

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?

Page 287:24 to 287:25

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.
00420:01 Q. And it was going to exceed BP's
02 resources, correct?
03 A. Yes.
04 Q. And it exceeded BP's resources
05 throughout May of 2010, correct?
06 A. Yes.
07 Q. And it exceeded BP's resources
08 in June of 2010, correct?
09 A. Yes, certainly their -- their
10 pre-negotiat- -- you know, pre-planned
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 FOOSC 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 FOOSC, 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 aerially?
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
00495:01 representatives from the State of Louisiana
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
00496:01 have a trajectory that sends that oil into
02 shore -- and I think by this point in time,
03 oil was hitting various shores, so we knew
04 that was certainly possible, if not very
05 probable, then you're endangering whatever
06 wildlife gets affected by, you know, oil in
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, ORR
TEXAS CSR, TCRR NO. 6813
Expiration Date: 12/31/13
LOUISIANA CCR NO. 2011010
Expiration Date: 12/31/12
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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*, *2023*.

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 a <u>RP, including BP</u>
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-</u> -- deliberate 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, I <u>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 <u>whole 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 <u>whole 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 the VO</u> -- 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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