

# Deposition Testimony of:

## **Robert Quitzau**

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Page 13:15 to 13:18

00013:15 ROBERT QUITZAU,  
16 after having been first duly sworn by the  
17 above-mentioned court reporter, did testify  
18 as follows:

Page 13:22 to 13:24

00013:22 Q. My name is Steve Fineman. I'm  
23 here on behalf of the Plaintiffs' Steering  
24 Committee. Have you ever had your

Page 15:16 to 16:18

00015:16 Q. Mr. Quitzau, do you have any  
17 college degrees?  
18 A. Yes, I do.  
19 Q. What are those?  
20 A. I have a BS in petroleum  
21 engineering and an MS in petroleum  
22 engineering, both from LSU.  
23 Q. I'm sorry, the first 1 was a BS  
24 in petroleum engineering?  
25 A. Yes.  
00016:01 Q. And what year was that?  
02 A. '79.  
03 Q. And I'm sorry, the second  
04 degree?  
05 A. An MS in petroleum engineering.  
06 Q. And what year was that?  
07 A. 1981.  
08 Q. What is an MS?  
09 A. Master's degree.  
10 Q. And generally speaking, how  
11 would you describe the discipline of  
12 petroleum engineering?  
13 A. Generally speaking, the  
14 discipline of petroleum engineering would  
15 involve various subgroups, including drilling  
16 which would be my specialty, reservoir  
17 engineering, production engineering and some  
18 others.

Page 17:09 to 18:04

00017:09 Q. Do you have any professional  
10 certifications?  
11 A. I'm a registered professional  
12 engineer in the State of Louisiana.  
13 Q. And what does that mean?  
14 A. That means I passed the  
15 professional engineering test and other  
16 associated requirements.

17 Q. When did you first become a  
18 registered professional engineer in  
19 Louisiana?  
20 A. I don't recall the date. It was  
21 probably back in the late 1980s.  
22 Q. Do you have to do something on  
23 an annual or other periodic basis in order to  
24 maintain that registration?  
25 A. I maintain training requirements  
00018:01 per the Louisiana professional engineering  
02 requirements.  
03 Q. And you're current?  
04 A. I'm current.

Page 18:08 to 19:07

00018:08 Q. After -- after you left LSU, did  
09 you go into the work force?  
10 A. Yes, I did.  
11 Q. And that would have been in or  
12 about 1981?  
13 A. Yes.  
14 Q. And where did you go to work?  
15 A. I went to work for Mobil Oil.  
16 Q. And how long were you with  
17 Mobil?  
18 A. Approximately 22 years.  
19 Q. So that would have been till  
20 about 2002, 2003?  
21 A. Actually, I apologize, give or  
22 take, '99 or 2000, I guess is when I left  
23 Mobil Oil. I don't remember the exact date.  
24 Q. And what did you do at Mobil  
25 Oil?  
00019:01 A. I was a drilling engineer for  
02 the most part.  
03 Q. Generally, what does a drilling  
04 engineer do?  
05 A. A drilling engineer takes a  
06 geological objective and designs a well to  
07 reach that geological objective.

Page 19:17 to 20:09

00019:17 Q. When you were with Mobil, did  
18 you work on any deepwater drilling projects?  
19 A. Yes, I did.  
20 Q. When were those?  
21 A. I worked on a deepwater project,  
22 approximately in the early 1990s.  
23 Q. Any others?  
24 A. Not that I can recall.  
25 Q. Just the one. Do you remember  
00020:01 the name of that project?  
02 A. There were two wells offshore

03 North Sumatra, the names of the wells were  
04 Intun Utara and Bayu Laut Dalam.  
05 Q. This is in Indonesia?  
06 A. That's correct.  
07 Q. Did you design those wells?  
08 A. I assisted in the planning for  
09 those wells.

Page 21:13 to 23:22

00021:13 Q. After you left Mobil in or about  
14 2000, what did you do then?  
15 A. I became a drilling consultant.  
16 Q. And were you working for  
17 yourself?  
18 A. I'm working for myself through  
19 --  
20 Q. Okay.  
21 A. I'm working for myself through  
22 an agent.  
23 Q. Let's go back to 2000.  
24 A. Okay.  
25 Q. To keep the time frame straight.  
00022:01 In 2000 you become a drilling consultant.  
02 At that time, who were you working with?  
03 A. For about one and a half years,  
04 I was completely on my own marketing some  
05 professional ideas that didn't pan out and  
06 so I began my consulting work approximately  
07 2001 or 2002.  
08 Q. And when you went into  
09 consultancy, were you operating on your own  
10 or with other people?  
11 A. I was working through an agent.  
12 Q. What does that mean?  
13 A. The agent markets my skills and  
14 arranges for me to have interviews and get  
15 employment to provide services for other  
16 operators.  
17 Q. Okay. And who was your agent  
18 then?  
19 A. Argonauta Energy.  
20 Q. Does Argonauta continue to be  
21 your agent to this day?  
22 A. Yes.  
23 Q. And since 2000, since you became  
24 a drilling consultant, has that been what  
25 you've done?  
00023:01 A. Yes.  
02 Q. Since 2000, have you been the  
03 employee of any particular company?  
04 A. No.  
05 Q. Generally speaking, what  
06 services do you provide as a drilling  
07 consultant?

08 A. As a drilling consultant, I  
09 provide well planning services.  
10 Q. And well planning services means  
11 the design of the well?  
12 A. Yes.  
13 Q. Does it mean anything else?  
14 A. No. So let me clarify. Design  
15 of the well, then we would follow the  
16 drilling of the well for that operator to  
17 basically follow the design through until its  
18 conclusion.  
19 Q. And did you provide services to  
20 operators and nonoperators or just to  
21 operators?  
22 A. Just to operators.

Page 24:08 to 26:18

00024:08 Q. Okay. Fair enough. Can you  
09 give me a list of the companies that you've  
10 provided consulting services for?  
11 A. I began with Kerr-McGee in  
12 Houston. When Kerr-McGee was combined with  
13 Anadarko, I just continued my role on  
14 through the merger and have continued with  
15 Anadarko ever since.  
16 Q. Have you provided -- excuse me,  
17 have you provided drilling consulting  
18 services for any other companies?  
19 A. No, I have not.  
20 Q. Have you ever been an employee  
21 of Anadarko Petroleum Corporation?  
22 A. I have not.  
23 Q. So when did you start providing  
24 drilling consulting services for Anadarko,  
25 about 2002?  
00025:01 A. Approximately 2002.  
02 Q. When I say Anadarko in that  
03 context, it was Kerr-McGee followed by  
04 Anadarko?  
05 A. Yes.  
06 Q. And since you started in 2003  
07 with Kerr-McGee as a drilling consultant, has  
08 your title always been drilling consultant?  
09 A. I believe my title is drilling  
10 engineering consultant on my card.  
11 Q. A minute ago you told me that  
12 your general responsibilities as a drilling  
13 consultant are well planning services which  
14 include well design and the following  
15 drilling to conclusion, correct?  
16 A. Correct.  
17 Q. And are those the services that  
18 you provided to Kerr-McGee and Anadarko.  
19 A. That's correct.

20 Q. We'll get into the nuances of  
21 Macondo in a second, but generally speaking  
22 those are the services you're providing, is  
23 that correct?  
24 A. That's correct. There would  
25 also be, you know, in this time of -- where  
00026:01 the industry has stopped, I would participate  
02 in projects that developed systems and  
03 equipment for Anadarko within joint industry  
04 projects.  
05 Q. I'm sorry, what does that mean,  
06 joint industry projects?  
07 A. Specifically, the industry is  
08 putting together well containment plans and  
09 Anadarko is participating in that and I'm  
10 representing Anadarko in that work.  
11 Q. And when did that start?  
12 A. Shortly -- that probably would  
13 have started in approximately November of  
14 last year or December of last year, 2010.  
15 Q. Okay. And was this joint  
16 industry project inspired by the events of  
17 Macondo?  
18 A. Yes.

Page 26:24 to 27:06

00026:24 Q. What's the purpose of this  
25 project?  
00027:01 A. To put together a containment  
02 system that would allow a well to be shut in  
03 if a blowout occurred or to capture fluids  
04 from a well that was blowing out.  
05 Q. Did the industry have anything  
06 like that prior to Macondo?

Page 27:09 to 28:05

00027:09 THE WITNESS:  
10 I'm not aware of any systems like  
11 that prior to Macondo.  
12 EXAMINATION BY MR. FINEMAN:  
13 Q. Who's heading up that project?  
14 A. There were -- there are two  
15 industry groups, the Helix Group and the  
16 MWCC group. Most of my work has been  
17 involved in the Helix Group which is a  
18 consortium of 24 different companies.  
19 Q. Including Anadarko?  
20 A. Including Anadarko.  
21 Q. What's your specific role?  
22 A. I've been the Anadarko  
23 representative on the technical steering  
24 committee.  
25 Q. And what do you do as a member

00028:01 of that committee?  
 02 A. As a member of that committee,  
 03 we -- I contribute Anadarko's input into the  
 04 direction of the development of the capping  
 05 stack and flowback systems.

Page 28:20 to 29:09

00028:20 Q. Okay. Going back to your  
 21 general responsibilities at Anadarko, as a  
 22 drilling consultant for Anadarko, you are  
 23 paid directly by Anadarko Petroleum?  
 24 A. Anadarko pays Argonauta and  
 25 Argonauta pays me.  
 00029:01 Q. Generally, did you have someone  
 02 you reported to?  
 03 A. Yes.  
 04 Q. Who is that?  
 05 A. Early on it was Mike Davis, and  
 06 recently it's Mike Pfister.  
 07 Q. What is Mr. Pfister's title?  
 08 A. Drilling engineering manager,  
 09 Deepwater Gulf of Mexico.

Page 29:21 to 30:18

00029:21 Q. With respect to -- with respect  
 22 to the Macondo well, what were your general  
 23 responsibilities?  
 24 A. I had two general  
 25 responsibilities, I was tasked to give  
 00030:01 approximately a 30-second update of the well  
 02 operations to the Anadarko drilling group in  
 03 their morning meetings, every morning,  
 04 Monday through Friday. And the second  
 05 objective was to track the progress of the  
 06 well towards reaching the geological  
 07 objectives of the well.  
 08 Q. Prior to Macondo, had you  
 09 provided drilling consulting services to  
 10 Anadarko where Anadarko was a nonoperator?  
 11 A. No.  
 12 Q. This was the first time you had  
 13 done so?  
 14 A. Yes.  
 15 Q. Did your job responsibilities  
 16 differ because of Anadarko's status as a  
 17 nonoperator on this project?  
 18 A. Yes.

Page 30:21 to 32:20

00030:21 THE WITNESS:  
 22 Yes.

23 EXAMINATION BY MR. FINEMAN:  
 24 Q. How did they differ?  
 25 A. The two objectives I described  
 00031:01 is what I did that involved no well planning  
 02 at all, no design work at all.  
 03 Q. Coming back to the drilling  
 04 group meetings, you said those were held  
 05 daily?  
 06 A. Yes.  
 07 Q. And they were held in the  
 08 morning?  
 09 A. Yes.  
 10 Q. And who led those meetings?  
 11 A. Typically they would be led by  
 12 Mike Pfister.  
 13 Q. Who else attended those  
 14 meetings?  
 15 A. The Deepwater Gulf of Mexico  
 16 drilling group with some representatives of  
 17 Operation Geology and sometimes the  
 18 international drilling group members would  
 19 attend.  
 20 Q. How many people in all?  
 21 A. Approximately 15 to 20.  
 22 Q. And how long did those meetings  
 23 last?  
 24 A. Fifteen to 30 minutes.  
 25 Q. I'm sorry, your role in those  
 00032:01 meetings was to provide a short report?  
 02 A. A short update on what happened  
 03 on the Macondo well.  
 04 Q. What happened on the Macondo  
 05 well the previous day?  
 06 A. Yes. The previous day or since  
 07 the last morning meeting, like over  
 08 weekends.  
 09 Q. Fair enough. We're going to  
 10 come back to this subject in a little bit,  
 11 but where did you get the information you  
 12 used for your presentation during the morning  
 13 meetings?  
 14 A. Generally, I used -- accessed  
 15 the WellSpace service and downloaded various  
 16 reports to get an understanding of what they  
 17 had done.  
 18 Q. Have you provided any consulting  
 19 services for Anadarko E&P?  
 20 A. I'm not aware that I have.

Page 32:25 to 33:24

00032:25 Q. The quickest way to do this, I'm  
 00033:01 going to give the witness what's previously  
 02 marked as 1597, it's Tab 50. Have you seen  
 03 this document before?



04           A.       Yes, I have.  
 05           Q.       Here's what I would like you to  
 06 do. I would like you to turn to Page--  
 07 there's no page numbers, but I would like  
 08 you to turn to Item 15 to start. This is a  
 09 little tedious, but you have been designated  
 10 for quite a number of topics here today.  
 11 What I'm going to ask you to do is to read  
 12 or review whatever you need to do, each of  
 13 the paragraphs identified for you. And then  
 14 I'm going to ask you the question whether  
 15 you're prepared to testify on behalf of  
 16 Anadarko as to those -- the subject matter  
 17 covered by each of those paragraphs, okay?  
 18           A.       Okay.  
 19           Q.       So let's start with Paragraph  
 20 15. Whatever you need to do, if you need to  
 21 -- whatever you need to do.  
 22           A.       (Reading) Okay.  
 23           Q.       Are you prepared to testify on  
 24 behalf of Anadarko on topic 15?

Page 34:05 to 35:04

00034:05 THE WITNESS:  
 06           Yes.  
 07 EXAMINATION BY MR. FINEMAN:  
 08           Q.       Paragraph 16?  
 09           A.       Yes.  
 10           Q.       Paragraph 17?  
 11           A.       Yes.  
 12           Q.       Paragraph 18?  
 13           A.       Yes.  
 14           Q.       Paragraph 19?  
 15           A.       Yes.  
 16           Q.       Paragraph 20?  
 17           A.       Yes.  
 18           Q.       Paragraph 21?  
 19           A.       Yes.  
 20           Q.       Paragraph 25?  
 21           A.       Yes.  
 22           Q.       Paragraph 26?  
 23           A.       Yes.  
 24           Q.       Paragraph 27?  
 25           A.       Yes.  
 00035:01           Q.       Paragraph 28?  
 02           A.       Yes.  
 03           Q.       Paragraph 30, which I believe  
 04 somebody else was also designated for.

Page 35:07 to 35:08

00035:07 THE WITNESS:  
 08           Yes.

Page 36:08 to 38:08

00036:08 Q. Had you ever heard of MOEX  
09 Offshore 2007, LLC at the time you started  
10 working on Macondo?  
11 A. I did not.  
12 Q. Have you ever met anybody from  
13 that company?  
14 A. I don't recall meeting anybody  
15 from that company.  
16 Q. Have you ever talked to anybody  
17 from that company, as far as you know?  
18 A. I have not.  
19 Q. Okay. Have you ever been at any  
20 meetings with anybody from that company?  
21 A. I'm not aware that I have.  
22 Q. Have you ever -- have you ever  
23 talked to anybody from any -- any Mitsui  
24 company regarding Macondo?  
25 A. I'm not aware that I've ever  
00037:01 done that.  
02 Q. What kinds of information did  
03 Anadarko receive about what was going on at  
04 Macondo?  
05 A. Are you talking about during the  
06 drilling operations?  
07 Q. Yes.  
08 A. Anadarko received information  
09 through WellSpace that would include daily  
10 operating reports or daily drilling reports,  
11 mudlogging reports, pore pressure frac  
12 gradient reports and various other documents  
13 were submitted. I don't know the entire  
14 list of them.  
15 Q. Let me show you what's been  
16 previously marked as Exhibit 1598, it's  
17 Tab 1. The first e-mail on here or the top  
18 e-mail on the page is from Nick Huch at  
19 Anadarko. Do you know Mr. Huch?  
20 A. I do not know him personally.  
21 Q. He's sending an e-mail here to  
22 Robert Bodek, who you do know, right?  
23 A. I've spoken to Robert Bodek,  
24 yes.  
25 Q. Mr. Bodek is at BP, yes?  
00038:01 A. Yes.  
02 Q. Do you know what Mr. Bodek's job  
03 was at BP?  
04 A. I understand he's their  
05 operational geologist for the Macondo well.  
06 Q. Was he responsible for  
07 communicating with Anadarko with respect to  
08 progress at the well?

Page 38:11 to 38:12

00038:11 THE WITNESS:

12 My understanding is that he was.

Page 38:14 to 38:19

00038:14 Q. You see in his e-mail here which  
15 is dated January 25, 2010, he says attached  
16 are Anadarko's data requirements for Macondo  
17 along with other contact information. Do  
18 you see that?

19 A. Yes, I do.

Page 39:08 to 40:12

00039:08 Q. I understand that. But if you  
09 turn to the second --the second page of the  
10 attachment, you will see a list of -- and  
11 description of types of documents and  
12 materials that I believe Anadarko was  
13 requesting from BP, is that correct?

14 A. I understand that this e-mail is  
15 correct.

16 Q. And if you could take a minute  
17 and look at the descriptions of the  
18 information on this page and on the next page  
19 and let me know if that is consistent with  
20 your understanding of the information that  
21 Anadarko received from BP?

22 A. My understanding of what  
23 Anadarko received was limited to what I  
24 actually used so I'm not real familiar with  
25 what was actually coming into the WellSpace  
00040:01 system.

02 Q. And you were -- what information  
03 specifically were you looking at?

04 A. Typically, I looked at the daily  
05 operating reports, sometimes the mudlog  
06 reports, and sometimes the pore pressure  
07 frac gradient reports.

08 Q. Are you aware at any point  
09 whether Anadarko expressed to BP that they  
10 were not receiving -- that Anadarko was not  
11 receiving all the information it had  
12 requested?

Page 40:15 to 40:19

00040:15 THE WITNESS:

16 I'm aware that there were  
17 occasions when reports came in a couple of  
18 days late and there may have been some  
19 expressions to BP on that.

Page 40:21 to 40:24

00040:21 Q. Okay. But are you aware of any  
22 instances where any type of report or  
23 information that Anadarko requested was not  
24 provided by BP?

Page 41:02 to 41:03

00041:02 THE WITNESS:  
03 I'm not aware of that.

Page 41:05 to 41:24

00041:05 Q. With respect to the kinds of --  
06 or the method with which Anadarko received  
07 information regarding operations at Macondo,  
08 you've testified already about WellSpace.  
09 I'm going to come back to WellSpace in a  
10 little bit. Were there any other sources of  
11 information that you or others at Anadarko  
12 used to obtain information about what was  
13 going on at Macondo?  
14 A. At various times, people could  
15 access InSite Anywhere. There were e-mail  
16 correspondences and phone calls.  
17 Q. Were there any regularly  
18 scheduled meetings between Anadarko personnel  
19 and BP to discuss what was going on at the  
20 well?  
21 A. Not that I'm aware of.  
22 Q. Were there any meetings between  
23 people at Anadarko and BP about what was  
24 going on at the well?

Page 42:02 to 42:11

00042:02 THE WITNESS:  
03 I'm not aware of those meetings,  
04 if they occurred.  
05 EXAMINATION BY MR. FINEMAN:  
06 Q. Sorry. I broke my own rule.  
07 Did you participate in any such meetings?  
08 A. I'm not aware of any meetings.  
09 Q. To your knowledge, was Anadarko  
10 allowed to make any decisions regarding  
11 operations at Macondo?

Page 42:14 to 42:20

00042:14 THE WITNESS:  
15 We did not make any decisions.

16 EXAMINATION BY MR. FINEMAN:

17 Q. Was Anadarko permitted to make  
18 recommendations or to raise questions,  
19 disagreements, concerns or objections to BP  
20 regarding operations at the well?

Page 42:23 to 42:25

00042:23 THE WITNESS:

24 We were allowed to communicate and  
25 track progress and ask questions.

Page 43:08 to 44:16

00043:08 Q. Can you recall any specific

09 examples of questions, disagreements,  
10 concerns or objections concerning operations  
11 at Macondo that you personally participated  
12 in?

13 MS. WILMS:

14 Object to form.

15 THE WITNESS:

16 I sent some e-mails with questions  
17 to Bobby Bodek on at least one or two  
18 occasions.

19 EXAMINATION BY MR. FINEMAN:

20 Q. Concerning what?

21 A. I believe it was concerning  
22 activities surrounding drilling through the  
23 productive interval.

24 Q. So that drilling depth?

25 A. Sorry?

00044:01 Q. Drilling depth, is that what

02 you're talking about? How far they would  
03 drill down?

04 A. While they were in the  
05 productive interval, I asked them some  
06 clarifying questions.

07 Q. Anything else you can remember,  
08 any other questions or disagreements,  
09 concerns, objections that you might have  
10 expressed?

11 A. I don't recall any others.

12 Q. Do you know whether Anadarko,  
13 other than you, the company, anybody else in  
14 the company, expressed any questions,  
15 disagreements, concerns or objections  
16 concerning operations of the well to BP?

Page 44:19 to 45:05

00044:19 THE WITNESS:

20 I'm not aware of anybody  
21 expressing disagreements or concerns.

22 EXAMINATION BY MR. FINEMAN:  
23 Q. You understand this is one of  
24 those topics where you're testifying for the  
25 company, right? You understand that?  
00045:01 A. I understand that.  
02 Q. Okay. And you're not aware of  
03 any other instances?  
04 A. I'm not aware of any other  
05 instances.

Page 45:17 to 46:05

00045:17 Q. Now, you -- as I understand it,  
18 you took over from somebody named Josh  
19 Nichols on Macondo on or about March 18th,  
20 2010, is that correct?  
21 A. That's correct.  
22 Q. And who is Josh Nichols?  
23 A. Josh Nichols was a drilling  
24 engineer in the Anadarko Deepwater Gulf of  
25 Mexico group.  
00046:01 Q. And why did you take over for  
02 Mr. Nichols, if you know?  
03 A. Mr. Nichols moved to another job  
04 within Anadarko and Mike Pfister assigned me  
05 to fulfill his role.

Page 46:14 to 46:18

00046:14 Q. At the time that you took over  
15 for Mr. Nichols on Macondo, had you any prior  
16 experience with deepwater drilling in the  
17 Gulf of Mexico?  
18 A. Yes.

Page 48:15 to 49:08

00048:15 Q. What was your next experience?  
16 A. I'm not going to get these in  
17 order, but I've drilled in various parts of  
18 the Gulf of Mexico, at Water Valley, Green  
19 Canyon, Garden Banks, and there may be some  
20 others.  
21 Q. In those instances, were you  
22 always the Anadarko drilling engineer?  
23 A. Yes.  
24 Q. And you were always in the  
25 position of designing the well?  
00049:01 A. Yes, and on some occasions, I  
02 would relieve an engineer who had designed  
03 the well and I would take over for them, for  
04 short periods.  
05 Q. But is it fair to say that you  
06 had experience in drilling in the Gulf of

07 Mexico?  
08 A. Yes.

Page 50:17 to 51:13

00050:17 Q. What did Mr. Nichols tell you  
18 about the history of the well?  
19 A. He may have mentioned that there  
20 was a kick and some hole conditions. I  
21 believe they were either sidetracking or  
22 getting ready to sidetrack at the time so he  
23 kind of gave me an update on the operations  
24 that were ongoing.  
25 Q. For the record, what is a kick?  
00051:01 A. A kick is the influx of  
02 formation fluids into the well.  
03 Q. And formation fluid is what?  
04 A. Whatever fluids are present in  
05 the formation.  
06 Q. So it could be -- it could be  
07 water, it could be gas, it could be oil?  
08 A. That's correct.  
09 Q. What do you mean when you use  
10 the term "hole conditions"?  
11 A. Hole conditions would be packing  
12 off, torque and drag, temporarily stuck pipe  
13 and permanently stuck pipe.

Page 54:04 to 55:02

00054:04 My question is whether you  
05 reviewed anything -- if you reviewed BP's  
06 well plan or well design?  
07 A. I reviewed one wellbore  
08 schematic that had plan casing depths and mud  
09 weights on it.  
10 Q. Okay. When we get to the  
11 documents, we will come back to that. I  
12 think I know what you're talking about. Did  
13 you review any drilling plans or is this  
14 what you're referring to?  
15 A. That's what I'm referring to,  
16 yes.  
17 Q. Okay. Is there a difference  
18 between a well design and a drilling plan?  
19 A. A drilling plan would be how to  
20 drill the well and the design would be --  
21 yes, there is a difference.  
22 Q. What is the difference?  
23 A. The plan is how the well is  
24 drilled, you know, step by step, and then  
25 the design would be related to selecting and  
00055:01 confirming the integrity of all the  
02 equipment that goes into the well.

Page 56:02 to 57:02

00056:02 THE WITNESS:

03 Yes, I'm aware of that.

04 EXAMINATION BY MR. FINEMAN:

05 Q. Okay. When you took over for --  
06 did you -- were you aware that there had  
07 been well control events at Macondo in both  
08 February and March 2010?

09 A. I was not.

10 Q. Nobody told you that?

11 A. Nobody has told me that.

12 Q. For the record, by the way, can  
13 you just tell us what a well control event  
14 is?

15 A. My understanding of a well  
16 control event is -- could be a kick, could be  
17 lost circulation or it could be some form of  
18 ballooning, which would be a combination of  
19 losses and flowbacks from fractures in rock.

20 Q. Was it -- in your experience in  
21 the Gulf of Mexico, drilling in the Gulf of  
22 Mexico, was it typical for there to be well  
23 control events during a drilling exercise?

24 A. Yes.

25 Q. In your experience, did you  
00057:01 often see kicks, lost circulation, ballooning  
02 during the drilling exercise?

Page 57:06 to 57:08

00057:06 I would not say often for kicks,  
07 ballooning and losses happen fairly  
08 regularly.

Page 57:10 to 57:13

00057:10 Q. At the time you took over on  
11 Macondo, did you have any reason to think  
12 that the well was particularly troublesome?

13 A. I did not.

Page 58:08 to 58:18

00058:08 Q. So your testimony -- let me ask  
09 the question this way: Did the company have  
10 any communications with BP regarding the  
11 March 8th, 2010 well control event?

12 A. I'm not aware of any  
13 communications.

14 Q. At or about the time you took  
15 over in March -- in March 2010, were you or  
16 any others at Anadarko concerned about BP's



17 ability to safely complete drilling of the  
18 well?

Page 58:21 to 58:22

00058:21 THE WITNESS:  
22 No, we were not concerned.

Page 59:02 to 60:04

00059:02 Q. Can you -- you testified a  
03 little bit ago that your role with respect to  
04 Macondo, at least from the March 18 through  
05 April 20, 2010 time period was to report to  
06 the drilling group of the morning meetings  
07 and to track progress towards your  
08 geological objectives; correct?  
09 A. Correct.  
10 Q. With respect to the tracking of  
11 the progress, what did you do? What steps  
12 did you take to track that progress?  
13 A. I would read the daily operating  
14 report, I would look at the depth and I  
15 would look at the mud weight and where mud  
16 weight increases occurred.  
17 Q. Anything else?  
18 A. I would read the operating, you  
19 know, what they actually did during that day  
20 so that I could give a 30-second summary of  
21 what happened.  
22 Q. Did you read the daily reports  
23 every day?  
24 A. Not every day.  
25 Q. Did you read all the daily  
00060:01 reports?  
02 A. I endeavored and succeeded in  
03 reading all the daily drilling reports after  
04 I got involved.

Page 60:14 to 60:16

00060:14 Q. Fair enough. It was your  
15 practice to try to read all of the reports?  
16 A. Yes.

Page 61:02 to 61:25

00061:02 Q. Okay. Other than the morning  
03 meetings, did you have other methods of  
04 communicating what you were observing in the  
05 daily reports to others at Anadarko?  
06 A. I communicated by e-mail to  
07 various members of the asset team.

08 Q. The asset team?  
09 A. The Anadarko project team.  
10 Q. And the head of that team was  
11 Alan O'Donnell?  
12 A. That's correct.  
13 Q. Who else was on that team?  
14 A. I'm aware of Paul Chandler, he's  
15 mainly the one I dealt with, and I think  
16 Derek Folger, I corresponded with him, and  
17 someone named Forrest, once or twice I  
18 corresponded with and there's probably  
19 others.  
20 Q. Mr. Chandler is a geologist,  
21 correct?  
22 A. That's correct.  
23 Q. He was the project geologist on  
24 Macondo?  
25 A. That's my understanding.

Page 62:09 to 62:13

00062:09 Q. After you took over and through  
10 the April 20, 2010 date, who was your  
11 contact at BP?  
12 A. My only contact at BP was Bobby  
13 Bodek.

Page 63:02 to 63:13

00063:02 Q. Did you find that he provided  
03 you with accurate and timely information?  
04 A. He did.  
05 Q. Did you have any complaints  
06 about his -- time out. Did you ever have any  
07 complaints about his providing you with  
08 accurate and timely information?  
09 A. I did not.  
10 Q. And I take it since you never  
11 met him in person, you communicated with him  
12 by phone and e-mail?  
13 A. That's correct.

Page 63:20 to 64:01

00063:20 Q. Did you ever visit the rig  
21 DEEPWATER HORIZON?  
22 A. I did not.  
23 Q. Did anybody from Anadarko visit  
24 the rig?  
25 A. During the time in question?  
00064:01 Q. Yes, sir.

Page 64:04 to 64:06

00064:04 THE WITNESS:

05 I'm not aware of anybody who has  
06 visited the rig.

Page 66:13 to 68:02

00066:13 Q. I also want to come back to the  
14 March 8th well control events. You  
15 testified a little while ago that you did  
16 not believe that the company had any  
17 communications with BP regarding the events  
18 of March 8th. Do you remember that?

19 A. I remember saying that, yes.

20 Q. And I just want to ask you  
21 again, if that's your testimony on behalf of  
22 Anadarko?

23 A. It is. I would like to clarify.

24 Q. Please.

25 A. There was an e-mail or maybe  
00067:01 possibly multiple e-mails from Josh asking  
02 for clarification and what I recall is  
03 seeing that the content of the e-mails  
04 related to the practices for backing off the  
05 stuck pipe. In my mind that's a stuck pipe  
06 event, but, in fact, the well still had a  
07 kick in the hole, so he described how BP --  
08 what he had heard from BP, how they were  
09 planning to do the back-off and that could  
10 be considered as part of the well control  
11 event, even though it was a stuck pipe event  
12 also.

13 Q. Is it your understanding that as  
14 a consequence of the events of March 8th that  
15 the drilling was delayed for some period of  
16 time?

17 A. Yes.

18 Q. Did you know that?

19 A. Yes, in the sense that it's  
20 trouble time and sidetrack is -- inherently  
21 requires more time.

22 Q. What is trouble time?

23 A. Trouble time is time that is not  
24 in the base plan.

25 Q. So it's delay?

00068:01 A. A delay, yes.

02 Q. It's time you're not drilling?

Page 68:06 to 68:06

00068:06 It's a time that's not planned.

Page 68:08 to 68:12

00068:08 Q. Okay, fair enough. And do you  
09 recall whether anybody at Anadarko was  
10 concerned about the events of March 8th  
11 enough to question whether or not the  
12 project should continue?

Page 68:15 to 68:16

00068:15 THE WITNESS:  
16 I did not hear any concerns.

Page 68:18 to 68:23

00068:18 Q. In your experience in drilling  
19 in the Gulf of Mexico, had you been involved  
20 in having to sidetrack?  
21 A. I have, yes.  
22 Q. Is that an unusual thing to have  
23 happen?

Page 69:01 to 69:05

00069:01 THE WITNESS:  
02 It happens occasionally.  
03 EXAMINATION BY MR. FINEMAN:  
04 Q. And is it a concern when that  
05 happens?

Page 69:08 to 69:19

00069:08 THE WITNESS:  
09 It's not a huge concern.  
10 EXAMINATION BY MR. FINEMAN:  
11 Q. Why is it not a huge concern?  
12 A. It happens. You take care of  
13 it.  
14 Q. In early March and late  
15 April 2010, did you become aware of any well  
16 design changes being made by BP?  
17 A. I was aware that casing points  
18 were changing slightly, casing setting  
19 depths were changing slightly.

Page 70:04 to 70:06

00070:04 Q. Did you ever conclude that there  
05 was an unusual number of well design changes  
06 on this well?

Page 70:11 to 70:12

00070:11 THE WITNESS:

12 I did not.

Page 70:17 to 71:04

00070:17 Q. What is an AFE?  
18 A. AFE is an authorization for  
19 expenditure.  
20 Q. Did you play any role in  
21 Anadarko's review or approval of AFEs with  
22 respect to Macondo?  
23 A. I did not. Let me clarify that.  
24 Near the end of the well, there was a -- an  
25 AFE submitted -- a draft AFE submitted for  
00071:01 potential casing running and at some point  
02 in there, I received a copy of that and I  
03 looked at it. I almost wouldn't call it a  
04 review.

Page 72:21 to 72:22

00072:21 (Exhibit No. 2623 marked for  
22 identification.)

Page 73:06 to 74:17

00073:06 Q. And this is an e-mail to you  
07 from Halliburton Central Data Hub, correct?  
08 A. Correct.  
09 Q. It's advising you that you've  
10 been granted access to MC252 No. 1 Macondo  
11 WellSpace?  
12 A. That's correct.  
13 Q. And is that consistent with your  
14 memory that you obtained access to Macondo  
15 WellSpace in or around March 11?  
16 A. Yes.  
17 Q. So I think earlier you testified  
18 a little bit about the kinds of information  
19 that Anadarko downloaded or could download  
20 from WellSpace. Can you tell me again the  
21 kinds of documents that were available, at  
22 least that Anadarko was looking at?  
23 A. Daily operating reports, mudlog  
24 reports, pore pressure frac gradient  
25 reports. There were various forms of logs  
00074:01 that people could download.  
02 Q. Wireline information?  
03 A. Wireline logs and LWD logs.  
04 Q. Geological reports?  
05 A. Geological reports.  
06 Q. Shallow hazard reports?  
07 A. Shallow hazard reports.  
08 Q. What is a pore pressure frac  
09 report?

10 A. BP posted, I guess they call it  
 11 pp/fg and there was something else behind  
 12 the title that summarizes their assessment  
 13 of the pore pressures and fracture gradients  
 14 that their various experts are monitoring  
 15 and tracking as they drill the well.

16 Q. How did Anadarko use the  
 17 information that it obtained from WellSpace?

Page 74:20 to 75:10

00074:20 THE WITNESS:

21 Are you asking how I did or  
 22 Anadarko?

23 EXAMINATION BY MR. FINEMAN:

24 Q. Right now I'm asking you how  
 25 Anadarko did. I'm going to come to you  
 00075:01 specifically. Right now I'm asking you  
 02 questions in your capacity as a 30(b)(6)  
 03 witness.

04 A. Various members used it in all  
 05 different ways. Predominantly, they would  
 06 use it to view the formation evaluation that  
 07 BP had contributed or to track the daily  
 08 operating steps, you know, what happened  
 09 during the drilling of the previous time  
 10 period.

Page 76:19 to 78:18

00076:19 Q. Who is John Kamm?

20 A. John Kamm is the Anadarko  
 21 operations geologist.

22 Q. We've already talked about  
 23 Mr. Chandler. Who is Sarah Chapman?

24 A. Sarah Chapman, I recall, was  
 25 also an operations geologist.

00077:01 Q. Mr. Folger, Derek Folger, do you  
 02 recall what his title was?

03 A. I don't recall his title.

04 Q. Do you know Bert Allbritton?

05 A. I know Bert Allbritton.

06 Q. And what was her title?

07 A. I don't know her title.

08 Q. Do you know what her discipline  
 09 was?

10 A. I want to say she was in  
 11 reservoir engineering.

12 Q. You don't know for sure?

13 A. I don't know for sure.

14 Q. How about Forrest Burton, do you  
 15 know him?

16 A. I know his name, yes.

17 Q. Do you know what he did at  
 18 Anadarko?

19 A. I do not.  
 20 Q. Do you know -- do you have any  
 21 information about any of those individuals'  
 22 practices with respect to reviewing  
 23 information from WellSpace?  
 24 A. I have some information, yes.  
 25 Q. What information do you have?  
 00078:01 A. We spoke to them prior to -- in  
 02 preparation for this and some of those  
 03 individuals would download information to  
 04 fill out their -- to put in the well files  
 05 that their groups maintained.  
 06 Q. Let me see if I understand what  
 07 you just said. You spoke with some of those  
 08 individuals, you personally?  
 09 A. Yes. We had a meeting with  
 10 counsel and some of those members to prepare  
 11 for this meeting.  
 12 Q. To prepare for this deposition?  
 13 A. Yes.  
 14 Q. Okay. And who participated,  
 15 which ones of those individuals participated  
 16 in that discussion?  
 17 A. John Kamm, Bert Allbritton, I  
 18 believe Derek Folger was in there.

Page 79:09 to 80:18

00079:09 Q. And without telling me what  
 10 counsel said or you said to counsel, what  
 11 was the general subject matter of those  
 12 meetings?  
 13 A. The general subject matter of  
 14 those meetings was what information was  
 15 downloaded near the event.  
 16 Q. Okay. Near the event meaning  
 17 April 16, April 20?  
 18 A. I don't recall the exact dates,  
 19 but up to the 20th.  
 20 Q. All right. So sitting here  
 21 right now as a 30(b)(6) witness for Anadarko,  
 22 what can you tell me about the kinds of  
 23 information that these people are  
 24 downloading approximate to the event?  
 25 A. As I said, they would download  
 00080:01 various files, for example, a geological  
 02 report could get loaded into a well file for  
 03 a record. One person was providing a status  
 04 update report, so they downloaded some  
 05 information to provide that report just on a  
 06 one-time occurrence. Some downloaded actual  
 07 log data to conduct analysis on the  
 08 productive zone. Those were the ones that I  
 09 can think of right now.  
 10 Q. What is a well file?

11 A. A well file would be an  
12 electronic folder in a common drive on the  
13 Anadarko network where a group would store  
14 files for the wells that they cover.  
15 Q. And was that information shared  
16 within the company?  
17 A. It's available to be shared  
18 within the company.

Page 87:01 to 87:06

00087:01 Q. All right. Was Anadarko  
02 satisfied that the information that it  
03 contained -- obtained via WellSpace was  
04 timely, accurate and complete?  
05 MS. WILMS:  
06 Object to form.

Page 87:08 to 88:11

00087:08 There were times when reports were  
09 delayed. There was no complaints about the  
10 accuracy, but there were times when the  
11 reports were delayed.  
12 EXAMINATION BY MR. FINEMAN:  
13 Q. Do you have any memory of --  
14 what is your -- strike that.  
15 Do you have a specific memory of  
16 times when reports were delayed?  
17 A. There were times when reports  
18 would come in after -- you want specific  
19 times? I guess the one specific time is  
20 near the time of the 18th or 19th. I think  
21 after a weekend, like -- we were short like  
22 four different reports. I don't remember  
23 the exact dates there. But they came in  
24 late. So that was a period when we had to  
25 use other reports. I'm talking about daily  
00088:01 operating reports there. So we didn't have  
02 access to those during that period.  
03 Q. Do you know why you didn't have  
04 access to those?  
05 A. I don't know why.  
06 Q. Did you complain to anybody at  
07 BP about not having access to those reports?  
08 A. I did not.  
09 Q. Do you know if anybody at  
10 Anadarko did?  
11 A. I do not know if they did.

Page 88:22 to 89:01

00088:22 Q. Sure. Were you aware in the  
23 March 18 to April 20, 2010 time period that



24 BP maintained a private location on  
25 WellSpace with respect to Macondo that was  
00089:01 not accessible to Anadarko?

Page 89:04 to 89:05

00089:04 THE WITNESS:  
05 I was not aware of that.

Page 89:23 to 89:24

00089:23 (Exhibit No. 2624 marked for  
24 identification.)

Page 90:01 to 90:12

00090:01 Q. Let's go to Tab 4. All right.  
02 I give you what we're marking as Exhibit 2624  
03 ANA-MDL-000002400 to 2403. That's Tab 4.  
04 I'm going to draw your attention to the  
05 first page of the exhibit and the e-mail on  
06 the bottom, it's from you to Mr. Nichols and  
07 Mr. Folger dated March 18, correct?  
08 A. Correct.  
09 Q. And this is an e-mail where  
10 you're telling Mr. Folger you're taking over  
11 for Mr. Nichols on the Macondo well, correct?  
12 A. Correct.

Page 90:24 to 91:20

00090:24 Q. Was it part of your  
25 responsibility in terms of tracking the  
00091:01 progress of the well to respond to questions  
02 that were raised by others at Anadarko about  
03 what was going on at the well?  
04 A. It was my responsibility to  
05 report to questions from the asset team  
06 regarding the progress towards reaching the  
07 objectives.  
08 Q. When you say reaching the  
09 objectives, what does that mean?  
10 A. Reaching the objectives means  
11 drilling through the objective zone as  
12 identified in the well objectives and  
13 running a wireline log -- wireline logs  
14 across that zone to fully eval -- to fully  
15 measure the properties of the rock.  
16 Q. Is reaching the objectives  
17 basically getting to the oil?  
18 A. It's just as I described,  
19 getting through the zone that has whatever  
20 fluids they're interested in.

Page 92:01 to 94:09

00092:01 before.

02 Q. Anyhow, here you're responding  
03 to him or you're providing him with  
04 information and you say that it appears that  
05 BP has gotten bypassed off the cement plug  
06 below 11615 feet. Do you see that?

07 A. Yes.

08 Q. What is that about?

09 A. That's a process of deviating  
10 from the original well where the pipe was  
11 stuck and that requires -- that original hole  
12 can no longer be used, so the bypass is  
13 setting a cement plug above the drill pipe  
14 that remains stuck in the hole and drilling  
15 off of the cement plug, deviating from the  
16 other wellbore to bypass around the fish, the  
17 stuck drill pipe.

18 Q. And this is relating back to the  
19 events of March 8th, is it not?

20 A. The stuck pipe occurred in  
21 conjunction with the kick, as I understand  
22 it.

23 Q. The March 8th kick?

24 A. The March 8th kick.

25 Q. Okay. So if you go down a  
00093:01 little bit in this e-mail it says: "I'm  
02 still evaluating the previous drilling  
03 problems to see how far they can expect to  
04 drill before setting 13 by 5/8 inch casing."  
05 Do you see that?

06 A. Yes.

07 Q. What previous drilling problems  
08 were you evaluating?

09 A. Specifically, the previous  
10 drilling problems with respect to what I was  
11 evaluating or preparing for have to do with  
12 any pressures that could have been measured  
13 as a result of the kick, and that provides  
14 me with sort of a calibration point on the  
15 planned pore pressure that BP had put  
16 forward.

17 Q. Anything else that you were  
18 evaluating with respect to previous drilling  
19 problems?

20 A. Mud weights and pore pressures  
21 and to the extent that there were any  
22 leak-offs or pump-ins that would indicate the  
23 fracture strength of the rock, I would try to  
24 capture from that review of their daily  
25 operating activities.

00094:01 Q. When you completed that  
02 evaluation, did you prepare any written  
03 document to summarize your findings?

04 A. No.  
05 Q. Did you discuss with anybody  
06 your findings?  
07 A. I did not discuss directly, but  
08 those findings would be put into plots that  
09 I would give to the asset team.

Page 94:24 to 96:14

00094:24 Q. Did you have any concerns about  
25 what BP was doing at the well, based on what  
00095:01 you had seen?  
02 A. I did not.  
03 Q. If you look at the last page of  
04 that exhibit -- actually, if you go back to  
05 -- I'm sorry -- the first page of the  
06 exhibit, this is the -- a few days later on  
07 March 23, you're sending an e-mail here to  
08 Mr. Folger, correct?  
09 A. That's correct.  
10 Q. And you say here that BP got an  
11 excellent shoe test on their 13 and 5/8th  
12 inch liner, and you say if no weak zones are  
13 encountered, they have a chance staying with  
14 their original casing size program to reach  
15 the objectives, correct?  
16 A. That's correct.  
17 Q. What does this mean?  
18 A. That means what it says, that if  
19 they -- if they continue to have lack of  
20 weak zones, they will be able to reach the  
21 objectives with the planned hole size.  
22 Q. What is a weak zone?  
23 A. A weak zone would be a zone  
24 that's anomalous or lower than what they  
25 predicted.  
00096:01 Q. Okay. Is that a problem?  
02 A. It could -- I would not call it  
03 a problem. It's a simple occurrence that  
04 would affect the ability to reach the  
05 objectives with the planned hole size.  
06 Q. Then you're attaching -- I  
07 believe what you're doing here is you're  
08 attaching Macondo well update, which is the  
09 last page of the exhibit, is that correct?  
10 A. That's correct.  
11 Q. Now, what is this, what am I  
12 looking at here?  
13 A. This is a plot that shows the  
14 actual casing set.

Page 97:01 to 97:25

00097:01 Q. Right.  
02 A. On the left is shown what I

03 believe to be BP's predicted pore pressure  
04 and fracture gradients, and they're color  
05 coded. I can describe it to you if you'd  
06 like. The first solid line from the left  
07 would be the predicted pore pressure, the  
08 second solid line that tracks that would be  
09 the predicted mud weight, the stair step  
10 solid line would be the actual mud weight,  
11 and there are two of those, one for the  
12 original well and one for the bypass.  
13 The -- let's see how would I describe that?  
14 The first shaded solid line would  
15 be the predicted fracture gradient from BP's  
16 pre-well analysis. So I plugged that in and  
17 then that's what they plan and then I  
18 type -- enter the mud weight to compare that  
19 as they drill so we can track the progress  
20 towards reaching the geological objectives.  
21 Q. Where did you obtain the well  
22 update, the actual -- the document that you  
23 were using, the well plan update, where did  
24 you obtain it from?  
25 A. Which document?

Page 98:04 to 98:08

00098:04 A. Yes, I understand. It's  
05 generated from a plotting program that I  
06 have, an Excel plotting program that I have.  
07 Q. Is this document coming from BP?  
08 A. This document is coming from me.

Page 98:14 to 98:17

00098:14 Q. Okay. And this was for internal  
15 purposes?  
16 A. It was for purposes of  
17 communicating with the asset team.

Page 99:07 to 100:03

00099:07 Q. Okay. And was there specific  
08 information on these updates that you  
09 specifically were paying most close  
10 attention to?  
11 A. I would pay attention to the mud  
12 weight daily and record that. And then the  
13 shoe tests, I would record those. As I  
14 previously stated, looking back at the kicks  
15 gave us some pressure data that would go on  
16 this plot also.  
17 Q. Why was it important to monitor  
18 the mud weight -- why was it important for  
19 you in terms of reporting to the people on

20 the asset team what was going on with mud  
 21 weight and the shoe test and pore pressures?  
 22 A. Those parameters together would  
 23 affect the chances of being able to reach  
 24 the geological objectives.  
 25 Q. And that was the focus from your  
 00100:01 point of view was reaching those geological  
 02 objectives?  
 03 A. That's correct.

Page 100:10 to 100:23

00100:10 (Exhibit No. 2625 marked for  
 11 identification.)  
 12 EXAMINATION BY MR. FINEMAN:  
 13 Q. No. 5. This is Exhibit 2625.  
 14 It's ANA-MDL-000007262 through 7265. It's  
 15 Tab 5. If you turn to the second page of  
 16 the exhibit.  
 17 A. (Complying.)  
 18 Q. It's an e-mail to you from  
 19 Mr. Bodek dated March 24, 2010, correct?  
 20 A. Correct.  
 21 Q. And it's entitled Macondo casing  
 22 plan and pore pressure update, correct?  
 23 A. Correct.

Page 101:03 to 104:03

00101:03 Q. And you, among other things, you  
 04 say to him: It looks like operations are  
 05 starting to go well. Do you see that?  
 06 A. I see that.  
 07 Q. Do you recall what you meant by  
 08 that?  
 09 A. I recall that they were able to  
 10 drill a substantial amount of footage in a  
 11 relatively short period of time, which  
 12 looked to me like things were going well.  
 13 Q. When you say starting to go  
 14 well, did you have an understanding that  
 15 things had not been going well at that point?  
 16 A. The stuck pipe incident and kick  
 17 would be an unplanned time and now they're  
 18 back on planned time.  
 19 Q. Okay. Any other observations at  
 20 that point about things not going well?  
 21 A. No.  
 22 Q. You asked Mr. Bodek for an  
 23 update on -- is the pore pressure expected to  
 24 come in higher than planned? Do you see  
 25 that?  
 00102:01 A. Yes, I do.  
 02 Q. What was that question for?  
 03 A. That was to help understand, try

04 to get an update from BP on their  
 05 understanding of the pore pressure  
 06 environment so that we could understand the  
 07 chances of being able to reach geological  
 08 objectives.

09 Q. If you go back to the first page  
 10 of that exhibit.

11 A. (Complying.)

12 Q. Mr. Bodek responds to your  
 13 e-mail on the 24th; correct?

14 A. Correct.

15 Q. And he says as discerned from  
 16 previous well control events, it appears as  
 17 if we have a 0.3 ppg sand overpressure  
 18 centroid at work. Do you see that?

19 A. I see that.

20 Q. Do you know what that meant?

21 A. I have an idea of what that  
 22 means.

23 Q. Okay. Go ahead.

24 A. The centroid effect is a pore  
 25 pressure mechanism that occurs in sands and  
 00103:01 is related to the dip and height of  
 02 hydrocarbons and fluid columns in those  
 03 sands and those can be different than the  
 04 shale pore pressures, and the shale pore  
 05 pressures are normally used to prepare the  
 06 well plan and it sounds -- my interpretation  
 07 of his comment was that they were  
 08 determining that this phenomenon was  
 09 occurring and it was causing some  
 10 differences from their plan.

11 Q. Okay. And if you go up to the  
 12 e-mail that you sent following Bodek's to  
 13 Mr. Folger and Mr. Chandler, it's basically  
 14 what you're explaining to them, right?

15 A. Yes.

16 Q. You say here if the sands are  
 17 dipping and have hydrocarbons in them,  
 18 there's a potential for taking a kick even  
 19 if the shales are overbalanced. Do you see  
 20 that?

21 A. Yes, I do.

22 Q. Do you remember whether you  
 23 communicated that thought to BP?

24 A. I did not.

25 Q. Was there a reason you didn't?

00104:01 A. I trusted that BP had good  
 02 control over what was going on.  
 03 (Exhibit No. 2626 marked for

Page 104:06 to 104:14

00104:06 Q. Okay, go ahead. I'm going to  
 07 give you what we're marking as 2626. It's

08 ANA-MDL-000005061, 5078. Do you recall this  
09 e-mail?  
10 A. I don't recall this e-mail, but  
11 I have no doubt that I sent it.  
12 Q. This is an e-mail from you to  
13 Mr. Chandler dated March 24, 2010, correct?  
14 A. Correct.

Page 105:06 to 105:09

00105:06 Q. So you were looking for  
07 information about what their plan was for  
08 production casing?  
09 A. Correct.

Page 107:11 to 107:24

00107:11 Q. Okay. If you turn to the fourth  
12 page of this exhibit.  
13 A. (Complying.)  
14 Q. It says BP GoM Deepwater  
15 Exploration. Do you see that?  
16 A. Yes.  
17 Q. Can you tell me what this is?  
18 A. This is a wellbore schematic of  
19 BP's plan for the Macondo well.  
20 Q. Do you recall whether you had  
21 seen this before you had pulled it off the L  
22 drive in late March?  
23 A. I have seen this one or one  
24 that's very similar.

Page 108:05 to 108:08

00108:05 Q. Okay. When you looked at the  
06 design, this wellhead design, did you have  
07 any questions or concerns about it that you  
08 raised with BP?

Page 108:11 to 108:16

00108:11 THE WITNESS:  
12 I have no concerns about this  
13 wellbore schematic.  
14 EXAMINATION BY MR. FINEMAN:  
15 Q. Did you at the time?  
16 A. I did not.

Page 108:21 to 109:20

00108:21 Q. All right. If you look at that  
22 document you will see in the middle upper --  
23 in the middle there, there's something

24 called a 16-inch rupture burst disk sub. Do  
 25 you see that?  
 00109:01 A. Yes, I do.  
 02 Q. And then below that there is  
 03 another rupture burst disk sub and then  
 04 there's another one below that. Do you see  
 05 that?  
 06 A. Yes, I do.  
 07 Q. And what -- they're at different  
 08 depths, is that correct?  
 09 A. That's correct.  
 10 Q. What are those?  
 11 A. My understanding of rupture disk  
 12 subs are subs that are put into the casing  
 13 by the well designer for purposes -- many  
 14 times for purposes of managing annular  
 15 pressure buildup problems in a producing  
 16 well.  
 17 Q. Have you used these sorts of  
 18 rupture burst disks in your design of wells?  
 19 A. I have used rupture burst disks  
 20 before, yes.

Page 109:25 to 110:02

00109:25 Q. Did you -- have you ever come to  
 00110:01 conclude that the inclusion of these rupture  
 02 burst disks were a design flaw?

Page 110:05 to 110:07

00110:05 THE WITNESS:  
 06 I don't consider them a design  
 07 flaw.

Page 113:08 to 113:11

00113:08 Q. I'm going to give you what's  
 09 been previously marked as 1905, Tab 7. So  
 10 this is an e-mail from you to Mr. Chandler  
 11 and now we're to March 29, correct?

Page 113:13 to 114:13

00113:13 Q. And you're attaching the updated  
 14 well plan update, correct?  
 15 A. Correct.  
 16 Q. In this e-mail, you say: "Based  
 17 on the mud weights, it looks like the pore  
 18 pressure is coming in higher than expected."  
 19 Do you see that?  
 20 A. Yes, I do.  
 21 Q. What did you mean by that?



22 A. I mean that the mud weights that  
 23 I plotted on the graph are higher than the  
 24 planned mud weights in BP's original  
 25 documents.

00114:01 Q. And was that a reason for  
 02 concern?

03 A. It's just an observation.

04 Q. Did you communicate that  
 05 observation to anybody at BP?

06 A. I did not.

07 Q. If you go to the paragraph after  
 08 that, it says: "The 9 7/8 liner depth shown  
 09 is a depth that may still allow us to reach  
 10 TD in the next hole section. Hopefully we  
 11 will set the 9 7/8 liner deeper than shown."  
 12 Do you see that?

13 A. Yes, I do.

Page 114:24 to 116:22

00114:24 Q. At this point, were you and  
 25 Anadarko concerned about whether or not BP  
 00115:01 would reach total depth?

02 A. At this point, I'm simply  
 03 tracking progress and advising the asset or  
 04 communicating that to the asset team on  
 05 whether or not -- on the chances of being  
 06 able to reach the objectives.

07 Q. You used the phrase may still  
 08 allow us to reach. At this point was there  
 09 a concern that you may not be able to reach  
 10 TD?

11 A. My recollection is that this 9  
 12 and 7/8th depth would be shallower than  
 13 planned and a possible concern with that  
 14 would be that by setting the same string  
 15 shallower, the risk would increase for not  
 16 reaching the objective and this is saying  
 17 that based on the observations there still  
 18 could be a chance that BP would reach the  
 19 objective.

20 Q. Okay. And did you or anybody  
 21 else from Anadarko communicate with BP about  
 22 these issues at this time?

23 A. I did not communicate to BP on  
 24 this.

25 Q. Do you know whether anybody else  
 00116:01 did?

02 A. I do not know.  
 03 (Exhibit No. 2627 marked for  
 04 identification.)

05 EXAMINATION BY MR. FINEMAN:

06 Q. Next document. I'm going to  
 07 give you what we're marking as 2627,  
 08 ANA-MDL-000008797 to 8798. It's Tab 8.

09 A. (Reading).  
 10 Q. This is an e-mail dated March  
 11 30, 2010 from you to people at the asset  
 12 team, correct?  
 13 A. That's correct.  
 14 Q. And again, you're attaching an  
 15 updated well plan, correct?  
 16 A. Correct.  
 17 Q. Let me ask you: There's a  
 18 number of these well plan updates over these  
 19 consecutive days we've seen, right?  
 20 A. Yes.  
 21 Q. Is it unusual for there to be a  
 22 well plan update this frequently?

Page 116:25 to 117:03

00116:25 THE WITNESS:  
 00117:01 I can't say whether it's unusual  
 02 or not. This is my one experience working  
 03 with Anadarko as a nonoperator.

Page 118:03 to 118:07

00118:03 Q. Okay. So you didn't -- there  
 04 was nothing -- did anything strike you as out  
 05 of the ordinary about receiving well plan  
 06 updates on a daily basis during this time  
 07 period?

Page 118:11 to 118:12

00118:11 Nothing seemed unusual about  
 12 sending out updates.

Page 121:15 to 122:08

00121:15 (Exhibit No. 2628 marked for  
 16 identification.)  
 17 EXAMINATION BY MR. FINEMAN:  
 18 Q. Now I'm going to give you a  
 19 document that we're marking as 2628, it's  
 20 ANA-MDL-000004592,4593, Tab 10.  
 21 A. (Reading).  
 22 Q. This is an e-mail from you to  
 23 members of the asset team, correct?  
 24 A. Correct.  
 25 Q. Dated -- now we're at April 3rd,  
 00122:01 2010, correct?  
 02 A. Correct.  
 03 Q. And here you're circulating a  
 04 well plan update, correct?  
 05 A. Yes.

06 Q. Okay. And here you say: "BP  
07 got another very good shoe test for their 9  
08 7/8 liner."

Page 122:11 to 123:07

00122:11 Q. What does that mean?  
12 A. That means that the actual shoe  
13 test is higher than the originally predicted  
14 fracture gradient at that depth.  
15 Q. And then you go on to say, a  
16 little bit later: "They hit a sand at 17700  
17 with promising looking resistivity and  
18 started taking some mud losses."  
19 Do you see that?  
20 A. Yes, I do.  
21 Q. And what does that mean?  
22 A. That means they drilled into a  
23 sand and started losing mud; in other words,  
24 the amount of mud they pumped in was not the  
25 same amount that was coming out of the  
00123:01 annulus.  
02 Q. And what is -- what does that  
03 tell you as a drilling engineer?  
04 A. That indicates that they're  
05 having lost circulation, in other words, at  
06 some depth, the fracture gradient is lower  
07 than predicted.

Page 123:18 to 124:25

00123:18 Q. They go on to say they have  
19 experienced gains with their pumps off at  
20 17750. Do you see that?  
21 A. I do.  
22 Q. What does that mean?  
23 A. That means when they turn the  
24 pumps off well -- mud continues to flow out  
25 of the well.  
00124:01 Q. And then you say as of 5:00 a.m.  
02 they were diagnosing the gains, right?  
03 A. Yes.  
04 Q. And you say, hopefully it's just  
05 ballooning and not a kick. What does that  
06 mean?  
07 A. That means if you have your  
08 pumps off and the mud is still coming out of  
09 the hole, it could be a kick or it could  
10 simply be this ballooning mechanism.  
11 Q. What does ballooning mean in  
12 this context?  
13 A. Ballooning means that when the  
14 pumps are on, the -- some formation downhole  
15 fractures and as it fractures, mud, some of  
16 the mud goes into that fracture and the

17 pressures are higher when the pumps are on.  
 18 When the pumps are off, the pressures are  
 19 lower, the fracture closes and then the mud  
 20 gets squeezed out of that fracture back into  
 21 the well and appears to be -- it does flow  
 22 back to surface even if the pumps are off.  
 23 Q. Did these events raise any  
 24 concerns at Anadarko?  
 25 A. We didn't have any concern, no.

Page 125:11 to 125:15

00125:11 Q. Okay. When you presented these  
 12 reports in the mornings, at the morning  
 13 meetings, did people ask you questions?  
 14 A. Very rarely, if ever, about this  
 15 well.

Page 126:03 to 126:08

00126:03 Q. And you mentioned earlier that  
 04 your presentations were very brief.  
 05 A. That's correct.  
 06 Q. How long would you say they were  
 07 on average?  
 08 A. Typically less than 30 seconds.

Page 126:13 to 126:14

00126:13 (Exhibit No. 2629 marked for  
 14 identification.)

Page 126:17 to 128:05

00126:17 I'm going to give you 2629, it's  
 18 ANA-MDL-000062019, 62020. It's Tab 12. Now  
 19 we're at April 5, correct?  
 20 A. Correct.  
 21 Q. And this is an e-mail from you  
 22 to members of the asset team, correct?  
 23 A. That's correct.  
 24 Q. And again you're providing a  
 25 well update, correct?  
 00127:01 A. That's correct.  
 02 Q. Okay. And here you say: "It  
 03 looks like they got back into a ballooning  
 04 mode when they raised the mud weight to 14.4  
 05 ppg."  
 06 Do you see that?  
 07 A. I do.  
 08 Q. What does that mean, back into a  
 09 ballooning mode?  
 10 A. That means, in this instance,

11 that they began having a loss circulation  
12 when they -- as they were raising the mud  
13 weight to 14.4 pound per gallon.  
14 Q. The -- in the following -- not  
15 the next paragraph, but the one after that  
16 you say: "If they POH all the way to surface  
17 it would be good to see the memory  
18 resistivity profile across the hole drilled  
19 from the trip out."  
20 Do you see that?  
21 A. I do.  
22 Q. What does that mean?  
23 A. That means that the resistivity  
24 data of the hole that they drilled might  
25 provide some information about what's  
00128:01 happening downhole.  
02 Q. And at this point, did you --  
03 did you -- did you or somebody at Anadarko  
04 determine to ask questions about these  
05 events of BP?

Page 128:11 to 128:14

00128:11 Q. Yeah. At this point, did you  
12 decide or somebody at Anadarko decide to ask  
13 questions of BP about what was going on with  
14 the well?

Page 128:21 to 128:21

00128:21 THE WITNESS:

Page 128:23 to 128:25

00128:23 At this point, I'm asking if  
24 questions can be asked. My last statement  
25 there.

Page 129:09 to 130:06

00129:09 Q. Do you recall whether or not you  
10 were asked by anybody to reach out to BP  
11 about what was happening at the well?  
12 A. Nobody asked me to reach out to  
13 BP.  
14 Q. But you had questions for  
15 Mr. Bodek?  
16 A. I had questions for BP.  
17 Q. Okay. The second sentence of  
18 that e-mail says the morning report says they  
19 got a GeoTap. gradient of 12.58 ppg at 1889  
20 feet MD. Is that correct? What was this  
21 about?

22 A. I was asking about the accuracy  
23 of the GeoTap. reading, whether it was  
24 correct or not.  
25 Q. What is a GeoTap. reading?  
00130:01 A. A GeoTap. reading is a direct  
02 measurement of the pore pressure in the zone  
03 of interest.  
04 Q. Was there something about the  
05 information you were seeing that you were  
06 concerned about?

Page 130:09 to 130:11

00130:09 THE WITNESS:  
10 I wasn't really concerned, just  
11 simply questioning the accuracy of it.

Page 130:13 to 130:16

00130:13 Q. And did you ever determine  
14 whether it was accurate or not?  
15 A. Can I clarify the time period  
16 that you're referring to?

Page 130:20 to 130:24

00130:20 Q. At the time?  
21 A. At the time, I never did get an  
22 answer.  
23 (Exhibit No. 2630 marked for  
24 identification.)

Page 131:01 to 131:08

00131:01 Q. Okay. This is 2630,  
02 ANA-MDL-000002157, 2158. Tab 13. If you  
03 start with the second page of the exhibit,  
04 so this, I believe, is following up on your  
05 prior -- the last exhibit we discussed.  
06 This is an April 5 e-mail from you to  
07 Mr. Bodek, correct?  
08 A. That's correct.

Page 131:12 to 133:19

00131:12 Q. And the last sentence of that  
13 e-mail is: "Is there any consideration to  
14 reducing the mud weight to 14.3 ppg?"  
15 Do you see that?  
16 A. I see that.  
17 Q. Why were you asking him if there  
18 was any consideration of that?  
19 A. I wanted to get an update on

20 what their thoughts were. They had no loss  
 21 returns with 14.3 and they encountered  
 22 losses when they had 14.4, so I asked them  
 23 if they were going to go back to the mud  
 24 weight that they weren't having losses.  
 25 Q. Were you recommending to him  
 00132:01 that they reduce the mud weight?  
 02 A. I was simply making a suggestion  
 03 at this point.  
 04 Q. Suggesting that they reduce the  
 05 mud weight?  
 06 A. Suggesting that they consider it  
 07 because there's many factors involved that  
 08 we were not aware of.  
 09 Q. All right. If you go to the  
 10 next e-mail, it's from you to members of the  
 11 asset team later on the 5th. Do you see  
 12 that? It's on the next page -- it's on  
 13 the --  
 14 A. The first page?  
 15 Q. I'm sorry, the first page, yes,  
 16 the bottom of the page, yeah. Is that  
 17 correct?  
 18 A. That's correct.  
 19 Q. Okay. And Mr. Bodek called you  
 20 in response to your questions, I take it.  
 21 A. Yes.  
 22 Q. In this e-mail, you wrote: "He  
 23 says they have pulled up into the casing  
 24 shoe and they're circulating with 14.3 ppg  
 25 mud."  
 00133:01 Do you see that?  
 02 A. I do.  
 03 Q. Did they come to that decision  
 04 on their own or were they following your  
 05 suggestion?  
 06 A. They came to that decision on  
 07 their own.  
 08 Q. If you go down to the paragraph  
 09 that starts "he said."  
 10 A. Yes.  
 11 Q. "He said they are thinking that  
 12 it is possible that they are through the M56  
 13 and may be through the M55. They're worried  
 14 about drilling into a pressure ramp that has  
 15 shown up elsewhere."  
 16 Do you see that?  
 17 A. I do.  
 18 Q. First of all, what is a pressure  
 19 ramp?

Page 133:22 to 133:24

00133:22 THE WITNESS:  
 23 A pressure ramp is an increase in

24 pore pressure gradient that occurs in shale.

Page 134:14 to 134:20

00134:14 Q. Did you do any investigation  
15 yourself into why BP might be worried about  
16 drilling into a pressure ramp?  
17 A. I did not.  
18 Q. Do you know what he meant when  
19 he referred to such a pressure ramp showing  
20 up elsewhere?

Page 134:24 to 135:01

00134:24 I don't recall the -- he was  
25 referring to an offset well, but I don't  
00135:01 recall what offset well.

Page 135:07 to 136:13

00135:07 Q. Fair enough. He goes -- you go  
08 on to recount him saying: "So it's possible  
09 that after they drill and ream a short  
10 distance below the current sand that they  
11 would rig up and run wireline to get good  
12 data on the big pay sand before drilling  
13 into more risks."  
14 Do you see that?  
15 A. Yes, I do.  
16 Q. Do you know -- well, what did  
17 you mean when you wrote "drilling into more  
18 risks"?  
19 A. Basically this is my  
20 understanding of what Bobby said was that  
21 they were going to make sure they stopped  
22 drilling before they got to any -- anything  
23 that could be considered a risk or the  
24 pressure ramp.  
25 Q. And in this context, what would  
00136:01 risk be?  
02 A. The risk in this context would  
03 be a required increase in mud weight in the  
04 pressure ramp.  
05 Q. Anything else?  
06 A. That's it.  
07 Q. So at this point he's telling  
08 you that they may -- they may just stop  
09 drilling?  
10 A. Let me read the paragraph.  
11 I would interpret that to mean  
12 they may stop drilling at some time, but  
13 they may not be finished drilling yet.



Page 136:16 to 137:09

00136:16 Q. If you go to the next page, it's  
17 in the same e-mail. He says, again,  
18 referring to Bodek: "That they will look at  
19 the POH resistivity data to determine where  
20 the losses/ballooning is occurring. Their  
21 thoughts are that the recent problems were  
22 due to ballooning and not higher pore  
23 pressure."

24 Do you see that?

25 A. I do.

00137:01 Q. Did you agree with that  
02 conclusion?

03 A. I didn't have an opinion on  
04 that.

05 I trusted his interpretation.

06 Q. Are you generally aware in the  
07 April 4, April 7 time period that they were  
08 having loss circulation problems out the  
09 well?

Page 137:12 to 137:20

00137:12 THE WITNESS:

13 I recall that they had some loss  
14 circulation problems and ballooning issues  
15 in those periods.

16 EXAMINATION BY MR. FINEMAN:

17 Q. And did any of the events in  
18 that time period cause you or anybody else at  
19 Anadarko to have concern about whether the  
20 well could be completed safely?

Page 137:25 to 138:02

00137:25 THE WITNESS:

00138:01 No, we did not have any concerns  
02 about them drilling the well safely.

Page 138:13 to 138:13

00138:13 (Exhibit No. 2631 marked for

Page 138:16 to 139:15

00138:16 Q. I'm going to give you a document  
17 that we're marking as 2631,  
18 ANA-MDL-000000503 to 506. It's Tab 14. If  
19 you look at the front page here of this  
20 exhibit, we're still on April 5 now,  
21 correct?

22 A. Correct.

23 Q. And these two e-mails on this  
24 page show that Mr. Bodek is asking that you  
25 be provided to -- provided access to InSite  
00139:01 Anywhere, is that correct?  
02 A. That's correct.  
03 Q. And then the subsequent e-mail  
04 from Josi Ortiz to Mr. Bodek copying you is  
05 that you've been granted that access. Do  
06 you see that?  
07 A. Yes, I do.  
08 Q. So it's fair to say you did not  
09 have access to InSite Anywhere with respect  
10 to Macondo until on or after April 5th, is  
11 that correct?  
12 A. That's correct.  
13 Q. Is there a reason why you didn't  
14 get access to InSite Anywhere earlier than  
15 April 5th?

Page 139:20 to 141:08

00139:20 THE WITNESS:  
21 I had no reason or interest in  
22 gaining access to InSite Anywhere for  
23 Macondo.  
24 EXAMINATION BY MR. FINEMAN:  
25 Q. Why did you have no interest?  
00140:01 A. There was no reason for me to  
02 look at that information. I had all the  
03 information I needed from the WellSpace.  
04 Q. So being able to see the -- see  
05 information in realtime was not something  
06 you didn't feel like you needed up until  
07 that point?  
08 A. I did not need that.  
09 Q. Did you ever conclude that you  
10 needed realtime access in order to perform  
11 your functions with respect to Macondo?  
12 A. I never needed realtime access  
13 to perform my functions.  
14 Q. You are a 30(b)(6) witness on  
15 the subject of InSite Anywhere so I'm going  
16 to cover some questions about it right now  
17 with you. Okay?  
18 A. Okay.  
19 Q. First of all, do you have any  
20 knowledge about the difference between  
21 what's referred to sometimes as the full  
22 version of InSite and InSite Anywhere?  
23 A. I do not.  
24 Q. What kind of information could  
25 Anadarko obtain and view on InSite Anywhere?  
00141:01 A. InSite Anywhere is capable of  
02 providing stored well data, it's also  
03 capable of providing realtime well data,

04 including various drilling parameters and  
05 formation evaluation parameters.  
06 Q. And how did Anadarko use  
07 realtime data obtained via InSite Anywhere  
08 for the Macondo well?

Page 141:11 to 141:15

00141:11 THE WITNESS:  
12 I used it simply to see an image  
13 of the pay sand on the wireline log, on the  
14 LWD logs. I don't recall what the other  
15 members said they used that for.

Page 142:06 to 142:23

00142:06 A. Okay.  
07 Q. Right now I want to know how  
08 Anadarko used realtime data obtained via  
09 InSite Anywhere for the Macondo well site.  
10 A. The explorationists would follow  
11 the progress while drilling through the zone  
12 to look at the pay properties. I don't know  
13 exactly how they do that, but when they see  
14 the pay zone, they like to watch that.  
15 Q. And that's something that's done  
16 by the -- you said the geologists?  
17 A. Yes.  
18 Q. How did drilling engineers use  
19 InSite Anywhere with respect to Macondo?  
20 A. I used it simply to see images  
21 of the resistivity and the LWD logs to see  
22 what the pay looked like, and I didn't use it  
23 for realtime.

Page 143:13 to 146:07

00143:13 Q. Is there a difference between  
14 how you would use it if you were the operator  
15 and you had designed the well versus how you  
16 used it in Macondo?  
17 A. Yes.  
18 Q. And explain the difference to  
19 me.  
20 A. The difference is as a  
21 nonoperator monitoring the well, I simply  
22 want to see, you know, what the pay zone  
23 looked like. As an operator, I would keep  
24 track of a lot of the practices that are  
25 ongoing on the rig.  
00144:01 If they're -- at times of interest that --  
02 at times of interest when I know exactly  
03 what they're doing out there. That would be  
04 a major difference from the two roles.

05 Q. To your knowledge did anybody at  
06 Anadarko use InSite Anywhere to monitor what  
07 was happening on the rig?  
08 A. I'm not aware of anybody doing  
09 that.  
10 Q. Did you?  
11 A. I did not.  
12 Q. Were there any policies --  
13 A. Let me clarify that. You're  
14 talking about realtime?  
15 Q. Yes.  
16 A. Yes, I did not.  
17 Q. So in addition to realtime,  
18 there was other static information that was  
19 stored on InSite Anywhere, correct?  
20 A. Yes, correct.  
21 Q. And what kind of information was  
22 that?  
23 A. They store what I call drilling  
24 data. They store the log data and the  
25 drilling data. The drilling data would be  
00145:01 all of the parameters that are recorded in  
02 the mudlogging unit on the rig which would  
03 include pressures and pump rates and torque  
04 and various parameters that they normally  
05 track.  
06 Q. Is that the -- did you -- with  
07 respect to Macondo, did you use the realtime  
08 at all?  
09 A. I did not. I don't recall using  
10 any realtime information.  
11 Q. So to the extent you used InSite  
12 Anywhere for Macondo, it was for static  
13 information?  
14 A. That's correct.  
15 Q. Are you aware of anybody at  
16 Anadarko who used realtime data for Macondo?  
17 A. I'm not aware of anybody using  
18 it.  
19 Q. Were there any policies or  
20 practices for Anadarko's review of  
21 information obtained via InSite Anywhere?  
22 A. I'm not aware of any policies or  
23 practices.  
24 Q. Were specific Anadarko personnel  
25 tasked with reviewing the realtime data from  
00146:01 InSite Anywhere for Macondo?  
02 A. I'm not aware of any assignments  
03 to do that.  
04 Q. Were there any specific days of  
05 the week or times of the day when Anadarko  
06 personnel were expected to be reviewing  
07 realtime data versus via InSite?

00146:10 THE WITNESS:

11 I'm not aware of any specific  
12 times of day that different members would  
13 review InSite Anywhere.

14 EXAMINATION BY MR. FINEMAN:

15 Q. Were there any specific well  
16 activities or procedures concerning which  
17 Anadarko personnel were expected to be  
18 reviewing realtime data via InSite?

Page 146:21 to 147:01

00146:21 THE WITNESS:

22 I'm not aware of that.

23 EXAMINATION BY MR. FINEMAN:

24 Q. Did Anadarko expect that someone  
25 would be monitoring Macondo via InSite  
00147:01 during temporary abandonment procedures?

Page 147:04 to 147:19

00147:04 THE WITNESS:

05 I'm not aware that Anadarko  
06 expected that.

07 EXAMINATION BY MR. FINEMAN:

08 Q. Do you know whether anybody at  
09 Anadarko was monitoring Macondo via InSite  
10 Anywhere during temporary abandonment  
11 procedures?

12 A. I'm not aware of anybody  
13 monitoring Macondo.

14 Q. Just to confirm this, is it your  
15 testimony that you did not or that you have  
16 no memory of looking at realtime data with  
17 respect to Macondo?

18 A. I have no memory of looking at  
19 realtime data for Macondo.

Page 148:04 to 148:06

00148:04 Q. Okay. Do you recall that you  
05 logged on to InSite Anywhere on April 17, 18  
06 and 19?

Page 148:09 to 148:12

00148:09 THE WITNESS:

10 In reviewing the InSite Anywhere  
11 log, it appears that I have logged on  
12 sometimes during that period.

Page 148:24 to 149:05

00148:24 Q. I'm going to give what's been  
25 previously marked as Exhibit 622. This  
00149:01 document is entitled "Supplemental InSite  
02 Anywhere Access Log for DEEPWATER HORIZON  
03 MC252 Macondo."  
04 If you turn to -- start with,  
05 let's turn to the third page.

Page 149:10 to 149:10

00149:10 Yes. Okay.

Page 151:10 to 152:10

00151:10 Q. And then I asked you if you did  
11 anything during the preparation for your  
12 deposition that refreshes -- might have  
13 refreshed your memory as to whether you were  
14 logged on at that time and if so, what you  
15 were looking at?  
16 A. In our preparation, we discussed  
17 and acknowledged that at this time I had  
18 another well going on which was drilling for  
19 a casing point and I would frequently  
20 monitor -- you know, as an operator, I would  
21 monitor the detailed operations. So typical  
22 practice would be to log on at night and  
23 watch it, and then when I wake up -- leave  
24 it running and the when I wake up in the  
25 morning, I would check it when I wake up.  
00152:01 We knew that was going on, but there was no  
02 way for us to relate back to exactly what  
03 happened from these logs.  
04 Q. So is it your testimony that  
05 this particular log on to InSite Anywhere  
06 relates to some well other than Macondo?  
07 A. My testimony was that's what we  
08 described in our preparation for this  
09 deposition and so I can't say conclusively  
10 that this was for another well.

Page 159:05 to 160:08

00159:05 Q. In your experience with InSite  
06 Anywhere, is it possible in looking at the  
07 realtime data to see an indication of or a  
08 possibility of hydrocarbons in a well?  
09 A. Yes, it is.  
10 Q. And what would the indicia or  
11 what would the information that you would see  
12 be that would suggest such a possibility?  
13 A. To the extent that InSite  
14 Anywhere displays the logging while drilling

15 information, that information often contains  
16 formation evaluation or formation fluid  
17 property information, depending on the log  
18 and I'm not a logging expert, but you can  
19 see the resistivity, for example that would  
20 possibly indicate pay or hydrocarbons.

21 Q. Can you see, based on your  
22 experience with InSite Anywhere, can you see  
23 in the realtime data, drill pipe pressure?

24 A. If they're capturing and  
25 displaying that, that's possible, yes.

00160:01 Q. And is drill pipe pressure, can  
02 that be an indication of hydrocarbons in a  
03 well?

04 MS. WILMS:

05 Object to form.

06 THE WITNESS:

07 I would say that it would not be a  
08 direct indicator.

Page 160:10 to 160:13

00160:10 Q. Could it be an indirect  
11 indicator?

12 MS. WILMS:

13 Object to form.

Page 160:18 to 160:19

00160:18 THE WITNESS:

19 I can't say that.

Page 160:21 to 160:23

00160:21 Q. You don't know?

22 A. It's not a direct indicator of  
23 hydrocarbons in a well.

Page 161:04 to 161:08

00161:04 What do you mean it's not a direct  
05 indicator?

06 A. The pressure has no direct  
07 relation to any fluid properties in the  
08 rocks.

Page 162:10 to 162:10

00162:10 you what I've marked as 2632, it's

Page 162:13 to 162:13

00162:13 the page, we're now at April 8th, 2010.

Page 162:16 to 162:24

00162:16 Q. And this is an e-mail from you  
17 to Mr. Bodek, correct?  
18 A. Yes, it is.  
19 Q. And you say to him in this  
20 e-mail: "It looks like we may be going in  
21 the hole without an underreamer and just  
22 drilling 8 and a quarter hole."  
23 Is this correct? Do you see that?  
24 A. Eight and a half hole?

Page 163:03 to 163:09

00163:03 Q. What was this about?  
04 A. I was questioning what hole size  
05 he was drilling. They had been drilling 9  
06 and 7/8ths hole and now they were going --  
07 it appeared they were going in to drill 8  
08 and a half hole, so I was asking for  
09 clarification.

Page 163:21 to 164:07

00163:21 Q. And then you ask him, if so,  
22 we'll be running a 7-inch production liner.  
23 Correct?  
24 A. That's correct.  
25 Q. So at this point, you're looking  
00164:01 whether they're changing from the 9 7/8th to  
02 a 7 inch?  
03 A. At this point, they've already  
04 run a 9 and 7/8th casing which is already a  
05 change in the plan, and this is to clarify  
06 what casing will go in the bottom part of  
07 the hole.

Page 164:14 to 164:17

00164:14 Q. The last casing is the  
15 production casing?  
16 A. The last casings run in the hole  
17 are the production casings.

Page 164:23 to 165:06

00164:23 Q. And here you're relaying  
24 Mr. Bodek's response to your e-mail below,  
25 correct?  
00165:01 A. Yes.  
02 Q. And at the bottom of that



03 e-mail, you say: "After logging, they will  
04 run a 7-inch production liner."  
05 Correct?  
06 A. That's correct.

Page 166:13 to 166:16

00166:13 Q. So at this point, your  
14 understanding is that they're going to run  
15 the liner with the tieback?  
16 A. That's my understanding.

Page 167:03 to 168:06

00167:03 THE WITNESS:  
04 The decision as to how to run the  
05 production casing is very, very complicated  
06 and a decision that requires extensive  
07 evaluation from multiple parties and I was  
08 in no position to make any opinion on that  
09 at that time then or now.  
10 EXAMINATION BY MR. FINEMAN:  
11 Q. In your experience as a drilling  
12 engineer working on deepwater drilling, what  
13 goes into your decision making whether to  
14 use a liner with a tieback as opposed to  
15 some other type of production casing?  
16 A. There are a great many factors.  
17 I'm not going to be able to list them all  
18 here, but I would say the production tubing  
19 size, annular pressure buildup  
20 considerations, the completion  
21 considerations as to whether or not they --  
22 acceptable to have a gap between the  
23 production tieback casing in a production  
24 liner for that option, all the different  
25 pressure ratings and the hole conditions at  
00168:01 the time could be a factor, and the length  
02 and the overall length of the production  
03 casing is a major factor.  
04 Q. Does the lining with the tieback  
05 provide additional barriers to annular flow?  
06 A. Yes, it would.

Page 179:20 to 179:21

00179:20 (Exhibit No. 2635 marked for  
21 identification.)

Page 179:23 to 181:03

00179:23 Q. All right, I'm giving you 2635,  
24 ANA-MDL-00005118 to 51199, Tab 18. And

25 start with the second page of the exhibit.  
00180:01 A. Okay.  
02 Q. And this is an e-mail from you  
03 on April 9 to members of the asset team,  
04 correct?  
05 A. Yes.  
06 Q. And the re: Line is "Macondo TD  
07 reached."  
08 Do you see that?  
09 A. Yes.  
10 Q. In this e-mail, Mr. Bodek --  
11 it's reflecting that Mr. Bodek called and  
12 notified you that BP had drilled ahead to  
13 18360 and called this final TD, correct?  
14 A. Yes.  
15 Q. And he says at this point they  
16 plan to run wireline followed by the 7-inch  
17 liner. Correct?  
18 A. Correct.  
19 Q. And then he says -- then you  
20 wrote: "He says they saw some abnormal  
21 resistivity in the small sand just below the  
22 pay sand that may include where they were  
23 losing returns."  
24 Do you see that?  
25 A. That may indicate where they  
00181:01 were losing returns, yes.  
02 Q. Thank you. Do you recall -- do  
03 you recall what he meant by that?

Page 181:06 to 182:05

00181:06 THE WITNESS:  
07 He was giving me an indication  
08 that based on their evaluation they may have  
09 determined where the mud losses were  
10 occurring.  
11 EXAMINATION BY MR. FINEMAN:  
12 Q. Okay. At a certain depth?  
13 A. At a certain point relative to  
14 the pay sand.  
15 Q. Okay.  
16 A. At a certain interval relative  
17 to the pay sand.  
18 Q. Do you remember anything else  
19 about that conversation with Mr. Bodek?  
20 A. I don't.  
21 Q. You forwarded that communication  
22 from Mr. Bodek to Mr. O'Donnell, correct?  
23 A. Correct.  
24 Q. And Mr. O'Donnell wrote that he  
25 was sorry to hear that they were stopping,  
00182:01 and asked whether you had a sense of whether  
02 or not they would keep going. Right?  
03 A. Yes.

04 Q. Do you know why Mr. O'Donnell  
05 was sorry to hear they were stopping?

Page 182:08 to 182:09

00182:08 THE WITNESS:  
09 I'm not sure of his exact reason.

Page 182:14 to 185:18

00182:14 Q. Well, you responded to him on  
15 April 9, correct?  
16 A. That's correct.  
17 Q. And you said: "If there's any  
18 risk of seeing a pressure gradient increase  
19 below the pay sand, it would be wise to case  
20 the entire completion zone now."  
21 Do you see that?  
22 A. I do.  
23 Q. What did you mean by that?  
24 A. By that, I mean that there is a  
25 risk of having a pressure gradient increase,  
00183:01 that they should run the production casing  
02 at that depth.  
03 Q. Okay. Then you said, a little  
04 bit later in that paragraph: "They clearly  
05 cannot tolerate any well control incident  
06 based on their recent mud losses."  
07 Do you see that?  
08 A. Yes.  
09 Q. What did you mean by that?  
10 A. That means that if they had to  
11 raise the mud weight, based on drilling into  
12 the pressure ramp, that they might not be  
13 able to run casing across the primary  
14 objective of the well, the geological  
15 objective of the well.  
16 Q. Why is that.  
17 A. That could result in lost  
18 circulation and complications that would  
19 prevent running casing into the well.  
20 Q. In the next paragraph you wrote:  
21 "A case could be made to drill ahead below  
22 the 7-inch casing."  
23 Then you said: "They may have to  
24 run the tieback casing before doing this.  
25 This could be done just after running the  
00184:01 liner and tieback or just prior to  
02 completion, assuming the well will be  
03 completed by another rig at a later date."  
04 Do you see that?  
05 A. Yes, I do.  
06 Q. What did you mean by that?  
07 A. Which part?  
08 Q. The whole paragraph. Well,

09 leave out the first sentence, from where it  
 10 says they may have to run the tieback.  
 11 A. So that would include the option  
 12 that if BP and the nonoperating participants  
 13 wanted to drill further, they -- it could be  
 14 an option to drill -- to run the 7-inch  
 15 liner and then drill ahead, but -- let me  
 16 see what it says here. But I'm  
 17 acknowledging that they might have to run  
 18 the tieback casing before doing this. In  
 19 other words, BP would have to do an  
 20 evaluation to confirm whether or not they  
 21 would have to run the tieback casing.  
 22 Q. Okay. At this point it was  
 23 still your understanding that BP was going to  
 24 use the liner with the tieback production  
 25 casing method, correct?  
 00185:01 A. That's correct.  
 02 Q. Let me have 20. I'm going to  
 03 give you what's been previously marked as  
 04 1592. It's Tab 20. This -- now we're at  
 05 April 12, correct?  
 06 A. Yes.  
 07 Q. And this is an e-mail from Paul  
 08 Chandler to members of the asset team and  
 09 including you, correct?  
 10 A. Yes.  
 11 Q. And this looks like it is  
 12 concerning a meeting to discuss our options  
 13 for possibly drilling deeper beyond our  
 14 current TD for the Macondo well.  
 15 Do you see that?  
 16 A. Yes, I do.  
 17 Q. Do you recall that meeting?  
 18 A. I recall going to that meeting.

Page 186:06 to 186:12

00186:06 Q. Do you recall the substance of  
 07 the meeting?  
 08 A. They were considering options  
 09 for drilling below the current depth, is what  
 10 they were going to talk about.  
 11 Q. Is that what they talked about?  
 12 A. That's what they talked about.

Page 186:18 to 187:13

00186:18 Q. Do you recall what options for  
 19 drilling deeper were discussed?  
 20 A. I recall the option to drill  
 21 deeper or not drill deeper or possibly to  
 22 wait for another well to drill deeper.  
 23 Those were the three options that I seem to  
 24 recall.

25 Q. Another well at Macondo?  
 00187:01 A. That's correct.  
 02 Q. And, again, do you recall what  
 03 came out of the meeting in terms of an  
 04 action plan, if there was one?  
 05 A. I don't know, I don't recall a  
 06 specific action plan. There was no  
 07 decisions made, so there was going to be  
 08 more discussions that I wasn't involved in.  
 09 Q. So you don't think there was a  
 10 decision made as a consequence of this  
 11 meeting?  
 12 A. There was not a decision made at  
 13 the meeting.

Page 188:05 to 188:05

00188:05 (Exhibit No. 2636 marked for

Page 188:08 to 189:23

00188:08 Q. I'm going to give you what's  
 09 marked as 2636, it's ANA-MDL-000008106 to  
 10 8108. Let's start on the second page of the  
 11 exhibit.  
 12 A. (Complying).  
 13 Q. At the bottom of that page there  
 14 is an e-mail from Michael Beirne at BP. Do  
 15 you see that?  
 16 A. Yes, I do.  
 17 Q. It's to Nick Huch and Naoki  
 18 Ishii. Do you see that?  
 19 A. Yes.  
 20 Q. I recognize this particular  
 21 e-mail was not sent to you. Do you know who  
 22 Mr. Beirne is?  
 23 A. I do not.  
 24 Q. This e-mail from Mr. Beirne ends  
 25 up being forwarded a couple of times until  
 00189:01 it was forwarded to you later on the 13th.  
 02 If you look at the first page of the  
 03 exhibit, bottom of the page, there's an  
 04 e-mail from Mr. O'Donnell to members of the  
 05 asset team and they include you as a CC,  
 06 which includes this earlier e-mail from  
 07 Mr. Beirne.  
 08 Do you see that?  
 09 A. Yes.  
 10 Q. Do you recall seeing this e-mail  
 11 from Mr. Beirne?  
 12 A. Yes, I do.  
 13 Q. In that e-mail from Mr. Beirne,  
 14 he says: "Due to safety concerns and  
 15 wellbore integrity issues, BP, as operator,  
 16 has deemed the Macondo exploratory well as

17 achieving objective depth at 18,360 feet  
18 MD."  
19 Do you see that?  
20 A. Yes.  
21 Q. Do you recall any discussion  
22 about what Mr. Beirne meant when he was  
23 referring to safety concerns?

Page 190:01 to 190:03

00190:01 THE WITNESS:  
02 I don't recall any discussion on  
03 that.

Page 190:05 to 190:16

00190:05 Q. Do you recall whether you  
06 inquired of anybody what he meant by safety  
07 concerns?  
08 A. I did not inquire.  
09 Q. Do you recall whether or not you  
10 asked anybody at Anadarko what Mr. Beirne  
11 meant by safety concerns?  
12 A. I did not ask anybody what he  
13 meant.  
14 Q. Did you do anything to  
15 investigate what he meant by safety concerns?  
16 A. I did not.

Page 190:23 to 191:03

00190:23 Q. Just so that I'm clear, what --  
24 if you remember, what do you think Mr. Beirne  
25 was referring to by wellbore integrity  
00191:01 issues?  
02 MS. WILMS:  
03 Object to form.

Page 191:07 to 191:10

00191:07 The wellbore integrity issues I  
08 assume would be due to the ballooning and  
09 loss issues that were the subject of  
10 previous e-mails.

Page 192:13 to 192:19

00192:13 Q. Do you recall at this time any  
14 discussion at Anadarko about concerns --  
15 about the safety of the well?  
16 A. There were no concerns about the  
17 safety of the well.  
18 Q. At Anadarko?

19 A. At Anadarko.

Page 194:09 to 194:21

00194:09 Q. -- start over.  
10 What I'm interested in, what's the  
11 basis for you telling Mr. O'Donnell that BP  
12 will probably be running a 7-inch liner  
13 followed by a 9 and 7/8th production tieback  
14 casing?  
15 A. The basis, the key point that I  
16 was getting there, was to let Alan know that  
17 both 7-inch casing would be run and 9-7/8  
18 casing would be run and at this time, the  
19 basis of saying that it was a liner and  
20 tieback was that I still thought that's what  
21 they were going to do.

Page 195:02 to 196:21

00195:02 Q. And the next sentence you say:  
03 "Or they might consider a full tapered  
04 string of 9 and 7/8th by 7-inch casing."  
05 Do you see that?  
06 A. I see that.  
07 Q. What was the basis for that  
08 statement?  
09 A. After reflecting on all the  
10 ongoing confusion, it occurred to me that  
11 that could be an option, and the fact that  
12 there was still confusion, that option -- I  
13 was pointing out that that option could be  
14 on the table.  
15 Q. What do you mean when you say  
16 "ongoing confusion"?  
17 A. Whether it's a liner a tieback  
18 or full string.  
19 Q. At this point?  
20 A. And the OD of the production  
21 liner or the deep production casing.  
22 Q. In your experience as a drilling  
23 engineer, was it -- was it typical that by  
24 this time in the process the production  
25 casing would have been settled upon?  
00196:01 A. Yes.  
02 Q. And the fact that there was some  
03 confusion about what final production casing  
04 was going to be used, did that cause you any  
05 concern?  
06 A. No, it did not.  
07 Q. Did it cause any concern at  
08 Anadarko?  
09 A. I wasn't aware of any concern.  
10 Q. Did you discuss with BP at or  
11 about this time the issue of what casing

12 they were going to use?

13 A. The previous e-mails document  
14 discussions with Bobby Bodek, but at the  
15 time of this e-mail, I did not have any  
16 further conversation on that or further  
17 correspondence on that.

18 Q. In your experience, as a  
19 drilling engineer, do you have a preference  
20 for one or the other, a full tapered string  
21 or a liner with a tieback?

Page 196:24 to 197:03

00196:24 THE WITNESS:

25 I don't have a preference. As I  
00197:01 described earlier, it's a very complicated  
02 decision that requires a huge amount of  
03 evaluation.

Page 199:13 to 199:22

00199:13 Q. Do you know what kind of  
14 production casing was ultimately used at  
15 Macondo?

16 A. Yes, I do.

17 Q. What was that?

18 A. 9-7/8ths and 7-inch full long  
19 string.

20 Q. Do you know why the decision was  
21 made to use the long string instead of the  
22 liner with the tieback?

Page 199:25 to 200:01

00199:25 THE WITNESS:

00200:01 I don't.

Page 200:03 to 200:16

00200:03 Q. Did you ever discuss with  
04 anybody at BP the decision to use the long  
05 string instead of the liner with the tieback?

06 A. I did not.

07 Q. Did you discuss with anybody at  
08 Anadarko that decision?

09 A. I did not.

10 Q. Do you recall being asked at any  
11 point to review the AFE that concerned  
12 funding the production casing among other  
13 things?

14 A. I recall receiving it and I  
15 don't recall what request was given with that  
16 e-mail.



Page 204:18 to 204:18

00204:18 (Exhibit No. 2637 marked for

Page 204:21 to 204:22

00204:21 Q. All right. I'm going to give  
22 you what we're marking as 2637. This is a

Page 205:06 to 205:13

00205:06 Mr. Quitzau, I've put in front of  
07 you a document that's called "Daily  
08 Operations Report Partners Drilling,"  
09 correct?  
10 A. Yes.  
11 Q. And it's dated at the top right  
12 corner 4/14/2010, correct?  
13 A. Correct.

Page 205:18 to 205:21

00205:18 Q. So am I correct that this is a  
19 daily operations report of the type that you  
20 sometimes downloaded from WellSpace?  
21 A. That's correct.

Page 207:03 to 207:16

00207:03 (Exhibit No. 2638 marked for  
04 identification.)  
05 EXAMINATION BY MR. FINEMAN:  
06 Q. All right. This document is  
07 2638 and the native is APCSHS2B000000012.  
08 It's also identified as  
09 BP-HZN-2179MDL00059382 through 386 (handing).  
10 This is a document called "Daily Operations  
11 Report Partners Completion."  
12 Do you see that?  
13 A. Yes, I do.  
14 Q. And it's dated April 18, 2010,  
15 correct?  
16 A. Correct.

Page 208:07 to 208:11

00208:07 Q. If I told you that I matched  
08 this document to an entry by you on  
09 WellSpace, would it surprise you that --  
10 would you be surprised that you downloaded  
11 this document?

Page 208:14 to 208:15

00208:14 THE WITNESS:

15 Can you repeat the question?

Page 208:17 to 209:01

00208:17 Q. What I'm trying to do is not  
18 spend a whole bunch of time trying to get you  
19 to match up documents you probably can't  
20 match up. What I'm asking you is if you have  
21 --  
22 if I tell you that I believe that you  
23 downloaded this document based on my review  
24 of the WellSpace log, would it surprise you  
25 that you downloaded this document?

00209:01 A. It wouldn't surprise me.

Page 209:11 to 209:22

00209:11 Q. In the -- and then it says  
12 24-hour summary, it says "24-hour forecast."  
13 Do you see that?  
14 A. Yes.  
15 Q. I take it you're familiar with  
16 reading all this shorthand, is that correct?  
17 A. Yes.  
18 Q. I would like you to tell me what  
19 it says after "24-hour forecast."  
20 A. Run in hole with 32 -- 7-inch  
21 32-pound HCQ125, hydrill 513 by 9 and 7/8  
22 62.8-pound Q-125, hydro523 casing.

Page 209:25 to 210:05

00209:25 A. Rig down 9-7/8th casing tools,  
00210:01 pick up hanger, continue run in hole with 7"  
02 by 9-7/8th casing on 6-5/8 landing string.  
03 Q. Stop right there. So what this  
04 is describing, if I understand it, is them  
05 running the production casing?

Page 210:08 to 210:10

00210:08 THE WITNESS:

09 That's running the production  
10 casing.

Page 210:13 to 210:23

00210:13 A. It's a forecast to run the  
14 production casing.

15 Q. I got that part. Keep going,  
16 please.  
17 A. Pick up cement head, land out,  
18 cement, set and test seal assembly, pull out  
19 of hole, test casing.  
20 Q. Do you recall whether or not you  
21 or anybody at Anadarko did any follow-up on  
22 what BP was doing with -- in terms of  
23 cementing?

Page 211:02 to 211:05

00211:02 Q. On or about April 18 or April  
03 19?  
04 A. No one did any follow-up on BP  
05 cementing ever. Is that your question?

Page 211:08 to 211:22

00211:08 Q. So do you recall whether or not  
09 there was any discussion at Anadarko about  
10 this particular 24-hour forecast?  
11 A. I don't recall whether there was  
12 any discussion or not. I'm sorry, you're  
13 talking about the report or the forecast?  
14 Q. I'm talking about the forecast.  
15 A. There was no discussion  
16 regarding the forecast.  
17 Q. If you turn to the next page, as  
18 I understand, this is sort of like on the  
19 right side, it's identifying what is going  
20 on at different times of the day, is that  
21 correct?  
22 A. That's correct.

Page 212:05 to 212:21

00212:05 THE WITNESS:  
06 In this case, this is about  
07 running the production casing, not a liner.  
08 EXAMINATION BY MR. FINEMAN:  
09 Q. I'm sorry, production casing,  
10 sorry, yes. Okay, and then if you go down  
11 to 1400 to 1500?  
12 A. Yes.  
13 Q. Do you see that?  
14 A. Yes.  
15 Q. It says -- after talking about  
16 the casing, it says, ran total of 74 JTS  
17 7-inch casing, shoe, float collar and six  
18 centralizers. Do you see that?  
19 A. Yes, I do.  
20 Q. Can you tell me what that means,  
21 the entry?

Page 212:24 to 213:14

00212:24 THE WITNESS:  
25 That means they ran their 74  
00213:01 joints of 7-inch casing with the shoe, the  
02 float collar and six centralizers.  
03 EXAMINATION BY MR. FINEMAN:  
04 Q. Do you recall discussing this  
05 particular entry in this report with anybody  
06 at Anadarko?  
07 A. I did not discuss this with  
08 anybody at Anadarko.  
09 Q. Did you discuss this entry with  
10 anybody at BP?  
11 A. I did not.  
12 Q. At any point, did you  
13 participate in a decision by BP to use six  
14 centralizers?

Page 213:17 to 214:01

00213:17 THE WITNESS:  
18 I did not.  
19 EXAMINATION BY MR. FINEMAN:  
20 Q. Do you know whether anybody at  
21 Anadarko did?  
22 A. I'm not aware of anybody that  
23 did.  
24 Q. Okay. Sitting here today, do  
25 you have any opinions at all about the  
00214:01 decision to use six centralizers?

Page 214:06 to 214:18

00214:06 THE WITNESS:  
07 The decision on centralizers is  
08 another one of those very complicated  
09 decisions that has to take into account a  
10 lot of evaluation by several key members of  
11 the well preparation team. So I have no  
12 opinion without seeing detailed design  
13 information.  
14 EXAMINATION BY MR. FINEMAN:  
15 Q. My question is have you ever  
16 formed an opinion about the decision to use  
17 six centralizers?  
18 A. I have not.

Page 214:23 to 216:01

00214:23 (Exhibit No. 2639 marked for  
24 identification.)

25 EXAMINATION BY MR. FINEMAN:  
00215:01 Q. Can I have 27, please. I'm  
02 going to give you what we're marking as 2639  
03 and it is -- the native is APCSHS2B-000000013  
04 and this is also identified as  
05 BP-HZN-2179MDL00059643 to 59649. (Handing).  
06 A. (Reading.)  
07 Q. This is another daily operations  
08 report partners completion, correct?  
09 A. Correct.  
10 Q. And it's dated April 19, 2010,  
11 correct?  
12 A. Correct.  
13 Q. In the 24-hour forecast, do you  
14 see that?  
15 A. Yes, I do.  
16 Q. It says: "Finish cementing  
17 casing string, RD cement tools, set seal  
18 ASSY," right?  
19 A. Yes.  
20 Q. "POOH with L/S, P/U CMT  
21 stinger," comma, "RH, displace riser, set  
22 cement plug," comma, "WOC."  
23 Do you see that?  
24 A. Yes.  
25 Q. Can you explain to me what all  
00216:01 that means?

Page 216:04 to 218:14

00216:04 THE WITNESS:  
05 I can read through it.  
06 EXAMINATION BY MR. FINEMAN:  
07 Q. Yes, please tell me --  
08 A. Finish cementing casing string,  
09 Rig down cement tools, set seal assembly,  
10 pull out of hole with landing string, pick  
11 up cement stinger, run in hole, displace  
12 riser, set cement plug and wait on cement.  
13 Q. Do you recall whether you  
14 reviewed this operations report and that  
15 entry on or about April 19th?  
16 A. I don't recall, but the  
17 WellSpace log would suggest that this report  
18 was not posted until after my morning  
19 meeting.  
20 Q. Okay. So that's -- is that  
21 something you discovered during your  
22 deposition prep?  
23 A. Yes.  
24 Q. So I'm sorry, what does that  
25 mean? What does that tell you?  
00217:01 A. That means it's likely I didn't  
02 look at it on the 19th.  
03 Q. Do you recall ever seeing this?

04 MS. WILMS:  
05 Just to be clear, we may be  
06 getting confused on dates. You said the  
07 19th, but you probably meant the 20th.  
08 THE WITNESS:  
09 Correct, I'm sorry.  
10 EXAMINATION BY MR. FINEMAN:  
11 Q. I know you said earlier that you  
12 didn't know what these bottom left-hand  
13 dates were. I think what they mean is in  
14 the date, I think that's when the document  
15 is actually downloaded. So I think what --  
16 your counsel is correct, this is April 20th,  
17 2010, 6:27 a.m. looks like when this was  
18 downloaded.  
19 But you're telling me that you  
20 think this was actually downloaded after  
21 your morning meeting?  
22 A. That's correct. That's my  
23 recollection from the deposition prep.  
24 Q. It's possible that more than one  
25 person at Anadarko downloaded the same  
00218:01 document, isn't it?  
02 A. Yes, it's possible.  
03 Q. Okay. In any event, do you  
04 recall having discussed this 24-hour forecast  
05 with anybody at Anadarko on April 20th?  
06 A. I do not.  
07 Q. Do you recall discussing this  
08 particular entry in the daily operations  
09 report with anybody at BP?  
10 A. I did not.  
11 Q. Do you know whether anybody at  
12 Anadarko did?  
13 A. I'm not aware of anybody that  
14 did.

Page 220:20 to 221:07

00220:20 Q. Sorry, it was the April 19  
21 report. If you look -- continue on the next  
22 page at twenty to 2200.  
23 A. Yes.  
24 Q. It says: "Perform cement job as  
25 follows."  
00221:01 Do you see that?  
02 A. Yes, I do.  
03 Q. If you could take a look at that  
04 entry and let me know if you can tell me  
05 what that's about.  
06 A. So they pumped the cement job in  
07 that step.

Page 221:09 to 221:13

00221:09 A. And they pumped the darts and  
 10 beyond that -- that's what it looks like to  
 11 me.  
 12 Q. Okay. Did they put spacer  
 13 material in also?

Page 221:16 to 221:19

00221:16 THE WITNESS:  
 17 When I say cement job, that  
 18 includes a lot of that. So, yes, they did  
 19 pump some spacer.

Page 221:21 to 222:12

00221:21 Q. Do you recall discussing this  
 22 entry with anybody at Anadarko?  
 23 A. I did not discuss this with  
 24 anybody at Anadarko prior to this or this  
 25 day or prior to the 20th.  
 00222:01 Q. And did you discuss this with  
 02 anybody at BP?  
 03 A. I did not.  
 04 Q. Do you recall whether you did  
 05 any follow-up on any of the information  
 06 contained in here? Again, I'm talking right  
 07 now about April 20 or before.  
 08 A. Right, I did not.  
 09 Q. Do you know whether or not  
 10 Anadarko participated at all in the cement  
 11 job protocol?  
 12 A. We did not. Anadarko did not.

Page 223:12 to 223:20

00223:12 Q. Do you have any opinions about  
 13 the decisions that were made with respect to  
 14 cement job?  
 15 A. I don't have any opinions on  
 16 their cement job.  
 17 Q. Did you play any role at all in  
 18 BP's planned procedures for temporarily  
 19 abandoning Macondo well?  
 20 A. I did not.

Page 223:23 to 224:24

00223:23 THE WITNESS:  
 24 I did not.  
 25 EXAMINATION BY MR. FINEMAN:  
 00224:01 Q. Do you know whether anybody at  
 02 Anadarko did?  
 03 A. No one at Anadarko participated

04 in those plans.  
 05 Q. Do you recall whether -- strike  
 06 that.  
 07 Did you communicate with anybody  
 08 at BP with respect to BP's planned  
 09 procedures for temporarily abandoning  
 10 Macondo well?  
 11 A. I did not.  
 12 Q. Do you know whether anybody at  
 13 Anadarko did?  
 14 A. No one at Anadarko communicated  
 15 to them about that.  
 16 Q. Did you -- prior to April 20,  
 17 2010, did you communicate with anybody at BP  
 18 concerning the blowout preventer on the  
 19 DEEPWATER HORIZON?  
 20 A. I did not.  
 21 Q. Do you know whether anybody at  
 22 Anadarko did?  
 23 A. I don't know anybody that  
 24 communicated with BP on that.

Page 226:02 to 226:02

00226:02 MR. FINEMAN:

Page 226:06 to 226:21

00226:06 "Q Were you aware on or before  
 07 April 20, 2010 that BP was making  
 08 changes to the drilling plans in the  
 09 days leading up to April 20?"  
 10 THE WITNESS:  
 11 The days leading up to April 20th,  
 12 as I just said, I was aware that the 9 and  
 13 7/8th casing was set short -- you know,  
 14 before the original plan. So that was a  
 15 change. So I was aware of that.  
 16 EXAMINATION BY MR. FINEMAN:  
 17 Q. Anything else?  
 18 A. I'm not aware of anything else.  
 19 Q. On or before April 20, 2010, did  
 20 you become aware that BP was making changes  
 21 to their temporary abandonment plans?

Page 226:24 to 226:25

00226:24 THE WITNESS:  
 25 I was not aware of that.

Page 227:09 to 229:22

00227:09 Q. Did Anadarko play any role in



10 capping -- efforts to cap, control, contain,  
11 shut in or kill the Macondo well after  
12 April 20, 2010?  
13 A. Yes.  
14 Q. Can you describe those efforts  
15 by Anadarko?  
16 A. There were at least three or  
17 four persons from Anadarko who went over to  
18 participate in the relief efforts, that  
19 would include myself -- you want me to give  
20 you names?  
21 Q. Yep.  
22 A. Myself, Steve Woelfel, Dennis  
23 McDaniel, Mark Lemker.  
24 Q. I'm sorry, Lamker?  
25 A. Lemker, I'm sorry.  
00228:01 Q. That's good enough for our  
02 purposes.  
03 A. And Tim Dean.  
04 Q. So Anadarko's role was to  
05 provide certain personnel to assist BP?  
06 A. Anadarko was very committed to  
07 helping out any way they could on the relief  
08 efforts, so we were in there to help BP, you  
09 know, conduct the relief efforts.  
10 Q. I appreciate that, but the --  
11 was the manner in which Anadarko contributed  
12 by contributing personnel to the effort?  
13 A. Yes.  
14 Q. And the personnel are the five  
15 people including yourself that you  
16 mentioned?  
17 A. Yes.  
18 Q. We're going to talk about your  
19 role in a minute. What did Mr. Woelfel do?  
20 A. Mr. Woelfel went for -- on the  
21 order of a week, very early in the relief  
22 efforts and he worked on the BOP review team  
23 and that might have been what they were  
24 officially called, but he was in there early  
25 trying to help out with understanding what  
00229:01 was going on with the HORIZON BOP.  
02 Q. And you said he was there early  
03 on, and just for a short period of time, a  
04 week?  
05 A. On the order of a week, maybe up  
06 to two weeks.  
07 Q. And what's his job at Anadarko?  
08 A. At the time of the incident, he  
09 was working, I believe, as an operation  
10 superintendent in land drilling.  
11 Previously, he had been in the deepwater  
12 group and, in fact, was a former employee of  
13 Transocean so he was familiar with the  
14 HORIZON.  
15 Q. Are you aware of Mr. Woelfel

16 playing any other role than this early  
17 short-term role with respect to the BOP?  
18 A. He said they did some  
19 brainstorming on different options that  
20 might be considered, but it was just very  
21 short. He didn't get descriptive. He left  
22 shortly thereafter.

Page 230:01 to 231:01

00230:01 Q. Okay. And what did Mr. McDaniel  
02 do?  
03 A. Dennis McDaniel was involved in  
04 assisting in planning for the flowback  
05 operations with the top hat.  
06 Q. Do you know how much time he  
07 devoted to relief efforts?  
08 A. I believe he was on the order of  
09 two to three weeks.  
10 Q. Do you know what his job is with  
11 Anadarko?  
12 A. He's a completion engineer.  
13 Q. And Mr. Lemker, what did he do?  
14 A. Mr. Lemker assisted in the  
15 logistics working with Tim Dean on  
16 preparation and shipping of the junk shot  
17 manifold.  
18 Q. I'm sorry of the junk shop  
19 manifold?  
20 A. Junk shot manifold.  
21 Q. I'm not sure I know what you  
22 mean by manifold in this context.  
23 A. The junk shot manifold was a  
24 system of piping that was placed on the  
25 ocean bed and attached to the HORIZON BOP  
00231:01 and contained junk shot.

Page 231:04 to 231:07

00231:04 Q. Golf balls and other stuff,  
05 right. And how long was he on the project?  
06 A. I believe he was on the order of  
07 two to four weeks.

Page 231:13 to 232:06

00231:13 Q. I'm talking about Lemker,  
14 right --  
15 A. Lemker was about a week or less.  
16 Sorry.  
17 Q. That's all right. He was  
18 working on the junk shot manifold?  
19 A. He was on the logistics of  
20 helping to get it shipped.

21 Q. To get it shipped. All right.  
22 And Tim Dean, what was his role?  
23 A. Tim Dean was involved in putting  
24 together the plan to attach the junk shot  
25 manifold to the HORIZON BOP.  
00232:01 Q. Anything else that he did?  
02 A. That's broadly what he did, yes.  
03 Q. And he was on for how long, on  
04 the project for how long?  
05 A. He was probably on the order of  
06 three weeks.

Page 233:12 to 233:20

00233:12 Q. To the best of your knowledge,  
13 did anybody from Anadarko have any meetings  
14 with anybody from MOEX or Mitsui Oil  
15 Exploration regarding relief efforts?  
16 A. I'm not aware of any meetings  
17 with MOEX on the relief efforts.  
18 Q. Did you participate in any such  
19 meetings?  
20 A. I did not.

Page 234:22 to 235:03

00234:22 Q. I know that you played a role in  
23 the relief efforts. Can you describe for us  
24 what role you played?  
25 A. I started in the BP office on  
00235:01 May 2nd and started off in the -- I will  
02 call it the relief well and dynamic concept  
03 team.

Page 235:08 to 237:16

00235:08 A. No. I started off in the relief  
09 well, what I call the concept team which  
10 would basically be to -- a small team that  
11 we put together, how the relief well would  
12 be drilled and how a dynamic kill would be  
13 conducted.  
14 Then shortly after that, myself  
15 and others transitioned in to a junk shot  
16 top kill team and we put together plans for  
17 conducting a top kill, you know, pumping the  
18 junk shot and pumping a top kill.  
19 That team moved into an  
20 implementation mode and so then we developed  
21 detail procedures and actually worked with  
22 the field operations team to actually  
23 conduct the junk shot and three top kill  
24 efforts.  
25 After that, I moved on to the

00236:01 relief well intercept team and followed the  
 02 progress of the relief wells and discussed  
 03 various aspects of how to intercept the  
 04 Macondo well, to conduct a dynamic kill with  
 05 the relief well.

06 And during that time, I also  
 07 participated or assisted in monitoring and  
 08 discussing the actual drilling operations of  
 09 the relief well so I would attend some of  
 10 the actual morning meetings with the relief  
 11 wells drilling team. And I wasn't involved  
 12 in the capping stack installation, but after  
 13 it was installed, we then put together what  
 14 was called the hydrostatic kill team and  
 15 cementing team that actually finally pumped  
 16 the kill job and the final cement job for  
 17 the -- to plug the well. I should say the  
 18 initial cement job to plug the well. And  
 19 then after that, I remained around for a  
 20 while to see the BOP removed, a new BOP  
 21 installed and then attended some of the  
 22 meetings in the actual fishing operations  
 23 that were conducted inside the Macondo well  
 24 and shortly after that I left the relief  
 25 operations.

00237:01 Q. When did you leave the relief  
 02 operations?

03 A. I don't remember the exact date.  
 04 I believe it was in mid-September.

05 Q. So from the beginning of May to  
 06 mid-September you were working on the relief  
 07 efforts?

08 A. Yes.

09 Q. How much of your time were you  
 10 spending on the relief efforts?

11 A. 100 percent.

12 Q. So what, you basically came off  
 13 all your other tasks to work on the relief  
 14 effort?

15 A. That's correct.

16 Q. Who made that decision?

Page 237:19 to 238:04

00237:19 THE WITNESS:

20 Todd Durkee.

21 EXAMINATION BY MR. FINEMAN:

22 Q. Who is Todd Durkee?

23 A. Todd Durkee is the Deepwater  
 24 Gulf of Mexico International Drilling  
 25 manager.

00238:01 He's Mike Pfister's boss.

02 Q. Okay. Do you know the thinking  
 03 behind having you spend 100 percent of your  
 04 time on this?

Page 238:07 to 238:13

00238:07 THE WITNESS:  
08 Anadarko wanted to contribute to  
09 the relief efforts.  
10 EXAMINATION BY MR. FINEMAN:  
11 Q. And where were you working when  
12 you were working relief efforts, at BP?  
13 A. At BP.

Page 238:22 to 239:04

00238:22 Q. Was there somebody at BP that  
23 you reported to?  
24 A. I would report to the team  
25 leaders of the various teams that I  
00239:01 participated on.  
02 Q. Were you ever a team leader  
03 yourself?  
04 A. I was not.

Page 249:22 to 250:05

00249:22 Q. Do you have an opinion about  
23 what the root cause of the Macondo disaster  
24 was?  
25 A. I do.  
00250:01 Q. What is that opinion?  
02 A. That opinion is that the  
03 negative test was not monitored properly and  
04 the displacement process allowed a large  
05 volume of hydrocarbons to come in the well.

Page 254:12 to 254:21

00254:12 Q. Was there somebody at Anadarko  
13 that you reported to about the relief  
14 efforts?  
15 A. Yes.  
16 Q. Who was that?  
17 A. I reported to Todd Durkee.  
18 Q. Did you report to Darrell  
19 Hollek?  
20 A. I communicated with Darrell  
21 Hollek and reported to Todd Durkee.

Page 255:04 to 255:08

00255:04 Q. How did you report internally on  
05 the relief efforts?  
06 A. I sent e-mail updates and  
07 occasionally had phone calls with Todd

08 Durkee.

Page 258:12 to 260:01

00258:12 Q. Mr. Quitzau, what I would like  
13 to do now is go back to each of the teams you  
14 worked on and have you explain to me, you  
15 know, exactly what your role was on the  
16 various teams, what you did.  
17 A. Okay.  
18 Q. So let's talk about -- you said  
19 you started with the relief well concept  
20 team. That was basically how to drill and  
21 perform a dynamic kill, correct?  
22 A. Correct.  
23 Q. So what did you -- what was your  
24 specific role with respect to that team?  
25 A. I was one of six or seven  
00259:01 persons during the day who would work through  
02 kind of a step-by-step sequence of how a  
03 relief well might be drilled and how the  
04 approach might be conducted and how the  
05 dynamic kill-- you know, how the intercept  
06 would be conducted and then how the dynamic  
07 kill would be pumped.  
08 Q. And I've heard a number of  
09 different words describe killing the well.  
10 I've heard -- there's top kill and there's  
11 momentum kill, I've heard dynamic kill.  
12 What's dynamic kill, the way you're using  
13 it?  
14 A. In this sense, the dynamic kill  
15 would be conducted by intercepting the  
16 Macondo well deep and then pumping mud into  
17 the flowing oil stream and generating  
18 friction by pumping at high rates to  
19 overcome the pressure in the Macondo well  
20 and thereby fill the well with kill mud and  
21 kill it.  
22 Q. And this could only be  
23 accomplished by -- through the relief wells,  
24 what you just described?  
25 A. That would be a relief well  
00260:01 dynamic kill, yes.

Page 260:14 to 262:04

00260:14 Q. So I think you testified that  
15 you -- soon after starting on the relief  
16 well concept team, you moved to the junk  
17 shot top kill team?  
18 A. Correct.  
19 Q. And what was your specific role  
20 on the junk shot top kill team?  
21 A. So first we had a smaller team

22 to deal with the concept of how that might be  
23 conducted, so we kind of put together a  
24 simplistic plan and then it became apparent  
25 that there was a strong interest that we  
00261:01 might actually do that, so then, we moved  
02 into a larger, kind of an operations  
03 planning team and there we worked through to  
04 develop detailed plans for pump -- for  
05 pumping the junk shot and doing the top  
06 kill.  
07 Q. What was your part of that?  
08 A. On the concept team, again, I  
09 was one of seven or eight people throwing  
10 together ideas and trying different things  
11 back and forth to see what might be the most  
12 appropriate way to conduct that operation,  
13 and then when we moved into the operation  
14 planning team, I was -- there were four or  
15 five different subgroups in the big room and  
16 I was on the pumping or the hydraulic part  
17 of that team.  
18 Q. And what did you do with respect  
19 to the pumping and hydraulic parts of that  
20 team?  
21 A. Again, we worked on more  
22 detailed, refined step by step procedures and  
23 looked at fluid densities that could be  
24 pumped into the well from the top. And  
25 steadily built up detailed operating  
00262:01 procedures. So I was one of -- like I say,  
02 somewhere between 30 and 45 people in the  
03 room at any one time working to write these  
04 procedures.

Page 262:12 to 264:16

00262:12 Q. Okay. All right. The -- if I  
13 understand the chronology, the top kill  
14 effort occurred at the end of May?  
15 A. I believe that's correct.  
16 Q. And it was determined that it  
17 was not successful by the end of May and then  
18 the beginning of June, you had moved on to  
19 other parts of the relief effort. Is that  
20 true?  
21 A. That's correct.  
22 Q. And that's when you moved on to  
23 the relief well intercept team?  
24 A. That's correct.  
25 Q. And what was your specific role  
00263:01 with respect to the relief well intercept  
02 team?  
03 A. The specific role, the relief  
04 well intercept team was to work with the  
05 smaller group that dealt with the wire --

06 that the range -- various ranging operations  
07 and technologies that we'd use to determine  
08 how close we were in the two different relief  
09 wells to the Macondo well, so the different  
10 tools and strategies for locating the  
11 blowout well and then approaching it and  
12 then finally drilling into it.

13 Q. I'm sorry, ranging operations?

14 A. The ranging technology is  
15 technology that can send out information  
16 into the rock and detect the steel and the  
17 well that's blowing out.

18 Q. And, again, what were you  
19 specifically doing on that team?

20 A. My specific -- I was more of a  
21 drilling person as opposed to a surveying  
22 and ranging technology person, so I would  
23 provide comments and suggestions on the  
24 directional drilling aspects of how to  
25 approach the well and I would also interface  
00264:01 with the pumping team in the other room who  
02 were actually putting together detailed  
03 operating plans for the actual top kill  
04 and -- I'm sorry, for the dynamic kill and  
05 so I would interface between the relief team  
06 and the dynamic kill team to just make sure  
07 there was consistency in all of our  
08 assumptions and procedures.

09 Q. You were able to use some of the  
10 information you had gathered as working on  
11 the pumping side of the top kill operation  
12 to help with the project -- the dynamic kill  
13 project?

14 A. Yes. I put forth ideas that we  
15 came up with that should be considered in  
16 the dynamic kill planning.

Page 264:25 to 266:19

00264:25 Q. Okay. And then you said in  
00265:01 conjunction with that effort, you were also  
02 participating in the actual drilling of the  
03 relief wells?

04 A. Later in that process, I would  
05 --  
06 I won't say I was participating in the  
07 process as much as I would attend their  
08 morning meetings to observe what they were  
09 doing and be aware of how they were  
10 progressing.

11 Q. Did you provide any input into  
12 the actual drilling exercise?

13 A. The actual drilling of the  
14 relief wells?

15 Q. Yeah.



16 A. Not -- no, I didn't.  
17 Q. Then you said that you moved on  
18 to the hydrostatic kill cementing team which  
19 was like the final plugging of the well.  
20 A. Yes.  
21 Q. What was your specific role  
22 there?  
23 A. The specific role there was,  
24 again, to write a detailed procedure for  
25 pumping the top kill job and I added  
00266:01 comments to those different steps that were  
02 put in the procedure and helped look at  
03 discussions related to the fluid density  
04 that could be used during that top kill.  
05 Q. Okay. And then you said finally  
06 that you were around for the BOP removal and  
07 the new BOP installed?  
08 A. Yes.  
09 Q. When you're talking about the  
10 new BOP installed, are you talking about a  
11 BOP or are you talking about a capping stack?  
12 A. At that time, there was a  
13 capping stack on top of the HORIZON BOP, so I  
14 observed the -- I didn't actually see it,  
15 but I was around when the capping stack was  
16 removed and then I saw the HORIZON BOP  
17 removed and then another BOP from one of the  
18 other rigs in the field was then installed  
19 on the Macondo wellhead.

Page 315:03 to 315:23

00315:03 Q. Good afternoon, Mr. Quitzau, I'm  
04 Nancy Flickinger for the United States of  
05 America. I just have a few questions to ask  
06 you this afternoon.  
07 A. Yes.  
08 Q. Follow-up on some of the things  
09 that we covered this morning.  
10 Briefly, are you familiar at all  
11 with AE&P, the corporate entity AE&P, have  
12 you ever heard of AE&P.  
13 A. I'm not familiar with that.  
14 Q. Have you ever dealt with any  
15 AE&P employees?  
16 A. I have not.  
17 Q. Most of the people that you were  
18 in touch with and communicating with on the  
19 assets team, were they APC employees, as far  
20 as you know?  
21 A. As far as I know.  
22 Q. Do you have any knowledge of  
23 A&P's business or anything of that nature?

Page 316:01 to 316:02

00316:01 THE WITNESS:  
02 I don't.

Page 316:24 to 317:14

00316:24 Q. Can you just tell me your  
25 understanding of what a leak-off test is?  
00317:01 A. When you first drill out a  
02 casing shoe that's been set and cemented,  
03 after you drill 10 feet of formation,  
04 circulate the hole clean and then you shut  
05 the pumps down and you apply a static  
06 pressure into the well and increase the  
07 pressure until the formation breaks and you  
08 plot the pressure versus volume pumped and  
09 it's a straight line up until when the  
10 pressure breaks and when the pressure breaks,  
11 that's an indication of the strength of the  
12 formation.  
13 Q. Okay, and if you continue to  
14 pump after that, what happens?

Page 317:17 to 317:19

00317:17 THE WITNESS:  
18 Typically, the pressure would  
19 break back to a propagation pressure.

Page 324:11 to 324:17

00324:11 Q. This has been previously marked  
12 as Exhibit 1074. This is a document related  
13 to the March 8th kick that we talked a little  
14 bit about this morning at the well.  
15 Have you seen this document  
16 before?  
17 A. I have not.

Page 326:03 to 326:05

00326:03 Q. What is your understanding of  
04 fracture pressure in terms of a leak-off  
05 test?

Page 326:08 to 326:22

00326:08 THE WITNESS:  
09 I consider -- in a leak-off test,  
10 I consider fracture gradient to be the  
11 leak-off, that's my interpretation.  
12 EXAMINATION BY MS. FLICKINGER:

13 Q. And leak-off is, again?  
14 A. The leak-off is where the  
15 pressure versus volume deviates from a  
16 straight line.  
17 Q. Okay. And that's where you --  
18 in your opinion, that's where the fracture  
19 gradient would be?  
20 A. Yes. And within the purposes of  
21 our pore pressure frac gradient curves that  
22 we give to BOEMRE, MMS at that time, yes.

Page 333:10 to 333:10

00333:10 (Exhibit No. 2653 marked for

Page 334:08 to 336:07

00334:08 Q. I would like to direct your  
09 attention to the third page which is the  
10 plot. Can you describe how you prepared  
11 this plot again?  
12 A. The pore pressure fracture  
13 gradient data in the line in blue and the  
14 line in green, I took that from a BP  
15 PowerPoint document related to pore pressure  
16 from early in the planning of the well that  
17 I found in the box that Josh Nichols gave  
18 me. I also took the purple line as the  
19 fracture gradient, and that's an  
20 approximation of the data that I got from  
21 Josh's box. I -- the casing size is in red,  
22 the casing depths in red were intended to be  
23 the actual setting depths of the well up to  
24 that time. And the red stair step lines are  
25 the mud -- the actual mud weights that I  
00335:01 record from daily drilling reports for the  
02 original well and the bypass hole.  
03 Q. And so some of these values, the  
04 blue line, the green line, and the fracture  
05 gradient line, those are predicted values?  
06 A. They're from the BP -- they're  
07 approximations, just eyeballing from the BP  
08 document I translated to here, so those  
09 would be planned values, correct.  
10 Q. And then there's another line  
11 for overburden gradient. Do you see that?  
12 A. Yes, I do.  
13 Q. Where did you get that data  
14 from?  
15 A. That might have been in that  
16 plot also, but I don't recall for sure.  
17 Q. Okay. Do you see the 4.6 ppg  
18 LOT, that's at the base of the 13 and 7/8th  
19 liner shoe?  
20 A. 14.6 pound per gallon?

21 Q. Yes.  
 22 A. Yes.  
 23 Q. And do you see that it's to the  
 24 -- to the right of the overburden gradient?  
 25 A. I do.  
 00336:01 Q. What does that mean?  
 02 A. That means it's a very high  
 03 leak-off test.  
 04 Q. Right. In your experience is it  
 05 reliable to have a fracture gradient that's  
 06 a higher number than the overburden  
 07 gradient?

Page 336:10 to 336:16

00336:10 THE WITNESS:  
 11 Yeah. I would not use reliable in  
 12 that sense. Sometimes shoe tests are over  
 13 the predicted overburden pressure. There's  
 14 various reasons for that. It doesn't happen  
 15 very often. It could be that the overburden  
 16 is wrong or it's unusual.

Page 336:20 to 336:20

00336:20 (Exhibit No. 2654 marked for

Page 336:23 to 337:13

00336:23 Q. And this will be Exhibit 2654,  
 24 and this is a daily pp/fg report, Bates  
 25 number BP-HZN-MBI00114042. And do you see  
 00337:01 the value there for the last FIT test?  
 02 A. Yes, I do.  
 03 Q. It's 14.6 ppg, correct?  
 04 A. Yes.  
 05 Q. And now, under additional  
 06 observations, the last sentence says: "LOT  
 07 broke over at 1480 psi which was above  
 08 overburden of 14.5 ppg causing uncertainty  
 09 about its usefulness as a formation  
 10 evaluation tool."  
 11 Do you agree with that statement?  
 12 MS. WILMS:  
 13 Object to form.

Page 337:16 to 337:18

00337:16 THE WITNESS:  
 17 I agree it's unusual and it should  
 18 be used with caution.

Page 343:15 to 343:15

00343:15 (Exhibit No. 2655 marked for

Page 343:18 to 343:24

00343:18 Q. This will be Exhibit 2655, and  
19 the Bates number is ANA-MDL-000004180 and it  
20 goes through 4183. And this is an e-mail  
21 that you sent to Derek Folger and Paul  
22 Chandler on Wednesday, March 24th, correct,  
23 2010?  
24 A. That's correct.

Page 345:23 to 346:07

00345:23 Q. Okay. So then you give him an  
24 update. And you say you downloaded their  
25 report. "I see their forecast is to run a  
00346:01 11-7/8th liner at 15,100 feet. Their pore  
02 pressure report indicates 13.5 ppg which is  
03 very close to the expected formation  
04 strength of 13.8 ppg. They may be  
05 disregarding their 14.6 ppg shoe test."  
06 So do you understand what the  
07 expected formation strength is of 13.8 ppg?

Page 346:10 to 347:09

00346:10 THE WITNESS:  
11 My understanding is that would  
12 have been one of those Xs that you  
13 identified on the plot.  
14 EXAMINATION BY MS. FLICKINGER:  
15 Q. Okay. And that would have -- do  
16 you know what that data would have been  
17 derived from?  
18 A. From the on -- the 13.8? That's  
19 BP's data, and it's an approximation of BP's  
20 data in the PowerPoint presentation I looked  
21 at.  
22 Q. All right. And when you say  
23 they may be disregarding their 14.6 ppg shoe  
24 test. Was that your assessment at the time  
25 that they set the liner because they did not  
00347:01 rely on the 14.6 ppg test?  
02 A. It goes back to the discussion  
03 we had before. I mean, you're asking me what  
04 BP thinks. I don't know for sure what they  
05 think. But I'm speculating in this e-mail,  
06 as you pointed out the 14.6 is overburden,  
07 so it's possible that they're not going to  
08 hang their hat on that and they're going to  
09 go back more closely to what was predicted.

Page 347:13 to 347:21

00347:13 Q. And this is an exhibit that -- a  
14 document previously marked as Exhibit 1344.  
15 It's Bates No. BP-HZN-MBI00117997. Again,  
16 this is a daily pp/fg report, correct?  
17 A. Yes.  
18 Q. You have seen these before.  
19 Okay. And then on this document it says the  
20 last FIT is taken at 17,157 feet, correct?  
21 Do you see that?

Page 347:24 to 348:09

00347:24 A. Yes, yes.  
25 Q. You see that. And the values  
00348:01 there are 15.98 ppg surface -- surf?  
02 A. Yes.  
03 Q. And then 16.22 ppg downhole,  
04 correct?  
05 A. (Nodding head affirmatively)  
06 yes.  
07 Q. Do you have any memory of seeing  
08 this document before?  
09 A. I don't.

Page 349:18 to 349:20

00349:18 Q. Okay. And "16.22 ppg DH  
19 exceeded the OBG."  
20 Do you understand what OBG means?

Page 349:24 to 349:25

00349:24 THE WITNESS:  
25 Overburden gradient.

Page 350:02 to 350:03

00350:02 Q. Is this another example of a LOT  
03 test that exceeded the overburden gradient?

Page 350:08 to 350:09

00350:08 THE WITNESS:  
09 Yes, it is.

Page 350:11 to 350:13

00350:11 Q. Would you agree with the  
12 conclusion that it's not useful for  
13 determining the rock properties?

Page 350:18 to 350:22

00350:18 THE WITNESS:

19 I wouldn't use those words. Like  
20 the last one, it's very high and suspect,  
21 so, use, you know, be careful how you use  
22 it, would be my way of putting it.

Page 351:03 to 353:06

00351:03 EXAMINATION BY MS. FLICKINGER:

04 Q. Okay, if you could turn then to  
05 Tab 36?

06 A. (Complying).  
07 (Exhibit No. 2656 marked for  
08 identification.)

09 EXAMINATION BY MS. FLICKINGER:

10 Q. And this will be marked as  
11 Exhibit 2656. And this is your e-mail to  
12 the asset team basically, correct, of  
13 April 3rd, 2010?

14 A. Yes, it is.

15 Q. And you're sending another well  
16 plan update as well, correct?

17 A. Yes.

18 Q. And in this document, you say:  
19 "BP got another very good shoe test for  
20 their 9-7/8th inch liner at 15.98 ppg FIT.  
21 When you say "very good shoe test," again,  
22 what does that mean?

23 A. It means that it's high compared  
24 to plan which is better -- it's higher than  
25 the plan and that's better than lower than  
00352:01 the plan.

02 Q. Okay, why is a higher value than  
03 the plan a positive thing?

04 A. It means that there may be  
05 potential for being able to tolerate more  
06 mud weight, but it's not for sure.

07 Q. Okay, if you can tolerate more  
08 mud weight, that allows you to presumably go  
09 further down the formation before you set  
10 another casing?

11 A. It would give us -- it would  
12 give BP a better chance of reaching the  
13 geological objectives by drilling deeper  
14 with each casing string -- possibly.

15 Q. Okay. Then the next sentence  
16 says: "They drilled with 14.5 ppg mud  
17 weight to 17,750 feet measured depth."

18 MD, that means measured depth,  
19 correct?

20 A. Yes.

21 Q. "They hit a sand with some

22 promising looking resistivity and started  
 23 taking some mud losses. What conclusions  
 24 can you draw if they're taking mud losses  
 25 with a 14.55 ppg in terms of what the  
 00353:01 fracture gradient is?  
 02 MS. WILMS:  
 03 Object to form.  
 04 THE WITNESS:  
 05 I conclude that at some point the  
 06 formation is fracturing.

Page 353:10 to 353:12

00353:10 Q. Okay. On the fracture gradient  
 11 line you have a 15.07 ppg ECD mud loss of  
 12 sand.

Page 353:15 to 354:11

00353:15 Q. At that point, what do you  
 16 believe the fracture gradient to be?  
 17 MS. WILMS:  
 18 Object to form.  
 19 THE WITNESS:  
 20 The fracture gradient would be  
 21 somewhere in the vicinity of 15.07 pound per  
 22 gallon at that point, if the fracture were  
 23 at that depth.  
 24 EXAMINATION BY MS. FLICKINGER:  
 25 Q. Okay. Did you ever form an  
 00354:01 opinion concerning the 15.98 ppg value in  
 02 terms of whether it was a reliable value or  
 03 not?  
 04 MS. WILMS:  
 05 Object to form.  
 06 THE WITNESS:  
 07 This is simply plotting the data  
 08 that was reported and giving some rough  
 09 indicators of the -- what the actual  
 10 observations are versus the planned so we  
 11 can track progress in the well.

Page 354:13 to 354:17

00354:13 Q. Okay. In terms of your  
 14 projection and trying to track progress in  
 15 the well, did you ultimately decide the 15.07  
 16 ppg was  
 17 a more reliable value?

Page 354:20 to 355:03

00354:20 THE WITNESS:



21 I didn't make any assessment of  
22 the -- more reliable than what?  
23 EXAMINATION BY MS. FLICKINGER:  
24 Q. A more useful value in terms of  
25 making your projections.  
00355:01 A. More useful than what?  
02 Q. More useful than the 159.98 ppg?  
03 A. Yes.

1  
2  
3 WITNESS' CERTIFICATE  
4

5 I have read or have had the  
6 foregoing testimony read to me and hereby  
7 certify that it is a true and correct  
8 transcription of my testimony with the  
9 exception of any attached corrections or  
10 changes.  
11

12  
13   
14 ROBERT QUITZAU  
15  
16

17 PLEASE INDICATE

18 ( ) NO CORRECTIONS

19 (✓) CORRECTIONS; ERRATA SHEET(S) ENCLOSED  
20  
21  
22  
23  
24  
25

## **ERRATA SHEET**

### **DEPOSITION OF ROBERT QUITZAU**

**MAY 25-26, 2011**

*In Re: Oil Spill by the Oil Rig DEEPWATER HORIZON in the Gulf of Mexico, on April 20, 2010*

<b><u>Page</u></b>	<b><u>Line</u></b>	<b><u>Change</u></b>	<b><u>Reason</u></b>
18	22	Change "'99 or 2000" to "2002"	Correction
20	4	Change "Intun" to "Intan"	Misspelled
22	7	Change "2001 or 2002" to "2004"	Correction
23	1	Change "Yes" to "Yes, since 2002"	Correction
23	4	Change "No" to "Not since 2002"	Correction
25	1	Change "2002" to "2004"	Correction
31	1	Change "did that involved" to "did. That involved"	Transcription error
36	6	Change "understanding to" to "understanding: to"	Transcription error
46	22	Change "Viasco" to "Viosca"	Misspelled
47	3	Change "Viasco" to "Viosca"	Misspelled
48	18	Change "at Water" to "Atwater"	Misspelled
91	5	Change "report" to "respond"	Transcription error
137	13	Change "loss" to	Misspelled

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>Reason</u>
		"lost"	
182	24	Change "that there" to "that if there"	Transcription error
217	2	Change "19th" to "20th"	Correction per contemporaneous acknowledgement at 217:16-17
243	18	Change "Syler" to "Seiler"	Misspelled
291	14	Change "oil" to "mud"	Transcription error
308	10	Change "of" to "in"	Transcription error
309	9	Change "hazards" to "HAZIDs"	Misspelled
309	21	Change "and identified" to "an identified"	Misspelled
341	9	Change "and predicted" to "than predicted"	Transcription error
353	11	Change "ECD mud loss of sand." to "ECD - mud losses - sand."	Transcription error
355	2	Change "159.98" to "15.98"	Transcription error
448	17	Delete "No"	Transcription error
448	20	Change "They" to "No, they"	Transcription error
454	13	Change "As the well" to "On the wells"	Transcription error
530	13	Change "Anadarko's" to "Anadarko"	Transcription error

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>Reason</u>
531	21	Change "loss" to "lost"	Misspelled
585	8	Change "off and" to "often"	Transcription error
590	6	Change "Alls" to "All"	Misspelled
601	12	Change "lost" to "loss"	Transcription error
601	15	Change "lost" to "loss"	Transcription error
604	22	Change "t his" to "this"	Misspelled
623	13	Change "of a lot of" to "allowed a"	Transcription error
623	14	Change "hydrocarbons come" to "hydrocarbons to come"	Transcription error
656	5	Change "spent" to "cement"	Transcription error