

UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

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Investigation of:

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HOUSE EXPLOSION IN FIRESTONE,
COLORADO, APRIL 17, 2017

* Accident No.: DCA17FP005

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Interview of: SCOTT OLEY

Frederick-Firestone Fire Protection
District Business & Education
Center
Longmont, Colorado

Tuesday,
May 13, 2017

APPEARANCES:

RAVI CHHATRE, Investigator in Charge
National Transportation Safety Board

MATTHEW MCKENZIE, Attorney
National Transportation Safety Board

GBENGA AJIBOYE, General Engineer
Pipeline and Hazardous Materials Safety Administration
(PHMSA)

MICHAEL LEONARD, Quality Assurance Professional
Colorado Oil & Gas Conservation Commission

MATTHEW LEPORE, Director
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DOUG PRUNK, Fire Investigator
Frederick-Firestone Fire Protection District

DAVID PUCETTI, Fire Investigator
Frederick-Firestone Fire Protection District

DAVID McBRIDE, Vice President of Health, Safety &
Environment
Anadarko Petroleum Corporation

ROB BLUME, Esq.
Gibson Dunn & Crutcher
(On behalf of Mr. Oley)

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I N T E R V I E W

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2 MR. CHHATRE: Good afternoon, today is Saturday, May 13,
3 2017. We are currently at Frederick-Firestone Fire Protection
4 District Business & Education Center, located at 8426 Kosmerl
5 Place, Longmont, Colorado. We are meeting, regarding the
6 investigation of the explosion of a home located at 6312 Twilight
7 Avenue, Firestone Colorado, that occurred on April 17, 2017.

8 My name is Ravi Chhatre. I am with the National
9 Transportation Safety Board, located in Washington D.C., and I am
10 investigator in charge of this accident. The NTSB investigation
11 number for this accident is DCA15FP005 [sic].

12 I would like to start by notifying everyone present in this
13 room that I will be recording this interview, and we may
14 transcribe it at a future date. Transcripts will be provided
15 directly to the interviewee for reviewing and identifying any
16 typos or errors. The transcripts may be posted in NTSB's public
17 docket.

18 Also, I would like to inform Mr. Scott Oley that you are
19 permitted to have one other person present with you during the
20 interview. This is a person of your choice -- your supervisor,
21 friend, family member or, if you choose, no one at all. Please
22 state for the record your full name, the spelling of your name,
23 organization that you work for and your title, business contact
24 information such as billing address, email, phone; and whom you
25 have chosen to be present with you during your interview.

1 MR. OLEY: My name is Scott Oley, that's S-C-O-T-T, O-L-E-Y.
2 I am a field coordinator for Anadarko Petroleum, and my business
3 contact email is [REDACTED], which is
4 A-N-A-R-D-A-R-K-O. I might have gotten that wrong, sorry. I use
5 my personal phone as business as well, and it is at [REDACTED].
6 I do not know Anadarko's present address.

7 MR. CHHATRE: Okay.

8 MR. OLEY: Sorry.

9 MR. BLUME: My name is Rob Blume, B-L-U-M-E with Gibson Dunn,
10 and Crutcher, representing Mr. Oley.

11 MR. CHHATRE: Okay. Thank you for that. Now, I'll go around
12 the room and have, and have each person introduce themselves.
13 Please state your name, spelling of your name, your title, and the
14 organization that you represent, and your business contact
15 information, starting from my left.

16 MR. AJIBOYE: My name is Gbenga Ajiboye, G-B-E-N-G-A,
17 A-J-I-B-O-Y-E, I'm an engineer with US DOT, PHMSA. My office is
18 in the Lakewood office in the Western district. My contact phone
19 number is [REDACTED], and my email address is [REDACTED]

20 [REDACTED]
21 MR. LEONARD: Mike Leonard, first name common spelling, last
22 name L-E-O-N-A-R-D, I'm with the Colorado Oil & Gas Conservation
23 Commission as the Quality Assurance Professional. My email
24 address is [REDACTED], business cell phone [REDACTED]
25 [REDACTED].

1 MR. PRUNK: Doug Prunk, Frederick-Firestone Fire Department,
2 Division Chief of (indiscernible) safety, it's [REDACTED], sorry,
3 [REDACTED], area code [REDACTED].

4 MR. BLUME: Again, Rob Blume, B-L-U-M-E with Gibson, Dunn &
5 Crutcher, representing Mr. Oley.

6 MR. CHHATRE: Contact information.

7 MR. BLUME: My office telephone number is [REDACTED], my
8 email is [REDACTED] com.

9 MR. McBRIDE: David McBride, M-C-B-R-I-D-E, I'm Vice
10 President of Health, Safety, and Environment for Anadarko
11 Petroleum Corporation. It's [REDACTED]
12 [REDACTED].

13 MR. CHHATRE: Thank you for that.

14 INTERVIEW OF SCOTT OLEY

15 BY MR. CHHATRE:

16 Q. Mr. Oley, for the record, tell us your educational
17 background, formal, informal education, and related work
18 information, you know, how many years you had with the company,
19 stuff like that.

20 A. I have no prior education. I started in the field 10 1/2
21 years ago, with Merit Energy in northern Colorado, here, and I was
22 with them for 5 years, and then PDC Energy bought us out, and I
23 worked with -- and they brought us on, and I worked with them for
24 a year and a half as operator in both companies, in both
25 companies. And then I moved over to Anadarko Petroleum 3½ years

1 ago, 3 years ago.

2 Q. As?

3 A. As an operator.

4 Q. Okay, and as operator, what are your duty hours, and what do
5 you do?

6 A. I was, I would, once the wells were drilled, I would take
7 care of them. So, I would be production.

8 Q. So, you're an Anadarko employee?

9 A. Correct.

10 Q. I know it means a lot to you, but tell me what you would take
11 care of them? What did you do?

12 A. I make sure that they run properly, in order to get the oil
13 and gas out of the ground, and make sure that there are no issues,
14 I mean, whether --

15 Q. Did you have to learn how to change the settings?

16 A. Yeah, I can change settings on a well, I can do minor
17 maintenance, I can, if -- basically it was just to make them run
18 properly, so that way there were no leaks, no this, no that. I
19 mean, there were no issues. I try to make them run as safely as
20 possible.

21 Q. Okay. So, where is the well that is near the accident scene?
22 Was that your well? Did you work on that well?

23 A. I did not work --

24 MR. BLUME: He's no longer an operator.

25 A. I'm not -- I'm sorry. I went --

1 MR. BLUME: His current position is something else.

2 A. Is, yeah, I'm no longer an operator. I moved from an
3 operator about a year ago, to a rover, which would be like a lead
4 for operators. And then, January 23rd I got promoted to field
5 coordinator.

6 Q. Okay, okay, okay, so you're a field coordinator, now?

7 A. Correct.

8 Q. Now, because, as your previous experience, you only stopped
9 at operator, so that's where I am.

10 A. Yeah, I apologize for that.

11 Q. Okay, so, tell me what a field coordinator does, and what a
12 rover does.

13 A. I get direction from my foreman who is right above me, and I
14 filter it down to my team. I have a team of anywhere between 6 to
15 12 people, as we have split north and south under my current
16 foreman. And make sure they have what they need. They have, if
17 there's a major incident, they can give me a call. I go out for
18 spills and such, or kind of keep -- make sure they're on the up
19 and up, like, are you guys being safe, what do you need, so on and
20 so on. If I need to, I can just kind of, like I said, just make
21 sure they're all safe.

22 Q. Okay, so you are a field coordinator for couple of, 3 months
23 now?

24 A. Correct.

25 Q. As a, as a rover, what were your responsibilities?

1 A. I would help out where needed. So, if an operator came to me
2 and said, Hey, I need to do this. I need you to help me out with
3 this., then I would go and help them out, whether it be in
4 training or if they said that, I don't understand how this is
5 really working right now, we would go out there and figure it out
6 together. And if the field coordinator asked me to go do
7 something, then I would, that would be my responsibility to go
8 take care of that as well. So, it's a field lead.

9 Q. It's a field lead, so would you be in the office, or would
10 you be in the field?

11 A. As a field, as --

12 Q. As a field coordinator.

13 A. As a field coordinator, it just depends on my daily duty,
14 whatever I needed to do. I tried to get out in the field as much
15 as possible, but sometimes it wouldn't allow it.

16 Q. So, on a, on a typical average day, what is your, 50/50, 60
17 in the office?

18 A. Probably be 60/40, 70/30, in the office.

19 Q. So, 70 percent in the office, 30 percent in the field,
20 roughly.

21 A. Roughly.

22 Q. Okay, and as a rover, what was, what was your percentages
23 that way?

24 A. Oh, that would be more like 80 percent in the field. In the
25 morning, we would come in and meet with the operators, and we

1 would talk to them and say, Hey, how do you -- what do you think
2 about this?, look at settings so forth, look at settings on the
3 wells. And say, Hey, you know, maybe we can tweak this over here,
4 and whatnot, Okay, we see this, let's go ahead and take a look at
5 it whatnot.

6 Q. So, you are which district, you're northern or southern?

7 A. I have the southern.

8 Q. Southern, and is the well in question near the ground zero,
9 is that in your area?

10 A. It is.

11 Q. You're in the southern regions, the area, what is it called?

12 A. I'm sorry?

13 Q. What is the term, how do you do -- do you say, I'm in the
14 southern area, I'm in the southern field?

15 A. Yeah, I'm the field coordinator for the south, under Ron
16 Kern, that's how I would have said it.

17 Q. Yes, it is just the south?

18 A. Correct. I take over for the north when the other field
19 coordinator is out or he is busy.

20 Q. Right, okay. So, that means, how many wells you are
21 responsible for? Roughly, if you don't know exact number.

22 A. I don't. I can tell you in the north and the south we have
23 roughly 850 wells.

24 Q. Together?

25 A. Together. Each operator averages about 85 wells.

1 Q. Okay. Each operator, 85.

2 A. And there's 10 operators.

3 Q. Okay. And how many operators are under you?

4 A. There's 10 operators, and there's two rovers. So, I
5 actually, under me, I have five operators, and one rover.

6 Q. And the rover will have a separate 85 wells?

7 A. No, he is actually there to help the five operators.

8 Q. So, if 85, that would be 85 times five, are the number of
9 wells in your area, is that reasonable?

10 A. That would be close.

11 Q. So, on a typical day, what happens, walk me through a typical
12 day -- you come in to the office and just walk me through your
13 8:00 to 4:30, how it's -- how it's like.

14 A. I walk in, I've scheduled a room for our operators to be in
15 from 6:00 to 7:00 in the morning. It's right around the corner
16 from my cubicle. I share a cubical with the north field
17 coordinator. I walk in, I say hi to the guys that are in there.
18 Usually I'm in there anywhere between 5:15 and 6:00, okay?

19 Q. In the morning?

20 A. In the morning. My operators usually start at about 6:00,
21 okay? I walk in, say hi, say hi to whoever's there, and then I go
22 to my cubicle, get on my system, and I start going through emails,
23 and kind of see what's out there. You know, I mean, it could be a
24 direction from wherever, okay. And then, once I kind of go
25 through some of the emails, I pop my head back into the guys and

1 say, Hey, if you need something, let me know. Are you guys good?
2 You know, so forth and so on. It just takes 10 seconds. Then I
3 go to my -- usually I go to my foreman, Ron Kern, and ask him what
4 the day's plan is, is there anything going on, do I need to go to
5 a meeting for you know, for our group, whatnot. And then, we'll
6 get direction that way. Depending on what the direction is, I'll
7 go back to my desk if I have to do reporting, or you know, look at
8 somebody's area for production, because production was down. You
9 want me to go take a look at it, settings, so forth and so on, I
10 will. Other than that, I usually try to be out in the field at
11 least to go between 10:00 and 11:00, to go ahead and get with the
12 guys. I'll give them a call, say, Hey, how you looking, you
13 feeling okay today? You know, because I mean, it's a stressful
14 job at times. And, Do you guys need help with anything?, and if
15 not, then I kind of check in all my guys, and I come back to the
16 office, and then I start -- I'll find something like, I'll go
17 through a route, and see if I can help out, or make notes, and
18 then I'll go over it with them tomorrow. Or, I'll get with the
19 engineer. You know, I mean, that's kind of what I do, it's just
20 oversee.

21 Q. Okay, and where do you meet your rovers in the morning?

22 A. My rovers are with my operators, and yes, I will talk to
23 them. And they, A=and the rover is supposed to come to me in the
24 morning, if I'm not in a meeting, and I'll say, Hey, you know, how
25 do we look? And he'll kind of give me a brief like, yeah, I

1 looked at this, I did this, I'm going to go with so and so, I'm
2 going to help him out. I'm going to say, Well, okay, let me know
3 if I can go out there to help you out. And then we'll coordinate
4 that way. And then at the end of the day, we'll try to coordinate
5 as well.

6 Q. So, what the operators know, how do they know what they are
7 supposed to do that day, who tells them?

8 A. They go through, they have a specific route. They have their
9 wells, they're assigned to them, and they get to go through our
10 automation system, which is CygNet. And they can tell
11 practically, I mean, they can tell quite a bit with the well.
12 They can tell the downhole pressures, they can tell how many, what
13 the runs -- I mean, if they're making runs, if, whatever they,
14 most of the time, whatever they need to find out.

15 A. Honestly, I don't, I don't understand this answer at all.
16 What they need to find out of what, how do they know what they
17 need to find out?

18 Q. We train them to look at specifics, like a run time. So, a
19 plunger is a run time, so the plunger comes from downhole, and
20 brings the fluid, that plunger hits, and it creates -- it goes
21 past an MSO, which is a magnetic sensor, it's a magnetic shut off,
22 basically. And it triggers that MSO, and it counts as a run. And
23 sometimes that plunger doesn't come up, so it won't count as a
24 run. So, they all know to say, Okay, well what happened here?,
25 and they can go ahead and look at it in the system. The system

1 will show pressure differentials, it will show gas made, it shows
2 a lot.

3 Q. Do they have a standard sheet that they have -- If I am your
4 operator, do I know what I'm supposed to be, or expected to do in
5 a certain way, or they do have a problem always, I guess they have
6 the problem, and maintenance? Am I correct or am I not correct?

7 A. I'm not understanding.

8 Q. Okay. If I'm your operator, and I show up in the morning,
9 and you go and say hello to me, next, how do I know what I'm
10 supposed to do, do I need to do?

11 A. We give training. So, they go into a trainer, before they
12 come to us, and they learn how to use --

13 Q. No, I understand, I'm just saying, I am, I am your operator,
14 and you and me have a number of wells, and I come in the morning,
15 you say hello to me, then what do I know what I'm supposed to do
16 then?

17 A. It's, they, that's just the way they're trained. There's no
18 other -- we come in and we look at our specific areas. They know
19 that they come in and they start with their highest producers, and
20 move downward in the system, and they just look at them, screen by
21 screen.

22 Q. And do they know what they're supposed to be looking at? Do
23 they, do they have some kind of a sheet or checklist, that's what
24 I'm asking you?

25 A. No, they don't have a checklist, we teach them on what they

1 should look at, and this will cause -- and this can cause this,
2 this can cause this, you know, we want you to look at these
3 things. Take your time and look, and if you have any questions,
4 you have your teammates here, and you have your rover, and you
5 have myself, you can have the foreman, you can go and ask anybody,
6 we're all one team, ask questions.

7 Q. But if I forget something, I mean, granted, you taught me
8 that during the training period, I got my training. And for
9 whatever reason I forget to look at something, would you know
10 that?

11 A. No, I will not.

12 Q. So, they aren't supposed to check off anything for each well.

13 A. No, there's no checklist.

14 Q. You don't give them the instruction that every time you go to
15 a well, look for this, this, this, and this? There is no
16 checklist on that?

17 A. No.

18 Q. So, if I forget to look at something, and something goes
19 wrong, how do you or anybody will know that the production is low,
20 or what is the right, I'm not familiar with the well operation.
21 But if I'm supposed to check a certain valve, and I don't, is
22 there any cross check that somebody can find, that the computer
23 program tells you that, Hey, look, he's supposed to check. This
24 thing is not checked, the setting is not correct, if I don't put
25 the certain settings on? I mean, if you are responsible, then how

1 would you know that something was not done right, here?

2 A. The system can tell you certain specifics, so --

3 Q. Give me an example, give me an example.

4 A. If a -- we'll say a latch value. A latch valve is what opens
5 up so gas can go through, gas and fluid can go through. We'll say
6 that sticks open. When I come in, and I look at it in the
7 morning, and we'll say it was cold last night, okay? And it stuck
8 open. Then I would notice that my tubing pressure is way down,
9 it's at line pressure, when it should be at x, okay? So, it will
10 show me that, that hey, that's a possible, that's a possibility
11 that, that was a problem. So, that's my first key is to say,
12 okay, I'm going to look at my run times, I'm going to look at the,
13 I'm going to look at my tubing and say, hey, I've got a big
14 differential here, that's a red flag for me.

15 Q. That's if something is not working, right?

16 A. That is correct.

17 Q. Now, if I'm going to look at the well, I'm not going there
18 only because something is not working there, right? I'm just
19 going there to maintain them passively, I think that's what you
20 told me. Am I correct, that the operators are, operators are
21 supposed to maintain their number of wells, whatever the number
22 they may be, or I'm getting it wrong.

23 A. The operators are supposed to maintain the running wells.

24 Q. Then, am I correct, or?

25 A. That is correct.

1 Q. So, if I go in there and the well's running smoothly, what do
2 I do, how do I? I understand, I understand, I don't have --

3 A. You don't have to go to every well every day.

4 Q. Okay, that's what I'm asking, okay.

5 A. No, it would, you don't, you don't have to go to every well
6 every day. The requirement for us is to look at it as often as
7 possible, but at least once a week.

8 Q. Once a week?

9 A. That is correct, and we can tell if it looks like it's
10 running decent, by our system, okay? So, if there's something
11 that's a little off, then we note it down, we train to note it
12 down, and go forward.

13 Q. So, you do a sign-up sheet at each well that when I come in
14 once a week that I sign in, and then you would know, the
15 supervisor, that I was there?

16 A. No. A sign-up sheet?

17 Q. Like if I, if I'm supposed to go to a well which is working
18 smoothly, and I'm supposed to go to the same well again next week,
19 right? Any time, right?

20 A. Okay.

21 Q. So, how do you, the supervisor, know that yes indeed, I went
22 and saw that well once a week, how would you know that, how would
23 your rover know that?

24 A. I wouldn't. That's a trust, that's a trust matter with the
25 operators.

1 Q. So, even the rover would not know that, that I went to a
2 certain well.

3 A. No.

4 Q. Okay.

5 A. Only by the notes in the system. If they put notes in the
6 system.

7 Q. Right, that means if I'm not there, there are no notes in the
8 system.

9 A. Correct, I have no idea.

10 Q. Say something minor goes wrong, let's suppose it is shut in,
11 and I'm supposed to close all these valves. I did that, and maybe
12 I have forgotten something. I guess what I'm asking is, if I
13 don't do something that I'm supposed to be doing, how would the
14 system know? I'm not saying you as the supervisor, there is no
15 way of knowing?

16 A. Unless it creates a differential in something in the system,
17 that is not normal, from what we're used to looking at, then
18 there's no way to know, that I know of.

19 Q. So, deviation, small deviation would not trigger anything

20 A. We try to train them to look for the deviations.

21 MR. CHHATRE: Now, I want to look at it -- can he give me the
22 drawing?

23 UNIDENTIFIED SPEAKER: Drawing off the shelf?

24 MR. CHHATRE: Yeah, photo drawing.

25 UNIDENTIFIED SPEAKER: Here you go, sir.

1 Q. This is the well, I guess, closest to the ground zero
2 building.

3 A. Is this the 6-14? Okay.

4 Q. I think it is number 14, that drawing.

5 A. I am -- that's only how I know it is that --

6 Q. Sure, that's why I'm asking you. So, when you came to work
7 for the company, did you look at this well any time at all during
8 your tenure?

9 A. I don't recall.

10 Q. Okay, are you required to visit all the wells at least some
11 time in your tenure as a -- visit each well that you're
12 responsible for, or you are not, in terms of expectations by the
13 company?

14 A. As a coordinator, or as a --

15 Q. No, as at your level, as a, as a coordinator, you're not
16 expected?

17 A. No, I am not, as far as I know, I'm not expected to go out to
18 these at all.

19 Q. Are your role -- no, not issue. I said, are you expected to
20 visit the wells that you are responsible for, at least some time
21 or during -- I'm not even saying once a year. Are you expected to
22 visit what you are responsible for, at any time, by the company?

23 A. I don't know. I do not know.

24 Q. Okay. Is your rover expected to --

25 A. I don't know that either.

1 Q. Okay.

2 A. I do know it's the operators, the operator is the one that
3 should be going out to those wells.

4 Q. Okay, now that's strange, because the operator is supposed to
5 contact the rovers, see if there is a problem, the rover is
6 supposed to contact you. But if you haven't seen the well, how
7 will you be able to help? That's what I was really trying to find
8 out. If you haven't seen the well, and I'm a rover, or I'm an
9 operator, a rover hasn't seen a well, how can you guys help that
10 person, is I'm trying to understand?

11 A. And the operator is the boots on the ground. They are the
12 ones that are our eyes and ears, and they let us know, and we'll
13 ask. If they come to me with an issue, I'll say, Okay, is this
14 set up, do you have -- did you shut the valves, did you do this,
15 did you do that? And they go, Yes. Okay, well then let's go take
16 a look at it, and then we'll go out and look at it, if it's
17 necessary.

18 Q. Now, this is a setup, this thing, the lines, and I'm not even
19 going to attempt to name all these components. But is this a
20 pretty normal setup for this region of the wells that you're
21 responsible for?

22 A. Yes. So, any, most all of our wells, most of our wells look
23 like this. If you didn't point it out that this was near ground
24 zero, I wouldn't have been able to tell you which well that was.

25 Q. Okay. Now with this photo here, do you know all the

1 different components, with your well experience?

2 A. I do know most.

3 Q. Good. Can you -- Can you --

4 A. No, I know how the operation works.

5 Q. Okay, great. So, can you tell me, kind of walk me through
6 what these different components are, and how this kind of thing
7 functions, and what you typically expect your operators to look
8 for?

9 A. Okay, so you have right here -- I'm sorry.

10 MR. AJIBOYE: No, you can write on this.

11 Q. You can go ahead and write it on this.

12 A. You want me to write it for you?

13 Q. Yeah, write down these different component for me, because
14 I'm, you know, I went through this many times, and I probably
15 always (indiscernible) when somebody explains it to me. This will
16 be nice to have.

17 A. No worries. So, this right here --

18 Q. You just can write, it's not really --

19 A. I might -- I am not a good writer, I write like a doctor.

20 So, this right here is your casing, okay? This is your casing set
21 up, okay?

22 Q. (indiscernible) okay.

23 A. Inside of this is your tubing, which is this right here,
24 actually. So, this right here is a lubricator, okay, do you want
25 me to write the whole thing down?

1 Q. Yeah, yeah, yeah.

2 A. All right. This right here is a lubricator, this right here
3 is your master valve. This is actually an orbit master valve.

4 Q. And what is the function of that?

5 A. This right here is your main shut in, so you spin it, and it
6 has, and it pushes it in, like this, okay? And it kind of gives a
7 seal. Okay, so that way, nothing downhole in your tubing can come
8 up, okay, from your tubing.

9 Q. Which is this, here?

10 A. Correct, which is this up here, so the tubing is what brings
11 your flow to sales, to our separators and sales, okay? So, this
12 right here is your casing line, I'm sorry I don't -- Okay, so,
13 this right here, this whole part right here is your casing line.

14 Q. Maybe you should have used a pen, is what I really think.
15 See if it writes better.

16 A. It will, I just used pencil, because I -- no, no, no.

17 Q. (Indiscernible) You can scratch it. No, see, this pen's not
18 working now. Here, this, I think this will work better.

19 (Indiscernible) Please go back and write down these, because I
20 cannot see your writing on this.

21 A. But, it's a paper. Is that better?

22 Q. Oh, that's a lot better.

23 MR. PRUNK: (indiscernible) that's where I keep them.

24 (Indiscernible).

25 A. So, this right here is your casing, that's this thing right

1 here, the whole thing, okay? This right here is your master
2 valve. This right here is your lubricator. And this is the --

3 Q. Okay, okay. Tube, right?

4 A. Lubricator cap.

5 Q. Okay.

6 A. Okay. This right here, what we call a dual flow. This right
7 -- do you want me to name every piece?

8 Q. No, no, no. The key pieces that if I'm your operator, just
9 write down the pieces that I should be looking for, the pieces
10 which are important for the operation of the well. When we shut
11 in, am I to understand these terms?

12 A. Okay, well when I'm in the field, I have them name off every
13 part.

14 Q. Don't name every single part, but okay.

15 A. So, this is an inner casing valve, the inner casing valve is
16 the closest valve to the master valve.

17 Q. Okay, and what does that do?

18 A. Okay? This is also an inner casing valve. These are, these
19 will shut the casing, okay? So, you can still, even though you
20 shut the master valve, you can still get casing, and that's what
21 supplies our latch valves to open.

22 Q. Okay, pneumatics. They are pneumatic?

23 A. It's gas-driven. There are pneumatic ones out there, but
24 it's all still open to the air. It's just -- so, this right here,
25 this set up is, this right here is a Meco, and this is a

1 regulator.

2 Q. Okay, that, write down.

3 A. This holds the casing pressure back, and then allow you, set
4 it to what you want it to go to.

5 Q. Okay, so it's a regulator, right, write that, regulator.

6 A. This is a, sorry, Mecco reg. I have it right there.

7 Q. Yeah, that's good.

8 A. This comes down to and supplies your 1-inch supply line.

9 This supply line goes to the separator scrub pot, which allows the
10 separator to stay up, which usually, it's 35 pounds, 40 pounds,
11 something like that. This right here is an R67, or a 67R
12 regulator. It's a lower regulator than the Mecco, it's usually up
13 to about 35 pounds, and we regulate how high we want our -- how
14 much we want our latch valve to open, to allow the flow to go
15 through.

16 Q. From zero percent to 100 percent open?

17 A. Correct. So, if this is backed all the way out, this doesn't
18 open, because it doesn't get supply through here. And then, I
19 don't know what really else you want me to do. This is, this
20 whole thing is called a tree. This my, this is a tubing, these
21 are transducers, they are basically electronic gages. So, a
22 tubing transducer. Down here you have, this one right here is a
23 casing transducer.

24 Q. Okay, so that's going to monitor or signal the casing
25 pressures, and all that stuff?

1 A. These two are what we see in our CygNet, in our automation,
2 and on our screen.

3 Q. Automation, okay.

4 A. So, when we see it, remember when I said the latch valve
5 stuck open? It's going to allow this, that means this stayed
6 open, and all that pressure in my tubing is all down line, and it
7 will, it will keep going until it reaches a sales line level, so,
8 sales line pressure level. Once they kind of hit each other, and
9 this is still open, it'll just stay there, kind of like, they just
10 equalize.

11 Q. And what does that do, no product flows out?

12 A. Well, yeah. Once there's -- I mean, unless there's a sales
13 line drop, then the tubing will drop with the sales line,
14 otherwise it will just stay there. The casing, the casing, we can
15 -- well, we'll go from that. So, anyway, you can still have, you
16 have your casing pressure and then downhole it makes it come up as
17 a U-tube into the tubing. So, that's where it counts your --
18 you'll get differentials. If we see 120 pounds here, sales line's
19 at 120 pounds, this is at 600 pounds, we know that's a problem.
20 So, that's a trigger, anyway. So, any other parts you want me to
21 rattle off? This is my electronics right here, my io-slave.

22 Q. No, no, no. Okay, so we understand that this will only
23 operate 30 minutes or something like that a day?

24 UNIDENTIFIED SPEAKER: That's what they were guessing, yeah.

25 Q. Yeah, roughly. I mean, not, I'm not holding you to the exact

1 time. But only a very short time a day, is that correct or do you
2 know the --

3 A. I couldn't tell you.

4 Q. Okay, that's fine. But when the well is shut in, what
5 happens? There's no product comes out, but you said something
6 like the casing still has the product?

7 A. Yeah, you can shut --

8 Q. But that runs through your system?

9 A. You have, in this set up, I have one, this is a Balon ball
10 valve, this is a ball valve, a half-inch ball valve, and then over
11 here is, if I have a frontal, a back view on this --

12 UNIDENTIFIED SPEAKER: There's the ball valve.

13 A. There is a ball valve right there, I do believe.

14 UNIDENTIFIED SPEAKER: He's showing them the ball valve.

15 A. So, you have three ball valves. There you go, that guy. You
16 have one, two, and three valves off your casing. So, you shut
17 this one, there's no casing that will go by. You shut this one,
18 there's no casing that will go beyond this point.

19 Q. Okay. So, if all of this is open, then you are putting the
20 product through 1-inch line?

21 A. Correct.

22 Q. According to.

23 A. Correct.

24 Q. But when I shut in the well, can I keep these open, if you
25 are -- if I'm using your flow line, your one inch, what do you

1 call that line --

2 A. The supply line?

3 Q. Supply line. For a supply line product to go wherever it
4 needs to be going to keep the system going on the separator, do
5 these valves need to be open, or they can be closed?

6 A. No, the separator only needs to have a supply if it keeps
7 going now and there's not enough runs on it. So, if it's not
8 needed, it doesn't need to be open. The supply line is more like
9 a backup.

10 Q. Okay, so I guess my question is, do you keep these open as a
11 backup, or you keep those closed? It looks -- they look like a
12 manual valve, see.

13 A. It is a manual valve. All three of those would be manual
14 valves.

15 Q. So, if you need -- Right, so if for some reason you want to
16 have the supply line provide the separator, or whatever, then
17 somebody would have to come and open these?

18 A. Correct.

19 Q. So, you don't leave them open all the time?

20 A. No. Well your casing, in this sense, your casing should be
21 open. Like, it should be open all the time, because you need to
22 be able to get your pressure to here to open up your latch valve.

23 Q. Okay. So, which of these valves needs to be opened?

24 A. To do what, exactly?

25 Q. No, I mean the set up here you told me, you said this needs

1 to be kept open for this?

2 A. Correct. So, your casing, in order for your latch valve to
3 open, you need pressure, so this comes from your casing, this ball
4 valve would have to stay open, and it comes up here, and this
5 valve would have to be open. This valve does not have to be open.

6 Q. Okay, okay, got it. So, those two at least, have to be open
7 all the time.

8 A. Correct. In order for your latch valve to open.

9 Q. Open, right. But you can always override the automatic and
10 go manually to open the latch valve, or you cannot do that?

11 A. One more time?

12 Q. Sure. For the latch valve, can, do they have a manual
13 override, so even if --

14 A. We do have a manual override, and I don't have a --

15 Q. That's okay, I mean --

16 A. What they have right here, they have, right here there's
17 thumb valves, we call them thumb valves, they're just little
18 turning things, there. And what it is, is that there's a bypass.
19 It has constant pressure on that bypass from this other line. Is
20 that a better picture?

21 UNIDENTIFIED SPEAKER: You can almost see it, behind that.

22 A. Yeah, it's this right here, okay? So, it's this right here,
23 and here's both sides. So, one side comes from -- one side has
24 constant pressure from this that line comes up and it goes over
25 here, okay? The other side is this goes into what we call -- this

1 right here is your latch valve, basically your latch valve. This
2 is -- when I'm saying latch valve. This is a motor valve, this is
3 your latch valve, driven by pressure, when this says, hey, turn on
4 it clicks, pops in there, and then this tells this to open, gives
5 it the pressure, lets it flow through.

6 Q. And somebody at your -- what does it say directly here, now,
7 CIO or whatever the station is will know -- if there's a signal?

8 A. Correct.

9 UNIDENTIFIED SPEAKER: Io-slave.

10 Q. Yeah, io-slave.

11 A. This is a io-slave, and the term is input/output.

12 Q. Right, okay.

13 A. That's its job, it gets input from the RTU, and the RTU is a
14 radio-transmitting unit back at the battery, and it sends it to
15 here. It says, I want you to open, I want you to close, how long,
16 so forth and so on.

17 Q. Okay, and this helps. Right now, I feel as if I understood.
18 We'll see.

19 UNIDENTIFIED SPEAKER: Maybe you could get out in the field,
20 go ahead.

21 Q. So, especially this particular valve, because it operates so
22 infrequently, is this reciprocal valves, they are, by your
23 protocol or procedure, they are meant to be open, they are meant
24 to be closed, what's your procedure? Or that's up to the
25 operator?

1 A. A running well, these are open, okay? Because you have no
2 way to open the latch valve without either one of these, whether
3 the set-ups in here, or the set-ups out here, either way it's
4 casing that's driving the latch valve opening, okay? With that
5 closed, your latch valve won't open, so the well's not running.
6 So, when we shut in our wells, we'll do that.

7 Q. Okay. But they'll be shut in without, only for 10 minutes,
8 or something? When are they shut in, when would we shut in a
9 well?

10 A. For a number of reasons. It could be because of nearby
11 fracks, it could be that we, for a number of reasons. We wanted
12 to, we're going to leave it shut in for 2 weeks to build pressure,
13 it could be 100 reasons.

14 Q. Okay. So, a running well, so, what does a running well mean
15 to you, then? If I were to keep the well closed for 2 weeks, this
16 is shut in, but I'm using that well to pump my product out, do you
17 consider that --

18 A. The well can't -- go ahead, sorry.

19 Q. No, no, that's it. Like I said, this well is putting gas
20 out, but because, like the example you gave me, because there's no
21 pressure built up, so you want to close this for 2 weeks, and get
22 the pressure built up again, so you can put the gas out. Those 2
23 weeks, now, do you consider that well working well, or do you
24 consider that well as not working well?

25 A. It's a non-working well for 2 weeks.

1 Q. Okay, so that time there for 2 weeks, do you close everything
2 in this --

3 A. Not necessarily.

4 Q. Okay, that's what I'm trying to understand. These wells
5 can't remain open, only this part of it.

6 UNIDENTIFIED SPEAKER: (Indiscernible).

7 Q. (Indiscernible), what is this component, I think he said
8 pipe? He said casing, but tubing, I --

9 A. Yeah, tubing?

10 Q. Tubing, yeah. So, when you close, you, this valve, the
11 tubing is closed, but the casing is open?

12 A. It depends on what the reason is for.

13 Q. That's what I'm asking. So, for 2 weeks, when you say, I
14 want this shut in for 2 weeks, do you, I think you answered that
15 question, that you don't keep all the valves closed.

16 A. It depends on what the reason is for. If there's nearby --

17 Q. I gave an example, like only for production, right?

18 A. Then no, I will, for production reasons --

19 Q. What would you do?

20 A. On shut-ins, I don't know what the operator is. We try to
21 teach them to go ahead. And I would have shut the master valve in
22 each valve.

23 Q. Okay, but leave the testing valves open, because you --

24 A. That, it just depends.

25 Q. So, that depends on the operator, how they want to do it, is

1 that (indiscernible) --

2 A. If they have a question -- if we say to go shut in the well,
3 they'll shut a ground valve, and they can shut the master valve,
4 and they'll shut the inner casing. Usually when they do it, there
5 will be, it's a five-point system to shut a well in, to lock it
6 out, and tag it out. And I will shut -- we have them, it's a
7 five-point system. One, you have your inner casings, you have
8 your ground valve, you have your master valve, and you have your
9 1-inch line, when you shut in a well.

10 Q. Everything is shut, okay. So, if you were to come back and
11 start again, you open all this, five valves?

12 A. I would start, I would start it inch by inch. I have every
13 valve closed, I open my master valve, make sure I don't have any
14 leaks here, then I open these valves, and make sure I have no
15 leaks up to this point. I make sure I have no leaks up to this
16 point, and we just go piece by piece.

17 Q. Okay, and that's part of their training, so they don't really
18 need a written instruction.

19 A. There is a written instruction out there for that, an SOP.

20 Q. Okay, and they are to carry that with them?

21 A. That is on their systems.

22 Q. Computer system?

23 A. Mm-hmm.

24 Q. Meaning, it's hard copy or computer, they, have it?

25 A. Right, it's in their Outlook.

1 Q. Outlook, okay, great. And that's all I have, thank you.

2 MR. AJIBOYE: This is Gbenga from --

3 MR. CHHATRE: Just one second, can you just mark down, and
4 write down your name and today's date, signature, that way we can
5 include that, write down exhibit one.

6 MR. OLEY: You want me to print and sign, or just sign and --

7 MR. CHHATRE: No, write down exhibit one, and your name, and
8 sign it, so today's date. So, what will happen is, we'll attach
9 that to your transcript.

10 MR. AJIBOYE: (Indiscernible) write here, on this.

11 MR. CHHATRE: You can mark any of that, we just want to give
12 what he marked (indiscernible).

13 MR. OLEY: You would like today's date on it as well?

14 MR. CHHATRE: Yeah, pardon me?

15 MR. OLEY: Today's date?

16 MR. CHHATRE: Yes, today's date, yeah.

17 MR. OLEY: Can I have today's date, please?

18 MR. CHHATRE: 30, that's what, that I can tell you.

19 MR. OLEY: Oh, thank you. You think I'd know, since it was
20 Tuesday, was a work day. Sir.

21 BY MR. AJIBOYE:

22 Q. So, this is Gbenga from PHMSA. Now, this well, you said is
23 part of your asset, 0000, right?

24 A. In my area?

25 Q. Yeah, you as a supervisor, right, as a coordinator, are you

1 responsible? Is this well under what you supervise?

2 A. It is in my southern region, yes.

3 Q. And you are the supervisor -- coordinator for southern
4 region?

5 A. Correct.

6 Q. And is this, does this well qualify for what you guys call
7 STEM requirement?

8 A. STEM -- can you repeat, please?

9 Q. STEM, this is STEM, STEM program, right? What does that
10 mean?

11 A. I know STEM. STEM is storage management. So, we can -- with
12 the state, we had -- you can produce a certain amount of oil, and
13 then once it reaches a certain point, then it's shut in.

14 Q. Okay, and is this, do you know if this well is part of, does
15 it qualify for that, does it meet that requirement?

16 A. I can't tell you.

17 Q. Okay, okay, say for the purpose of conversation, say it
18 qualifies, right?

19 A. Okay.

20 Q. And if it met that requirement, what do you do at that point?

21 A. We shut the well in.

22 Q. So, if you want to shut it in for STEM, what do you really
23 shut off, here?

24 A. My personal opinion, I would do the five-point system.

25 Q. Which is?

1 A. I would have my, I would have my operator go out there and
2 shut the master valve, the inner casing valves, the flow line, and
3 make sure that the 1-inch is off.

4 Q. So, which way, say this is shut in for this time program,
5 then it wouldn't be pressured for the casing?

6 A. It will not. And we blow down the wellhead.

7 Q. So, which way, if you do the automatic, for anything, for
8 here?

9 A. It won't run. And then it's also put in manual mode in our
10 system.

11 Q. Okay. And is that kind of shut down different from the
12 regular shut down you do for say, 2 weeks, like he was talking --

13 A. It can be. Once again, the regular 2 week shut down could be
14 for a number of reasons. It could be, like we said, a nearby
15 frack, it could be for a number of reasons.

16 Q. So, which means the five-point shut down is actually more
17 intensive than just regular shut down.

18 A. A five-point shut down is more intensive, yes.

19 Q. So, do you call your operator, and say, I need one point shut
20 down, two point shut down, three point, you can --

21 A. No. Usually when it's a five-point shut down, it's a lock
22 out tag out, which means we put locks on it, tag it out, we sign
23 our names and phone numbers, and the reason why. So, that way, if
24 a person comes over there afterwards, they can at least identify
25 who, why, give them a call and say, I need your locks up, because

1 we're going to put it back under pressure, or whatnot. There is
2 no one, two, three.

3 Q. Okay, so you also said that the supply line feeds the
4 separate shrub, is that what you call it?

5 A. Scrub pot, we call it a scrub pot.

6 Q. Scrub? Can do you spell that?

7 MR. CHHATRE: S-C-R-U-B, probably.

8 A. That's what I'm going to go with.

9 Q. S-C-R-

10 A. P-O-T

11 Q. Okay, S-C-R-U-B pot, right?

12 A. Yes.

13 Q. But that's a backup, right? What really is the major, who
14 has the primary feed to that separate scrub pot?

15 A. That would be your -- if I have a picture of a separator, I
16 can help you with this.

17 UNIDENTIFIED SPEAKER: We do not.

18 A. Then can I --

19 Q. So, what would be the main feed to that?

20 A. It would be, it would be a line that comes off of your, of
21 your dry gas tower, on the separator. So, when a well runs, it
22 produces gas, oil, and so forth and so on, it separates the water,
23 the water, and the oil, but the gas goes up through a gas dryer,
24 and it knocks out the fluids, and then it sends that dry gas to
25 the scrub pot. That's your main source.

1 Q. On the main source, was that, is the 2-inch, can that be the
2 main source to that scrub pot, your 2-inch supply line?

3 A. Okay, so my flow line?

4 Q. Yeah, flow line, is that where it gets the primary gas?

5 A. Correct. It comes up through here from the downhole it comes
6 up through, down the flow line, and it supplies the separator.

7 Q. So, and then, the 1-inch supplements the system? Does the 1-
8 inch supply line supplement the 2 inch to the scrub pot?

9 A. No.

10 Q. But you just mentioned that the 1-inch system, this one
11 supply line goes to a scrub pot, that's where it came up,
12 actually?

13 A. It comes up through the side of the scrub pot.

14 Q. In through the side, it doesn't supply it?

15 A. Correct, it comes in through the side of a scrub pot. It's
16 only this far from the top of the scrub pot. Scrub pots are
17 usually only about this big.

18 Q. Okay, so can that be a scrub pot? Oh, can you differentiate
19 from a scrub pot that doesn't have a supply line input, is there,
20 is there a way to tell that there's no 1-inch supply to that last
21 scrub pot, in a separator unit, is there a way you can tell?

22 A. You can tell that there is no one inch supply coming into the
23 scrub pot, from looking at the separator.

24 Q. Was there something specifically you have to look at?

25 A. Yes.

1 Q. And are the operators, are the operators, are they trained to
2 know?

3 A. Yes.

4 Q. So, because in this configuration, right, it's a 1-inch,
5 right?

6 A. Correct.

7 Q. But, will, but will the separator, will they have a
8 differentiating characteristics from one without a one inch?

9 A. Yeah, so it will have a 1-inch line that comes up through the
10 ground into what we call the dump house, and come down and in
11 through the side of the scrub, that scrub pot.

12 Q. So, if you see, if you see a setup like this, with this one
13 inch going into a particle separator, and you get to that
14 separator, and there's no 1-inch, what would that normally tell
15 you?

16 A. That I'd like to know where the 1-inch line goes.

17 Q. And has that been anything that has come up through your
18 chain of -- so, nobody has ever had any problem with that, no
19 concern about that?

20 A. I have not seen.

21 Q. For this particular setup? Okay, now the, okay, now the last
22 thing. So, if this 1-inch line, for example, say let's, for the
23 purpose of this conversation, right, say this one inch is
24 supplying a separator, and there's a 1-inch riser, and there's a
25 lid between the two 1-inch, is there a way, is there a trigger to

1 you guys to tell that this one inch is not supplying that
2 separator what it should supply. Is there a trigger to do with
3 that pressure as a problem?

4 A. Can you repeat it one more time?

5 Q. From what I'm learning from you, right, this 1-inch supply
6 line should have a little riser at the separator?

7 A. It should have another line that comes out over by the
8 separator, right.

9 Q. And there should be gas flow?

10 A. If this is open.

11 Q. If this is open. Now, if, what if that gas flow has not been
12 supplied to that one, to that 1-inch riser, is there a way you
13 guys can know?

14 A. If it's pulling, then it can be a block of ice.

15 Q. Well, is -- Okay, if there's a block of ice, is there a
16 trigger to you guys to know that there is a problem?

17 A. Yeah, I mean that would say that hey, you know what, but that
18 could be that this is turned up too high, your Meco. It could be
19 that something was wrong with your, like a leaking valve at the
20 separator, you know, as it was going in. It could be a number of
21 things.

22 Q. So, would that be something that would give an operator a red
23 flag to look at it again?

24 A. Correct, and that would have been to go ahead and shut the
25 valve to see if it's shut, and then turn it. Once again, it could

1 have been here.

2 Q. Okay, and if such is done, would there be a work order to
3 that effect?

4 A. I'm sorry?

5 Q. Would there be a work order to that effect, if --

6 MR. CHHATRE: Work, work order.

7 Q. A work order.

8 A. Oh. For the Meco freezing, or just --

9 Q. No, no, no, say we are assuming that I would say that there's
10 a freeze in this one inch, would that trigger the system up to the
11 point where there would be a work order to fix that problem?

12 A. I can't say. I mean, I would had to have looked at it first.
13 I'd have had a rover go over there and look at it first.

14 Q. So, say that your rover comes to you now and says, hey, my
15 operator told me that there's a freeze between this one inch, he's
16 suspecting that. So, you as the coordinator, you would not
17 require them to have a work order to do something on that, is that
18 what you are saying?

19 A. No, because I can fix this up here. Now, if I get there and
20 the valves are shut and I have something in here, downhole right
21 here in this one inch, then yes, then there's a problem, and I'm
22 having somebody come out. But right here, this I can take care
23 of.

24 Q. So, how will you know that's it's something that -- So, how
25 will you know that there's something downhole, how will you know,

1 how will the operator know, how will somebody know?

2 A. If after it's shut, and this is still frozen, that would tell
3 me that there's a problem. Here.

4 Q. But you don't know if that's, but you don't know if that
5 problem has come up on this asset, you don't know?

6 A. No.

7 Q. Okay, okay, that's the end of my question.

8 BY MR. LEONARD:

9 Q. You sure? It's Mike Leonard. So, you said that your
10 operators look at their records every day, who looks at them when
11 they're on days off?

12 A. We have either our rover or myself, another operator can
13 help, the other field coordinator can help, the other rover can
14 help, from the north.

15 Q. But there's somebody that looks at them?

16 A. We're all one team, yes. It can go all the way to the
17 foreman, who can look, which is not normal.

18 Q. And would that person necessarily know if there's a problem?
19 Can you look back far enough to see if there's, I mean, do you
20 look back? Do you see just back the day before, or do you see a
21 week before?

22 A. You can see, you can see back, usually you can see it from
23 the life of the well, I can go back --

24 Q. But would you, I mean, would you look? How far back would
25 you look? Like, so, let's just back up, this well didn't get

1 turned on until January whatever, you wouldn't look back a year,
2 but you'd look back a week, week, and a half, probably, is that
3 correct?

4 A. Yeah, give or take, sure. Depends on how long they're out.
5 If they're only out a day, I would take a look at the last 2 days.

6 Q. Sure, okay. So, on this particular well, did you ever look,
7 look at the records on it?

8 A. I don't recall.

9 Q. You don't recall? Okay.

10 A. It was a lower producer, they're -- it was down towards the
11 bottom of the list.

12 Q. Sure, so it wasn't one of your high-priority wells?

13 A. Correct.

14 Q. Thank you. How much pressure does it take to fully open your
15 latch valve?

16 A. About 25 to 30 pounds, 25 pounds.

17 Q. What happened if, what would happen if you didn't get that 25
18 to 30 pounds?

19 A. It would just creep open to about what it would allow -- as
20 much pressure as it would allow to --

21 Q. So, it wouldn't fully open?

22 A. Correct.

23 Q. Would that potentially be a cause for loss of production?

24 A. It would slow it down, and it would stop, maybe stop the
25 plunger from coming up on a regular run, yes.

1 Q. Okay, so, what's your typical, and I know every one of them's
2 different, but your typical downstream pressure for your Mecos
3 regulators?

4 A. I usually keep mine between about 40, about 45 to 50 pounds.

5 Q. So, downstream 45 to 50 pounds?

6 A. Correct.

7 Q. But it only takes 30 pounds to open your latch valve?

8 A. That's from the 67R regulator.

9 Q. Oh, I'm sorry, you're right, okay, that goes to -- all right,
10 (indiscernible), thanks. So, when you said, back on the picture,
11 you can fix this, and I, and I was sitting over here, but if
12 you're talking about a freeze up in the stainless tubing, and
13 things like that --

14 A. Correct.

15 Q. So, what would you do to fix that?

16 A. So, in turn, I'm shutting, I'm shutting, and I'm relieving
17 the pressure that's in here, okay, from here to here, via the
18 blowdown right here, or whatnot. Get my bucket underneath, make
19 sure I have no fluids, whatnot. This will usually, I've pulled up
20 on many of these, and it's a block of ice. And sometimes, they're
21 turned all the way in. So, throughout time, and operator came in,
22 it could have been a number of people that did this, okay? I
23 would either get a heating blanket, I'd put it around, I'd use
24 from my tailpipe, I'd go ahead and have a hose, and I'd heat it
25 up, melt it off. I'd take it apart. I'd take out the cube on the

1 bottom. I mean, I would take this apart, I'd clean out all my
2 lines, make sure they were good. I'd put it back, and make sure,
3 piece by piece from here to here I'd make sure that I, it held
4 pressure, and then I'd go ahead and make sure that I set it to
5 where I want it.

6 Q. So, I mean, so just for everybody here's education, what kind
7 of tools would it take to do that? Are we talking, is this --

8 A. Crescent wrench, no, crescent wrench, screw driver. It's a
9 pretty simple procedure.

10 Q. The heating blanket you would have to -- how is that heating
11 blanket operated?

12 A. So, it's like a thermal blanket. And all you do is it just
13 velcros on the outside, so I would wrap it up in here, put a 2-
14 inch heater hose to --

15 Q. Close enough.

16 A. Yeah, and I'd put it in here, and I'd let the heat from my
17 exhaust go ahead and heat up inside the blanket. So, it will make
18 everything pretty hot.

19 Q. Okay, so back it up just a little bit. You'd open the
20 blowdown before you ever got to the heater? I mean, if you didn't
21 see any indication of ice or anything? And so, if you, if you did
22 -- how are you going to know that there's an ice block in there?

23 A. This will be an ice block.

24 Q. That will be an ice block?

25 A. On the outside. To the, I've seen them to the point, because

1 it may have leaked out of here, whatnot, and it will be to where I
2 can only see -- you can see the formation, I mean, the form of it,
3 the shape of it, but it will be, it will be, you know, a quarter
4 inch of ice all the way around here.

5 Q. So, at that point in time, you would have to have your heater
6 -- you would help it (indiscernible) --

7 A. You're right. I would make sure I've alleviated -- what I
8 would do is blow it all down, okay? And this piece right here,
9 specifically, to make sure I didn't have anything in here. And
10 then I would make sure that I've shut everywhere I need to be,
11 taken care that there -- the safe route. I don't have -- I don't
12 want any gas present.

13 Q. Don't want any pressure?

14 A. Correct. And in turn, then I will go ahead, and I will take
15 this apart, and then I will fix it accordingly.

16 Q. But, I guess, what I'm saying is that if you didn't, but if
17 for some reason, you weren't able to get your heater blanket in
18 there, how far would you go, just blow it down?

19 A. I would shut it --

20 Q. Let's say, I'm going to give you a hypothetical. Let's say
21 it's muddy, and you can't get your well -- your well. The well
22 all the way to your truck. Your truck all the way to the well for
23 your heater hose, would you go ahead and blow it down?

24 A. That's, it just -- honestly at that point, I would probably
25 have just shut it, and then I would have waited and come back to

1 it.

2 Q. Okay, all right. So, and you said you don't recall if you've
3 ever seen this well?

4 A. Prior to this, I saw GPS, and I was there as a drive around
5 in February, but I don't remember seeing -- I don't remember even
6 what I did.

7 Q. Okay, a drive around, so you were just touring the field,
8 basically?

9 A. Yeah.

10 Q. Just kind of getting a feel for where the wells were?

11 A. I went there for a reason on a weekend, and I don't remember
12 the reason in that, to the separator.

13 Q. You went to the separator on the weekend?

14 A. Mm-hmm. I don't remember the exact reason why I was going
15 there. But when I arrived --

16 Q. And obviously, you probably don't remember when, I mean, an
17 estimate date?

18 A. Only from the GPS, which was my weekend, which I do believe
19 was in February. I don't remember the exact date of it.

20 Q. Yeah, that's cool. We can look at those GPS records. And
21 you went to the separator at the well?

22 A. Yeah, and I went there, and I noticed the 613 well, which is
23 next to the separator, and that had a fence that was pushed in.
24 There's an access road that goes from the main road, through to
25 the residential area, and I had been passed there from residents a

1 few times. But that one, I noticed that the fence had been
2 pushed, and so --

3 Q. At the well to the west, not this well?

4 A. Correct, yeah, this was, yeah.

5 MR. AJIBOYE: Okay, I have a follow up, can I?

6 MR. CHHATRE: Yeah, whatever you need.

7 MR. AJIBOYE: Okay.

8 MR. PRUNK: No.

9 MR. CHHATRE: Go ahead.

10 MR. AJIBOYE: Okay, this is Gbenga, again.

11 MR. OLEY: Can I get a water? I'm sorry. Wow, like five
12 jumped -- can I get \$100?

13 UNIDENTIFIED SPEAKER: Yeah, no.

14 MR. OLEY: Just kidding. Thank you very much.

15 UNIDENTIFIED SPEAKER: The water's pretty bad from the
16 faucet.

17 BY MR. AJIBOYE:

18 Q. This is Gbenga again, from PHMSA, I just want to quickly do
19 this for the log, before I forget. You said you went to the
20 separator, physically?

21 A. No, I drove into, when I say the separator, I drove into the
22 battery area.

23 Q. Well did you get into it? Did you look inside?

24 A. I do not recall.

25 Q. But you went to that vicinity?

1 A. Correct. What I saw that caught my eye upfront was the fence
2 on the well 30 feet to the right.

3 Q. Okay, and you don't know the exact date that you went?

4 A. I don't remember the exact date.

5 Q. Okay, that's fine.

6 A. It was on my weekend to work in February.

7 Q. Okay, okay, and that's -- I just realized you gave that.

8 Right, okay.

9 A. And I didn't even remember that until I saw, until somebody
10 showed me the GPS, and I didn't even remember being there, it was
11 minor.

12 BY MR. PRUNK:

13 Q. Prior to the event of --

14 MR. CHHATRE: (Indiscernible).

15 Q. Oh sorry, Doug Prunk. Prior to the event of the house
16 explosion on the 18th, or 17th of April, did you know of any
17 maintenance issues with this well?

18 A. No, just other than what, the 11th, when he had, when Stephen
19 had approached me and said, Hey, I had, I had a freeze. And I
20 said, okay. He said, I couldn't get in there. I said, okay. I
21 said, let's go take a look at it, and we met. I said, I'll call
22 you in a little bit, and we'll go ahead and meet out there. And
23 that's the only time I remember being out there.

24 Q. Okay, so you've said a couple times that you hadn't been
25 there except for February, but then now we're back there on the

1 11th?

2 A. No, short of -- and I apologize. I thought you meant, had I
3 been there previous of this, okay, of the 11th. So, I was there
4 in February as a drive around, as whatever was my weekend. I was
5 there on the 11th, I don't recall the exact date, that's just what
6 I was shown in the, in the notes from Stephen. In turn, yes, it
7 was a -- he told me about it, and I was there. That's when I
8 physically went to the well.

9 Q. Okay, so what, what type of, what did he explain it was, or
10 what did he say he was having trouble with?

11 A. He told me at the office that he goes, I have a freeze. And
12 I said, Okay. And so, I said, Did you close the valves? He goes,
13 Yes, that I recall. And he said -- I said, I'll go ahead and meet
14 you out there, I've got a few things to do, then I'll go ahead and
15 give you a call, and I'll meet you out there. I called him, we
16 met up at the separator, I noticed that the fence on the 613 was
17 messed up again, and then I said, Okay, where's it at? And he
18 said, It's over here. We went down Twilight, and I looped around.
19 And I said, Where's it at? He said, It's across here. I said,
20 Okay. We stopped, we each walked out there. I took -- He opened
21 up the gate, or I did, either one, I don't remember. Quickly
22 looked. I did not see any freeze. I said, Okay, you isolated it.
23 My mind was on now, that you isolated it, my mind is on the
24 access. I went around the south side of the well, I looked, I saw
25 the walkway, and I said, well, where's your access? And I said,

1 Okay, I'm going to have to get with land. And I said, And we'll
2 let you know. I said, I'm going to drive around the other side
3 and see if I can get some access. And he goes, Okay. So, and
4 that was the extent of my stay.

5 UNIDENTIFIED: You got in?

6 Q. So, just we understand a little bit, so can you explain what
7 the access issues were with this, just for the record, so that --

8 A. There's construction to the south, of condos and such, and I
9 think if I had a picture, I could show you.

10 UNIDENTIFIED SPEAKER: Yeah, no, we all, everybody --

11 Q. We understand, just --

12 A. You go down Twilight, they put grass, they put grass, and the
13 well is, I do believe about 40 yards away from Twilight, the road,
14 something like that. And that used to, from what I understood,
15 that used to be our -- and that's what I was going to look at is
16 that was going to be, that was our access road to get into that
17 well. There was no way to get into the well unless you walked.
18 Stephen said I have to walk, and I said, Well, let me go around
19 here to find out. So, I went down and back to the west, and I
20 don't remember if I went, where I went, if I went to county road
21 13 and back up and around, or whatnot. But I tried to get into
22 where they were building the condos. The only access into the
23 condos that I knew of. There was two construction trucks, one
24 parked one way, the other parked the other, and there was a couple
25 guys there. I said, okay, well maybe I'll go to the south. That

1 was going to the north, okay? And I said, well maybe I'll go to
2 the south. I saw construction people down here, I said, I don't,
3 I'm not going to pop a tire, because nails and such. And so, I
4 went back, I sat here for a second to watch these guys and said,
5 okay, well am I going to go through. I said, let me just go ahead
6 and I'll find land, so I went on my way from there.

7 Q. So, basically in a nutshell, your land access that has been
8 denied because of construction?

9 A. Correct.

10 Q. I mean, or somehow it got acquired by the construction
11 (indiscernible) when they --

12 A. Correct, and usually when that happens, and we've had it
13 happen many a time. Usually we'll go out there and the super out
14 there will go ahead and go, Look, I need you to go this way to get
15 there, or whatnot, and I was never notified of any other way in
16 there.

17 Q. Had any of the operators, either the current one at the time,
18 or the one before, ever made mention that they had a land issue,
19 and it needed to be taken care of?

20 A. I don't recall.

21 Q. Okay. So, on the 10th or 11th, we'll go with whatever he,
22 the pumper, Stephen, right, or Steve?

23 UNIDENTIFIED SPEAKER: Stephen.

24 Q. Stephen, yes. So, he notifies you that it's froze up. Go
25 back out the next day, meet him out there to go take a peek at it.

1 It's not froze up. How come there wasn't an attempt to either
2 make those adjustments that we had talked about, previous, you
3 know, that you said, If it's anything up here, I can kind of take
4 care of that.? Or why, what else would we be needing, if we
5 didn't need to have a truck blanket tailpipe scenario, we're not
6 froze up, is it, is it standard to just leave it inoperable for a
7 while until we've got the land agreement (indiscernible)?

8 A. On a lower, on a lower producing well, yes. I have to
9 prioritize my area, and that is, that was a lower producing well.

10 Q. How long is, just by nature, I understand this is a lower
11 producing well, how long is a, is it kind of an industry
12 acceptable or maybe just Anadarko acceptable to leave a well not
13 producing like that? Is there like a time? You know, even if
14 it's low producing, money is money, right? So, is there a
15 timeframe of going, well, we should really have any repairs try to
16 be corrected within 7 days, or 5 days, is there a timeline that
17 you shoot for, to get something going back in service?

18 A. Depending on the priority of the well. We are, once again,
19 they're supposed to look at them once a week, if they can get
20 there. And in turn they're -- I don't have timelines on these, we
21 just take them case by case.

22 Q. Got you. Got it. You said that the only way to track
23 physical interaction with the well is not, you know, eyes on, not
24 just the computer interaction, is through notes, right, as a
25 supervisor? Were there notes created before or after the freeze

1 up?

2 A. I just remember the one on the 11th that's in CygNet.

3 Q. So, I guess, is it the operator's job to try to get the land
4 management figured out, or where, how does that fall in the
5 hierarchy?

6 A. No, that would have been, that would have been me contacting
7 either my foreman to help me out, or to go to land.

8 Q. Okay, and you would do that, or --

9 A. I unfortunately did not.

10 Q. Okay. So, even with, like, would, or did the operator put
11 any notes for the 12th saying, Me and the boss were here, and we
12 let it go, because of land management. Or was there any notes of
13 the day that you guys went?

14 A. Honestly, I just remember him saying that he had to talk to
15 the field coordinator, that's the note I remember reading.

16 Q. That he had to. So, that was --

17 A. He was going to get with the field coordinator to discuss.

18 Q. Okay. Do they make -- since it is -- just a real quick kind
19 of follow up of the note thing, eyes on. Do they usually, if
20 they've made it to a well, do they go, checked out okay, and just
21 keep moving? Like, do they make a note every time they look at a
22 well? Or can they do a drive by, they look at it, they check
23 their thing, did exactly what their job is, but they just don't,
24 there's no -- They don't give themselves credit for it, I guess is
25 what I want to say?

1 A. Right. Some operators do, do that, and some don't. They
2 might keep their own notes for that. It's kind of operator to
3 operator.

4 Q. It's not policy to do that?

5 A. We try to ask them to put the best notes they can, if you've
6 been there, it checks out, great. If you fixed this, tell
7 somebody, because it shows that you are doing something.

8 Q. Doing something, yeah, it's giving them credit for their good
9 work, okay.

10 A. Correct.

11 Q. But it's not a standard, it's not a requirement, or anything
12 like that?

13 A. No, and I don't look at what they do on their everyday list.

14 Q. Okay, sorry one last one.

15 UNIDENTIFIED SPEAKER: No, you're good.

16 Q. You spoke about you know, you knew by GPS that you were there
17 in February at the battery?

18 A. Correct.

19 Q. So, do we have a GPS system for all the operator trucks, or
20 how do you --

21 A. As far as I know, Anadarko.

22 Q. Anadarko owns, so, Mr. Kern said that we have, what, 9 out of
23 10 operators are contract, so none of those vehicles are GPS, or
24 you don't know for a fact, or you do know for a fact?

25 A. I don't know that they have GPS. Not through my system, I

1 can look at Anadarko employees. And I do believe he's right,
2 there is one, one operator.

3 Q. Okay, all right, thanks.

4 MR. LEONARD: So, I've got a couple of follow-ups.

5 MR. CHHATRE: Okay, go ahead. So --

6 MR. PRUNK: Mike Leonard.

7 BY MR. LEONARD:

8 Q. Yeah, I'm Mike Leonard. I'm still going back to the, you
9 went out there and you didn't see a freeze, and that's, I mean,
10 okay, you didn't see anything frozen up, there wasn't a thought to
11 try and cycle that well? I mean, bear with me, I mean, I've been
12 in the field before, Hey, it's not like what I saw before, should
13 we give it a shot? Should we try and see if it will run? Or
14 should we try and see if we're getting gas? Should we see real
15 quick if there's not an ice block, open the blowdown? Help me
16 out, here.

17 A. On the 30 seconds to a minute at best that I was there, I
18 looked, I remember looking here. I did not see any problems here.
19 As for this, as far as, as far as I've seen, that he isolated it.
20 And in turn, I don't remember, I don't remember the actual, if
21 the, if the well could run, if it was low. I don't remember any
22 of that, but I just --

23 Q. But there was never any discussion of, Well, hey, let's give
24 it a shot?

25 A. We were going to revisit everything, because it was a low

1 producing well, we were going to revisit this, after we took care
2 of land. So, once he isolated it, and then we would come back to
3 it. Once I saw that it was isolated, I was like, Okay, I don't
4 see any frost. I'm closed.

5 Q. Just real quick, when you say, isolated what valves did he
6 close?

7 A. I don't recall.

8 Q. You don't recall, okay. All right.

9 BY MR. AJIBOYE:

10 Q. This is Gbenga, again, not for long, because I was asking
11 earlier, did you physically get to that well before the explosion?
12 Because your clarification --

13 A. Yes.

14 Q. -- indicated you got there physically.

15 A. I did walk out there with Stephen, and I did look, quick
16 glance, we opened it up. I saw that there was -- I remember that
17 there was no freeze down here.

18 Q. Okay. So, which means that we can see Stephen saw a problem,
19 that is what escalated him to the field coordinator, with this
20 particular well, is that, would that be a right assumption for me
21 to make?

22 A. Can you say it one more time, I'm sorry?

23 Q. That Stephen did see a problem with this well, that is
24 significant enough to take it up to the field coordinator.

25 A. He did ask me about it, yes.

1 Q. And it was significant enough for you to be there,
2 physically?

3 A. He just said to come out and take a look at it.

4 Q. And when you got there, you went to the separator, as well?

5 A. No.

6 Q. I thought that was --

7 UNIDENTIFIED SPEAKER: (Indiscernible).

8 A. We met at the battery. So, the separator is fenced in,
9 everything is fenced in. We met --

10 Q. Okay, okay. Oh, you didn't go inside, that was just, that
11 was your meeting point, okay, that's okay.

12 A. No, no, correct.

13 Q. Then, so you were on this facility pre-11th, is that correct?

14 A. I don't recall, I'm just going off of what the notes were.

15 Q. Okay, and aside from trust, say you have a x number of
16 foreman, and field operators, that are contracted out. They are
17 required to visit these wells. What if these operators are making
18 up, they are sitting there in their living room, making up notes.
19 How do you hold them accountable, as Anadarko, aside from saying
20 you trust them? Say they're just making up this note that, I
21 visited this well, and they do not, how do you know? Because
22 you're paying them, right, to do this job, right? So, is there a
23 accountability issue with -- who's making sure your operators are
24 physically on that facility?

25 A. It's, I can't answer that, honestly. I am looking at it as

1 trust.

2 B. So, but if you have to make a decision to address this trust
3 issue, what will you do to address it? Potentially now, you guys
4 just depend on trust, right now. So, if you have to put one more
5 layer to their accountability to you, aside from trust, what would
6 you think that should be as a field coordinator? How do you think
7 you can hold your people more --

8 A. I want the notes in the system saying you were there.

9 Q. Every day, right?

10 A. When you went somewhere, you tell, you put in the system, so
11 everybody can see it. Because if you don't know if you're going
12 to be here tomorrow or not.

13 Q. So, regardless of whether or not you did something?

14 A. Even if you walked up and said, I just went, did a walk
15 around, looks good, no leaks, no whatever., and you put that in
16 the system, that tells me that you were there.

17 Q. So, but that's not even a requirement right now as it is,
18 right?

19 A. We ask them to, but it doesn't always happen.

20 Q. Okay, anyway, that will be the end of my question.

21 MR. CHHATRE: David (indiscernible), you?

22 UNIDENTIFIED SPEAKER: No questions for me, thanks.

23 BY MR. CHHATRE:

24 Q. Couple quick questions, going back to just the freezing, or
25 icing, or whatever it may be. If nobody paid any attention to it,

1 and it just stayed, what consequences it could have, eventually?
2 Probably (indiscernible), I mean, I'm not saying it would happen,
3 I'm saying, what would that will entail as a problem for that
4 well?

5 A. Usually if it freezes over, it does not let any gas go
6 through, because it's frozen inside. So, the consequences could
7 be that the well didn't run, because the latch valve didn't open,
8 or something like that. That's the first thing that I noticed,
9 that if the Meco is frozen, there's no gas going through.

10 Q. And will the system then get alerted that something is not
11 going through?

12 A. It will show in the sense that the well did not open and
13 close like it's supposed to.

14 Q. But that should be -- I guess what I'm saying is, will the
15 computer get some kind of alarm, saying, problem here? So, unless
16 somebody goes and looks at the system themselves, they will not
17 even know that there is no problem going or -- I just don't
18 understand why so much focus on icing, what can cause the problem?
19 Or what the problem will result into, eventually?

20 A. There's a number of them. But my first thought is that the
21 Meco could be, it could have been turned in too far, it was
22 pulling from one side --

23 Q. No, I'm not asking why, though. I'm saying it's frozen, but
24 you don't correct the problem, what that will result into?

25 A. Honestly, I haven't had any issues like that in the past,

1 that have done any more than just freeze and stop gas from
2 flowing, so I couldn't tell you.

3 Q. So, even if you, I guess, I'm just trying to understand some
4 of these problems here with this frozen line, or frost on the
5 line, if you are not to do anything to it, the problem will
6 eventually go away, or will it, or will it have no effect on the
7 well? I'm just trying to understand what would happen if I don't
8 take this action, what will happen? Did I answer the question
9 correctly, or you're not sure?

10 A. If it's isolated, then there shouldn't be much of anything
11 that happens. If it's not isolated, I still have a freeze, and
12 it's not going through. So, I don't know the consequences after
13 that, because I would see that it's frozen, there's no gas going
14 through, I haven't --

15 Q. The gas is not going through, what could happen to the well,
16 I guess maybe that's a better --

17 A. The latch valve will not open, because this is what's
18 supplying this, in turn supplies this. It won't open.

19 Q. Okay, so the latch doesn't open

20 A. So, it will show us in the system that there's no run --

21 Q. Meaning what?

22 A. We won't see a drop in pressure, we won't see anything. That
23 will tell us to go to the well.

24 Q. No run means no gas is getting pushed from the well?

25 A. That your valve is not opening, therefore it gives us a

1 reason to go to the well.

2 Q. Okay, and how will that get flagged in your -- and I forget -
3 - in your system? I think -- I guess what I'm saying is, how will
4 the operator, you, or somebody at Anadarko will know that there is
5 a problem at this particular well, the gas is not going through?
6 Audible alarm, electronic alarm?

7 A. No, at that point there's no telling that, that is a freeze,
8 or anything. All I'm seeing is that my flag is in the system,
9 that says that I don't see a run, I don't see a drop in pressure,
10 when it's supposed to run, so forth and so on.

11 Q. No, I understand that. But if you don't -- let's just say
12 you're on vacation, or you are busy. If you don't look at that
13 system, physically, how will the system contact you, saying, hey,
14 hello, that kind of thing? Or there's no system like that?

15 A. I don't -- I'm not going to get an alarm on that. It's just
16 looking at my screen and noticing.

17 Q. Okay, so if you don't look at the screen you will, you will
18 not know that nothing is coming out.

19 A. No, yeah, if you don't look at the screen, no.

20 Q. I mean, there is no alarm, is I'm saying, okay. But I guess
21 on the extreme end, nothing harmful would happen to the well,
22 except it stops producing for you?

23 A. Yeah, there's no -- I wouldn't see any issues. But I haven't
24 had anything like that happen, I've just had them freeze, and no,
25 the well sits. It just sits idle. It keeps building pressure in

1 the casing.

2 Q. I understand. Yeah, that's all, today. I just wanted to
3 make sure what would happen.

4 BY MR. AJIBOYE:

5 Q. You want to do it? So, Gbenga again, but not for long. Are
6 you familiar with this document?

7 A. Your gas total, casing pressure.

8 Q. Are you familiar with this reading?

9 A. I've seen this recently.

10 Q. So, is this part of, as a field coordinator, are you required
11 to, as a field coordinator, are you required to be able to
12 interpret this, if you see it in the office?

13 A. On a screen?

14 Q. Yes.

15 A. Yes, I can, I can read it.

16 Q. Okay, if you read it, can you interpret it into some green
17 hat guy, who doesn't know, some new hire that just comes and asks
18 you, Hey, can you walk me through the significance of this thing?

19 A. I can tell you the days that it made gas, the days it didn't,
20 and the pressures.

21 Q. Okay, can you walk me though what was going on, say, I don't
22 know, I don't know your system, but start from 3/21, right? Can
23 you walk me through a trend from -- is there something I can read
24 into any of this, that you can explain to me?

25 A. Well, I can tell, I can tell you that, if this is me looking

1 at it, I'd say that right here, it would have probably been
2 something. Right here, it's running maybe one time a day, maybe
3 twice a day, and then right here it missed. I don't know, I don't
4 see the screen, I'm just giving, this is a 10,000-foot overview.

5 Q. Okay, so on the 4th, you think it missed, right?

6 A. It might have missed. It didn't run for one reason or
7 another.

8 Q. Okay.

9 A. However, it happened, it could be loaded, it could be
10 anything. Tried to run again, did it again. As far as I'm
11 concerned, this is a normal run. These two would be normal runs.

12 Q. So, that's the second, and the --

13 A. Again, this is just an overview, I'm not, I don't know. So,
14 it looks good. In turn, these could be settings, the reason
15 they're off, it could have been put in manual mode by the
16 operator, it could have, a number of reasons.

17 BY MR. LEONARD:

18 Q. Okay, what -- So, this is Mike Leonard. So, you say it could
19 have been put in manual. When is it -- I know you can't tell, but
20 on the 1st, or --

21 MR. AJIBOYE: When do you think that --

22 A. This is a date, this would be, so on the 4th, this would have
23 been put in manual. Usually it's 6:00 AM to 6:00 AM is the run
24 times, it depends.

25 Q. Yeah, we understand that there's a different allocation.

1 A. Yeah, so if he put it on manual at 6:30, and it hadn't ran,
2 or at 7:00 in the morning, and it hadn't ran yet, then it's going
3 to show zero gas for that day, if it doesn't turn back on.

4 Q. I'm sorry, what day do you -- and you don't know for sure,
5 but it's zero that day, and what day?

6 A. I don't know for sure. On the 4th. So, to me, he would have
7 put it in on the 3rd, I'm sorry, on the 4th. I don't know,
8 honestly, I don't know.

9 BY MR. AJIBOYE:

10 Q. No, skip it. Okay, let's keep going down, just moving down,
11 go ahead.

12 A. Maybe tried to run it again, here.

13 Q. On the 6th?

14 A. Automatically.

15 Q. State the date, please.

16 A. On the 6th, sorry. Maybe tried to run it again, here,
17 enabled it, it said the pressures are climbing, once again, I
18 don't know, okay? Yeah, they were climbing. Tried to run it
19 again, no big deal. Shut it, put it in manual again, and --

20 Q. On what day, what day did he put it in manual again?

21 A. Sorry, put it in manual again, he would have tried to run it
22 on the 6th, put it in manual on the 6th. Because, then there's
23 nothing again until the 12th.

24 Q. So, then what happened on the 12th?

25 A. It looks like it may have made a run.

1 Q. On the 12th?

2 A. On the -- If I'm looking at 10,000-foot overview, this looks
3 to me like it would have tried to have ran.

4 Q. Then what happened on the 13th?

5 A. On the, on the, and once again, on the date, it would have
6 ran on the 11th or 12th.

7 UNIDENTIFIED SPEAKER: 11th or 12th.

8 Q. Then after 12th, what will have happened again, just you
9 looking at this, keep going.

10 UNIDENTIFIED SPEAKER: After the 12th.

11 A. If it, to me it's just, it's just not running. Either it was
12 in manual mode, shut in, it could have been anything, because my
13 pressures are building.

14 Q. So, are you -- who is required to look at this daily run?

15 A. This is your operator would look at it in the system.

16 Q. This is what they look at in their system, every day before?

17 A. Correct.

18 Q. That's what triggers, this thing means something right? And
19 if you are field coordinator, and your operator comes to you, are
20 you required to check this daily run report?

21 A. No, if they come to me, am I going to look at it? I'm going
22 to look at the history. If he, if he comes to me with a specific
23 reason, then I'd look at the history.

24 Q. Say just in like, this case, he said, I think there's a
25 freeze, a froze in this line.

1 A. That wouldn't --

2 Q. So, with this kind of data, would that have triggered him to
3 think there's a freeze somewhere?

4 A. No. I mean, possibly here. But I am looking at it like he
5 put it in manual. It depends on what the operator tells me, or
6 I'll go in and look at the notes, or I'll go and investigate.

7 Q. So, whatever the situation that would require you to leave
8 your office to physically go close to the well for like 30
9 seconds, wouldn't that trigger you as a coordinator, to look at
10 this daily run? I'm just curious, like would that not be
11 something that would come to your mind, like, hey I need to check
12 this from this well, before I eventually will get close to it?

13 A. Not all the time.

14 Q. Okay, now, another thing, you said, you made a statement, you
15 said you had the land issue, and say, assuming nothing has
16 happened. You say you would have revisited this well to deal with
17 the land issue, right?

18 A. I'm sorry, one more time?

19 Q. So, you said when you got there, there was an access problem
20 to the well?

21 UNIDENTIFIED SPEAKER: Access.

22 A. Access problem, okay, yes, sorry.

23 Q. And that's something you'll have taken care of, it should
24 have been on your priority list to solve the problem, right?

25 A. It would have been, and yes, I should have taken care of

1 that.

2 Q. What kind of timeline would you have taken care of it?

3 A. With everything that's on the plate, I would have had to have
4 taken -- I should have taken care of that in the next day or two.

5 Q. So, we can say it's an oversight that you didn't go back to?

6 A. It could have been 100 different things on my plate the rest
7 of the day.

8 Q. Okay, I am just trying to -- and that's --

9 A. This would have been something that could have triggered in
10 my head the next morning, talked to land.

11 MR. LEONARD: I've just got one last question. If that, if
12 that well was isolated, how did it run on the 11th or 12th?

13 MR. OLEY: And I can't tell you that. I don't know.

14 MR. LEONARD: You don't know?

15 MR. OLEY: I'm just going off the 10,000-foot overview.

16 MR. LEONARD: Yeah, I get it.

17 MR. PRUNK: One last follow-up. Sorry, that's Prunk, and I
18 think I'm almost at the end of my green helmet, so I want some
19 credit for that, but I just want to be done with this whole
20 process. Anyway, just on the automation, I understand the
21 difference between manual and automatic, I've been versed in that
22 a little bit, but can you, when you really physically go back to
23 manual, does manual still mean that it has to be done from a
24 computer, or can it be done at a well site in the box, at all?

25 MR. OLEY: It could be done in the RTU as well, on some

1 systems.

2 MR. PRUNK: RTU?

3 UNIDENTIFIED SPEAKER: That's the box.

4 MR. OLEY: That's at the separator.

5 MR. PRUNK: With the battery, everything in that kind of --

6 MR. OLEY: Yes, but on some systems, if it's an older system,
7 they don't have that manual option.

8 MR. LEONARD: And this is Mike Leonard, but on this one,
9 someone could go open that thumb valve --

10 MR. OLEY: And run the well.

11 MR. LEONARD: And run the well, correct?

12 MR. OLEY: Correct.

13 MR. LEONARD: Because there is the manual, there is a manual
14 in the automated system, and then there's a manual physical
15 override.

16 MR. PRUNK: A manual lock down. A mechanical.

17 MR. LEONARD: Mechanical.

18 MR. OLEY: Correct, and that will supply gas to open the
19 manual thumb valves.

20 MR. PRUNK: And any one of those, Doug Prunk again, any one
21 of those would be traceable through the automation system, to the
22 CygNet, right? Is that what you guys called that? Or what's your
23 automation --

24 MR. OLEY: No.

25 MR. PRUNK: So, if somebody used a mechanical thumb valve, as

1 we just said, would it show up in the computer as a run, could it,
2 would it track it?

3 MR. OLEY: It will go through, it will go through the sales
4 meter, which is what I'm believing this is counting, okay, this is
5 what I'm seeing. But it's not going to show it to the well in
6 CygNet, because it wasn't turned on in automation. So, in order
7 for it to count the gas in that, it has to show that it was on.
8 So, if there, if the well is in manual, and it's thumb valved, you
9 can see it in the meter, but you won't see it in CygNet. That's
10 how we do it.

11 MR. PRUNK: (Indiscernible). Okay, no that's -- thank you, I
12 appreciate that.

13 BY MR. AJIBOYE:

14 Q. This is Gbenga, one last -- I promise, this is my last one.

15 MR. CHHATRE: Just, why do you say last, just ask the
16 question.

17 Q. So, as a field coordinator, do you guys have asset audits for
18 your wells? Do you guys do audits on your wells? You know, you
19 have about 500, 850 wells, right? Is that from the field operator
20 going in there, as in the office, do you guys at a point say,
21 Okay, in order to take accountability for all the wells we have,
22 somebody has to go physically see that those wells are still
23 there., aside from your field operators?

24 A. Not aside from the field operators. They have well tests
25 that they do. And a well test is to measure how much gas and oil

1 it makes, and that does not actually require going to the well.

2 But other than that --

3 Q. Okay now, if the rover is training a field operator, which is
4 new, right? And the rover comes across, say, for example, this 1-
5 inch line. There's a 1-inch line, just supply line here. Is that
6 not an issue, should that not be part of the training, for the
7 rover to tell the new operator that, If you go to the separator,
8 you should be seeing a 1-inch line.

9 A. Yes.

10 Q. And do you think that was done, in the case of when this
11 operator was then trained? Do you think that would have been
12 something that will have come up in the course of the training?

13 A. I would, I would hope so.

14 Q. Because I think now we know that there's no one is --

15 A. I do it when I train.

16 Q. Okay, so and it should have been the rover's responsibility,
17 or whoever is training the operator, to say that, There's a 1-inch
18 riser here, oh, that's the one, that riser, there. Oh, maybe I
19 need to explain something else do you, don't I?

20 A. In our training, we would ask them, we would say, What is
21 this, and where does it go?

22 Q. Okay.

23 A. And then, when we go to the separator, we would say, What is
24 this, and where does it come from?

25 Q. Okay.

1 A. And that's how we would train them.

2 Q. And who trained, do you know who trained the operator on this
3 particular well?

4 A. I do not.

5 Q. I thought you mentioned --

6 A. Who trained the operator?

7 Q. Of this, for this time. On this time, as of April, whoever
8 the operator, that is responsible for this well. You are the
9 field coordinator, right?

10 A. Correct.

11 Q. And you know the operator that is responsible for this well,
12 right?

13 A. So, Stephen Heideman is the operator for the well.

14 Q. Do you -- all right, do you know who trained Stephen?

15 A. I, when I, when I came on it was January 23, I do believe
16 that he was training with Curtis Harvey.

17 Q. Curtis Harvey.

18 A. Curtis Harvey.

19 Q. All right, that's --

20 A. And he is a -- he was an APC employee.

21 Q. Okay, an Anadarko employee, that's what I meant.

22 A. Correct.

23 Q. Okay, okay, that's it.

24 MR. CHHATRE: Anybody has any questions?

25 UNIDENTIFIED SPEAKER: No.

1 BY MR. CHHATRE:

2 Q. Okay, I'm just going to ask you -- I don't believe nobody
3 asked.

4 UNIDENTIFIED SPEAKER: You tell him.

5 MR. AJIBOYE: You need to talk to him. (indiscernible) No.

6 BY MR. CHHATRE:

7 Q. I guess you have one employee, and other subcontracted
8 employees, in terms of inspectors?

9 A. Contractors in my area?

10 Q. Yeah.

11 A. I have one employee, yes, one Anadarko employee.

12 Q. And everybody else, everybody else is contractor?

13 A. And the rest of them are contractors.

14 Q. Do you have any requirements of the outfit that's providing
15 you contractors, that the contractors should have this educational
16 background, this experience, or something like that?

17 A. That is all done through a separate foreman.

18 Q. Sure, but I mean, are you aware of what is -- somebody is
19 coming to you, do you know what your requirements are? That these
20 men are going to be working for you, that's, you see where --

21 A. No, my foreman says, You're getting a new person. And I say,
22 Okay, and then I send my rover out to him, and say, Go find out
23 what he knows, and report to me

24 Q. Okay, okay.

25 MR. CHHATRE: Fair enough, that's all for me, and before

1 anybody has any more questions, I will, I will say thank you for
2 coming, and appreciate you spending Saturday with us.

3 Off the record.

4 (Whereupon, the interview was concluded.)

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CERTIFICATE

This is to certify that the attached proceeding before the

NATIONAL TRANSPORTATION SAFETY BOARD


IN THE MATTER OF: HOUSE EXPLOSION IN FIRESTONE,
 COLORADO, APRIL 17, 2017
 Interview of Scott Oley

ACCIDENT NO.: DCA17FP005

PLACE: Longmont, Colorado

DATE: May 13, 2017

was held according to the record, and that this is the original,
complete, true and accurate transcript which has been transcribed
to the best of my skill and ability.



Kim Dragon
Transcriber