

Deposition Testimony of:

Michael Saucier

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00363:13 Q. And based on your over 25 years of
14 experience with MMS, is it standard practice that
15 a non-operating leaseholder has no involvement in
16 submitting APMs and APDs and weekly reports to
17 MMS?
18 A. Correct.
19 Q. And is it fair to say that MMS doesn't
20 require the non-operator to submit anything in
21 connection with the design, the drilling, and the
22 temporary abandonment of a well because it doesn't
23 view those procedures as the non-operating
24 leaseholder's responsibility? Is that correct?
25 A. Correct.

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00389:15 MR. SAUNDERS: And we'll mark this as
16 Exhibit 4767.
17 (Marked Exhibit No. 4767.)
18 Q. (BY MR. SAUNDERS) This is an E-mail from
19 John Rodi to you and others at MMS on May 7th,
20 2010. Do you recall seeing this?
21 A. Yes.
22 Q. Okay. And although the E-mail references
23 an attachment, I'll represent to you that it was
24 produced here without the attachment; but just
25 focusing on the description, the attachment given
00390:01 to you by Mr. Rodi -- by the way, who is he?
02 A. He is the deputy regional super -- deputy
03 regional director of the Gulf of Mexico Region for
04 MMS.
05 Q. Regarding the referenced letter from
06 Anadarko CEO, Jim Hackett, to Secretary Salazar,
07 Mr. Rodi states that: "Anadarko...asserts that it
08 did not have input into the design of the well,
09 drilling procedures, or vendor/equipment selection
10 as those are all functions of BP as operator."
11 Would you agree that that's an
12 accurate statement?
13 MR. KEEGAN: Objection; form.
14 MR. FLYNN: Objection as to form.
15 Are you saying did Anadarko say this in the
16 letter?
17 MR. SAUNDERS: Let me clarify that.
18 Q. (BY MR. SAUNDERS) Is there anything about
19 that assertion by Anadarko that you believe to be
20 inaccurate?
21 MR. KEEGAN: Objection; form.
22 A. No.
23 Q. (BY MR. SAUNDERS) Okay. And with respect
24 to the following sentence: "Anadarko concludes by
25 saying they are committed to understanding the
00391:01 causes of the incident" -- I'm sorry.

02 Let's go to the paragraph above, the
03 second paragraph here of this E-mail: "Anadarko
04 acknowledges...that it is working with BP in a
05 technical advice capacity on efforts to close the
06 blowout preventers and otherwise contain the flow
07 of oil?"
08 As deputy area commander for the
09 Unified Area Command, did you ever have any reason
10 to dispute that Anadarko was offering the full
11 extent of its assistance and expertise in
12 connection with the containment effort?
13 A. No.