

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

IN RE: OIL SPILL ) MDL NO. 2179  
BY THE OIL RIG )  
"DEEPWATER HORIZON" IN ) SECTION "J"  
THE GULF OF MEXICO, ON )  
APRIL 20, 2010 ) JUDGE BARBIER  
 ) MAG. JUDGE SHUSHAN

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VOLUME 1  
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Deposition of David William Young, taken  
at the Pan-American Building, 601 Poydras Street,  
11th Floor, New Orleans, Louisiana, 70130, on the  
22nd day of September, 2011.

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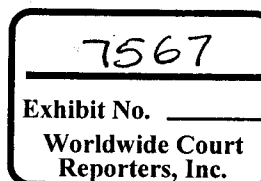
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ALSO PRESENT:

Mr. Mark Hendrix, Videographer



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1 of the business, but, yes.

2 Q. Okay. Well, what was the name of that

3 ship that you worked on?

4 A. I sailed on multiple vessels with them.

5 Q. Okay. Well, on -- on the various vessels

6 that you sailed on for Tycom, who was command of

7 those optic -- fiber -- fiberoptic cable ships?

8 A. The Captain was in command.

9 Q. Okay. Did the Captain split his command

10 with anyone else onboard?

11 A. No, he did not.

12 Q. What about was there some person who was

13 in charge of the actual business of what the ship

14 did in its industrial function, that is, the

15 fiberoptic cable repair or inspection?

16 A. There were -- there were entities of the

17 vessel who handled the -- the fiberoptic. We had

18 Cable Engineers and that kind of stuff, so there

19 were other people that dealt with the fiberoptic

20 end of it, yes.

21 Q. Okay. But the -- the purpose of these

22 ships you sailed on for Tycom was to, what, with

23 fiberoptic cable? What was the purpose of the

24 ships?

25 A. Installation/repair of fiberoptic cables.

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1 Q. Okay. So there were persons who did the

2 installation/repair of fiberoptic cables on the

3 ship?

4 A. It was -- everybody onboard had a role to

5 some extent.

6 Q. In the installation and repair of

7 fiberoptic cables?

8 A. Yes.

9 Q. But the Captain was in ultimate command

10 of the ship?

11 A. Yes.

12 Q. Do -- did you learn, in your training or

13 in the academic setting at the Maritime College

14 SUNY Maritime College, why there would be one

15 Commander of a vessel in navigation?

16 A. I -- I can't say that there was a

17 specific why there is one Commander. I mean --

18 Q. What, in your own -- what did you learn

19 in your four years of Maritime College about

20 having one Captain onboard of a ship?

21 A. There was always one Captain onboard, so

22 there wasn't much to learn about it.

23 Q. Okay. You just accepted that's the way

24 it was?

25 A. There's one Captain, yes.

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1 Q. Okay. At -- at Transocean on the

2 DEEPWATER HORIZON, is it fair to say that there

3 was a dual command structure?

4 A. There were -- there are people in charge

5 of different entities of the vessel.

6 Q. Okay. The OIM is in charge of some

7 things?

8 A. Yes.

9 Q. And the Captain is in charge of some

10 other things?

11 A. Yes.

12 Q. Between the two, who's in charge?

13 A. The -- the Captain is ultimately

14 responsible for the safety of the vessel.

15 Q. Okay. But between the OIM and the

16 Captain, who's in charge of the DEEPWATER

17 HORIZON?

18 A. The Captain would be in charge of the

19 safety of the vessel and navigation, and the OIM

20 would be in charge of the -- the operational --

21 the drilling operations of the vessel.

22 Q. Okay. When you -- when you were on the

23 Bridge during the -- during the time of the

24 explosions and fire, who was in charge of the

25 ship?

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1 A. The Captain was in charge.

2 Q. Okay. Have you -- do you recall giving

3 prior testimony in this case?

4 A. Yes.

5 Q. Okay. I'm going to read from the

6 transcript of -- do you recall giving testimony

7 to the Joint Investigation Team between the Coast

8 Guard and the Bureau of Energy Management and

9 Regulatory?

10 A. Yes, I do.

11 Q. Okay. I'm going to read from Page 62

12 and 63 of the transcript, and first I'm going to

13 ask you if I'm reading it accurately, and then

14 I'll ask you a followup question.

15 "From the time you came on watch to the

16 time you departed the vessel, you evacuated from

17 the vessel, who was in charge of the HORIZON?"

18 Your answer was: "The O" -- "The OIM is

19 in charge while connected and the captain would

20 be in charge of the emergency situation."

21 "QUESTION: So the captain is in charge

22 of the emergency situation whether it's connected

23 or not connected?"

24 Your answer: "No. He would be dealing

25 with the fire end of it and the evacuation end of

1 it.

2 "QUESTION: So who is in charge of the  
3 vessel?

4 "ANSWER: The OIM.

5 "QUESTION: From the time you came on  
6 watch to the time you evacuated the vessel?"

7 Your answer then was: "Yes."

8 And my first question is simply for you  
9 to make sure that I read those two passages  
10 correctly. (Tendering.)

11 A. (Reviewing transcript.) It looks like you  
12 read them correctly.

13 Q. Okay. You've just testified in this  
14 proceeding that the Captain was in charge, didn't  
15 you?

16 A. Yes.

17 Q. Okay. Which is correct, what you said a  
18 few months after this tragedy or what you're  
19 saying today?

20 MR. KINCHEN: Object to form.

21 A. The Captain is in charge of the emergency  
22 situation, which was the -- the navigational and  
23 safety end of the vessel, and the OIM for the  
24 drilling end.

25 Q. (By Mr. Haycraft) Okay. And I'm talking

1 about during the emergency. They both have their  
2 roles?

3 A. The Master is ultimately in charge of the  
4 vessel during the emergency.

5 Q. Okay. So which is right, what you're  
6 saying right now, or what you said to the Coast  
7 Guard M -- MBI inquiry?

8 MR. KINCHEN: Object to form.

9 A. My understanding of it now, and before,  
10 was that the OIM is in charge for the drilling  
11 end of the vessel, the Captain is in charge of  
12 the emergency situation and the navigation and  
13 safety of the vessel.

14 Q. (By Mr. Haycraft) Okay.

15 MR. HAYCRAFT: Well, I'm going to  
16 attach as the next numbered exhibit the page that  
17 I've just referenced from your MBI testimony.  
18 That will be Exhibit 5298.

19 (Exhibit No. 5298 marked.)

20 Q. (By Mr. Haycraft) Do you recall giving  
21 that testimony?

22 A. I -- I recall being at the Joint  
23 Investigation. I don't remember the details of  
24 the testimony.

25 Q. Okay. And you'll with me that that was a

1 lot sooner in time to when this tragic event  
2 occurred, isn't it -- wasn't it?

3 A. That was before now, yes.

4 Q. Yeah. And has your memory improved over  
5 time?

6 MR. KINCHEN: Object to form.

7 A. I don't know that my memory has improved  
8 or -- I mean, I can't -- I don't know how much  
9 better my memory is.

10 Q. (By Mr. Haycraft) Okay. Did you meet  
11 with attorneys to prepare for this deposition?

12 A. Yes, I did.

13 Q. When did you meet?

14 A. Two half days over the -- at the  
15 beginning of this week.

16 Q. Okay. Did those include your own  
17 personal attorney, Mr. Walsh?

18 MR. JOHNSON: My name is Johnson.

19 A. Mister -- Mr. Walsh is not --

20 Q. (By Mr. Haycraft) I'm sorry. Mister --  
21 Mr. Johnson, Tim Johnson?

22 A. Yes, it did.

23 Q. And you met with Transocean's attorneys?

24 A. Yes, I did.

25 Q. Okay. Let's look at the organizational

1 chart that's part of the -- have you ever seen  
2 the "DEEPWATER HORIZON EMERGENCY RESPONSE  
3 MANUAL," the cover of which I'm holding in front  
4 of you?

5 A. It looks familiar.

6 Q. Okay. Well, have you ever seen the  
7 "DEEPWATER HORIZON EMERGENCY RESPONSE MANUAL"?

8 A. Yes, I have.

9 Q. Okay. I'm going to show you an excerpt  
10 from that Manual, and I'm going to show you the  
11 actual page from the Manual, too.

12 MR. HAYCRAFT: It's Bates numbered  
13 in this case -- well, first of all, let me say  
14 that the "EMERGENCY RESPONSE MANUAL VOLUME 1" has  
15 been introduced twice into the record, at least,  
16 and it's at Exhibits 597 and 4644, and I'm not  
17 going to reintroduce it again today.

18 But I'm going to show you a page, in the  
19 very first pages of that document, and then I'm  
20 going to show you a document that I've prepared  
21 which we're going to mark -- sorry, about that,  
22 Tim -- as the next numbered Exhibit, 5299.

23 (Exhibit No. 5299 marked.)

24 MR. HAYCRAFT: If you would, hand  
25 that out.

<p style="text-align: right;">201</p> <p>1 Q. (By Mr. Haycraft) And looking at both the</p> <p>2 page from the "EMERGENCY" ex -- "EMERGENCY</p> <p>3 RESPONSE MANUAL" itself and then the exhibit I've</p> <p>4 marked as 5299, first, I want you to just make</p> <p>5 sure they're both the same document, that is,</p> <p>6 they're depicting the same Org Chart.</p> <p>7 A. (Reviewing document.) Looks like they</p> <p>8 match up.</p> <p>9 Q. Okay. What I did was I enhanced the</p> <p>10 shading with the green to make the lettering</p> <p>11 within the boxes on the Org chart stand out</p> <p>12 better.</p> <p>13 And then I also placed the cover page of</p> <p>14 the "DEEPWATER HORIZON EMERGENCY RESPONSE MANUAL"</p> <p>15 in the upper right-hand corner so that it would</p> <p>16 be clear where this document came from.</p> <p>17 Now I'm going to ask you questions. You</p> <p>18 see that the Org Chart shows the "O.I.M." on top</p> <p>19 of all the boxes, right?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And you see over to the upper left-hand</p> <p>22 corner where the -- the letters "PIC" are</p> <p>23 located. Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And you know that "PIC" means Person In</p>	<p style="text-align: right;">203</p> <p>1 2009?</p> <p>2 A. Yes.</p> <p>3 Q. And you see that in the E-mail itself,</p> <p>4 it's from Katie Williams, Senior DPO, to -- to</p> <p>5 the Captain, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Turn the page, because the -- the</p> <p>8 page is the document that's attached to the</p> <p>9 transmittal E-mail we've just reviewed, and take</p> <p>10 a look and see if it looks like a document with</p> <p>11 which you're familiar.</p> <p>12 A. (Reviewing document.) I don't remember</p> <p>13 the details of our -- the document that we had</p> <p>14 posted.</p> <p>15 Q. Does that mean you are or are not</p> <p>16 familiar with this particular page?</p> <p>17 A. I'm not familiar with this particular</p> <p>18 page.</p> <p>19 Q. Okay.</p> <p>20 A. No.</p> <p>21 Q. Well, why don't you read through it and</p> <p>22 see if it's an accurate description of the Chain</p> <p>23 of Command aboard the DEEPWATER HORIZON, whether</p> <p>24 that be in August 2009 when this E-mail was</p> <p>25 transmitted to the Captain, or in April of 2010</p>
<p style="text-align: right;">202</p> <p>1 Charge?</p> <p>2 A. Yes.</p> <p>3 Q. And you see that the document states:</p> <p>4 "Underway" -- "Underway Mode: Master is in</p> <p>5 Charge."</p> <p>6 Did I read that right?</p> <p>7 A. Yes.</p> <p>8 Q. And you see: "Drilling Mode: Offshore</p> <p>9 Installation Manager (O.I.M.) is in Charge."</p> <p>10 Did I read that correctly?</p> <p>11 A. Yes.</p> <p>12 Q. Did you understand in April 2010 when you</p> <p>13 were a Chief Mate aboard the DEEPWATER HORIZON</p> <p>14 that this organizational chart was an accurate</p> <p>15 organizational chart in the "EMERGENCY RESPONSE</p> <p>16 MANUAL"?</p> <p>17 A. Yes.</p> <p>18 Q. And let me show you now what's been</p> <p>19 previously marked as Exhibit 5033. And I asked</p> <p>20 Yancy Keplinger last week about this particular</p> <p>21 document.</p> <p>22 You see that it's from the DPO mailbox to</p> <p>23 the "DWH, Captain" mailbox?</p> <p>24 A. Yes.</p> <p>25 Q. And you see that it's dated August 22,</p>	<p style="text-align: right;">204</p> <p>1 while you were Chief Mate aboard the DEEPWATER</p> <p>2 HORIZON?</p> <p>3 A. (Reviewing document.)</p> <p>4 MR. JOHNSON: Object to form.</p> <p>5 A. This looks to be accurate.</p> <p>6 Q. (By Mr. Haycraft) Okay. Why don't you</p> <p>7 read for the Judge the last sentence that's</p> <p>8 underlined on this document.</p> <p>9 A. "Well Control Operations are not an</p> <p>10 'emergency' within the scope of this paragraph."</p> <p>11 Q. Okay. Now, if you would, turn to Tab 18</p> <p>12 in your binder.</p> <p>13 MR. HAYCRAFT: And we'll mark this</p> <p>14 as the next numbered exhibit, which will be the</p> <p>15 new No. 5336.</p> <p>16 Please place Exhibit Sticker 5336 on the</p> <p>17 first page of this document at Tab 18 in our</p> <p>18 binder.</p> <p>19 Thank you.</p> <p>20 THE WITNESS: (Complying.)</p> <p>21 (Exhibit No. 5336 marked.)</p> <p>22 Q. (By Mr. Haycraft) Okay. And -- and I'm</p> <p>23 going to also have in front of you, while you're</p> <p>24 looking at that, the exhibit we were just</p> <p>25 reviewing, Exhibit 5033, and see if it appears</p>

1 that the text in the Document 5336 looks very  
2 similar, if not identical, to the text in  
3 exhibit --

4 MR. HAYCRAFT: -- and I've forgotten  
5 the number, if you don't mind.

6 THE COURT REPORTER: 5033.

7 MR. JOHNSON: 5033.

8 MR. HAYCRAFT: 5033. Thank you,  
9 Tim.

10 A. It looks similar, but not exactly the  
11 same.

12 Q. (By Mr. Haycraft) Okay. In particular --  
13 well, you see -- you see this document comes from  
14 the "Transocean FLOATING OPERATIONS MANUAL,  
15 MARINE OPERATIONS GUIDELINES" and the section  
16 entitled "OIM/MASTER'S AUTHORITY"?

17 A. Yes.

18 Q. Okay. And read for the Judge the last  
19 line that has an underline underneath the entire  
20 sentence?

21 A. On the Floating Ops Manual page?

22 Q. Yes.

23 A. "A 'Controlled Well' is not an  
24 'emergency' event within the scope of this  
25 paragraph."

1 Q. Okay. So that's -- that's different than  
2 the underlined sentence in the 5033 exhibit we  
3 were just looking at, dated from August 2009,  
4 isn't it?

5 A. Yes, it is.

6 Q. Okay. In one, the paragraph says a well  
7 control situation is not an emergency event, and  
8 in the document from the Floating Operations  
9 Manual, it says that "A 'Controlled Well' is not  
10 an emergency event."

11 You see that difference?

12 A. Well, it says "Well Control Operations  
13 are not an emergency" --

14 Q. Right.

15 A. -- "within the scope of this paragraph,"  
16 versus "A 'Controlled Well' is not an emergency  
17 event within the scope of this paragraph."

18 Q. Okay. Well, now let's -- I -- I -- I  
19 thank you for that correction.

20 In April 2010, which sentence was  
21 operative aboard the DEEPWATER HORIZON?

22 A. The -- the one with the E-mail attached,  
23 5033.

24 Q. Okay. So it -- is it fair for me to  
25 understand, then, and for the Court to understand

1 that in April 2010, well control operations were  
2 not considered an emergency in the definition of  
3 who's in charge between the Captain and OIM in  
4 particular time period -- time periods? Fair to  
5 say?

6 MR. KINCHEN: Object to form.

7 A. I'm -- I'm not quite sure that -- that --  
8 can you rephrase the question, please?

9 Q. (By Mr. Haycraft) Okay. In April 2010  
10 when you -- you were Chief Mate aboard the  
11 DEEPWATER HORIZON, the -- the -- the governing  
12 document for who was in charge during an  
13 emergency would be what we see in Exhibit 5033?

14 A. This would -- yes. Yes.

15 Q. Okay. Let me show you what's been  
16 previously marked as Exhibit 942, which is from  
17 the Transocean website back at the time I took  
18 Jerry Canducci's deposition. Do you know who  
19 Jerry Canducci is?

20 A. Yes, I do.

21 Q. Okay. Let me show you Exhibit 942, and  
22 you'll see the date of the printout from the  
23 website down in the lower right-hand corner is  
24 3/22/2011?

25 A. Yes.

1 Q. Okay. Just you see -- you see it says up  
2 at the top, "Master, North American Division,"  
3 and then it has a button to "Submit Resumé." And  
4 then the very first line of the job description  
5 states, quote, "REPORTING," end quote --  
6 "REPORTING;" end quote, and then, quote,  
7 "Reports to the Offshore Installation Manager  
8 (OIM)." Did I read that correctly?

9 A. Yes. That's what it says on the page.

10 Q. Okay. And does -- does that job  
11 description accurately describe the  
12 organizational chart on the DEEPWATER HORIZON in  
13 April 2010?

14 A. Yes, I believe it does.

15 Q. So to sort of review the Chain of Command  
16 on the DEEPWATER HORIZON, the Captain or the  
17 Master of the DEEPWATER HORIZON was in charge in  
18 every way while the ship was underway from one  
19 drilling -- one well location to another well  
20 location?

21 A. Yes.

22 Q. While the DEEPWATER HORIZON was drilling  
23 and latched onto the well, both the Captain and  
24 the OIM were in charge of different aspects of  
25 the DP positioned vessel at that time, correct?

<p style="text-align: right;">209</p> <p>1 A. They were in charge of different aspects 2 of the vessel, yes. 3 Q. They -- they each were in command of 4 something? 5 A. Yes. 6 Q. And then during an emergency, at some 7 point -- well, you tell me. During an emergency, 8 was the OIM still in charge? 9 A. No. 10 Q. Okay. Who was in charge during an 11 emergency? 12 A. Master is in charge for an emergency 13 situation. 14 Q. Okay. Who de -- who -- between the two, 15 who de -- determines that it's an emergency? 16 A. Any event that would deem the general 17 alarm being sounded would be considered an 18 emergency. 19 Q. Okay. And in this particular event, 20 sometime after 9:30 on April the 20th, when you 21 and/or the DPO sounded the general alarm, was 22 that the point in time when everybody on the ship 23 would know the Captain was in charge? 24 MR. KINCHEN: Object to form. 25 MR. JOHNSON: Objection.</p>	<p style="text-align: right;">211</p> <p>1 could get to it. 2 Q. (By Mr. Haycraft) Okay. Well, that -- 3 that's -- I understand that. I understand what 4 you're saying there, but what I'm asking you is 5 when, in your position as Chief Mate, did you 6 determine that this was an emergency? 7 A. I determined it as an emergency situation 8 as I was pushing the button, which was at the 9 explosion, I guess. 10 Q. Okay. So how many seconds after the 11 explosion did you -- were you able to hit -- 12 well, first, let's stop and just let me just ask. 13 Physically, is this a button, is it a toggle, is 14 it a circuit breaker? What kind of an instrument 15 is this emergency alarm? 16 A. The -- the button that I pushed was a 17 pushbutton. 18 Q. Okay. Well, let -- then I'll -- I'll use 19 the right phrasing. At the point you pushed the 20 button and the general alarm sounded, you had 21 determined that an emergency situation had 22 occurred? 23 A. Yes. 24 Q. Okay. At that point in time, in your -- 25 from your perspective as Chief Mate, the Captain</p>
<p style="text-align: right;">210</p> <p>1 A. I can't -- I can't speak for if they knew 2 that the Master was in charge. They were 3 certainly trained that the Master was in charge 4 for emergencies. I can't speak for whether or 5 not they knew that. 6 Q. (By Mr. Haycraft) Okay. And in your 7 mind, as Chief Mate and -- and Second in Command 8 on the Marine side of the ship, below the 9 Captain, did you deem the point in time when you 10 pushed the button for the general alarm, that at 11 that point it was an emergency? 12 MR. KINCHEN: Object to form. 13 A. We were in an emergency situation when I 14 hit the general alarm, yes. 15 Q. (By Mr. Haycraft) Okay. Well, when did 16 the emergency start? 17 A. I would -- it -- it's hard to say. I 18 mean, the -- the entire event was an emergency, 19 so -- 20 Q. Well, when -- from your -- I'm look -- 21 I'm strictly focused on you in your official role 22 as Chief Mate, Mr. Young. When -- when did the 23 emergency begin? 24 MR. JOHNSON: Objection, form. 25 A. I hit the general alarm as soon as I</p>	<p style="text-align: right;">212</p> <p>1 was in charge of the emergency? 2 A. Yes. 3 Q. Did the Captain tell you to hit the 4 general alarm? 5 A. No. 6 Q. Did you ever hear the Captain tell Andrea 7 Fleytas not to call a Mayday? 8 A. No. 9 Q. Did the presence of the Transocean and BP 10 Executives onboard the DEEPWATER HORIZON affect 11 the performance of the Marine Department in any 12 way? 13 A. Not to my knowledge. 14 Q. Okay. Well, you were -- you were onboard 15 and on duty, weren't you, when they were there? 16 A. Yes, I was. 17 Q. Okay. Well, when you say "not to your 18 knowledge," are you qualifying your answer? 19 A. I can't speak -- 20 MR. KINCHEN: Objection to form. 21 A. I can't speak for others. I know it 22 didn't -- I wasn't made aware of anybody's 23 performance being affected. 24 Q. (By Mr. Haycraft) Okay. And let's -- 25 let's -- there's several documents that indicate</p>

1 that 21:30 was the time that you went to the  
2 drill floor, and I just want to explore the  
3 21:30. Is it your testimony today that indeed it  
4 was 21:30 when you went to the drill floor?

5 A. Yes.

6 Q. Okay. Is there any doubt in your mind  
7 that it was 21:30 at that point in time?

8 A. No.

9 Q. Okay. And 21:30, of course, is 9:30  
10 p.m.?

11 A. Yes.

12 Q. And at 21:30 you talked to the Toolpusher  
13 and the Driller?

14 A. I don't know ex -- exactly what time I  
15 actually spoke to them.

16 Q. Good -- good point. 21:30 is when --  
17 when you arrived in the drill shack?

18 A. That's the time that I headed to the  
19 drill shack from the Bridge.

20 Q. Okay. So there's some period passed  
21 between 21:30 and when you actually arrived in  
22 the drill shack?

23 A. Yes.

24 Q. Do you know whether that would be 21:31,  
25 21:32?

1 being back on, but somewhere in there.

2 Q. Okay. You -- you -- you think you were  
3 in the drill shack, though, somewhere between 10  
4 and 15 minutes?

5 A. I -- I would say between the drill shack  
6 and behind the drill shack, headed down.

7 Q. Okay. So if -- if we -- if we place you  
8 in the drill shack -- drill shack sometime  
9 between 9:31 or 9:32 and 9:41 or 9:42, that would  
10 be fairly accurate, in your own mind, as you sit  
11 here today?

12 A. Somewhere in there. I -- I was up there  
13 within that period.

14 Q. Okay. And you could tell that -- oh, and  
15 the Trool -- the Toolpur -- blah, blah, blah.  
16 The Toolpusher was Jason Anderson?

17 A. Yes, it was.

18 Q. And then the -- the Driller on duty in  
19 the drill shack, that you saw, was Dewey Revette?

20 A. Yes.

21 Q. And the other person in the drill shack  
22 was Vince Tabler?

23 A. Yes.

24 Q. Anybody else?

25 A. Not that I remember in the drill shack,

1 A. It would be very close. It was a short  
2 walk, so --

3 Q. Okay. And in the drill shack, at first  
4 you didn't talk to the Toolpusher and Driller.  
5 You talked to Vince Tabler?

6 A. Yes.

7 Q. Sort of to the back of the drill shack?

8 A. Yes.

9 Q. Okay. And you were waiting for an  
10 opportunity to get a word in with the Toolpusher  
11 or Driller at that point?

12 A. Yes.

13 Q. Okay. Who -- you've estimated  
14 previously -- and tell me what your current  
15 memory is -- that you were in the drill shack for  
16 approximately 10 or possibly 10 to 15 minutes.

17 A. My total time away from the Bridge was  
18 probably 10 -- 10 to 15 minutes.

19 Q. Okay. So you were -- you were -- let's  
20 just sort of encapsulate that thought. You left  
21 the Bridge at 9:30. You were in the drill shack  
22 for some period of time, and then you were back  
23 to the Bridge by, what, 9:40 or 9:45, somewhere  
24 in that time frame, that five-minute time frame?

25 A. Maybe. I -- I can't pinpoint the time

1 no.

2 Q. Okay. Did you know who the Well Site  
3 Leader was that evening, on duty that evening?

4 A. I'm not sure who was on duty that  
5 evening.

6 Q. Okay.

7 A. I can't remember.

8 Q. Well, do you remember the two Well Site  
9 Leaders at that time were Don Vidrine and Bob  
10 Kaluza?

11 A. Yes.

12 Q. Okay. Did you see either of them in the  
13 drill shack at that time you were there between  
14 the times we were just discussing?

15 A. No, I did not.

16 Q. Okay. And you didn't know what Dewey or  
17 Jason were doing. You knew, though, that they  
18 were busy?

19 A. Yes.

20 Q. Did either of them -- well, is there a  
21 BOP control panel in the drill shack?

22 A. Yes, there is.

23 Q. And do you know where it is in the drill  
24 shack?

25 A. Yes.

