

# Deposition Testimony of:

## **James Watson**

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Page 284:23 to 284:25

00284:23 Q. If you can turn, please, to  
24 Tab 4, which was marked yesterday as  
25 Exhibit 10577, but it's in my book as well

Page 286:10 to 287:22

00286:10 Q. Okay. So if you can look at the  
11 second paragraph, it says, the first  
12 sentence, "For surface applications, BP will  
13 continue to evaluate daily reconnaissance  
14 data and ascertain if there are aerial  
15 dispersant targets that are not recoverable  
16 via other techniques."  
17 Do you know how BP established  
18 whether the oil could be recovered by other  
19 techniques?  
20 A. Well, the only other techniques  
21 once the oil was beyond the -- you know, the  
22 capping stack or the insertion tube or any of  
23 those tools that were used subsea was  
24 mechanical recovery with the skimmer or  
25 burning. And so the daily reconnaissance was  
00287:01 done in order to determine whether there was  
02 oil beyond the reach of the burning  
03 operations or the mechanical skimmers. And  
04 if it was of a significant size of a slick  
05 and thickness, then it would be a candidate  
06 for dispersants.  
07 Q. And was BP supposed to describe  
08 to the Coast Guard in its request for  
09 exemptions that type of information so the  
10 Coast Guard could determine whether an  
11 exemption was appropriate?  
12 A. Well, typically the process  
13 occurred at Houma and the -- there was a  
14 Unified Command at Houma. So whatever  
15 information BP had was merged with the  
16 information that the other participants in  
17 that Unified Command had, and then they would  
18 make a recommendation to the Unified Area  
19 Command, which is where I was.  
20 Q. Were these exemptions allowed to  
21 be requested orally, or did they have to be  
22 requested in writing?

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00287:24 A. After the addendum they were  
25 requested in writing.

Page 288:14 to 288:17

00288:14 Q. And was BP part of that Unified  
15 Command request?  
16 A. Yes, yes, BP was part of the  
17 Unified Command in -- in Houma.

Page 295:04 to 295:17

00295:04 Q. Okay. If you could turn to  
05 Tab 17, please. This is, again, an unsigned  
06 letter. I couldn't locate the signed one, if  
07 there is one. It is a multipage,  
08 Bates-stamped EPC072-001524 through 1529.  
09 It's a letter, appears, to you from Houma  
10 Unified Command, and then there are some --  
11 it's a two-page letter with some attachments.  
12 A. Yeah.  
13 Q. Have you seen this before?  
14 A. Yeah, this is similar to that  
15 other letter. This was very typical of the  
16 letters that came in almost on a daily  
17 basis --

Page 295:19 to 295:19

00295:19 A. -- requesting dispersant --

Page 295:21 to 296:01

00295:21 A. -- application.  
22 Q. I'm sorry. Is it -- is it fair  
23 to say that at as of June 13th, at least, of  
24 2010 that the procedures had changed, so that  
25 the requests would come in from Houma,  
00296:01 Unified Command and not just from BP?

Page 296:04 to 296:04

00296:04 A. Yes.

Page 297:02 to 298:03

00297:02 Q. (BY MS. GREENWALD) Just  
03 generally around that time frame, in the June  
04 time frame while you were Federal On Scene  
05 Coordinator -- let me ask this question: Who  
06 was in charge of the Coast Guard of working  
07 with BP or ensuring that BP had sufficient  
08 skimmers available to capture oil coming out  
09 of the well?  
10 A. I was.  
11 Q. Okay. And so at some point in  
12 time did the Coast Guard make a determination  
13 that BP should have additional skimmers

14 available or try to obtain additional  
15 skimmers to --

16 A. Sure, we were -- we were  
17 constantly working as Unified Command to get  
18 more skimmers.

19 Q. How does one go about getting  
20 skimmers in a situation like this? So go  
21 back to April 2010. April 22nd, 2010, the  
22 rig is now collapsed and there is,  
23 apparently, an oil spill.

24 A. Right.

25 Q. As the responsible party, how  
00298:01 would one go about obtaining skimmers to  
02 capture oil that may come to the surface?

03 A. Sure.

Page 298:05 to 300:02

00298:05 A. (Continuing) They would have  
06 had a contingency plan for their worst-case  
07 discharge, and they would have had the  
08 resources equal to the re- -- response  
09 required by the National Contingency Plan for  
10 that worst-case discharge. That plan would  
11 have been reviewed and approved by the MMS.

12 And so when an actual spill  
13 occurs, they -- those -- those resources are  
14 required to have retainers and contracts and  
15 those sort of things in place, and the  
16 equipment is supposed to be functional,  
17 maintained, manned, and within a certain  
18 distance from where they're operating so that  
19 they can be there in a -- in a specified  
20 time. And so at the beginning of a spill  
21 they would just activate all those contracts.  
22 They would just have a plan to -- to launch  
23 whatever was in that plan.

24 And as far as I know, that's  
25 what happened. Now, I -- I never checked  
00299:01 that plan. That was not a -- a Coast Guard  
02 function to review that plan, and we didn't  
03 have an obligation in the Unified Command to  
04 do any sort of oversight of the adequacy of  
05 the plan.

06 But once that's used up, once  
07 you've -- you've activated everything in the  
08 company's plan, then you -- and then you form  
09 this Unified Command, then you create a -- a  
10 resources section in that Unified Command to  
11 get more resources, and, actually, one of the  
12 main functions I had at the very beginning  
13 when I was assigned to be the Deputy FOOSC was  
14 to be the force generator. So that was a big  
15 part of my job, was to generator more forces.  
16 And we would get them however we could get

17 them. We obviously leaned on BP for  
18 commercial assets, things that could be, you  
19 know, contracted for directly by BP. The  
20 Coast Guard could go to other agencies of the  
21 federal government, such as the Department of  
22 Defense or NOAA or States and -- and activate  
23 interagency agreements, just generate forces.  
24 And then we went even to -- through the State  
25 Department to foreign governments, and -- and  
00300:01 kept bringing in more and more and more, and  
02 we did that constantly.

Page 300:24 to 301:13

00300:24 Q. So as the responsible party --  
25 not focusing on what the Coast Guard did. As  
00301:01 the responsible party, BP, what, if anything,  
02 do you know that it did, for example, in the  
03 period when you were Deputy Federal On Scene  
04 Coordinator to obtain additional skimming  
05 vessels?  
06 A. They -- they stood up this  
07 resource division within the -- or section  
08 within the Unified Command in accordance with  
09 ICS and the National Contingency Plan and  
10 began seeking sources of supply for  
11 additional assets and then contracting to  
12 have those supplies and those new contracts  
13 put into place.

Page 302:01 to 302:07

00302:01 Q. There's definitely discussion  
02 among the various people that were working on  
03 the response about the safety of a certain  
04 number of response vessels, skimmer vessels  
05 at the well site. Do you recall those  
06 general discussions?  
07 A. Oh, those were --

Page 302:09 to 302:10

00302:09 A. -- those were very high concerns  
10 on our mind, safety.

Page 311:15 to 311:25

00311:15 Q. Does it -- does it make sense,  
16 though -- I'm just asking the question. I  
17 don't know -- I think I know the answer, but  
18 I'm -- it's not based on anything technical,  
19 for certain -- for sure. Does it make sense  
20 that the amount of dispersant that BP would

21 apply subsea would be in some way related to  
 22 the flow of oil coming out of the wellhead?  
 23 A. It does. It makes sense that  
 24 there would be a optimum quantity of  
 25 dispersant to a particular flow rate.

Page 312:02 to 312:03

00312:02 A. If -- if you're going to get the  
 03 full effect of the dispersant.

Page 318:18 to 319:21

00318:18 Q. And did any procedures change  
 19 following this June 15th, 2010 e-mail  
 20 exchange to ensure that the most viable  
 21 targets are identified before exemptions are  
 22 granted for application of dispersants in  
 23 accordance with Addendum 3?  
 24 A. We were constantly trying to  
 25 improve the procedures for dispersants, but  
 00319:01 I -- I don't know specifically what was done  
 02 in direct response to these concerns.  
 03 Q. Okay.  
 04 A. I -- I -- I expect that given  
 05 the validity, I --  
 06 Q. Uh-huh.  
 07 A. -- attributed to these things,  
 08 that we would have immediately followed up,  
 09 but I -- I don't have --  
 10 Q. Okay.  
 11 A. -- enough memory to recall  
 12 specifically what was done.  
 13 Q. Well, that was two years ago.  
 14 A. Yes.  
 15 Q. More than two years ago. Wow,  
 16 time flies.  
 17 A. But there was constant changes  
 18 and improvements and refinements to the --  
 19 the spotting and to the targeting and to the  
 20 evaluation of the toxicity and the  
 21 effectiveness, all those kinds of things.

Page 320:08 to 320:13

00320:08 The last sentence of your e-mail  
 09 back to Mr. Crossland says, "I don't want to  
 10 let oil go unattended, but the dispersant  
 11 applications must be properly monitored and  
 12 effective." Do you see that?  
 13 A. Right.

Page 325:19 to 326:12

00325:19 Q. The next question is, "Why isn't  
20 the burning being effective?" Do you recall  
21 whether you had an opinion on June 15th, 2010  
22 as to whether the burning was affected --  
23 effective and, if not, why?  
24 A. I -- I -- I can't say as to what  
25 I was thinking this particular day, but in  
00326:01 general --  
02 Q. Yeah, around that time period is  
03 fine.  
04 A. Yeah, and I can't, you know,  
05 recall specific chunks of time, but my -- our  
06 overall feeling was the burning -- the  
07 burning that was done in the Deepwater  
08 Horizon was -- was by far the most effective  
09 burning in the history of the world. It was  
10 an amazing application of a -- of oil spill  
11 response technique compared to any previous  
12 attempt to burn oil.

Page 327:17 to 327:24

00327:17 Q. (BY MS. GREENWALD) Do you know  
18 what other oil spill in the United States has  
19 had in situ burning other than this Deepwater  
20 Horizon oil spill response?  
21 A. Exxon Valdez.  
22 Q. Okay.  
23 A. And I'm sure there is many  
24 others.

Page 328:09 to 328:13

00328:09 Q. Okay. And so do you believe  
10 that the burning -- the in situ burning was  
11 effective in this -- in the Deepwater Horizon  
12 response?  
13 A. I think it was very effective.

Page 343:25 to 344:04

00343:25 Q. What technologies were already  
00344:01 in place, if you know did BP -- what  
02 technologies did BP have in place as of  
03 May 14th, 2010 for responding to the oil  
04 spill?

Page 344:06 to 344:09

00344:06 A. Well, there was -- there was  
07 just a lot of equipment and -- and  
08 technologies, but I -- I couldn't name them  
09 all off.

Page 344:11 to 344:21

00344:11 A. You know, the primary  
12 technologies that were in their contingency  
13 plan, of course, were the skimming and  
14 in situ burning and dispersants and then  
15 beach recovery. I don't know of any other  
16 technologies that were available that they  
17 would have put in their plan prior to the  
18 spill, but there was a lot of technologies  
19 that were tried during the -- during the  
20 spill. Some of them were successful. Some  
21 of them weren't.

Page 345:21 to 346:05

00345:21 Q. That's okay. Was BP part, if  
22 you recall, of that strategic planning unit  
23 that you developed?  
24 A. Oh, yes, yes.  
25 Q. Okay. And was Coast Guard part  
00346:01 of that?  
02 A. Oh, yes.  
03 Q. And the other members of the  
04 Unified Area Command?  
05 A. Yes.

Page 346:07 to 346:09

00346:07 A. Yes, this was an activity we  
08 actually brought in people from the Defense  
09 Department and other agencies to assist with.

Page 347:22 to 348:03

00347:22 Q. So it was the whole time you  
23 were Federal On Scene Coordinator you kept  
24 this unit in place to continue to --  
25 A. Yes --  
00348:01 Q. -- strategic plan?  
02 A. -- we always had a strategic  
03 plan, yes.

Page 351:15 to 352:22

00351:15 Q. Okay. The -- the alternative  
16 technologies plan, this was created by BP,  
17 right, the actual PowerPoint attached?  
18 A. Yes.  
19 Q. Okay. Who's Kurt Hansen?  
20 A. Kurt Hansen is an -- is a Coast  
21 Guard employee of the Coast Guard Research



22 and Development Center in Groton,  
 23 Connecticut.  
 24 Q. On Page 3 of the PowerPoint that  
 25 starts out, "The Process..."  
 00352:01 A. Yeah.  
 02 Q. I see that there are six points  
 03 there. Do you see those?  
 04 A. Yes.  
 05 Q. So Kurt Hansen's name appears  
 06 after each -- well, Kurt Hansen is the first  
 07 one, and then for 2 through 6 it just says --  
 08 I'm sorry, for 2 through 5, I apologize, it  
 09 just says "Kurt."  
 10 A. Right.  
 11 Q. Can I assume that means Kurt  
 12 Hansen, also?  
 13 A. Yes.  
 14 Q. Do you know why BP has put  
 15 hyphen Kurt Hansen next to 1 through 5 for  
 16 the process?  
 17 A. Well, Kurt was involved with  
 18 alternative technologies. That was why he  
 19 was sent to -- to Houma. And this -- this  
 20 was an attempt by BP to document what they  
 21 were trying to do for the Unified Area  
 22 Command.

Page 353:21 to 356:03

00353:21 Q. Is it fair to say that in mid  
 22 May of 2010 the most pressing desire would  
 23 have been to stop the flow of oil at the  
 24 wellhead?  
 25 A. Mid May.  
 00354:01 Q. Well, actually, probably could  
 02 ask that question from the get-go. Would  
 03 that not have always been --  
 04 A. Well, that's always -- in any  
 05 oil spill the first thing you want to do is  
 06 stop the flow.  
 07 Q. Right.  
 08 A. Stop the flow at the source.  
 09 That's always your primary concern. But  
 10 it -- this initiative was one that was based  
 11 on the fact that there were a lot of  
 12 operators in -- in the Houma incident command  
 13 center and then even people out in the field  
 14 that were struggling with all kinds of  
 15 challenges --  
 16 Q. Right.  
 17 A. -- and just one of which was  
 18 the -- was the subsea, and that was actually  
 19 largely managed in the Houston command  
 20 center.  
 21 So Kurt Hansen came down from

22 the R&D center and realized that his talents  
23 could be used and stayed and he had a lot of  
24 daily interaction with the operators. Then  
25 BP's role would have been to actually try to  
00355:01 acquire this stuff and -- and Kurt Hansen's  
02 role would have been to evaluate the need and  
03 then evaluate the possibility that any of  
04 these technologies could actually --  
05 Q. Right?  
06 A. -- deliver.  
07 Q. So the Coast Guard was basically  
08 offering its expertise to BP to try to help  
09 it to develop technologies that would help  
10 respond to the oil spill; is that a fair  
11 statement?  
12 A. Yes.  
13 Q. Okay. Did -- while you were  
14 either Deputy Federal On Scene Coordinator or  
15 Federal On Scene Coordinator did you have any  
16 involvement at all with the Vessels of  
17 Opportunity program --  
18 A. Yes.  
19 Q. -- that BP created? And what  
20 was your involvement?  
21 A. At the highest level, just  
22 approving the use of Vessels of Opportunity  
23 for the operations when it was proposed and  
24 then having daily oversight of how they were  
25 being used. And then ultimately I did take  
00356:01 some personal time and tried to go to the  
02 field and improve how they were being used  
03 after they were already under contract.

Page 357:04 to 359:18

00357:04 Q. (BY MS. GREENWALD) Do you know  
05 whether -- do you know whether the Coast  
06 Guard would have had any involvement in  
07 actually commissioning various vessels to go  
08 to particular spots to conduct response  
09 activities, or would that have been an  
10 activity driven either by BP or BP's  
11 contractors?  
12 A. The -- yeah, the Coast -- the  
13 Coast Guard incident commanders would decide  
14 what the operations of the day were going to  
15 be, based on all the information they were  
16 getting from -- from BP's resources as well  
17 as NOAA's as well as Coast Guard's as well as  
18 Navy's. And the VoOs were part of the daily  
19 response.  
20 Some VoOs had the capability to  
21 stay out overnight, and so they were just  
22 directed to a different part of the Gulf of  
23 Mexico, depending on what their capability

24 was and what the needs were. Other VoOs --  
25 and most VoOs had to return to port each day  
00358:01 so that in the morning they all had to come  
02 to work and get underway and -- and go  
03 offshore.

04 Q. I understand that the Coast  
05 Guard sort of had the, what I'm going to call  
06 for lack of a better word the master plan.  
07 But as to which individual VoO vessel went to  
08 which particular spot, with a that a decision  
09 driven by BP and BP's contractors or by the  
10 Coast Guard?

11 A. Well, it was a -- it was a kind  
12 of an integrated concept where there was some  
13 contingents of -- of VoO vessels,  
14 particularly later on that were being  
15 directly managed by a Coast Guard patrol boat  
16 in a particular section of the Gulf of  
17 Mexico. There was other VoOs that might have  
18 been used just as a single vessel working  
19 with, say, in situ burning. They were --  
20 they were used to pull the boom that would  
21 collect the oil, and then the contractor that  
22 was doing the in situ burning would clearly  
23 direct them in -- in a very tactical way.

24 There -- when the program first  
25 got going there was -- there was VoOs that  
00359:01 didn't have the greatest command and control,  
02 and they just went out and did whatever they  
03 thought would be helpful and then came back  
04 and I guess they just recorded what they did  
05 and hopefully somebody reviewed what that  
06 was. The -- the reason I went personally  
07 to -- to Alabama where -- where a lot of that  
08 type of activity was going on was to -- was  
09 to try to make sure that that -- that was  
10 being managed better and -- and primarily I  
11 went to the Coast Guard officers there, and  
12 they came up with a great plan to -- to  
13 coordinate the operations better than they  
14 had been for those boats that really had no  
15 special capabilities to be used for burning  
16 or some of the offshore activities that  
17 benefited from a vessel that had overnight  
18 accommodations.

Page 360:03 to 360:05

00360:03 Q. And the Coast Guard didn't do  
04 any of that contracting, right?  
05 A. No, no.

Page 360:07 to 360:09

00360:07 A. We did have an inspection

08 program and a safety oversight program for  
09 them, though.

Page 361:03 to 361:11

00361:03 Q. Okay. Am I correct that it was  
04 not the Coast Guard's responsibility to  
05 ensure that a particular VoO vessel had the  
06 necessary protective gear to perform whatever  
07 activities it was being assigned to do that  
08 day?  
09 A. We -- we made it very clear that  
10 the VoO operators were responsible for their  
11 protective equipment.

Page 361:13 to 362:02

00361:13 A. And they were trained to know  
14 what they needed.  
15 Q. And was that also -- was that  
16 message also given to the various cleanup  
17 companies that were hiring the VoO workers?  
18 A. Yes. I believe so. I mean,  
19 that was a thing that we were very strict  
20 about, was that -- that if you were part of  
21 this response organization, that you were  
22 informed of what the requirements were for  
23 personal protective equipment and that it was  
24 your responsibility to have it on board your  
25 vessel and wear it when it was un- -- when  
00362:01 you were involved in conditions that required  
02 it, per our safety instructions.

Page 363:03 to 363:14

00363:03 Q. (BY MS. GREENWALD) I'm going to  
04 ask it better. You mentioned before that  
05 there's this training for the actual VoO  
06 workers to make sure that they understood PPE  
07 requirements. What I guess I'm asking, is,  
08 is it not also the case that that type of  
09 training to make sure that that the PPE  
10 requirements were understood and followed  
11 would have also been necessary and given to  
12 the numerous cleanup companies that  
13 participated in the cleanup activities of the  
14 Deepwater Horizon oil spill?

Page 363:17 to 364:03

00363:17 A. The -- the contractors, the  
18 professionals in oil spill response, I  
19 expected to have a lot more training than the

20 VoOs, and that would have necessarily  
21 included the PPE requirements.  
22 Q. (BY MS. GREENWALD) And did  
23 you -- did the Coast Guard expect those  
24 cleanup companies with that experience who  
25 were hiring these VoO workers to also make  
00364:01 sure that the VoO workers understood the PPE  
02 requirements and had access to those PPE --  
03 that PPE when it went out to do the work?

Page 364:07 to 364:10

00364:07 A. I can't, you know, really answer  
08 that because I don't know what expectations  
09 we put on any particular contractor with  
10 regard to oversight of the VoOs.

Page 387:09 to 388:01

00387:09 Q. It says, "Sir, I met with  
10 Operations this evening and we conducted an  
11 assessment of our response efforts at this  
12 time. We all agreed that we can do much more  
13 at the source. I have been arguing from my  
14 first day here we need more capacity at the  
15 source. Mike Utsler does not agree with my  
16 assessment, but I have universal agreement  
17 with all my Coast Guard Operations personnel  
18 that we need to attack the source better than  
19 we have been."  
20 Do you see that?  
21 A. Yes.  
22 Q. Do you agree with  
23 Mr. Laferriere's view that the Coast Guard  
24 believed that additional sources were  
25 necessary at the -- at the source, but that  
00388:01 BP did not agree with that assessment?

Page 388:03 to 388:10

00388:03 A. Well, I -- I can't comment on --  
04 on Mike Utsler's opinion at the time, but --  
05 but we always, I think, throughout wanted  
06 more resources, more skimmers, more assets as  
07 close to the source as possible because  
08 that's where the oil was the most readily  
09 available for recovery, before it started to  
10 emulsify --

Page 388:12 to 388:13

00388:12 A. -- and string out over miles and  
13 miles of Gulf of Mexico.

Page 389:01 to 389:05

00389:01 Did you support as the Federal  
 02 On Scene Coordinator Mr. Laferriere's opinion  
 03 that additional forces were necessary to  
 04 attack the source -- to attack the oil at the  
 05 source at -- in around June 15th, 2010?

Page 389:07 to 389:09

00389:07 A. I did agree with him. I was  
 08 aware of the challenges because we were  
 09 dealing with those every day.

Page 389:11 to 389:24

00389:11 A. But I certainly agreed with him.  
 12 Q. Right, the Coast Guard had a lot  
 13 on its plate. Okay.  
 14 A. Well, these were resources we  
 15 called critical resources.  
 16 Q. Right.  
 17 A. So we were particularly focused  
 18 on those resources.  
 19 Q. Am I correct that -- that the  
 20 Coast Guard even tried to get those resources  
 21 from other governmental agencies, such as the  
 22 Navy and other military branches; is that  
 23 right?  
 24 A. We did, yes.

Page 391:18 to 392:05

00391:18 Q. The third sentence says,  
 19 "Several hundred people are working in a  
 20 confined space with live hydrocarbons on up  
 21 to 4 vessels. This is significantly beyond  
 22 both BP and industry practice." We just  
 23 looked at Exhibit 20 [sic] before, which was  
 24 Mr. Laferriere's e-mails to both you and  
 25 Admiral Allen about wanting more vessels at  
 00392:01 the -- at the source. Well, I'm sorry,  
 02 strike that. That doesn't...  
 03 Did -- is -- is it true that --  
 04 that having that number of vessels at a  
 05 particular site was beyond industry practice?

Page 392:08 to 392:13

00392:08 A. I don't know specifically what  
 09 the industry practice is for this kind of  
 10 thing, but we were concerned about people  
 11 working in confined spaces with live

12 hydrocarbons, and that was certainly the  
13 situation there.

Page 402:20 to 403:08

00402:20 Q. Okay. I'm going to start a  
21 couple sentences down. It says, The  
22 responders that local citizens saw operating  
23 skimming "vestival" -- skimming vessels,  
24 picking up tarballs, or deploying boom were  
25 private hired workers and not Coast Guard or  
00403:01 other government personnel. BP was providing  
02 the money and the large part of the  
03 equipment, and BP was providing the  
04 contractors and response personnel out on the  
05 beaches.  
06 Do you agree with that -- those  
07 sentences?  
08 A. Yes.

Page 403:24 to 404:06

00403:24 Q. Do you agree that it was BP's  
25 obligation to develop plans and procedures  
00404:01 for capturing the oil coming from the well?  
02 A. Yes.  
03 Q. Do you agree that it was BP's  
04 obligation to develop plans and procedures  
05 for stopping the flow of oil from the well?  
06 A. Yes.

Page 406:04 to 407:16

00406:04 You'd agree that there was a  
05 significant amount of boom that was placed  
06 along Louisiana's coast, wouldn't you?  
07 A. Yes.  
08 Q. And that boom was obviously put  
09 there as a result of the spill, correct?  
10 A. Yes.  
11 Q. And it was to protect the  
12 shoreline from oiling?  
13 A. It was -- that was the purpose.  
14 Q. Okay. Do you happen to have any  
15 approximation of how much boom was placed  
16 outside Louisiana's coastline?  
17 A. Oh, I've forgotten the numbers.  
18 Q. Okay. And that's not terribly  
19 important to my point. That boom had to be  
20 secured, didn't it?  
21 A. Yes.  
22 Q. And how was it secured?  
23 A. Typically with anchors and line.  
24 Q. Okay. When you were either the

25 Deputy Federal On Scene Commander or the  
00407:01 Federal On Scene Commander was there a plan  
02 in place to remove the anchors when the boom  
03 was removed?  
04 A. I don't recall that there was at  
05 that time.  
06 Q. Okay. Would --  
07 A. It became a major operation  
08 later on. That was after I left.  
09 Q. Okay. So do you -- sitting here  
10 today, do you have any knowledge as to  
11 whether all those anchors were removed?  
12 A. No, I don't.  
13 Q. Okay.  
14 A. A lot of them were removed, but  
15 I don't know whether all of them were  
16 removed.

Page 410:06 to 410:11

00410:06 Q. Okay. Do you recall any  
07 instances in which any representatives from  
08 the State of Louisiana objected to the  
09 continued use of dispersants?  
10 A. No. My understanding was that  
11 they abstained.

Page 410:16 to 411:04

00410:16 Q. Did Louisiana have any role in  
17 the decision as to how much dispersant was  
18 being used? While you -- and this is -- I'm  
19 limiting my questions to while you were  
20 either Deputy Federal On Scene Commander or  
21 Federal On Scene Commander.  
22 A. Right. Well, this is one of the  
23 things that evolved, because during a period  
24 of time Louisiana was abstaining from all  
25 aspects, as far as I can recall. I think  
00411:01 during the very early stages they were very  
02 much involved with the decision to start  
03 applying dispersants, but that was when I  
04 wasn't there.

Page 412:22 to 413:07

00412:22 Q. (BY MR. KRAUS) Okay. Okay.  
23 The only reason you were using dispersants in  
24 the first place was related to the blowout,  
25 though, correct?  
00413:01 A. Yes.  
02 Q. You would have never authorized  
03 the use of dispersants had it not been for  
04 the blowout; is that correct?



05       A.       Well, there is no reason to put  
06 dispersants out in the ocean unless you have  
07 an oil spill.

Page 414:11 to 414:19

00414:11       Q.       Well, can -- can you just  
12 explain generally what you're talking about?  
13 Maybe we can go about it that way.  
14       A.       Well, we were generally pretty  
15 open with what we were doing with various  
16 levels of government, but we were surprised  
17 when we learned that there had been, you  
18 know, basically, BP checks written to various  
19 governments.

Page 419:06 to 420:10

00419:06       Q.       Okay. Yesterday in some  
07 testimony you stated that when you became  
08 the -- involved as the Deputy Federal On  
09 Scene Commander it became apparent to you  
10 that there were not sufficient resources to  
11 respond to the spill; is that correct?  
12       A.       When I became the deputy --  
13       Q.       Yes.  
14       A.       -- yes --  
15       Q.       Okay.  
16       A.       -- there were --  
17       Q.       And --  
18       A.       -- need for more resources.  
19       Q.       And my -- and you said -- I  
20 think you specifically stated the spill was  
21 going to exceed commercial resources, U.S.  
22 Coast Guard resources, and State resources;  
23 is that correct?  
24       A.       Yes.  
25       Q.       And it was going to exceed BP's  
00420:01 resources, correct?  
02       A.       Yes.  
03       Q.       And it exceeded BP's resources  
04 throughout May of 2010, correct?  
05       A.       Yes.  
06       Q.       And it exceeded BP's resources  
07 in June of 2010, correct?  
08       A.       Yes, certainly their -- their  
09 pre-negotiat- -- you know, pre-planned  
10 resources for an oil spill response.

Page 451:06 to 451:07

00451:06       Q.       And who is S1, for the record?  
07       A.       That's Secretary Napolitano.

Page 471:15 to 472:11

00471:15 Can you name for me the incident command  
16 posts that were involved in the Deepwater  
17 Horizon blowout?  
18 A. Oh, the incident command posts  
19 was at Houma and Mobile. Those were the  
20 major ones. We later had an Incident Command  
21 Post in Miami and in Galveston, and we had an  
22 Incident Command Post in Houston.  
23 Q. Were all the incident command  
24 posts organized similarly?  
25 A. No.  
00472:01 Q. How were they different?  
02 A. The -- the incident command  
03 posts in Houma, Mobile, Miami, Galveston all  
04 had Coast Guard captains that were incident  
05 commanders. They also had BP people who were  
06 designated as co-incident commanders, and  
07 they typically had state representatives  
08 there and they had at Unified Command.  
09 Houston really didn't have a Coast Guard  
10 Cap- -- they didn't have a Coast Guard  
11 captain incident commander.

Page 473:03 to 473:20

00473:03 Q. Some members of Congress were  
04 raising concern about the use of dispersants?  
05 A. Yes.  
06 Q. There were reports in the media  
07 about the use of dispersants?  
08 A. Yes.  
09 Q. The U.S. Environmental  
10 Protection Agency was raising concern about  
11 the use of dispersants?  
12 A. Yes.  
13 Q. And members of the public in  
14 general were raising concerns about the use  
15 of dispersants --  
16 A. Yes.  
17 Q. -- during the response? As FOSC  
18 you also did not believe that dispersants  
19 should be overused or over-applied?  
20 A. Correct.

Page 474:03 to 475:02

00474:03 Q. You recognized that there were  
04 circumstances when the use of dispersants was  
05 necessary?  
06 A. Yes.  
07 Q. There were circumstances when  
08 aerial application of dispersants was needed?

09 A. There -- there were  
10 circumstances when it was the only resource  
11 we had to attack a certain place in the Gulf  
12 that was full of oil.  
13 Q. And there were circumstances  
14 when you believed that the use of subsea  
15 dispersants was necessary?  
16 A. Yes.  
17 Q. And there were times when you  
18 believed that the surface application of  
19 dispersants was warranted?  
20 A. You're talking about from  
21 vessels?  
22 Q. From vessels on the surface.  
23 A. Yes, absolutely.  
24 Q. And you had a process in place  
25 for granting exemptions for the use of  
00475:01 dispersants while you were the FOSC?  
02 A. Yes.

Page 478:22 to 479:04

00478:22 Q. (BY MR. FIELDS) Based on your  
23 role as the FOSC and also the Deputy FOSC  
24 prior to that time, do you agree that the  
25 goal of dispersants use was as a response  
00479:01 tool and also as a safety tool to ensure  
02 critical source control operations were not  
03 disrupted?  
04 A. Yes, I can agree with that.

Page 481:03 to 481:20

00481:03 Q. Do you agree with the statement  
04 that both you as the FOSC and the Houma  
05 Unified Command were both committed to  
06 reducing the use of dispersants to the  
07 minimum amount necessary as indicated in  
08 Addendum 3 of the directive?  
09 A. Yes. Although I would note that  
10 the directive gave us a target of 75 percent  
11 reduction.  
12 Q. Right.  
13 A. So there -- there wasn't a --  
14 necessarily a commitment to reduce it to  
15 zero.  
16 Q. Right, okay. And do you believe  
17 that there were -- there were effective  
18 communications between you as the FOSC and  
19 the Houma Unified Command with respect to the  
20 use of dispersants during the response?

Page 481:22 to 482:01

00481:22 A. My recollection was that both  
23 sides were working very hard to have the  
24 highest level of effective communication, but  
25 there was times when it could have been  
00482:01 better than other times.

Page 482:11 to 484:07

00482:11 A. My -- my opinion was that it was  
12 perfectly acceptable to have that kind of  
13 healthy dialogue. That's a -- really, a  
14 matter of -- of leadership style, and the --  
15 the type of communications we had fit my  
16 leadership style just fine.  
17 Q. (BY MR. FIELDS) There is a  
18 discussion in this letter on Page No. 4 under  
19 Q.4.b about the criteria that was used by the  
20 Coast Guard to evaluate whether justification  
21 provided in an exemption request was  
22 sufficient to warrant an exemption; do you  
23 see that?

24 A. Yes.  
25 Q. And one of the things it says is  
00483:01 that, "Many criteria are used to evaluate  
02 exemption requests including but not limited  
03 to the presence of dispersible oil, size of  
04 oil slicks, weather conditions, availability  
05 and feasibility of other response methods,  
06 and other factors (such as worker health and  
07 safety). In addition, specific events at the  
08 well head such as the temporary loss of  
09 containment were considered in determining if  
10 exemptions were necessary."

11 Do you agree that that is a list  
12 of some of the criteria that you used as the  
13 FOSC to determine whether to grant an  
14 exemption request?

15 A. Yes, I would say all those plus  
16 a number of others, probably.  
17 Q. What would be examples of other  
18 criteria that you would use to determine  
19 whether or not to grant an exemption request?

20 A. Well, one that comes to mind was  
21 if there appeared to be any sort of  
22 non-effectiveness from the day before or  
23 inability to monitor in accordance with our  
24 requirements for application of dispersants  
25 or even if there had been some kind of  
00484:01 complaint, that -- that could have  
02 potentially led to my not approving the  
03 request that would have immediately followed  
04 until those issues were resolved, in addition  
05 to these -- these kind of things as well.

06 Q. Okay.  
07 A. There was a lot of factors.

Page 486:01 to 486:21

00486:01 Q. So one of the procedures that  
02 you put in place or were in -- was -- one of  
03 the procedures that were in place while you  
04 were the FOSC is for the Unified Area Command  
05 and the Incident Command Post to monitor the  
06 aircraft tank levels to verify the amount of  
07 dispersants used?  
08 A. Yes, there was some kind of  
09 process, I -- I couldn't go into any kind of  
10 detail, to monitor tank levels and the amount  
11 of dispersant used.  
12 Q. While you were FOSC, were there  
13 also procedures in place to monitor the tank  
14 levels on surface vessels to determine and  
15 verify the amount of dispersants used?  
16 A. Yes, we did have Coast Guard  
17 people out on the surface vessels, at least  
18 from time to time, if not continuously over  
19 periods of time, and one of their duties was  
20 to also monitor the tank levels of  
21 dispersants.

Page 488:11 to 490:02

00488:11 Q. If you turn in your binder, if  
12 you go back to the binder that I gave you  
13 yesterday, we were using yesterday, Binder 2,  
14 and if you would turn to Tab 25, and the  
15 document behind Tab No. 25 is a June 6, 2010  
16 e-mail from you to Admiral Allen and other  
17 Coast Guard personnel with the subject line  
18 "Aerial Dispersant Temp Increase"; do you see  
19 that?  
20 A. Yes.  
21 Q. And we're going to mark this as  
22 Exhibit 10593. If you'd take a look at that,  
23 I have a few questions to ask you.  
24 A. Okay.  
25 Q. Exhibit 10593 is an e-mail that  
00489:01 you sent to Admiral Allen and several other  
02 Coast Guard personnel on or about June 6,  
03 2010?  
04 A. Yes.  
05 Q. And it was an e-mail that you  
06 sent to Admiral Allen and others concerning  
07 the temp- -- temporary increase in the amount  
08 of dispersants being applied aurally?  
09 A. Yes.  
10 Q. And what was your purpose in  
11 sending this e-mail to Admiral Allen and  
12 other Coast Guard personnel on June 6, 2010?  
13 A. Well, I like to keep

14 Admiral Allen informed when there was  
15 changing conditions that affected our  
16 operations. So that was one reason. And  
17 then also to give him some particular  
18 heads-up on what I anticipated would be a  
19 sequence of dispersant requests that I would  
20 get and potentially approve because of those  
21 conditions.  
22 I knew that he often had  
23 interactions with Administrator Jackson of  
24 the EPA and that she would be aware of these  
25 requests and my actions on them, and so I --  
00490:01 I just wanted to make sure there was no big  
02 surprises for him.

Page 490:13 to 492:22

00490:13 Q. You -- at least as of June 6th,  
14 2010, you were anticipating that over the  
15 next several days, you would be getting  
16 additional requests to use dispersants or to  
17 apply dispersants aerially?  
18 A. Yes, I was anticipating that.  
19 Q. And you anticipated that these  
20 exemption requests would come in, that you  
21 would need to evaluate them, and you would  
22 need to determine whether or not to grant the  
23 exemption request?  
24 A. Yes, yes.  
25 Q. And you anticipated based on the  
00491:01 information that you knew at the time that  
02 the circumstances might be such that you  
03 would grant those exemption requests?  
04 A. Well, the -- what changed with  
05 regard to -- to that activity was one of the  
06 factors of -- of applying dispersants was  
07 that you didn't have any ability to get to  
08 that oil with skimmers or with in situ  
09 burning, and so that made it more likely that  
10 dispersants were going to be the only tool  
11 left in the toolbox.  
12 Q. And so you were providing  
13 Admiral Allen and other Coast Guard personnel  
14 with information, letting them know that it  
15 was possible that because of the  
16 circumstances, you might be granting  
17 authorization for the application of  
18 dispersants aerially?  
19 A. Right, I think I was saying -- I  
20 mean, it was always possible for me to grant  
21 exemptions, but I think I was saying that  
22 I -- I could see that there could be more  
23 likelihood that there would be approvals.  
24 Q. If you would turn to Tab 27, and  
25 the document behind Tab 27 will be marked as

00492:01 Exhibit 10594. It is a June 7, 2010 e-mail  
02 from Captain -- how do you pronounce his last  
03 name?  
04 A. Laferriere.  
05 Q. -- Laferriere to you,  
06 Admiral Watson, as your Deputy FOOSC,  
07 Admiral Nash, and others, correct?  
08 A. Right.  
09 Q. And this is a -- and Captain  
10 Laferriere was the incident commander at  
11 Houma?  
12 A. Yes.  
13 Q. And would you periodically  
14 receive requests from Captain Laferriere to  
15 apply dispersants?  
16 A. I would typically receive  
17 requests from him for that, yes.  
18 Q. And is this an example of a  
19 request coming in not just from BP, but from  
20 the Houma Unified Command regarding the use  
21 or potential use of dispersants?  
22 A. Yes, as I recall.

Page 493:05 to 496:12

00493:05 Q. Exhibit 10595 is a exemption  
06 request sent to you as Federal On-Scene  
07 Coordinator on June 12th, 2010, from the  
08 Houma Unified Command?  
09 A. Yes.  
10 Q. And is this an example of the  
11 type of exemption requests that you received  
12 for the application of dispersants?  
13 A. Yes.  
14 Q. And this was -- request was  
15 coming not just from BP, but it was coming  
16 from the Houma Unified Command?  
17 A. Yes.  
18 Q. And in this exemption request,  
19 it sets forth the reasons why Houma Unified  
20 Command believed that an exemption was  
21 justified?  
22 A. Yes.  
23 Q. One of the things it also does  
24 is sets -- sets forth why alternative means  
25 of responding to the spill are not sufficient  
00494:01 to deal with the oil?  
02 A. Yes.  
03 Q. And once you would receive an  
04 exemption request like the one that is  
05 captured in Exhibit 10595, you would  
06 carefully evaluate the request?  
07 A. I would.  
08 Q. And you would determine whether  
09 or not the information contained in the

10 exemption request was sufficient to justify  
11 an exemption?

12 A. I would. I'd also consult with  
13 people -- other people in the Unified Area  
14 Command.

15 Q. And who would be examples of  
16 individuals at the Unified Area Command that  
17 you would consult with in order to determine  
18 whether or not you should grant an exemption  
19 request?

20 A. Well, I had a -- a Coast Guard  
21 officer who was in charge of the  
22 environmental section, there was the NOAA  
23 scientific support coordinator, there was the  
24 EPA rep, and occasionally there was  
25 representatives from the State of Louisiana  
00495:01 or one of the other states.

02 Q. And -- and why would you consult  
03 with others at Unified Area Command before  
04 deciding whether to grant an exemption  
05 request for the application of dispersants?

06 A. Well, that was just how we ran  
07 Unified Command. This -- this was an area  
08 that there was people that were very  
09 dedicated to getting dispersant applications  
10 right because it was a -- an issue that  
11 involved trading off environmental damage,  
12 basically.

13 There is -- there is no easy  
14 answer when you have to -- when you get to  
15 the point where you have to use dispersants  
16 because dispersants are going to go into  
17 the -- send the oil into the -- to the water  
18 column, and until they're dispersed to such  
19 an extent that there is no toxic effect from  
20 the oil in that water column, there -- there  
21 could be damage to some of the aquatic  
22 wildlife.

23 On the other hand, if you don't  
24 have any other means to get the oil and you  
25 have a trajectory that sends that oil into  
00496:01 shore -- and I think by this point in time,  
02 oil was hitting various shores, so we knew  
03 that was certainly possible, if not very  
04 probable, then you're endangering whatever  
05 wildlife gets affected by, you know, oil in  
06 marshes and on beaches.

07 And then in the meantime, you've  
08 got birds and wildlife that actually is  
09 living and having activities right at the  
10 surface of the water and the air. So the  
11 whole time that this oil is floating around  
12 is -- is a risk to them.



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

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

\*\*\*\*\*

VOLUME 2

\*\*\*\*\*

Deposition of JAMES ANGUS  
WATSON, IV, taken at Pan-American Building,  
601 Poydras Street, 11th Floor, New Orleans,  
Louisiana, 70130, on the 20th day of  
December, 2012.

1 THE STATE OF LOUISIANA :  
2 PARISH OF ORLEANS :

3 I, PHYLLIS WALTZ, a Certified Court Reporter,  
4 Registered Professional Reporter, and  
5 Certified Realtime Reporter in and for the  
6 State of Louisiana, do hereby certify that  
7 the facts as stated by me in the caption  
8 hereto are true; that the above and foregoing  
9 answers of the witness, JAMES ANGUS WATSON,  
10 IV, to the interrogatories as indicated were  
11 made before me by the said witness after  
12 being first duly sworn to testify the truth,  
13 and same were reduced to typewriting under my  
14 direction; that the above and foregoing  
15 deposition as set forth in typewriting is a  
16 full, true, and correct transcript of the  
17 proceedings had at the time of taking of said  
18 deposition.

19 I further certify that I am not, in any  
20 capacity, a regular employee of the party in  
21 whose behalf this deposition is taken, nor in  
22 the regular employ of his attorney; and I  
23 certify that I am not interested in the  
24 cause, nor of kin or counsel to either of the  
25 parties.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, on  
this, the 20TH day of DECEMBER, 2012.

*Phyllis Waltz*

PHYLLIS WALTZ, RPR, CRR  
TEXAS CSR, TCRR NO. 6813  
Expiration Date: 12/31/13  
LOUISIANA CCR NO. 2011010  
Expiration Date: 12/31/12  
NEW MEXICO CCR NO. 610  
Expiration Date: 12/31/12



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1 WITNESS CORRECTIONS AND SIGNATURE  
2 JAMES ANGUS WATSON, IV DECEMBER 20, 2012

3 Please indicate changes on this sheet of  
4 paper, giving the change, page number, line  
5 number and reason for the change. Please  
6 sign each page of changes.

7 PAGE/LINE CORRECTION REASON FOR CHANGE

8 Please see attached Errataadocument.  
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JAMES ANGUS WATSON, IV, VOLUME 2

I, JAMES ANGUS WATSON, IV, have  
 read the foregoing deposition and hereby  
 affix my signature that same is true and  
 correct, except as noted above.

*James Watson IV*

JAMES ANGUS WATSON, IV, VOLUME 2

STATE OF LOUISIANA )  
 PARISH OF *Dist. of Columbia*

Before me, \_\_\_\_\_,  
 on this day personally appeared JAMES ANGUS  
 WATSON, IV, known to me, or proved to me  
 under oath or through *Govt ID* )  
 (description of identity card or other  
 document)), to be the person whose name is  
 subscribed to the foregoing instrument and  
 acknowledged to me that they executed the  
 same for the purposes and consideration  
 therein expressed.

Given under my hand and seal of  
 office on this, the *25* day of *January*,  
*2013*.

*Cheryl V. Brown*

NOTARY PUBLIC IN AND FOR THE  
 STATE OF LOUISIANA

My Commission Expires:

**CHERYL V. BROWN**  
 NOTARY PUBLIC  
 DISTRICT OF COLUMBIA  
 MY COMMISSION EXPIRES: MARCH 14, 2013



Name of Deponent	Title	Date	Vol	Citation	Statement	Correction
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	13:19-20	He is currently attorney at the U.S. Coast Guard headquarters.	He is currently <u>an</u> attorney at the U.S. Coast Guard headquarters.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	21:16-17	No. I was -- I was two jobs for part of that time.	No. I was -- I was <u>holding</u> two jobs for part of that time.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	43:9-11	The -- there -- the NIC received some authorities, not all, that were assigned by the Secretary of Homeland Security.	The -- there -- the NIC received some <u>FOSC</u> authorities, not all, that were assigned by the Secretary of Homeland Security.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	46:11	also placed the <u>FOC</u> in charge of	also placed the <u>FOSC</u> in charge of
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	54:16-17	It's -- it's hard for me to say any.	It's -- it's hard for me to say any <u>important decisions</u> .
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	57:16-17	-- of any RP, not including BP	-- of <u>a RP</u> , including BP
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	59:11-12	there <u>was</u> different priorities and different resources	there <u>were</u> different priorities and different resources
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	62:8-9	incident commander <u>in</u> the FOSCR	incident commander <u>and</u> the FOSCR
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	65:21-22	His <u>was</u> similar to my duties as deputy.	His <u>duties were</u> similar to my duties as deputy.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	78:25-79:4	I can recall there <u>was</u> informal discussions, but I can't re- -- that ultimately didn't result in resources, but I don't recall specifically what they were right now.	I can recall there <u>were</u> informal discussions that ultimately <u>didn't</u> result in resources, but I don't recall specifically what they were right now.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	85:7-8	There <u>is</u> probably a couple of reasons that come to mind.	There <u>are</u> probably a couple of reasons that come to mind.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	85:14-17	And I had recently participated in an exercise that early spring <u>as the National Incident Commander in the National Incident Commander</u> role during the exercise.	And I had recently participated in an exercise that early spring <u>in the National Incident Commander role</u> during the exercise.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	94:12:00	There <u>was</u> a lot of people	There <u>were</u> a lot of people
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	123:10-13	because there <u>was</u> situations that occurred on a periodic basis in which it was the only method that we -- we had to deal with an oil slick.	because there <u>were</u> situations that occurred on a periodic basis in which it was the only method that we -- we had to deal with an oil slick.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	134:9-13	There was a <u>concerned</u> expressed by the parish presidents, and it was also a -- an interest of, I think, the deputy secretary that we establish better communications with the parish presidents.	There was a <u>concern</u> expressed by the parish presidents, and it was also a -- an interest of, I think, the deputy secretary that we establish better communications with the parish presidents.



Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	135:9-16	Well, there -- there was an interest in making sure that the parish presidents were not surprised by media news, and so by this time there had been established that -- that liaison network to -- it was -- evidently I was requesting him to set up a telephone conference call, to use that structure to <u>communication</u> that information that night.	Well, there -- there was an interest in making sure that the parish presidents were not surprised by media news, and so by this time there had been established that -- that liaison network to -- it was -- evidently I was requesting him to set up a telephone conference call, to use that structure to <u>communicate</u> that information that night.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	152:6-8	Well, we were always interested in having <u>a</u> end state where the well was sealed.	Well, we were always interested in having <u>an</u> end state where the well was sealed.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	165:20-22	We were, <u>you know, also concerned about what -- you know, having single</u> means of failure.	We were <u>also concerned about having a single</u> means of failure.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	176:6-11	well, primarily the government people overseeing that developed usually fairly thick pages of thick booklets, a lot of them came <u>in in</u> binders like this, which were very detailed procedures that would ultimately get up to the FOSC level	well, primarily the government people overseeing that developed usually fairly thick pages of thick booklets, a lot of them came <u>in</u> binders like this, which were very detailed procedures that would ultimately get up to the FOSC level
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	177:19-21	we got concerned that we -- that what was provided <u>previous</u> was based on a lower flow estimate	we got concerned that we -- that what was provided <u>previously</u> was based on a lower flow estimate
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	183:1-3	I don't know specifically, but the overall intent of all the federal actions <u>were</u> to stay coordinated.	I don't know specifically, but the overall intent of all the federal actions <u>was</u> to stay coordinated.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	193:15-20	Well, as I -- as I described before, I -- my concern was that we -- we stick to a Unified Command type of a -- of a process that <u>involved de- -- deliberate</u> planning and sequence of -- that the engineers were already involved in.	Well, as I -- as I described before, I -- my concern was that we -- we stick to a Unified Command type of a -- of a process that <u>involved the deliberate</u> planning and sequence of -- that the engineers were already involved in.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	200:12-20	and you say in this email, <u>my initial read... to come up with anything.</u> Did you see that?	and you say in this email, " <u>my initial read... to come up with anything.</u> " Did you see that? (quotes added)
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	201:20-21	paragraph, <u>I had hoped... kill line.</u>	paragraph, " <u>I had hoped... kill line.</u> " (quotes added)
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	207:11:00	<u>were</u> n't thinking	<u>were</u> thinking
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	215:7-8	At some point in time, yes, I <u>do</u> .	At some point in time, yes, I <u>did</u> . (The question was in past tense)
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	220:21-23	And after some questions and <u>answered</u> , I felt like the -- the risks were acceptable.	And after some questions and <u>answers</u> , I felt like the -- the risks were acceptable.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	221:22-25	Well, I think that that goes into a whole <u>nother</u> level of analysis as to whether you actually were going to use the capping stack to shut in the well.	Well, I think that that goes into a whole <u>other</u> level of analysis as to whether you actually were going to use the capping stack to shut in the well.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	224:21:00	<u>that, had</u> been proposed	that <u>which</u> had been proposed
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	227:22	I don't <u>think so he</u> overtly	I don't <u>think he</u> overtly



Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	233:8-9	Well, there was -- there <u>was</u> two reasons.	Well, there was -- there <u>were</u> two reasons.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	237:12-14	Well, this was probably a -- one of -- I did -- we had a lot of <u>correspondents</u> about dispersants.	Well, this was probably a -- one of -- I did -- we had a lot of <u>correspondence</u> about dispersants.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	244:3-7	paragraph, <u>My approval...into the GOM</u>	paragraph, " <u>My approval ...into the GOM</u> " (quotes added)
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	245:16-18	It was just <u>mixed in the with</u> the air -- it was a surface dispersant application.	It was just <u>mixed in with</u> the air -- it was a surface dispersant application.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	246:24:00	<u>FOC</u>	<u>FOSC</u>
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	248:24 - 249:4	There -- there were constant improvements to our processes, and the quantity thing more had to do with -- with process and communications than -- Q. What do you mean by that? A. -- any kind of <u>deliberate or misapplication</u> .	A. -- any kind of <u>deliberate act or misapplication</u> .
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	249:14-15	there was <u>a</u> over application beyond the final approval.	there was <u>an</u> over application beyond the final approval.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	254:2-3	And I would make a <u>decision communication</u> that back to Houma.	And I would make a <u>decision and communication</u> that back to Houma.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	256:20-22	Not on every application, but on a certain percentage of the applications there <u>was</u> boats.	Not on every application, but on a certain percentage of the applications there <u>were</u> boats.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	265:6-9	I had conversations with the incident commander, and I was assured that there <u>was</u> protocols in place on the quantity of dispersants.	I had conversations with the incident commander, and I was assured that there <u>were</u> protocols in place on the quantity of dispersants.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	267:20-21	I don't <u>know</u> I would characterize it.	I don't <u>know how</u> I would characterize it.
Adm. James Watson, IV	Director of BSEE, DOI	20121219	I	270:22 - 271:2	And then sometimes they realized that they had used up their limit earlier in the day for some other operation and then were -- and then were -- had shut down, but couldn't <u>sustain that without</u> the VO -- they saw the VOCs going up.	And then sometimes they realized that they had used up their limit earlier in the day for some other operation and then were -- and then were -- had shut down, but couldn't <u>sustain subsea dispersants being shutdown without the VO</u> -- they saw the VOCs going up.
Adm. James Watson, IV	Director of BSEE, DOI	20121220	2	327:23-24	A. And I'm sure there <u>is</u> many others.	A. And I'm sure there <u>are</u> many others.
Adm. James Watson, IV	Director of BSEE, DOI	20121220	2	358:17-19	There <u>was</u> other VoOs that might have been used just as a single vessel working with, say, in situ burning.	There <u>were</u> other VOOs that might have been used just as a single vessel working with, say, in situ burning.
Adm. James Watson, IV	Director of BSEE, DOI	20121220	2	401:20	taking <u>anything</u> you said	taking <u>anything</u> you said
Adm. James Watson, IV	Director of BSEE, DOI	20121220	2	471:18-19	A. Oh, the incident command posts <u>was</u> at Houma and Mobile.	A. Oh, the incident command posts <u>were</u> at Houma and Mobile.

Adm. James Watson, IV	Director of BSEE, DOI	20121220	2	495:7-12	This -- this was an area that there <u>was</u> people that were very dedicated to getting dispersant applications right because it was a -- an issue that involved trading off environmental damage, basically.	This -- this was an area that there <u>were</u> people that were very dedicated to getting dispersant applications right because it was a -- an issue that involved trading off environmental damage, basically.
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