

Deposition Testimony of:

Elliot Taylor

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00299:10 Q. I want to turn to your personal
11 knowledge and involvement in the spill. Were
12 you personally involved in responding to the
13 DEEPWATER HORIZON oil spill?

14 A. Yes, I was.

15 Q. When did you first become
16 involved?

17 A. My first mobilization was right
18 near the end of April. I think it was the
19 28th or something like that. It's in my
20 report.

21 Q. How did you become involved in
22 the DEEPWATER HORIZON oil spill?

23 A. Became involved as -- as one of
24 the, I guess, world experts, if you will.
25 Our company and several of us that work in
00300:01 there -- in the company are recognized as
02 leaders in shoreline cleanup assessment
03 techniques, the program, its application and
04 use on spills with the experience that we
05 have.

06 We had worked previously with
07 BP. We trained BP personnel specifically up
08 in Alaska. And so when this happened, some
09 of the BP team members who were mobilized in
10 here from Alaska, having had direct firsthand
11 knowledge and having worked with our people,
12 called us and asked us to come in and help.

13 Q. When you say as one of the world
14 experts in shoreline cleanup assessment, tell
15 us what your experience was prior to the
16 spill in responding to oil spills.

17 A. Well, the -- my -- my first use
18 of -- of SCAT and the whole process was
19 really on the Exxon Valdez oil spill back in
20 '89, starting in '89. And so the process --
21 that technique, we used for several years and
22 in surveys post-cleanup up in Prince William
23 Sound.

24 And then subsequently we've used
25 it on any number of other spills. I've used
00301:01 them on -- as I said earlier, on spills in
02 other coastal environments off of Oregon, up
03 in Alaska. I've used them on river spills in
04 South America, in Canada.

05 Q. Okay.

06 A. So, yeah. It's just something
07 that we use on -- on a very routine basis. I
08 mean, it is a standard that's now included,
09 if you will, in area contingency plans,
10 national contingency plans and -- and
11 adopted.

12 Q. How long -- I'm sorry. How long
13 did you remain involved in the DEEPWATER

14 HORIZON oil spill response activity?
15 A. My -- I was involved from 2010
16 through -- through the end of that year, in
17 2011 and into 2012.

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00301:21 Q. What role did you have in that
22 activity?
23 A. My role is -- was at the SCAT
24 technical advisor. Originally coordinator
25 and then technical advisor in the eastern
00302:01 states.
02 Q. And briefly, in the interest of
03 time, could you describe what a SCAT
04 technical advisor does?
05 A. Basically, helps to steer where
06 the teams are surveying, what's being
07 surveyed, how that information's being
08 processed, how it's being presented to
09 Unified Command, developing STRs, et cetera.
10 Q. Did you visit sites in
11 Mississippi, Alabama and Florida in your role
12 as technical advisor for the SCAT program?
13 A. Yes, I did.
14 Q. And did you also visit sites in
15 Louisiana wetlands during the response?
16 A. Yes, I did.
17 Q. When did you complete your work
18 on the DEEPWATER HORIZON shoreline response?
19 A. As a SCAT technical advisor?
20 Q. Correct.
21 A. That was in 2012.

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00303:11 Q. Dr. Taylor, I want to talk to
12 you briefly about SCAT. First, was SCAT
13 employed in response to the DEEPWATER HORIZON
14 oil spill?
15 A. Yes. Yes.
16 Q. And were you personally involved
17 in employing SCAT at the DEEPWATER HORIZON
18 oil spill?
19 A. I was, indeed.
20 Q. Tell us how the SCAT process
21 worked in the DEEPWATER HORIZON oil spill
22 that you were personally involved in.
23 A. The SCAT process was defined in
24 a SCAT plan and then developed in various
25 shoreline stage plans during the course of
00304:01 the -- of the response. And it was
02 implemented by having teams.
03 Again, these are joint
04 representative -- representation teams. So

05 representing Unified Command in the field,
06 conducting surveys of the shorelines and
07 marshes, any shoreline in general,
08 documenting oiling conditions or the lack
09 thereof, as well as other pertinent
10 information on that shoreline.

11 And then providing that data,
12 running it through a database, analysis,
13 compilation of information, downloading
14 photographs, GPS tracks, everything that goes
15 with it, with the data collection. And then
16 where appropriate, where indicated, shoreline
17 treatment recommendations were being -- were
18 prepared.

19 Again, jointly. Shoreline
20 treatment and recommendations are a joint
21 effort, is done at the Unified Command post.
22 And then ultimately those treatment and
23 recommendations are reviewed by multiple
24 parties for cultural resources and fisheries
25 and et cetera for best management practices
00305:01 to be protective of the techniques that are
02 going to be used and be protective of the --
03 each -- each segment of the shoreline.

04 Have those approved by Unified
05 Command and then in turn, follow up in the
06 field posttreatment to verify that no further
07 treatment objectives, goals had been met.

08 Q. When did the Unified Command
09 establish the SCAT program for the DEEPWATER
10 HORIZON oil spill?

11 A. It was one of the first tasks
12 that we -- we tackled when -- that was
13 specifically why we were called in. BP
14 mobilized our -- ourselves to come in and get
15 the SCAT program underway, get the shoreline
16 segmented, get teams stood up, ensure that
17 the teams were calibrated, had an
18 understanding of what records formed --

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00305:25 Q. Okay. We were talking about
00306:01 when the SCAT program was put in place. Is
02 it fair to say it was put in place very early
03 on in the response?

04 A. Yes.

05 Q. And was the SCAT program managed
06 by the Unified Command led by the federal
07 on-scene coordinator?

08 A. Overall, yes.

09 Q. We -- we talked earlier about
10 how the SCAT program was set up. Was it
11 divided up into two areas of operation, the
12 eastern states and the western?

13 A. Well, there's a single SCAT
14 program, but we had the teams and a
15 coordination and technical advisors at each
16 of the command posts.

17 Q. And where were you?

18 A. I was in Mobile, in the eastern
19 states.

20 Q. Okay. And then there was also
21 an office in Louisiana, Houma; is that
22 correct?

23 A. That's correct.

24 Q. And did you coordinate with the
25 Houma office in implementing the SCAT
00307:01 program?

02 A. Very much so. That was a key
03 part of it, is to make sure we were -- we
04 were going to use the same consistent
05 approach, terms and across the board, yes.

06 Q. And based on your personal
07 involvement, did the SCAT teams, in fact,
08 employ a consistent approach between
09 Louisiana and the eastern states?

10 A. Very much so.

11 Q. Was the SCAT program a
12 deliberate effort in order to understand the
13 extent of the oiling that occurred in the
14 Gulf states from the DEEPWATER HORIZON oil
15 spill?

16 MS. ANDRE: Objection to form.

17 A. It was very much a specific task
18 to document shoreline oiling, yes. From
19 the -- from the spill.

20 Q. Did the SCAT teams document
21 shoreline oiling, employing the SCAT process
22 you identified?

23 A. Yes, they did.

24 Q. And to your knowledge, was that
25 information then relied on for purpose of
00308:01 determining cleanup efforts?

02 A. Yes.

03 Q. Did the SCAT field teams go
04 through a rigorous process for assuring data
05 quality, to your knowledge?

06 A. Yes. We had -- as I said, when
07 we set the whole SCAT program up, we made
08 sure that the SCAT teams, in particular, the
09 SCAT team leads, all understood what forms
10 were being used, what was expected to go on
11 to those forms, what data was to be collected
12 in the field.

13 We actually even had several
14 joint team calibration events where we
15 brought team leads together, as I've
16 mentioned earlier, between the two groups so
17 that they could, again, work to make sure
18 that they were characterizing and describing

19 and estimating oil coverage, for instance, in
20 a very consistent way across the board.

21 Q. Did the SCAT teams attempt to
22 locate buried oil?

23 A. The SCAT teams did a lot of
24 effort to locate buried oil, yes.

25 Q. What efforts were those?

00309:01 A. Well, on a regular basis as part
02 of normal SCAT, teams will typically dig up
03 holes or trenches, particularly on sand
04 beaches to identify if oil has penetrated or
05 if oil's covered up on those beaches and
06 characterize subsurface oil.

07 There's not digging done on
08 sensitive areas like marshes. Don't want to
09 dig into the -- into the roots to -- to
10 delineate that -- usually oil doesn't
11 penetrate into the finer grain. And then of
12 course, you don't really dig in sort of
13 coarse riff-raff and that type of material.

14 Q. Are you familiar with something
15 called snorkel SCAT?

16 A. Very much so. That was
17 implemented on the -- this is the first time
18 it was implemented.

19 Q. What is snorkel SCAT?

20 A. Snorkel SCAT was a program that
21 we put in place to investigate and delineate
22 the presence of oil in the sub-tidals. So
23 that is below the waterline out to the point
24 where teams could -- could safely go. So
25 it's typically about four to five feet of

00310:01 water depth. And -- and then characterize
02 oil that -- and identify and assist
03 operations if there was going to be locations
04 where oil was to be treated, removed.

05 Q. Based on your prior experience
06 with SCAT, did Unified Command go to great
07 lengths to locate buried oil and other oil on
08 the shoreline?

09 A. There was a -- a tremendous
10 effort, yes, done to -- to find buried oil
11 both on the -- on the shorelines themselves,
12 on the beaches. So the exposed part as well
13 as in the sub-tidal.

14 Q. When you say a tremendous
15 effort, what do you mean?

16 A. I think you'll see in the OSAT-3
17 reports, for instance, you know, the tens of
18 thousands. There are over a hundred thousand
19 pits, trenches, auger holes put in place to
20 identify and -- and attempt to locate
21 recoverable actionable oil in the sub --
22 subsurface.

23 Q. Did BP contribute to what you
24 called a tremendous effort?

25 A. Yes. BP was very much a part of
00311:01 that.

02 Q. How so?

03 A. They contributed assets. They
04 contributed the personnel to -- to go out
05 and -- and carry out. A lot of the augering
06 effort was done through their contractors.

07 Q. Did they contribute by bringing
08 in experts like yourself to assist with this
09 effort?

10 A. They brought in myself and --
11 and they brought in so many experts on all
12 different aspects of the response. But, yes,
13 that was very much a key component of
14 their -- of their involvement.

15 Q. Based on your personal
16 involvement in the SCAT program and the
17 collection of SCAT data, did you view the
18 SCAT data as reliable and comprehensive?

19 A. I -- I do view the SCAT data
20 as -- as reliable and comprehensive, yes.

21 Q. Why is that?

22 A. As we have reviewed here, it's
23 a -- a rigorous applied procedure that we
24 use. It revisits the shorelines numerous
25 times in a very systematic way. Our SCAT
00312:01 team leads very often were familiar with the
02 areas they're working so they had -- they
03 have a history.

04 We did not -- the leads were
05 not -- were consistent throughout the
06 response. And so they're calibrated, their
07 eyes are calibrated to the environment
08 they're working in and the oiling and the
09 changes in the oiling. And all of that is,
10 of course, being consistently documented.

11 Q. How long did the SCAT process
12 last?

13 A. It lasted up through the -- the
14 end of the response. The final segments were
15 done in -- in May, I guess. Or at least -- I
16 don't -- I can't tell you what the date of
17 the last survey was, but it's into 2014, I
18 believe.

19 Q. And did you remain familiar with
20 the SCAT process throughout that entire time?

21 A. Yes. Yes.

22 Q. Dr. Taylor, are you -- are you
23 proud of the work that you did as well as
24 other members of BP and the Unified Command
25 in connection with the SCAT process in
00313:01 understanding the oiling that took place from
02 the DEEPWATER HORIZON oil spill?

03 A. I'm very proud. I think we had
04 -- we have the best people in the world doing
05 this work. And it -- it -- it was an

06 incredible effort over a long period of time,
07 and it's not -- it -- it -- it's that joint
08 team effort. It's -- so we had Coast Guard
09 people out there. We had State people out
10 there. We -- of course ourselves was brought
11 in by BP. So it was a -- a tremendous
12 effort, very comprehensive, a lot of work.