 hand to make sure everything was okay?
16 A. Same answer.
17 Q. There were two assistant drillers on duty
18 at any time, correct?
19 A. Same answer.
20 Q. One assistant driller sits next to the
21 driller in the driller's B chair, correct?
22 A. Same answer.
23 Q. And that individual has access to the
24 same information, both the high-tech monitoring
25 information and the Sperry-Sun monitoring
00104:01 information, that the driller has?
02 A. Same answer.
03 Q. And at least one assistant driller should
04 be monitoring the well at all times, correct?
05 A. Same answer.

Page 104:08 to 105:17

00104:08 And as an assistant driller, you would
09 agree that there is never a time you can pay less
10 attention to monitoring the well?
11 A. Same answer.
12 Q. You have to monitor the well carefully
13 during all stages of the operations?
14 A. Same answer.

15 Q. And you have to monitor carefully during
16 each and every operation?

17 A. Same answer.

18 Q. And if you feel that certain operations
19 being performed on the rig are interfering with
20 your ability to monitor, you would stop the job,
21 correct?

22 A. Same answer.

23 Q. And you did not conclude that operations
24 on April 20, 2010, interfered with your ability
25 to monitor the well, did you?

00105:01 A. Same answer.

02 Q. And you were not told by anyone else that
03 operations on April 20th, 2010, interfered with
04 your ability to monitor the well?

05 A. Same answer.

06 Q. Now, as an assistant driller, we've
07 talked about some of the data that was available
08 to you. The driller and assistant driller had
09 access to both high-tech data, which is the
10 Transocean system, and Sperry-Sun data, the
11 Halliburton system?

12 A. Same answer.

13 Q. And you used the Transocean high-tech
14 monitoring system and the Sperry-Sun monitoring
15 system that was available to you in the driller's
16 cabin?

17 A. Same answer.

Page 106:01 to 112:13

00106:01 Q. (BY MR. STEPHANY) Mr. Seraile, we left
02 off talking about the Transocean high-tech
03 monitoring system and Sperry-Sun data.

04 Both of those systems and information
05 were available to you as the assistant driller in
06 the driller's cabin; is that correct?

07 A. Same answer.

08 Q. And you felt that the type of information
09 available to you on the screen of both the
10 high-tech monitoring system and the Sperry-Sun
11 data monitoring system was sufficient information
12 to allow you to do your job properly, correct?

13 A. Same answer.

14 Q. If I continue asking you about your
15 general responsibilities as an assistant driller,
16 are you going to continue to assert your Fifth
17 Amendment privilege against self-incrimination?

18 A. Same answer.

19 Q. I'd like to talk to you briefly about
20 your duties in an emergency response situation.

21 You're familiar with the Transocean
22 Emergency Response Manual?

23 A. Same answer.

24 Q. And there is -- and you're familiar with

25 the fact that there are different levels of well
00107:01 control emergencies?

02 A. Same answer.

03 Q. As the assistant driller, your general
04 responsibilities as stated in the Emergency
05 Response Manual are: To monitor drilling
06 instrumentation; to recognize and control well
07 conditions, including well kicks or blowouts; and
08 that you must be able to perform procedures for
09 resolving abnormal well conditions in accordance
10 with accepted well control methods and directions
11 from the driller and client representative; and
12 the assistant driller, when the appropriate time
13 allows, will detail the abnormal well conditions
14 and procedures to take and resolve the well
15 control event.

16 Is that correct?

17 A. Same answer.

18 Q. During an emergency disconnect situation,
19 also known as Red Alert Situation, your
20 responsibilities as an assistant driller are: To
21 monitor the riser annulus for gas that may have
22 been trapped under the top pipe rams and prepare
23 to close the diverter if trapped gas is migrating
24 to the surface.

25 Is that correct?

00108:01 A. Same answer.

02 Q. As an assistant driller, you're familiar
03 with the procedures to operate the emergency
04 disconnect system, or EDS?

05 A. Same answer.

06 Q. You were instructed that you as the
07 assistant driller were not supposed to operate
08 the EDS until the OIM was present, correct?

09 A. Same answer.

10 Q. If you as the assistant driller were
11 permitted to function the EDS in an emergency
12 situation without the need for approval from the
13 OIM, the crew would be able to respond more
14 quickly to an emergency situation well control
15 event?

16 A. Same answer.

17 Q. And that ability to respond more quickly
18 would have allowed the drilling crew that was on
19 duty on April 20th, 2010, to avert the blowout,
20 fire and explosion?

21 A. Same answer.

22 Q. If I continue asking you questions about
23 your responsibilities during an emergency
24 response situation, are you going to continue to
25 assert your Fifth Amendment privilege against

00109:01 self-incrimination?

02 A. Same answer.

03 Q. I'd like to talk to you a little bit
04 about well control actions.

05 You're familiar with the Transocean Well
06 Control Handbook?
07 A. Same answer.
08 Q. And you understand the roles of your
09 supervisors and those you supervise in the
10 process?
11 A. Same answer.
12 Q. And you understand your own roles?
13 A. Same answer.
14 Q. As stated in Section 1.2 of the
15 Transocean Well Control Handbook: If there is
16 any indication of flow, you should consider
17 shutting in the well immediately rather than
18 taking the additional time to conduct a flow
19 check?
20 A. Same answer.
21 Q. And you understood that in a well control
22 situation, as an assistant driller you should
23 shut the well in first and then consider
24 conducting a flow check, correct?
25 A. Same answer.
00110:01 Q. And you're familiar with Section 1.3 of
02 the Transocean Well Control Handbook?
03 A. Same answer.
04 Q. Section 1.3 under Detection Procedures
05 states that: It is the responsibility of the
06 driller or a person performing the driller's role
07 to shut in the well as quickly as possible if a
08 kick is indicated or suspected.
09 Correct?
10 A. Same answer.
11 Q. And you as the assistant driller would be
12 one of those people responsible for performing
13 the driller's role at times?
14 A. Same answer.
15 Q. Also under Section 1.3 of the Transocean
16 Well Control Handbook, it states: The driller is
17 responsible for monitoring the well at all times,
18 identifying when the well is to be shut in, and
19 shutting in the well quickly and safely.
20 Correct?
21 A. Same answer.
22 Q. And once the well is shut in, then you
23 can call the person in charge?
24 A. Same answer.
25 Q. And so the clear instruction to the
00111:01 driller and then you as the assistant driller in
02 the Well Control Handbook is to shut the well in
03 first, correct?
04 A. Same answer.
05 Q. Also stated in the well control
06 responsibilities of Section 1.3 of the Transocean
07 Well Control Handbook is: The assistant driller
08 lines up the mud gas separator and vacuum
09 degasser.

10 Correct?
11 A. Same answer.
12 Q. And so the assistant driller is
13 responsible for deciding whether to use the
14 diverter or send influx to the mud gas separator
15 in a well control event?
16 A. Same answer.
17 Q. In your role as an assistant driller
18 you're also familiar with the Transocean Field
19 Operations Manual?
20 A. Same answer.
21 Q. And you understand that one of your
22 responsibilities as set forth in that manual is:
23 To effectively implement the policies and
24 procedures set forth in the Transocean Well
25 Control Handbook?
00112:01 A. Same answer.
02 Q. And you also understand that you're
03 responsible as set forth in the Transocean Field
04 Operations Manual: To ensure that your direct
05 reports are involved in well control procedures
06 and competent to fulfill their responsibilities?
07 A. Same answer.
08 Q. And you also understand as set forth in
09 the Transocean Field Operations Manual that: You
10 as the assistant driller are responsible for
11 understanding and following the driller's key
12 responsibilities?
13 A. Same answer.

Page 112:15 to 119:11

00112:15 And as an assistant driller you're
16 responsible for supervising the drill crew in
17 their roles to meet the driller's key
18 responsibilities?
19 A. Same answer.
20 Q. Subsection 3 -- I'm sorry -- Section 3,
21 Subsection 1.3 of the Transocean Field Operations
22 Manual sets forth the driller's key
23 responsibilities, correct?
24 A. Same answer.
25 Q. And you're familiar with all those
00113:01 responsibilities?
02 A. Same answer.
03 Q. And the policy that's set forth in the
04 Transocean Field Operations Manual with respect
05 to the driller's key responsibilities is that you
06 are required to comply with the driller's key
07 responsibilities, correct?
08 A. Same answer.
09 Q. They're not suggestions or optional goals
10 but, rather, requirements, correct?
11 A. Same answer.
12 Q. The responsibilities of the driller and

13 assistant driller with regard to the driller's
14 key responsibilities are that the driller is
15 responsible for understanding all the driller's
16 key responsibilities?
17 A. Same answer.
18 Q. And that you as the assistant driller are
19 responsible for understanding all the driller's
20 key responsibilities?
21 A. Same answer.
22 Q. Policies set forth in the Transocean
23 Field Operations Manual for the driller's key
24 responsibilities state that: The drillers must
25 conduct drilling operations in compliance with
00114:01 the driller's key responsibilities.
02 Correct?
03 A. Same answer.
04 Q. And the purpose is that certain basic
05 practices are required to have safe operations?
06 A. Same answer.
07 Q. One of the four basic practices that's
08 specifically mentioned is systematic monitoring,
09 correct?
10 A. Same answer.
11 Q. The purpose of the driller's key
12 responsibilities, which are basic to good oil
13 field practice and should be clearly communicated
14 in writing to each driller in order to ensure
15 that drilling operations are conducted in a safe
16 and efficient manner, include clear
17 communications, systematic monitoring,
18 recordkeeping and safe working practices at all
19 times.
20 Correct?
21 A. Same answer.
22 Q. Driller's key responsibilities as you
23 understand them are intended to reduce the
24 chances of unwanted events, correct?
25 A. Same answer.
00115:01 Q. And you agree that one of those unwanted
02 events would be kicks?
03 A. Same answer.
04 Q. And blowouts?
05 A. Same answer.
06 Q. The responsibilities identified in the
07 Transocean Field Operations Manual for the
08 driller's key responsibilities are the minimum
09 requirements for the driller and assistant
10 driller, correct?
11 A. Same answer.
12 Q. And they're intended to be supplemented
13 by even more than what's specified there?
14 A. Same answer.
15 Q. Starting with 4.1, the driller's key
16 responsibilities sets forth what a driller must
17 do, correct?

18 A. Same answer.
19 Q. And your understanding is that the items
20 identified there are required, correct?
21 A. Same answer.
22 Q. They're not optional?
23 A. Same answer.
24 Q. Focusing on the second of the driller's
25 key responsibilities, Transocean Field Operations
00116:01 Manual states that: Shut in the well as quickly
02 as possible if a kick is indicated or suspected.
03 Early recognition of the warning signals and
04 rapid shut-in are the key to effective well
05 control. Shutting in the well quickly will
06 minimize the amount of formation fluid entering
07 the wellbore.
08 Correct?
09 A. Same answer.
10 Q. A driller must shut in a well as quickly
11 as possible if a kick is indicated, correct?
12 A. Same answer.
13 Q. And that's true even if a kick is only
14 suspected?
15 A. Same answer.
16 Q. And No. 15 of the Driller's Key
17 Responsibilities states: It's a requirement to
18 constantly monitor speed, pump strokes, pressure,
19 pit volume, trip tank, penetration, mud weight
20 and rotary torque to detect anything unusual or
21 out of the ordinary.
22 Correct?
23 A. Same answer.
24 Q. A driller must constantly monitor the
25 well?
00117:01 A. Same answer.
02 Q. And as an assistant driller, if you were
03 unable to constantly monitor the well and fulfill
04 your responsibilities under the driller's key
05 responsibilities, you would stop the job?
06 A. Same answer.
07 Q. If I continue asking you questions about
08 your responsibilities as an assistant driller
09 with regard to the driller's key
10 responsibilities, are you going to continue to
11 assert your Fifth Amendment privilege against
12 self-incrimination?
13 A. Same answer.
14 Q. Mr. Seraile, I'd like to talk to you a
15 little bit about your awareness of rig
16 operations.
17 In your role as an assistant driller you
18 received daily plans, correct?
19 A. Same answer.
20 Q. And those daily plans set forth the
21 operations that were to be conducted on that day,
22 correct?

23 A. Same answer.
24 Q. You also attended pretour meetings,
25 correct?
00118:01 A. Same answer.
02 Q. And during those pretour meetings you
03 were provided with information pertaining to the
04 operations that were to be conducted on that day?
05 A. Same answer.
06 Q. You were also provided with -- I'm sorry.
07 Strike that.
08 You prepared and had access to riser run
09 reports, correct?
10 A. Same answer.
11 Q. And riser run reports show the number of
12 joints of casing to be run?
13 A. Same answer.
14 Q. And the riser run reports also show where
15 centralizers were placed on the casing?
16 A. Same answer.
17 Q. And as an assistant driller you prepared
18 and utilized an informational spreadsheet
19 referred to as Well Advisor, correct?
20 A. Same answer.
21 Q. I'd like to show you a document that I'm
22 going to mark as 4805.
23 (Exhibit 4805 was marked.)
24 Q. (BY MR. STEPHANY) You recognize that as
25 the Well Advisor program that -- I'm sorry -- the
00119:01 Well Advisor informational spreadsheet that you
02 utilized as an assistant driller, correct?
03 A. Same answer.
04 Q. And on the very first page of
05 Exhibit 4805, you see that's an e-mail from DWH,
06 Assistant Driller to DWH, Toolpusher, correct?
07 A. Same answer.
08 Q. And that DWH, Assistant Driller is the
09 e-mail account you would utilize in your role as
10 an assistant driller on the DEEPWATER HORIZON?
11 A. Same answer.

Page 119:16 to 132:22

00119:16 Q. (BY MR. STEPHANY) If you'll flip to the
17 second page, Bates No. 77597, you'll see a number
18 of categories there that are covered in this Well
19 Advisor spreadsheet. And they include a well
20 review checklist, correct?
21 A. Same answer.
22 Q. Input kick tolerance data, correct?
23 A. Same answer.
24 Q. Well overview?
25 A. Same answer.
00120:01 Q. Maximum pressure wellhead?
02 A. Same answer.
03 Q. Pore pressure, mud and fracture weights

04 chart?
05 A. Same answer.
06 Q. Well control preparation checklist?
07 A. Same answer.
08 Q. This tool, Well Advisor, helps you
09 understand and calculate kick tolerance, correct?
10 A. Same answer.
11 Q. And also provided you with information
12 about the pore pressure and fracture gradients on
13 the Macondo well that you were drilling, correct?
14 A. Same answer.
15 Q. And also included well control
16 preparation checklists?
17 A. Same answer.
18 Q. You were also provided with daily mud
19 reports?
20 A. Same answer.
21 Q. I'm going to hand you what's been marked
22 as Exhibit 4806.
23 (Exhibit 4806 was marked.)
24 Q. (BY MR. STEPHANY) And you recognize that
25 as an e-mail from a Gordon Jones at M-I Swaco
00121:01 sent on February 26, 2010, to a number of e-mail
02 addresses, one of which includes DWH, comma,
03 assistant driller, correct?
04 A. Same answer.
05 Q. And as an assistant driller on board the
06 DEEPWATER HORIZON at this time, this is an e-mail
07 that you would have received, correct?
08 A. Same answer.
09 Q. And these reports provided information
10 about the mud weight being used at the time?
11 A. Same answer.
12 Q. And provided information about the volume
13 of mud being utilized?
14 A. Same answer.
15 Q. Provided information about the
16 composition and type of mud being used?
17 A. Same answer.
18 Q. And provided information about
19 circulation?
20 A. Same answer.
21 Q. Provided information about the flow rate?
22 A. Same answer.
23 Q. And it provided information about the
24 pump pressures?
25 A. Same answer.
00122:01 Q. Mr. Seraile, you had -- you had
02 sufficient information from the pretour meetings,
03 the daily plans, the mud reports, the Well
04 Advisor and the riser run information to
05 adequately and properly perform your job duties
06 as an assistant driller on board the Transocean
07 DEEPWATER HORIZON while at the Macondo well,
08 correct?

09 A. Same answer.
10 Q. And if there was information that you
11 needed to complete your job and conduct those
12 tasks, you would ask the appropriate individuals
13 before proceeding, correct?
14 A. Same answer.
15 Q. If I continue to ask you questions about
16 your awareness of operations on the rig, are you
17 going to continue to assert your Fifth Amendment
18 privilege against self-incrimination?
19 A. Same answer.
20 Q. I'd like to talk to you briefly about
21 your awareness of stop work authority.
22 You're familiar with -- in your role as
23 assistant driller, you're familiar with the
24 Transocean HSE Policies and Procedures Manual?
25 A. Same answer.
00123:01 Q. And you're aware of your stop work
02 authority?
03 A. Same answer.
04 Q. You're aware of the Transocean policy
05 contained within that manual that each employee
06 has the obligation to interrupt an operation to
07 prevent an incident from occurring?
08 A. Same answer.
09 Q. And you understand that you have the
10 authority to stop a job if you see an unsafe
11 condition?
12 A. Same answer.
13 Q. And in fact not just the authority, but
14 you have an obligation to stop work to prevent an
15 incident from occurring?
16 A. Same answer.
17 Q. And that obligation is not just one to
18 stop the operation, but also an obligation and
19 responsibility to take action to correct any
20 unsafe behavior or condition, correct?
21 A. Same answer.
22 Q. And each Transocean employee on board the
23 DEEPWATER HORIZON while at the Macondo well had
24 that same obligation and authority, correct?
25 A. Same answer.
00124:01 Q. Simply put, if you or anyone on board
02 feel that an operation is unsafe, you're
03 obligated to interrupt it?
04 A. Same answer.
05 Q. I'd like to talk to you briefly about any
06 concerns with the negative pressure test on
07 April 20th, 2010.
08 You came off tour approximately noon on
09 April 20th, 2010, correct?
10 A. Same answer.
11 Q. And you weren't present during the
12 negative test?
13 A. Same answer.

14 Q. You were relieved just before that test
15 was conducted, correct?
16 A. Same answer.
17 Q. But you're aware that the negative test
18 was eventually conducted?
19 A. Same answer.
20 Q. And you're aware that the crew agreed to
21 proceed following completion of the negative
22 test?
23 A. Same answer.
24 Q. And if anyone involved in the operations
25 for the negative pressure test felt it was unsafe
00125:01 to proceed, they could exercise their stop work
02 authority before proceeding to displacement,
03 correct?
04 A. Same answer.
05 Q. And you would agree that you didn't have
06 any safety concerns regarding the operations on
07 April 20th, 2010?
08 A. Same answer.
09 Q. And if you did have any concerns
10 regarding those operations, you would have
11 stopped the job until those concerns were
12 addressed?
13 A. Same answer.
14 Q. Because you've received training
15 regarding your stop work authority?
16 A. Same answer.
17 Q. And you're aware that other Transocean
18 employees received the same training?
19 A. Same answer.
20 Q. And if anyone else had concerns regarding
21 the operations being conducted on April 20, 2010,
22 including the negative pressure test, you would
23 expect them to stop the job until those concerns
24 were addressed?
25 A. Same answer.
00126:01 Q. And you never heard anyone else voice
02 concerns about the operations being conducted on
03 April 20, 2010?
04 A. Same answer.
05 Q. If I continue to ask you questions about
06 your understanding of your authority to stop the
07 job or any safety concerns that you may have had
08 in connection with the operations on the
09 DEEPWATER HORIZON on April 20th, 2010, are you
10 going to continue to assert your Fifth Amendment
11 privilege against self-incrimination?
12 A. Same answer.
13 Q. I want to talk to you briefly about
14 negative test procedures generally.
15 In the course of your duties as an
16 assistant driller you've been involved in well
17 integrity tests before, correct?
18 A. Same answer.

19 Q. You've been involved in positive pressure
20 tests?
21 A. Same answer.
22 Q. And you've been involved in negative
23 pressure tests?
24 A. Same answer.
25 Q. And you've been involved in negative
00127:01 pressure tests conducted during displacement as
02 was done at the Macondo well on April 20, 2010?
03 A. Same answer.
04 Q. I'd like to show you what's been
05 previously marked as Exhibit 3465. And you
06 recognize that as a Daily Drilling Report dated
07 January 28th, 2010, correct?
08 A. Same answer.
09 Q. And the well number identified at the top
10 of Exhibit 3465 is MC 727 No. 2?
11 A. Same answer.
12 Q. And that's the Kodiak prospect at which
13 the DEEPWATER HORIZON was conducting operations
14 prior to moving to the Macondo well, correct?
15 A. Same answer.
16 Q. Now, in the notes for the day tour, which
17 is the box in the bottom half of the page ending
18 in Bates No. 0990, you see a section stated
19 Remarks, correct?
20 A. Same answer.
21 Q. And in that section it states that:
22 Visually inspected diverter and slip joint; held
23 pretask meeting with crew?
24 A. Same answer.
25 Q. Monitor well on trip tank well static?
00128:01 A. Same answer.
02 Q. And -- I'm sorry. If you'd flip over to
03 the second page ending in Bates No. 0991 and look
04 to the Details of Operations and Sequence and
05 Remarks for the day tour; again, the box on the
06 bottom half of that page. If you'll look at the
07 entry, Time Log starting 2200 hours to 2230
08 hours, you held a prejob safety meeting with rig
09 crew performing negative test and displacing
10 riser to seawater.
11 Carrying over onto the page ending in
12 Bates No. 0992, correct?
13 A. Same answer.
14 Q. And it goes on the state that: Monitor
15 well and trip tank well static.
16 Correct?
17 A. Same answer.
18 Q. The entry, still on page ending in Bates
19 No. 0992, the last time log entry there, 2230 to
20 2400, states: Halliburton test Chiksan lines,
21 choke and kill lines to 3,000 psi. Good test.
22 Displaced boost, choke kill lines to seawater.
23 Pump 163 barrels of WBM spacer down drill pipe

24 and displace drill pipe in hole to seawater from
25 5,864 feet to top stack to perform negative test.

00129:01 Correct?
02 A. Same answer.
03 Q. And the procedure described in the notes
04 is in fact the procedure that you performed?
05 A. Same answer.
06 Q. And if you'd turn over two more pages to
07 the Bates number ending in 0994, it's labeled:
08 Drilling Crew Payroll Data.
09 And you'll see your name listed there as
10 part of the day tour as an assistant driller; is
11 that correct?
12 A. Same answer.
13 Q. So you were on duty while the negative
14 test at the MC 727 No. 2 well was performed,
15 correct?
16 A. Same answer.
17 Q. And at the bottom right-hand corner, this
18 daily drilling report has been signed by Miles
19 R. Ezell?
20 A. Same answer.
21 Q. And you know Mr. Ezell?
22 A. Same answer.
23 Q. And he was the senior toolpusher on the
24 DEEPWATER HORIZON, correct?
25 A. Same answer.

00130:01 Q. I'd like to show you one more document.
02 It's been previously marked as Exhibit 3466.
03 This is an e-mail -- this is an e-mail sent
04 January 28, 2010, at 4:05 p.m., correct?
05 A. Same answer.
06 Q. And it's sent from the DWH, assistant
07 driller to DWH, toolpusher, correct?
08 A. Same answer.
09 Q. And the DWH, assistant driller e-mail
10 account is the one you utilized while employed by
11 Transocean on the DEEPWATER HORIZON, correct?
12 A. Same answer.
13 Q. As we saw in the daily drilling report
14 that was marked as Exhibit 34 -- I'm sorry -- the
15 prior Exhibit 3465, you were one of the assistant
16 drillers on duty during the day tour on
17 January 20th, 2010, correct?
18 A. Same answer.
19 Q. And this negative test procedure was sent
20 to the DEEPWATER HORIZON toolpusher?
21 A. Same answer.
22 Q. And again, as shown in the daily drilling
23 report that was marked as Exhibit 3465, the
24 toolpusher on duty was Mr. Ezell?
25 A. Same answer.

00131:01 Q. And so Mr. Ezell and the other drill crew
02 members were advised of this negative test
03 procedure as described in this e-mail, correct?

04 A. Same answer.

05 Q. And the procedures that are set forth in
06 this e-mail, and specifically on the second page
07 ending in Bates No. 23432, were created by
08 Transocean's assistant drillers, correct?

09 A. Same answer.

10 Q. And you knew how to create those
11 procedures because you had received training from
12 Transocean regarding the steps that go into a
13 negative test procedure?

14 A. Same answer.

15 Q. And you knew how to conduct negative test
16 procedures because you had received training from
17 Transocean regarding how to perform a negative
18 test procedure?

19 A. Same answer.

20 Q. And you knew how to evaluate a negative
21 pressure test because Transocean had provided you
22 with training to teach you how to evaluate a
23 negative pressure test?

24 A. Same answer.

25 Q. And you received that training along with
00132:01 other members of the Transocean drill crew aboard
02 the DEEPWATER HORIZON?

03 A. Same answer.

04 Q. And you have no reason to doubt that they
05 were similarly capable of drafting procedures for
06 a negative test?

07 A. Same answer.

08 Q. And you have no reason to doubt that they
09 were capable of conducting a negative pressure
10 test?

11 A. Same answer.

12 Q. And you have no reason to doubt that they
13 were capable of evaluating a negative pressure
14 test?

15 A. Same answer.

16 Q. And if I continue to ask you questions
17 about your understanding of negative test
18 procedures generally or your knowledge of a
19 negative test and related procedures as reflected
20 in Exhibits 3465 and 3466, are you going to
21 continue to assert your Fifth Amendment right?

22 A. Same answer.

Page 133:20 to 135:07

00133:20 Q. I'd like to talk to you lastly about
21 maintenance on the DEEPWATER HORIZON.

22 Transocean used a Rig Management System
23 No. 2 on the DEEPWATER HORIZON, correct?

24 A. Same answer.

25 Q. And RMS No. 2, as it was referred to, was
00134:01 implemented following a merger with Global
02 Santa Fe, or GSF?

03 A. Same answer.
04 Q. And RMS No. 2 had a number of problems,
05 correct?
06 A. Same answer.
07 Q. Many of those problems were not resolved
08 as of April 20th, 2010?
09 A. Same answer.
10 Q. And you never advised BP that -- of those
11 problems or issues with the RMS No. 2?
12 A. Same answer.
13 Q. The RMS No. 2 was disorganized and had
14 erroneous maintenance orders?
15 A. Same answer.
16 Q. The crew had to continually submit
17 requests to remove duplicate work orders?
18 A. Same answer.
19 Q. And the RMS No. 2 also generated work
20 orders for equipment that had already been
21 repaired?
22 A. Same answer.
23 Q. And this led the rig crew to not being
24 able to rely on the RMS No. 2 system, correct?
25 A. Same answer.
00135:01 Q. In fact, in the past you've described the
02 RMS No. 2 system as chaos, correct?
03 A. Same answer.
04 Q. You've never -- but you never
05 communicated that fact to BP?
06 A. Same answer.
07 Q. Thank you very much for your time.

Page 137:09 to 137:12

00137:09 Isn't it true that BP had all the data
10 available to the drillers and mud loggers fed
11 into its offices on the rig so that BP personnel
12 could monitor the well site parameters?

Page 137:14 to 138:03

00137:14 A. Same answer.
15 Q. (BY MR. MAGEE) And this data included
16 pit volume changes?
17 A. Same answer.
18 Q. And this data included flow rates?
19 A. Same answer.
20 Q. And this data included drill pipe
21 pressures?
22 A. Same answer.
23 Q. And this data included pump pressures?
24 A. Same answer.
25 Q. Isn't it true that the data BP had
00138:01 available on its monitors aboard the DEEPWATER
02 HORIZON was more than what was available to the

03 driller and mud logger?

Page 138:05 to 138:09

00138:05 A. Same answer.
06 Q. (BY MR. MAGEE) Isn't it true that BP's
07 personnel failed to identify the influx of
08 hydrocarbons into the casing and riser to
09 DEEPWATER HORIZON?

Page 138:11 to 138:15

00138:11 A. Same answer.
12 Q. (BY MR. MAGEE) Isn't it true that BP's
13 failure to identify this influx contributed to
14 the discharge, explosion and fire aboard the
15 DEEPWATER HORIZON?

Page 138:17 to 138:17

00138:17 A. Same answer.

Page 138:21 to 138:23

00138:21 Isn't it true that BP provided the
22 protocol to be used for the positive and negative
23 pressure tests aboard the DEEPWATER HORIZON?

Page 138:25 to 139:04

00138:25 A. Same answer.
00139:01 Q. (BY MR. MAGEE) And isn't it true that
02 the protocol used for the -- provided by BP for
03 the negative pressure test came at an exceedingly
04 late stage in the process?

Page 139:06 to 139:06

00139:06 A. Same answer.

Page 139:24 to 140:17

00139:24 Isn't it true that you have no reason to
25 believe that Cameron equipment caused or
00140:01 contributed to the blowout at the Macondo well?
02 A. Same answer.
03 Q. Isn't it true that you have no reason to
04 believe that Cameron equipment caused or
05 contributed to the oil spill at the Macondo well?
06 A. Same answer.
07 Q. Isn't it true that you have no reason to

08 believe that Cameron equipment caused or
09 contributed to your alleged injuries in your
10 lawsuit?
11 A. Same answer.
12 Q. Isn't it also true that you have no
13 reason to believe that Cameron personnel caused
14 or contributed to the blowout, the oil spill or
15 your injuries that you've alleged related to the
16 Macondo well incident?
17 A. Same answer.

Page 141:06 to 141:13

00141:06 Isn't it true that the blowout prevention
07 equipment at the DEEPWATER HORIZON was not in
08 fact inadequate?
09 A. Same answer.
10 Q. Isn't it true that the DEEPWATER HORIZON
11 blowout prevention equipment was not in fact
12 defective?
13 A. Same answer.

Page 143:03 to 143:15

00143:03 Q. You've alleged that, in short, the BOP
04 failed to operate on April 20th, 2010, and was
05 not fit for its ordinary purpose.
06 Do you have any evidence of that, any
07 reason to believe that that is true or any
08 personal knowledge regarding that statement?
09 A. Same answer.
10 Q. In fact, the BOP did not fail to operate
11 on April 20th, 2010, correct?
12 A. Same answer.
13 Q. And the BOP was fit for its ordinary
14 purpose, correct?
15 A. Same answer.

Page 145:13 to 145:25

00145:13 Q. In fact the BOP was not unreasonably
14 dangerous, correct?
15 A. Same answer.
16 Q. You've stated that this defect existed
17 when the BOP left Cameron's control.
18 In fact the BOP had no defects when it
19 left Cameron's control, correct?
20 A. Same answer.
21 Q. Do you have any reason to believe that
22 it's true, any evidence or any personal knowledge
23 regarding a defect existing when the BOP left
24 Cameron's control?
25 A. Same answer.

Page 149:04 to 149:08

00149:04 Q. You are an assistant driller for
05 Transocean on the DEEPWATER HORIZON --
06 A. Same answer.
07 Q. -- is that correct?
08 A. Same answer.

Page 150:08 to 151:11

00150:08 Q. When you were on -- working on the
09 DEEPWATER HORIZON you took orders exclusively
10 from Transocean personnel, correct?
11 A. Same answer.
12 Q. You never took any orders of any sort
13 from Cameron personnel, directly or indirectly,
14 correct?
15 A. Same answer.
16 Q. Cameron had no control whatsoever over
17 your work, did they?
18 A. Same answer.
19 Q. The BP company man never directly gave
20 you instructions, did he?
21 A. Same answer.
22 Q. Your paycheck for the work that you did
23 on the DEEPWATER HORIZON always came from
24 Transocean, correct?
25 A. Same answer.
00151:01 Q. And absolutely nobody was obligated to
02 pay you other than Transocean for your work on
03 the DEEPWATER HORIZON, correct?
04 A. Same answer.
05 Q. You considered yourself a Transocean
06 employee while you were on the DEEPWATER HORIZON?
07 A. Same answer.
08 Q. You did not consider yourself to be
09 employed or working for any other entity or
10 person other than Transocean, correct?
11 A. Same answer.

Page 151:15 to 151:23

00151:15 Q. No party could fire you except for
16 Transocean from your work on the DEEPWATER
17 HORIZON, correct?
18 A. Same answer.
19 Q. And you are not aware of any agreement
20 between Transocean and any other defendant in
21 this case related to your specific employment,
22 correct?
23 A. Same answer.

Page 152:03 to 152:16

00152:03 Q. Do you have any idea when anyone on the
04 DEEPWATER HORIZON on April 20th first tried to
05 activate the BOP?
06 A. Same answer.
07 Q. Do you know how much gas had gotten above
08 the riser before the BOP activated?
09 A. Same answer.
10 Q. Do you have any reason to disagree with
11 the Graham/Reilly Chief Counsel's conclusion that
12 even a perfectly functioning BOP would have had
13 no impact on the explosions of the rig because by
14 the time the BOP would have activated, there was
15 already large amounts of gas above the riser?
16 A. Same answer.

Page 153:25 to 155:03

00153:25 Q. Prior to April 20th of 2010, you and
00154:01 Transocean knew that early kick detection and
02 rapid shut-in are the keys to successful well
03 control?
04 A. Same answer.
05 Q. Prior to April 20th, you and Transocean
06 knew that the DEEPWATER HORIZON BOP was designed
07 to assist with well control in conjunction with
08 early kick detection?
09 A. Same answer.
10 Q. Prior to April 20, 2010, you and
11 Transocean knew the DEEPWATER HORIZON BOP was
12 designed to rapidly shut in a well in the event
13 the well starts to flow, right?
14 A. Same answer.
15 Q. On April 20th there was no early kick
16 detection by the people hired by TO to monitor
17 the well, right?
18 A. Same answer.
19 Q. On April 20th, 2010, because the people
20 hired by Transocean did not detect a kick, there
21 was no attempt made to rapidly shut in the well
22 when the well started to flow, correct?
23 A. Same answer.
24 Q. And in fact because the people hired by
25 Transocean did not detect a kick, there was no
00155:01 attempt made to activate the BOP until the
02 hydrocarbons, oil and gas, were in the riser
03 above the BOP, correct?

Page 155:05 to 155:10

00155:05 A. Same answer.
06 Q. (BY MR. GANNAWAY) And because the people
07 hired by Transocean did not detect the kick,

08 there was no attempt made to activate the BOP
09 until after the blowout had already occurred,
10 correct?

Page 155:12 to 155:18

00155:12 A. Same answer.
13 Q. (BY MR. GANNAWAY) Because of
14 Transocean's decisions about the integrity of the
15 well that allowed the uncontrolled flow of
16 hydrocarbons on April 20th, the blowout preventer
17 was not actually used to prevent the blowout,
18 right?

Page 155:20 to 156:01

00155:20 A. Same answer.
21 Q. (BY MR. GANNAWAY) Rather, because of
22 Transocean's decisions about the integrity of the
23 well that allowed an uncontrolled flow of
24 hydrocarbons on April 20th, the blowout preventer
25 was first activated after the blowout had already
00156:01 occurred, correct?

Page 156:03 to 156:17

00156:03 A. Same answer.
04 Q. (BY MR. GANNAWAY) And for that reason,
05 it is true that the BOP was not given the chance
06 to prevent the explosion that you allege caused
07 your injuries, correct?
08 A. Same answer.
09 Q. At the time that the BOP was first
10 activated following the blowout on April 20th,
11 the flow from the Macondo well was severe,
12 correct?
13 A. Same answer.
14 Q. Prior to April 20th, 2010, you and
15 Transocean knew that the DEEPWATER HORIZON BOP
16 was not designed, manufactured or tested to close
17 and seal on a severely flowing well, correct?

Page 156:19 to 156:23

00156:19 A. Same answer.
20 Q. (BY MR. GANNAWAY) Prior to April 20th,
21 you and Transocean knew that the DEEPWATER
22 HORIZON BOP was designed, manufactured and tested
23 in accordance with API standard 16, correct?

Page 156:25 to 157:03

00156:25 A. Same answer.
00157:01 Q. (BY MR. GANNAWAY) Prior to April 20th,
02 2010, you and Transocean knew that the testing
03 required by API 16 was static testing, right?

Page 157:05 to 157:09

00157:05 A. Same answer.
06 Q. (BY MR. GANNAWAY) Prior to April 20th,
07 2010, you and Transocean knew that the DEEPWATER
08 HORIZON BOP had not been subjected to dynamic
09 flow testing, correct?

Page 157:11 to 157:15

00157:11 A. Same answer.
12 Q. (BY MR. GANNAWAY) Prior to April 20th,
13 2010, neither you nor Transocean ever requested
14 the DEEPWATER HORIZON BOP be subjected to dynamic
15 flow testing --

Page 157:17 to 157:24

00157:17 Q. (BY MR. GANNAWAY) -- is that right?
18 A. Same answer.
19 Q. Nevertheless, despite the fact that you
20 and Transocean had never requested dynamic flow
21 testing on April 20th, 2010, a severe
22 uncontrolled hydrocarbon flow situation was
23 allowed to arise in the Macondo well; is that
24 right?

Page 158:01 to 158:01

00158:01 A. Same answer.