

Deposition Testimony of:
Robert Quitzau

Date: May 25, 2011

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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 Parteners 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 madethat 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

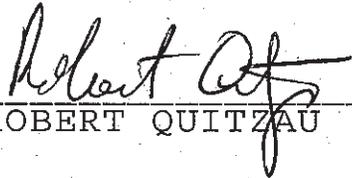
00354:20 THE WITNESS:

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.

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WITNESS' CERTIFICATE

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



ROBERT QUITZAU

PLEASE INDICATE

() NO CORRECTIONS

(✓) CORRECTIONS; ERRATA SHEET(S) ENCLOSED

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

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>Reason</u>
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