

NTSB Case # DCA 10 MP 007

Enbridge Energy Lin6B July 25th Rupture in Marshall Michigan



Interview Transcripts

Enbridge Human Factors Interviews – Edmonton Alberta Canada

November 2011

Matthew Nicholson IIC NTSB

Barry Strauch - NTSB

Karen Butler PHMSA

Brian Pierzina PHMSA

Jay Johnson Enbridge Energy

UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

* * * * *

Investigation of:

*
*

ENBRIDGE - LINE 6B RUPTURE IN
MARSHALL, MICHIGAN

Docket No.: DCA-10-MP-007

*
*

* * * * *

Interview of: GHAZAL DERHAMI

Crowne Plaza Hotel
Edmonton, Alberta
Canada

Thursday,
November 17, 2011

The above-captioned matter convened, pursuant to notice.

BEFORE: MATTHEW NICHOLSON
Investigator-in-Charge

APPEARANCES:

MATTHEW NICHOLSON, Investigator-in-Charge
Office of Railroad, Pipeline, and
Hazardous Materials Investigations
National Transportation Safety Board

[REDACTED]

BARRY STRAUCH, Accident Investigator
National Transportation Safety Board

[REDACTED]

BRIAN PIERZINA, Accident Investigator
Pipeline and Hazardous Materials Safety
Administration (PHMSA)

[REDACTED]

KAREN BUTLER, Supervisor
Accident Investigations
PHMSA

[REDACTED]

JAY JOHNSON, Supervisor
Audits and Inspections
Enbridge Pipelines

[REDACTED]

I N D E X

| <u>ITEM</u> | <u>PAGE</u> |
|------------------------------|-------------|
| Interview of Ghazal Derhami: | |
| By Mr. Nicholson | 6 |
| By Mr. Strauch | 47 |
| By Mr. Pierzina | 62 |
| By Ms. Butler | 70 |
| By Mr. Pierzina | 83 |
| By Mr. Johnson | 85 |
| By Mr. Nicholson | 89 |
| By Unidentified Speaker | 90 |
| By Unidentified Speaker | 91 |
| By Unidentified Speaker | 93 |
| By Unidentified Speaker | 95 |
| By Mr. Strauch | 96 |
| By Mr. Pierzina | 100 |

1 I N T E R V I E W

2 MR. NICHOLSON: Okay. We're on the record. I've got to
3 read a few things before we start.

4 This is NTSB Pipeline Case Number DCA-10-MP-007,
5 Enbridge Energy, July 2010 Crude Oil Release in Marshall,
6 Michigan. This will be an Operations Group interview being
7 conducted at the Crowne Plaza Hotel in Edmonton, Alberta, Canada.
8 Today is Thursday, November 17, 2011.

9 This interview is being recorded for transcription at a
10 later date. Copies of the transcripts will be provided to the
11 parties and the witness for review once completed.

12 For the record, Ghazal, please state your full name,
13 with spelling, employer name and job title, and by employer name,
14 I should say who were you employed with in 2010 in July.

15 MS. DERHAMI: Okay. My name is Ghazal Derhami, G H A Z
16 A L, last name, D E R H A M I. I was employed with Enbridge,
17 Incorporated in the control center in the control room as a
18 control center operator.

19 MR. NICHOLSON: Okay. And if you could for the record,
20 please provide a contact phone number and e-mail address you can
21 be reached at.

22 MS. DERHAMI: My cell phone number is [REDACTED]
23 E-mail address [REDACTED]

24 MR. NICHOLSON: Thank you. And, Ghazal, you were
25 allowed to have one other person of your choice present during

1 this interview. Now, this other person can be an attorney,
2 friend, family member or co-worker or nobody at all. If you
3 would, please indicate whom you've chosen to be present with you
4 during this interview?

5 MS. DERHAMI: I've chosen nobody today.

6 MR. NICHOLSON: Okay. We'll now go around the room and
7 have each person introduce themselves for the record. Please
8 include your name with spelling, your employer's name and contact
9 phone number and e-mail address. I will start, and we'll progress
10 clockwise starting from my left.

11 My name is Matthew Nicholson, M A T T H E W, N I C H O L
12 S O N. I am with the National Transportation Safety Board, in
13 Washington, D.C. My number is [REDACTED] I can be reached
14 at [REDACTED]

15 MR. PIERZINA: I'm Brian Pierzina, B R I A N, P I E R Z
16 I N A, [REDACTED] with the PHMSA [REDACTED]
17 [REDACTED] as an accident investigator, and my office phone is
18 [REDACTED]

19 MR. JOHNSON: Jay Johnson, Enbridge Pipelines,
20 Supervisor of Audits and Inspections, [REDACTED]
21 cell [REDACTED]

22 MS. BUTLER: Karen Butler, K A R E N, B U T L E R. My
23 e-mail is [REDACTED] I am PHMSA's [REDACTED]
24 accident supervisor, and I'm located out of [REDACTED] My phone
25 number is [REDACTED] That was cell, I'm sorry. [REDACTED]

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

[REDACTED]

MR. STRAUCH: I'm Barry Strauch with the NTSB. B A R R
Y, S T R A U C H, and my e-mail is [REDACTED] and my phone
is [REDACTED]

MR. NICHOLSON: Thanks. And, Ghazal, thanks for coming
in.

INTERVIEW OF GHAZAL DERHAMI

BY MR. NICHOLSON:

Q. To start with, we just ask for some background
information from you if you would.

A. Sure.

Q. Just tell us a little bit about your educational
background and positions that you had prior to Enbridge.

A. Wow. That would be going back a few years. Educational
background, I do have my diploma in nursing, actually, and I have
my diploma in chemical engineering technology, which was just
prior to Enbridge, and shortly after school, actually I started at
Enbridge, and was with Enbridge for about 3 years.

Q. Okay.

A. Until about 6 to 8 months ago.

Q. So you started -- when did you start with Enbridge?

A. 2008.

Q. Okay.

A. I believe May 1 of 2008.

Q. And you hired in at a control center operator position?

1 A. That's right, Control Center Operator III position.

2 Q. And you held that position for the duration of your
3 employment there?

4 A. Operator III for about 6 to 9 months, my first half of
5 the training, on my first desk, and then after that, I was --
6 after I was done my training, I was moved up to an Operator II,
7 which I held until the end of my employment with Enbridge.

8 Q. So you hired in as Operator III. Did I hear that right?

9 A. That's right.

10 Q. Okay.

11 A. That's the bottom level.

12 Q. Okay.

13 A. And then you move up.

14 Q. Okay.

15 A. Or is it the other way around? Actually I'm thinking --
16 the company I work for now, it's III to I. For Enbridge it was I
17 to III.

18 Q. Okay.

19 A. I apologize. The other way around.

20 Q. That's fine. Perfect.

21 A. So I was hired as an Operator I and after 6 months, I
22 was moved up to an Operator II and I held Operator II until the
23 end of employment.

24 Q. Okay. And again you said you left 6 months ago?

25 A. February 17, 2011 was my last shift.

1 Q. Did you ever act as a mentor to another controller while
2 you were at the control center?

3 A. Not officially but there was a few times where an
4 operator was -- who was supposed to be training with a trainer,
5 the trainer called in sick, and I had to come in and therefore
6 they sat with me and observed me while I did my job.

7 Q. So that was just -- so you acted kind of as a fill-in?

8 A. As a fill-in. It wasn't really a mentor.

9 Q. And how, how were you notified? How did that happen?
10 Who told you you were going to be sitting in? Shift lead,
11 supervisor?

12 A. That would just be if somebody called in sick and I was
13 called in to come in. I came in. I just happened to know who was
14 working, who I was filling in for and --

15 Q. Oh, I see.

16 A. -- would be aware whether they had a trainee with them.
17 So --

18 Q. Okay. So if that operator's out or sick or some other
19 reason and you were coming in to fill their spot.

20 A. That's right.

21 Q. So they wouldn't reassign that trainee to another
22 mentor?

23 A. Sometimes they did. If I said I was uncomfortable with
24 having somebody sit with me, especially when I first started
25 operating on my own, because I had to get into it myself as

1 opposed to trying to walk somebody else as well, and I did, I
2 would pass them off to a much more senior operator of the room.

3 Q. So you felt comfortable --

4 A. Yeah.

5 Q. -- telling your shift lead if you didn't feel
6 comfortable being a mentor?

7 A. Yeah.

8 Q. Okay. So can you tell us a little bit about -- I mean,
9 we've talked to other operators, probably have a fairly good idea,
10 but I just want to hear in your words what your role was as a
11 control center operator.

12 A. Are you asking for a description of the job?

13 Q. I'm asking for a description of your job I suppose.

14 A. My job.

15 Q. What lines you operated, that sort of thing.

16 A. Well, the lines I operated, I started out with Line 4
17 and 14, which are actually in accordance to what we're -- the
18 reason why we're here is right across -- like if you got the PODS,
19 I'd be on this side of the POD. And I started on Lines 4 and 14,
20 and I was there for about a year and a half, a year and a half,
21 maybe almost 2 years, and then I was cross-trained on the side
22 which was Line 3 at the time, Line 6A, Line 6B, Line 17, and I
23 believe it was the Stockbridge Terminal for about 6 months of
24 training there, and then 6 months after that I left.

25 Q. Okay. So I think I heard, you said you were training

1 qualified to operate Line 6B?

2 A. I was. I probably had finished my training about a
3 month or two prior to the accident.

4 Q. Okay. You had finished your training, which means you
5 had actually operated the line?

6 A. Operated with some -- like I was the trainee and I had a
7 trainer with me --

8 Q. Okay.

9 A. -- for the 6 months prior, but, yes, it is hands-on
10 training. Not the first part of it, but until you're more
11 comfortable and you say, yes, I can sit down and operate this
12 line; just make sure you're watching me; if you see anything
13 wrong, point it out. But, yes, after that I was on my own --

14 Q. Okay.

15 A. -- operating.

16 Q. Who was overseeing your training on 6B? I'm just
17 curious.

18 A. The -- I got tossed around a few times. It was Steve
19 Gold, Ashley Byers, and I think that was it, and just whenever
20 somebody filled in and happened to be there when my trainer wasn't
21 there. But Steve Gold was my main mentor, but my shift was
22 different than his so there was a lot of jumping around.

23 Q. Can you -- you mentioned where your POD was located.
24 Can you just sketch for me -- and I know where the 6B PODS are.
25 I'm familiar with that. Can you just kind of sketch for me where

1 you would have --

2 A. So this is the -- if you've got 6B POD here, and then
3 you've got your Hardisty, Kerrobert and Mokena's here. This is
4 where I started out, which would be 4 and 14.

5 Q. Okay.

6 A. And this was 6A, 6B, 17 and 3. So if you're walking --
7 this is that main --

8 Q. Right, exactly.

9 A. -- walking down and you've got the other two PODS here.

10 Q. Okay.

11 A. And the PODS would be --

12 Q. So 4 and 14 are behind 6B?

13 A. Yeah, so the person would be sitting facing this way. I
14 would be facing this way. My back would be to them.

15 Q. Okay. Yeah, so this is one console. That's the other.

16 A. Yeah.

17 Q. I've got you. Okay. Because you've written 6B twice.
18 That kind of threw me off.

19 A. Sorry.

20 Q. This is all one thing?

21 A. Yeah.

22 Q. So you're actually behind the 6B operator --

23 A. Yeah, directly --

24 Q. -- on 4 and 14?

25 A. -- behind them, yeah.

1 Q. Okay.

2 A. They would be my POD mate.

3 Q. Right, and that's called Group 1. Is that correct?

4 A. That's correct.

5 Q. Okay. I'm going to shift gears a little bit. And now I
6 want to go post-accident for a little while, and I was curious,
7 after Marshall, was there any discussion between you and a
8 supervisor or shift lead regarding the events surrounding the
9 accident?

10 A. Many.

11 Q. Many. What sorts of conversations were there?

12 A. Where do I start? Well, of course, there was always the
13 ongoing discussions that was going on within the room with
14 everybody. I did have my internal interview. The only person's
15 name I do recall would be Bonnie Iverchock (ph.), which would be
16 the compliance supervisor, I believe, and two other gentlemen.
17 Unfortunately I don't remember their names.

18 I had my internal interview in regards to that night.
19 And shortly after that, actually the next day, I ended up having a
20 chat with Curt Goeson as I came in for my shift, and there was, of
21 course, ongoing talk with the shift leads as to what I said in my
22 interviews and ongoing gossip, I elect to refer -- call it. So --

23 Q. Can you elaborate a little? They're talking about what
24 kind of things they discussed in their interviews or --

25 A. Oh, in the internal interview.

1 Q. Well, you said that there was talk amongst the
2 controllers about comments made in the interviews. Are you
3 referring to NTSB interviews or --

4 A. The internal interviews.

5 Q. The internal interviews. Okay.

6 A. Well, then I would have to go into the internal
7 interview, and the internal interview and what was discussed was
8 it's in regard to that procedure that I'm sure you're aware of,
9 which was the calculating how much was drained from that section
10 of pipe, whether it was a controlled drain, and then how long it
11 takes to pack the line, and that was the procedure they were
12 referring to, which was mentioned in the internal interview and
13 this would be -- I guess, would be subjective answering from my
14 point of view, which was I was told that it was going to be
15 confidential in the meeting. And the next morning I show up for
16 shift at 6:00 in the morning, and Curt Goeson is waiting for me,
17 and pulls me into the office and has a discussion with me in
18 regards to what was mentioned in the interview, and I'm completely
19 just blindsided because I thought it was confidential, and from
20 there on, things kind of went downhill and hence I left 6 months
21 later.

22 Q. So was there disciplinary actions or --

23 A. Not necessarily disciplinary action, but the way I was
24 treated. I was talked down to. I was made to be scared, fearful
25 of losing my job. Not only was I -- unfortunately I didn't have

1 much -- actually, it was a fortunate thing I didn't have much
2 contact with the two shift leads involved on the day of, but I
3 noticed a significant, significant change in the other shift's
4 attitude towards me, and it seemed that my daily job was
5 monitored. Everything I did was questioned, and hence I left.

6 MS. BUTLER: Ghazal, what do you think it was about that
7 interview that prompted that response?

8 MS. DERHAMI: I don't know, and it would purely be based
9 on speculation and gossip, which would not be the right answer --

10 MS. BUTLER: Okay.

11 MS. DERHAMI: -- because I don't know. That would have
12 to be something that would have to be discussed with them.

13 I was -- there was one incident that I do recall and I
14 was -- it will stand out to me because I noticed a significant
15 change in Curt Goeson's attitude towards me after -- this was
16 after the incident -- our integrity department came up with
17 voluntary pressure restrictions and it started out with line 4,
18 which was the line that I mainly operated. And I had come off
19 days off, and I wasn't aware that these restrictions had been
20 imposed overnight. And I sat down and the operator prior to me
21 had just gotten qualified on that desk and he was just shaking,
22 just ready to get out there. I'm like what's going on? And he's
23 like, well, last night they brought these pressure restrictions.
24 It's 80 percent restrictions. The line is a brand new line. I
25 don't know how to do this.

1 And he just gave me my shift rundown and I'm just,
2 really, okay, take deep breath. Sat down and sure enough, these
3 pressure restrictions were so significant that it did make running
4 the line difficult, especially if you're somebody who's only had
5 2, 3 years of experience. It was like learning to ride a bike
6 again, and there was no warning, no forewarning, and if there was,
7 it may have been through e-mail. There was no training to, hey,
8 it's going to come down, let's get used to this.

9 And that evening I actually stormed into Curt Goeson and
10 Ian's office and I said, this is not acceptable; I came from days
11 off and I'm sitting here learning to operate a new line. I'm
12 vibrating to my core, near tears, not to mention this was pushed
13 on Justin, who is a junior, junior operator, and he ran out of
14 here with his tail between his legs crying. This is unacceptable.
15 You guys should have given us at least a month's heads up, maybe
16 some training, maybe a week or two of training on the trainer, and
17 then said these are the restrictions that are going to be imposed.

18 And it was about 2 days later, I got a talking from Curt
19 Goeson in the front of the room that I shouldn't have barged in
20 like that, it's disrespectful and that I should have gone to him
21 first as opposed to barging into Ian's office. And I apologized
22 saying, you know, I'm sorry for that but I feel as an operator
23 that I don't feel safe sitting here. I'm stressed. I can't sleep
24 when I go home because I'm afraid of coming into work because I
25 don't want to sit here and operate this line. And --

1 MS. BUTLER: Ghazal, which line was that?

2 MS. DERHAMI: Line 4.

3 BY MR. NICHOLSON:

4 Q. And why wouldn't you have gone to a shift lead first?
5 What made you go all the way up to Ian?

6 A. Because the shift leads couldn't do anything about it or
7 were not. Well, their response is, well, this is it. Sit down.
8 Deal with it. You're an operator, you know, if you need help,
9 we'll help you, but there's only so much help they can provide as
10 well concerning they don't know how to run the line. In reality,
11 I am the expert even though the shift lead is sitting beside me,
12 and what is it they can do besides watch for possible issues that
13 might arise that I might not see farther down the line?

14 Q. So the shift lead was of limited help to you in being
15 able to actually --

16 A. Yeah, that first -- it was the second shift that that
17 restriction had happened, and it was actually a 25-year operator,
18 Steve Gold who was just leaving shift, and I had to start up the
19 line and I turned to him, I said, "Steve, please, can you please
20 stay for an extra half hour, just give me a hand, watch me while I
21 do this because I don't feel comfortable?" And he says, okay, you
22 know, he was tired. God, he wanted to go home, but he sat down
23 for a half an hour and both him and I are just sitting there
24 vibrating and every 5 minutes he would be like, (deep inhale,
25 exhale, inhale), oh, my God, what's going on? And he walked out

1 of there like -- with his tail between his legs and this is a 25-
2 year guy.

3 Q. So how would a pressure restriction like that normally
4 be communicated to an operator? Have you ever been given
5 something like that?

6 A. That was the first time I've ever experienced that.

7 Q. Okay.

8 A. The other times that we've experienced it, it was very
9 minor.

10 Q. Okay.

11 A. And it would be communicated via e-mail saying -- you
12 know, the engineers would send an e-mail saying that the
13 restrictions on these certain stations are going to be changed and
14 they're going to be implemented tonight, but usually they weren't
15 as significant as it was on line 4, and it was a matter of cutting
16 down high suction shutdowns on the stations from 450 psi to 200.
17 And that's a significant reduction especially when you have 5,000
18 horse units that you're using and you have to use your PCPs and a
19 lot more control as opposed to before where you could let them
20 ramp up, get the PCP to catch, versus now you had to bring the PCP
21 to the end, let it catch before you start that unit, and --

22 Q. So a lot more --

23 A. A lot more --

24 Q. -- mental exercise?

25 A. Uh-huh.

1 Q. Okay.

2 A. As opposed to, you had to watch, a very, very finding as
3 to every move you made and how was it going to affect you
4 downstream. I mean, that you would do on a regular basis, but it
5 was just that much more focused now.

6 Q. You talked a little bit about how you felt Curt Goeson
7 was treating you post-Marshall or post-internal interviews. Did
8 you see that same sort of attitude towards other operators that
9 may have been involved with the Marshall incident?

10 A. In specifically with the Marshall incident?

11 Q. Or any -- yeah, I'm thinking, you know, Tim Chubb or
12 anyone else that might have been involved in that accident. Did
13 you see the same sort of --

14 A. To be honest with you, I didn't see Tim Chubb and
15 Theresa or --

16 Q. Okay.

17 A. -- Dave very much afterwards because they weren't
18 supposed to come into the room. And they were on a completely
19 different shift than I was. So they had been moved to days. So
20 when I was working, I was in the room. In terms of things
21 changing in the room, they had started changing prior to the
22 Marshall incident. I think the Marshall incident made it worse,
23 in my personal opinion. Things became more tightened, every
24 little mishap, being as small as over injecting a batch by 500
25 cubes or under injecting a batch by 500 cubes became such things

1 as errors; not even operator incidents, but, quote/unquote,
2 "errors". So it was a very, very, very negative environment to
3 work in, very fearful because any move you made you were afraid
4 you were going to get dinged or, pardon my language, but the
5 common language that was used was being hung for it.

6 Q. That was post-Marshall?

7 A. It had started becoming bad post-Marshall, but it got
8 significantly worse after Marshall.

9 Q. Well, what would have been the catalyst prior to
10 Marshall for that sort of thing?

11 A. I don't know. That would be something that has to be
12 discussed with management.

13 Q. Okay. Back to the internal interview. When were you
14 interviewed by Enbridge? Do you remember? Month, day -- month.

15 A. Maybe within a month after the incident, maybe 2 months.

16 Q. Do you remember if it was recorded?

17 A. I believe so. If it was deemed confidential and there
18 was a lawyer in the room, I would probably guess it would be
19 recorded.

20 Q. Well, did they tell you it was recorded --

21 A. Yeah.

22 Q. -- or are you just --

23 A. I'm -- yeah, they did, yeah.

24 Q. Okay.

25 UNIDENTIFIED SPEAKER: I thought I heard, and apologize

1 for interrupting, that within a day or two you were interviewed
2 by --

3 MS. DERHAMI: Was it a day or two? To be honest with
4 you, I don't remember that far back.

5 MR. NICHOLSON: You're saying you thought that's what
6 she said?

7 UNIDENTIFIED SPEAKER: I thought that's what you said.

8 MR. NICHOLSON: Oh, no, she said a month.

9 UNIDENTIFIED SPEAKER: It was like the next after the
10 interview, right?

11 MS. DERHAMI: The next day after the interview.

12 UNIDENTIFIED SPEAKER: Oh, I'm sorry.

13 MS. DERHAMI: Yeah. Yeah, that Curt Goeson -- I'm like,
14 oh. Yes, that was -- it was probably about a month or two after
15 the Marshall incident. Again, I'm vaguely remembering those days.

16 UNIDENTIFIED SPEAKER: Okay. I apologize. Thank you.

17 MS. DERHAMI: Oh, no worries.

18 UNIDENTIFIED SPEAKER: I missed that.

19 BY MR. NICHOLSON:

20 Q. So I think you've already mentioned this already but
21 just to go back a little bit, it was that change in atmosphere
22 that changed the way they were treating you that eventually led to
23 your leaving the company?

24 A. Uh-huh.

25 Q. Okay.

1 A. That's right.

2 Q. Okay. So at this point, what I think I want you to do,
3 and we're going to go back in time at this point, we're going 15
4 months back or so, to the shift you worked with Tim Chubb.

5 A. Uh-huh.

6 Q. And I want you to just take some time and think back to
7 that shift and, if you could, just kind of walk us through the
8 events as you recall them, maybe starting at about -- I think the
9 first start-up 1:00 a.m. and you were sitting then behind Tim
10 Chubb and he was starting the line up. If you could just kind of
11 -- just talk to us about what you remember during that shift, what
12 you observed and walk us up through it. We know at some point
13 there was a procedure pulled. If you could talk to that and just
14 what you were doing and what you observed, and give us your
15 feelings on that?

16 A. Well, to be honest with you, I don't remember fine
17 details because I was busy doing my own work as well, so --

18 Q. That's fine.

19 A. When I do my work, it's the --

20 Q. I understand. Okay. Any details, please.

21 A. I vaguely remember him starting up at 1:00. I remember
22 at the time I was busy doing my own maneuver, but what I do recall
23 was -- I don't know exactly how long after the first attempt was,
24 but I was sitting at my desk doing my -- it's called gauge hour at
25 Enbridge. I want to call it inventory, but it's not. Gauge hour

1 every 2 hours, when we do gauge hour, and I was sitting there
2 doing my gauge hour. I think it was the 3:00 a.m. one. And I
3 vaguely remember Aaron Zimmel (ph.) talking to Tim Chubb, but then
4 again, when I'm doing my work, I get a lot of tunnel vision and I
5 don't -- I tune everything out. And they were talking about not
6 being able to put the column back together, and I remember saying,
7 well, did you check to see how much Theresa and Dave drained the
8 line when they shut down? Was it a controlled shutdown? Was it
9 a, you know, quick stop or was it a slow gradual shutdown? And
10 Aaron's like, well, I don't know. I said, well, check into that.

11 And they did their thing, and Tim went off to the front
12 of the room and, of course, whenever he was gone, I had to, of
13 course, stay at the desk. So unfortunately, I don't remember much
14 of that until Aaron came to me later on and asked, have you
15 started up the line much? I said, well, a few times. I've only
16 been on my own a couple of months. Well, how much do you usually
17 pack when you start up? I said, well, on a good start-up anywhere
18 from 350 cubes to 400. He said, well, do you have facts for that?
19 I said, well, I can try to go back to the day I started up the
20 line and get you -- it's called a CMT line fill. And I think it
21 was about a month prior, I had started up the line. And I pulled
22 up the line fill, and sure enough, on a start from Griffith -- I
23 think it goes all the way to Sarnia, a start would be about -- it
24 was about 375 cubes at a rate of 1400 cubes an hour. It comes out
25 to about 15 minutes of being able to put that column together, and

1 that column being -- I want to call it LaPorte, but I think it's
2 Leonard. I think it's Leonard, which is that big dip. It takes
3 about 15 minutes to put the column together, and I had mentioned
4 that.

5 And the reason -- he asked me, well, why are you
6 mentioning this? And I said, well, about a couple of weeks ago, I
7 had -- on line 3, I had a pig coming to a station, which is the
8 Cromer Station, and it's a sectionalizing valve. So it's a
9 station you close when you shut down a pipeline. And I had a pig
10 coming to the station and we had to do an emergency shutdown
11 because we lost power to the station -- on this line, it's very
12 hard to bypass stations without going below minimum, and this pig
13 was probably about 7 minutes upstream of the station that I had to
14 close off. And I called the shift lead and said, well, the pig's
15 on its way; it's literally 7 minutes away. I'm going to shut down
16 slowly so I can get this thing past the station because the
17 station's already isolated, ready to receive. And the shift lead
18 at the time was Bob O'Donnell (ph.) and he said, yeah, sure, if
19 you can maybe drain that column a bit, get that pig through
20 without closing that valve off if the pig just sits upstream. So
21 we did, we got the pig through and it got through and it got
22 through in about 15 minutes, finished shutting down the line and
23 then buttoned up at Cromer and the pig was safely past the
24 station, and then going back to startup.

25 So I went to go start up the line, and we knew we had a

1 controlled drain in that section of pipe, and I turned to Bob and
2 it was about 2 minutes into the start-up and I turned to him and I
3 said to him, well, what if we can't get that column together in 10
4 minutes, because we did drain it down so we could get that pig
5 passed through. And he said, well, how much did you drain? And I
6 looked at my line fill prior. I said, well, it equates to about
7 20 minutes worth of a drain in terms of volume. And he said,
8 okay. Well, there's this new procedure in review that we know we
9 did this on purpose. We know it's going to take 20 minutes to put
10 that column back together, so why don't we go ahead and start up.
11 I'll watch you from here and keep a time. And I had my POD mate
12 come over, and we had a timer going and, sure enough, right at 19-
13 1/2 minutes, bam, the column came back together, the pig was on
14 its way and the line started up.

15 So I mentioned that to Aaron. I said, maybe look at how
16 much Theresa and Dave drained while they shut down, and -- because
17 it wasn't on our shift. We are not aware of what they did when
18 they shut down. And I brought the piece of paper to Aaron and I
19 said it was about 350 cubes; it shouldn't take you more than 15
20 minutes, and that was it. It was left at that.

21 And then the second time I saw them come back to the
22 desk was for the second start-up. Because from then on, I was at
23 my desk doing my thing, answering phone calls, and Tim was up
24 front and the shift leads were doing what it is they had to do to
25 get the line going again, I don't know.

1 Q. Okay. So when was this previous shutdown that you
2 pulled that procedure? That was a shutdown on 4A?

3 A. That was on 3, actually. It was on 3.

4 Q. 3.

5 A. And I was not aware of this procedure in review myself
6 and I was made aware of it by Bob who mentioned it to me. And it
7 happened in that case it worked because it wasn't a leak. We had
8 done that on purpose so we don't slam a pig into a station, and we
9 were aware of it, and he gave me the approval to go ahead, to keep
10 it on the 20 minutes and, thankfully, in our case it wasn't a
11 leak, and it came together. But unfortunately in this case, that
12 wasn't it. If that procedure was ended up being used for that,
13 but -- and if it had, it shouldn't have been more than 15 minutes.

14 Q. Okay. I didn't hear though at what point did you
15 present -- did you bring that up on your screen?

16 A. The procedure?

17 Q. You referred to the procedure.

18 A. I --

19 Q. So you were aware of it, but how did Aaron get hold of
20 the procedure?

21 A. Well, I brought it up because I had mentioned that Bob
22 had mentioned to me.

23 Q. Okay.

24 A. And Aaron said, what procedure are you talking about?
25 So I said it's not a procedure. It's a procedure in review, and I

1 had brought it up. We have -- I can't -- I don't know what it's
2 called anymore, but it's a program where the procedures -- you can
3 access your procedures, and then there's a section where there's
4 procedures in review.

5 Q. Okay.

6 A. And aside from getting e-mails sent to you, but the
7 procedure in reviews were there. I actually happened to -- now
8 that I think about it, I withdrew the procedure from my e-mails.
9 Because I had this file, which was my procedures in review file,
10 and I accessed that file and I said it's this procedure, and he
11 had a brief look over it on my screen and then walked away and
12 that was it. I --

13 Q. Okay.

14 A. -- don't know from there on what came of it.

15 Q. So you pulled it from an e-mail, but you're saying you
16 can also get to a procedure in draft form from that procedure
17 screen, that intranet site?

18 A. It's an intranet site. I want to call it Lotus Notes, I
19 think it's called.

20 Q. Okay.

21 A. Is it Lotus Notes?

22 Q. Yeah. I believe it is.

23 A. On that, there was a procedure section button that you
24 have available and then you've got your procedures, and I think, I
25 think at the bottom there's a section where it says procedures in

1 review where you can access all the procedures that are being in
2 review and also be able to see people's comments, operator's
3 comments, management's comments on the procedures.

4 Q. So you knew it was a procedure in a draft form or --

5 A. I had put it in my procedures in review --

6 Q. Okay.

7 A. -- form.

8 Q. So you were aware of it. And you said you mentioned
9 that to Aaron when you first -- so Aaron was aware or should have
10 been aware then that this was an unapproved --

11 A. Was aware or should have, I don't know. That you would
12 have to ask Aaron.

13 MS. BUTLER: Ghazal, could you clarify for me, when you
14 said Bob presented it to you, who were you talking about?

15 MS. DERHAMI: Bob O'Donnell I think is his last name.
16 He's one of the shift leads --

17 MS. BUTLER: Okay.

18 MS. DERHAMI: -- or was at the time I was there. I
19 don't know if he's there any more.

20 BY MR. NICHOLSON:

21 Q. When was the -- the time you used this procedure with
22 Bob O'Donnell, what -- do you remember when that was? What month?
23 I know that's asking a lot.

24 A. It couldn't have been much before that because I had
25 only been operating on that desk for a month or two. So I was on

1 my own. So it would have been within that month, maybe 2, 3 weeks
2 prior.

3 UNIDENTIFIED SPEAKER: On Line 3?

4 MS. DERHAMI: On Line 3.

5 UNIDENTIFIED SPEAKER: And the pig was coming into
6 Cromer?

7 MS. DERHAMI: That's right.

8 UNIDENTIFIED SPEAKER: So we would be able to find
9 that --

10 MS. DERHAMI: Yeah.

11 UNIDENTIFIED SPEAKER: -- just based on pig draining?

12 MS. DERHAMI: Yep. Yeah, I'm thinking it has to be
13 within that first month because I was on my own. There was no
14 trainer with me. So, yeah.

15 UNIDENTIFIED SPEAKER: Like 2 or 3 weeks you thought? A
16 ball park.

17 MS. DERHAMI: I'm going to say 2 or 3 weeks because the
18 procedure in review was still fresh in my memory because I
19 remembered using it. So I had brought it up, yeah.

20 UNIDENTIFIED SPEAKER: All right.

21 BY MR. NICHOLSON:

22 Q. When you brought this standard up, did you tell him the
23 story that you just explained to us about how it was used
24 previously?

25 A. I did briefly. I kind of explained to him, I said,

1 well, there's this procedure in review that Bob and I used to get
2 a pig through a station and that's really it. There was no
3 questions asked. I just -- I told a brief story and that was it.

4 Q. So he wouldn't have known necessarily that the drain up
5 in your scenario was intentional to get a pig by?

6 A. Well, I did tell him we were getting a pig through a
7 station and it was just upstream of a station. So I don't know
8 whether he would have assumed that that was the reason.

9 UNIDENTIFIED SPEAKER: Was that Tim or Aaron?

10 MS. DERHAMI: Aaron.

11 UNIDENTIFIED SPEAKER: Okay.

12 MS. DERHAMI: To be honest with you, I didn't have much
13 interaction with Tim throughout the whole night.

14 UNIDENTIFIED SPEAKER: Is it -- you know, I don't want
15 to put words in your mouth. Is it safe to say that when you used
16 that procedure, it was you and Bob used that procedure?

17 MS. DERHAMI: I wasn't aware of the procedure until Bob
18 mentioned it and asked me, and I said, why are you asking?

19 UNIDENTIFIED SPEAKER: Okay.

20 MS. DERHAMI: And he said there's this procedure in
21 review and we know for a fact we did drain on purpose. I said
22 that's true. So he said how long will it take? And we -- and I
23 pulled up my CMT and we calculated it together. We said 20
24 minutes, and I said that's going to go over 10 minutes. He said
25 that's okay. We've done the calculations. We know it's going to

1 take 20 minutes. I give you approval to start up. I'll watch. I
2 said okay, and I started up with his -- him watching and my other
3 POD mate watching as well.

4 BY MR. NICHOLSON:

5 Q. Okay. So Aaron walked away with that procedure, and you
6 had also given him CMTs from your previous --

7 A. He walked away --

8 Q. -- start-up on 6B.

9 A. He walked away from the procedure and then it was about
10 an hour or so later when he come up and asked me specifically how
11 much do you take to pack that line?

12 Q. Oh, okay.

13 A. And that's when I went and did some digging on my own
14 and brought him up the CMT of a fresh start-up, which was from
15 Griffith to Mokena, from Griffith to Sarnia, and it was about 350,
16 375 from what I remember.

17 Q. Okay. So that -- he came back for the CMT information
18 after he had seen the procedure on the screen, is what you --

19 A. I don't know if he had seen the procedure. He -- and as
20 I said, he briefly looked it over.

21 Q. Okay.

22 A. And that was briefly --

23 Q. Okay.

24 A. -- as in I pointed it out to him. He says -- he looks,
25 okay, and then walks away. It was a matter of 5 seconds.

1 Q. He would have been able to find that same procedure from
2 his desk, right?

3 A. Yes.

4 Q. Having just seen it on your computer?

5 A. That's right.

6 Q. Okay. And go ahead with your story then. You were
7 saying you didn't see him again until a second start-up that
8 night.

9 A. No, just about an hour later, he had asked me about the
10 CMT.

11 Q. Okay.

12 A. So I brought the information to him. I said this is how
13 much it takes, and then after that, I didn't see them or talk to
14 them much until the second start-up where it was about, if I
15 remember the time, I think it was around 4:00 a.m. Because I
16 remember the phone calls going off the hook because Tim was busy
17 starting up and the phones were coming over to me, and I had to
18 answer them. I think it was about 4:00 a.m.

19 Q. Okay. And can you elaborate a little bit? What type of
20 phone calls were you getting? What was your involvement?

21 A. Well, 6B gets a lot of phone calls from 4:00 a.m. until
22 about 6:00 a.m., which is a lot of guys working on the line, you
23 know, excavating. So they call in and they all seem to call in
24 within the same 5 minutes. I don't know why but, yeah, at 4:00,
25 you know what's going to happen. You've got your sheet ready. So

1 prior to the second start-up, I grabbed Tim's sheets and the shift
2 -- and I think it was Darren. Darren had come and sat down with
3 him for the second start-up.

4 Q. Him being?

5 A. Him being Tim Chubb. Darren Arsens (ph.). And I
6 grabbed the sheet and I went over to my desk because I had to get
7 my stuff ready, too, and I had a few other maneuvers to do prior
8 to shift change. And his phones would just ring over to me and I
9 would answer them, and there was a lot of guys wanting to say,
10 we're going to be at such and such milepost doing such and such,
11 and I would tell them, no, don't start your work; something's
12 going on right now. We're about to start up a line. Just hold
13 off until we give you a call. And most of them were complying and
14 they said okay.

15 And one phone call I do remember during that start-up
16 was -- my phone was ringing off the hook, too. So I put that
17 phone down, I said, hold on, I'll be right back. Rang over --
18 there's three phones at that desk. Scooted over to the other
19 phone and it was Aaron Zimmel. And Aaron -- I grab it. He said,
20 hey, can you tell Tim to open up that PCV 10 more percent? I
21 don't remember which PVC it was, what station it was. I said,
22 hey, Tim, Aaron says can you open up that PCV 10 more percent?
23 And I said, Aaron, I've got to go. I've got phones coming off the
24 hook. I have to go answer them. So -- and that was it.

25 Q. Why would Aaron being calling you to relay information

1 to Tim Chubb?

2 A. He was calling Tim, but since he wasn't answering his
3 phone, he was busy, the phone rings over to the other two phones
4 that are available. And if my phone -- which my phone was busy as
5 well because I had three people on hold, it rang over to the third
6 phone. So I scooted over this way.

7 Q. So at that point, Tim's with Darren. He's not answering
8 his phone. They're busy with the start-up and so you're getting
9 the calls?

10 A. I'm getting the calls.

11 Q. Okay.

12 A. And that went on until about 4:45 until my shift relief
13 came in and at that point I said, I'm sorry, Tim, I have to go get
14 my relief, and --

15 Q. So the conversations happening behind you at Tim's desk,
16 nothing was kind of filtering over to you?

17 A. Honestly, I was so busy with the phone. At one point, I
18 had one phone going in one ear, the other, "hold on, hold on, hold
19 on", writing information down, you know, who it is, their phone
20 number and what milepost they're at, and giving everybody the same
21 spiel, can you just hold off for a bit; we'll call you back when
22 we're ready to get the work started? So -- and I --

23 Q. Go ahead.

24 A. Another phone call I do remember was the field operator
25 that was supposed to be going to Marshall to bypass the station

1 for that pig. That was supposed to be going -- that was supposed
2 to start up at 1:00. And he happened to be one of those guys
3 filtered through the phone, and he turns to me and says, so I
4 never got that call; did that pig get to Marshall? I said, no,
5 the line hasn't started up yet. He said, what do you mean the
6 line still hasn't started up? And I said, there's some issues;
7 are you on your way to Marshall right now? He's like, yeah, I was
8 supposed to be there an hour ago. I don't know why you guys
9 didn't call me. And I was like, well, you're on your way to
10 Marshall so I would suggest you head that way.

11 UNIDENTIFIED SPEAKER: Was that Darrell Carter or Brian
12 Whittaker? And if you don't know, that's fine.

13 MS. DERHAMI: I don't remember because it was just
14 somebody who was going out to -- I don't recall Darrell because
15 Darrell's voice is very distinct. It wasn't Darrell. It was
16 somebody else.

17 UNIDENTIFIED SPEAKER: So Brian?

18 MS. DERHAMI: It could be Brian Whittaker. He --

19 UNIDENTIFIED SPEAKER: So was it the person to go to
20 Marshall? That would help.

21 MS. DERHAMI: The person that was supposed to go to
22 Marshall that night to bypass the station for the pig.

23 BY MR. NICHOLSON:

24 Q. And you told him to what? I'm sorry.

25 A. He was on his way to Marshall.

1 Q. Yes.

2 A. I said if you're on your way to Marshall, head that way,
3 and that was around 4:40-ish, 4:30 I think he called. And he's
4 like, well, I --

5 Q. Why would you tell him to go to Marshall?

6 A. Because he was on his way to Marshall to go bypass the
7 station for the pig.

8 Q. The line's down, right?

9 A. He was on his way, and I said you're heading that way,
10 why don't you head that way? Because I was seeing that there was
11 issues.

12 Q. Okay.

13 A. And going for the back, actually.

14 Q. Uh-huh.

15 A. I did mention to Darren. Darren came up to me at one
16 point and asked me what did I think it was, and I said, to be
17 honest with you, Darren, I think it's a leak.

18 Q. But you weren't paying attention to what was going on
19 behind you. How did you get to that?

20 A. And that was just because the column wasn't coming back
21 together.

22 Q. Okay.

23 A. Everybody seemed stressed. Everybody seemed like
24 something was going on.

25 Q. Okay.

1 A. And it's best to assume the worst than to assume the
2 best.

3 Q. So was it fair to say that was kind of a gut feeling
4 or --

5 A. Yeah.

6 Q. Okay.

7 A. It was just kind of like something's going on. What's
8 happening? Why isn't the line coming together? Why are they
9 doing this twice? And I haven't had much experience with the
10 line, but within that section of pipe, it doesn't take that long
11 to put it back together because, from my understanding, it's a
12 flat, flat elevation. The issue is usually with Leonard, which is
13 at the very bottom -- at the top of that hill --

14 Q. Uh-huh.

15 A. -- from what I can remember from the elevation profile.
16 But something seemed wrong, especially if they were -- I'm sorry,
17 they were running around nervous.

18 Q. Yeah. You've had very limited experience on 6B and that
19 was your thought. What was Darren's response when you said to
20 him, I think it's a leak?

21 A. To be honest with you, I don't remember exactly, but I
22 remember being ignored because it didn't go further than that.

23 Q. Okay.

24 A. It was just, what do you think it is? I said, in all
25 honesty, I think it's a leak.

1 Q. Did you mention that to Tim at all?

2 A. Tim did not talk to me at all, all night, and I even
3 mentioned to him, I said, would you like any help? Nope, I'm
4 good.

5 Q. Why do you think that is?

6 A. I don't know.

7 Q. Okay. Because we hear a lot -- we've heard from Curt
8 Goeson and other people we've interviewed that the grouping is
9 supposed to be sort of a collaborative arrangement where, you
10 know, the person behind, the operator behind is supposed to help
11 out the operator in front. You guys --

12 A. Yeah.

13 Q. -- since you're the experts, you're supposed to --

14 A. Help each other out.

15 Q. Yeah.

16 A. That's correct. This again will be -- this will be a
17 very subjective answer. It will solely be based on my
18 speculations as to how I felt. Tim wasn't the nicest of people to
19 me right from the beginning of me sitting with him on shift. On
20 shift, there was no interaction between us. He would -- this is
21 my impression of Tim. The whole time.

22 Q. Okay.

23 A. This is him. This is his computer desk. This is -- no
24 movement unless he has to get up and go pee or get his food. That
25 was him the whole time when I worked with him. He didn't talk to

1 me much. Whenever I asked for help, it was very degrading, the
2 tone he talked to me. Whenever I offered to help him, his
3 response was, no thank you; I can do it myself. A few times I
4 asked him for help was, why don't you go find the answer? You
5 know where to find it.

6 So again this is a very subjective response. In all
7 honesty, because of Tim and because of the way I was treated by
8 Aaron Zimmel, Tim and Curt Goeson, [REDACTED]

9 [REDACTED] [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 Q. That's something -- management was aware of these
13 conflicts obviously?

14 A. Curt Goeson was aware of it from day 1.

15 Q. But they never offered to switch you out --

16 A. No.

17 Q. -- rotation so you didn't have to be with Tim?

18 A. If we do it for you, we have to do it for everybody
19 else, too. You need to get along with everybody.

20 Q. That's --

21 A. And I had a, I had a brief chat with him, with Aaron
22 Zimmel, actually, going back to things prior to Marshall, going to
23 the error reports. I do remember, this is my second error. I
24 came in on a shift and there was a pig being sent out that morning
25 within half an hour of sitting down, and the pig was batch-

1 specific, and I wasn't made aware of that. I had just sat down at
2 my desk, was just getting my papers together. And I actually
3 ended up having to slow the line down because something had
4 happened at Hardisty and one of the booster fell off and I had to
5 -- just as I'm getting my things together, I had to scoot over,
6 slow the line down and make sure nothing happened.

7 And apparently there was a pig going out at a station
8 upstream of Clearbrook and the pig -- the guys in the field called
9 saying, well, the pig's going to go out. And at this point I'm
10 just, okay. And they send the pig out and I'm just like, what
11 pig? Pulled the sheet up. Okay, the pig's batch-specific. What
12 batch are we at? And I'm sitting there calculating away, oh, my
13 God, we're in the wrong batch. Okay. Let's take this to the
14 shift leads and see what happens. And I brought it up to Aaron
15 Zimmel and I said, I'm -- you know, I made an honest mistake. I
16 just sat down at my desk and a pig was sent out and I was not
17 aware that the pig was batch-specific, but now that I'm aware, we
18 sent it in the last batch of the train and that's destined for
19 Clearbrook, so we can't deliver into Clearbrook; we have to swing
20 even on that batch, otherwise, we're going to slam this pig.

21 And Aaron Zimmel, his exact words were to me, "If you
22 have another one of these, you're not going to have a job here."
23 This was at 6:30 in the morning in front of the entire room. I
24 had just sat down and I turned to him and I said, it was an honest
25 mistake. I'm going to call scheduling. We're get this figured

1 out. We'll find a way.

2 And Allister Ewing was the other shift lead on and, of
3 course, I walked back to my desk with my tail between my legs and
4 tears kind of rolling down my eye, and trying to sit there and
5 operate and I didn't know what to do. I was just so shaken up. I
6 didn't feel that Aaron had the right to say such a thing to me
7 especially so early in the morning. So I picked up the phone and
8 left a voicemail for Curt Goeson. I said, Curt -- and I was
9 calling and crying at the time -- Curt, as soon as you come in,
10 please give me a call at my desk; I need to speak with you.

11 And he comes in and calls me and he says, what's going
12 on? And I told him the situation and we left it at that. I
13 thought Curt would do something about it. I wasn't sure, but it
14 seemed like Aaron's and my relationship got worse after that, if
15 something was done or not. Allister was very understanding. He
16 came up to me and said, do you want to go home? You don't look
17 like you can operate. I said, you know what, Allister, just watch
18 the desk for 5 minutes. I just need to go to the bathroom, take a
19 deep breath, go for a smoke, I'll be right back. And he sat there
20 for 5 minutes; I took a breather and came back and sat down for
21 the rest of my job. But that was prior to Marshall and I -- going
22 back to why I left.

23 Q. Do you need a break?

24 A. No, I'm okay. I get a little emotional, but I'm okay.

25 Q. It's understandable, and if we need to, we can timeout

1 or go off the record.

2 One thing I didn't hear you mention, I thought I saw it
3 in transcripts was, you made some calls that evening also to get
4 pumps started at LaPorte. Is that something you recall?

5 A. You know, to be honest with you, I don't recall much of
6 it.

7 Q. Okay.

8 A. But I do remember now, because an ex-coworker of mine,
9 that I do work with, this again comes up. It's gossip. Everybody
10 talks about it.

11 Q. Uh-huh.

12 A. It was mentioned and I do remember -- thinking back to
13 it, I do remember Aaron asking me about, I think it was unit 3 at
14 LaPorte, if I do recall correctly. And he had asked me is that
15 unit available for use. I said, there's electrical issues with it
16 and that unit is not available for use. And he said, well, how do
17 you know? And I pulled up the FacMan, and the FacMan said that
18 there's parts missing or something missing and we can't use it. I
19 think it was an electrical issue because I do recall him asking me
20 can you call an electrician and ask? I was like, well, it's 2 in
21 the morning. Okay. Who do I call? I think it was Darrell Carter
22 who I ended up calling for Aaron. I don't recall the phone
23 conversation, but I do remember asking him if the unit was
24 available for use and he said, no. And I said that's what I
25 thought; that's what the FacMan indicates.

1 If it was an electrical issue or a mechanical issue, I
2 don't remember the rest of the conversation, and I do remember
3 taking it back to Aaron and saying this is what Darrell said, the
4 unit is not available for use because there's issues with it or it
5 draws too much power. I can't quite recall what the reason was
6 and then the conversation was left at that with Aaron. I don't
7 remember if he asked me to call Darrell back out. It might have
8 been. Something is vaguely kind of popping up, but it's so vague
9 that I --

10 Q. I understand. So it was different -- it sounds like --
11 so there was FacMan. So the reason the pump was out was a
12 maintenance reason, not -- because we've seen the screens and
13 there's like power -- aren't there like peak power limitations on
14 certain stations? It wasn't that. It was a mechanical or
15 electrical issue specific to the pump?

16 A. Again, I'm grabbing at bits and pieces here. From what
17 I recall, I think it was a mechanical issue.

18 Q. Whatever it was --

19 A. It could very well --

20 Q. -- you went to FacMan?

21 A. Yes, the FacMan stated on there what the issues were and
22 there was constant FacMans entered in by the field as to work
23 being done --

24 Q. Okay.

25 A. -- on the unit, but I do recall it being locked out for

1 a reason.

2 Q. Okay. So it never got started?

3 A. I don't remember. The only thing I remember from the
4 second start-up was Aaron asking me to tell Tim to open up that
5 PCV.

6 Q. And Tim did that?

7 A. Yeah.

8 UNIDENTIFIED SPEAKER: That would have been the one at
9 Marysville or which PVC?

10 MS. DERHAMI: It was the one just upstream of Marshall,
11 I think.

12 UNIDENTIFIED SPEAKER: Okay.

13 MS. DERHAMI: Because I think we were at minimum suction
14 there, maybe 45 psi, and I think the minimum limit on the suction
15 on the units is 35 psi. So they had asked to bring it down to
16 bare minimum.

17 UNIDENTIFIED SPEAKER: So the idea is to just get as
18 much oil moving out of Mendon as possible. Is that the idea?

19 MS. DERHAMI: That was my understanding and that would
20 be based on their calculations. Then again, this is going to
21 after the incident, from just gossip from hearing, from my
22 understanding, was the MBS supervisor on shift that had calculated
23 how much pressure needs to be on the discharge side of Mendon to
24 fill that column. That was not something I recall from that
25 night. That was something just from gossip and talk around the

1 room. So that was open up that PCV so that discharge on that
2 station would get to the limit they required to fill that column.

3 BY MR. NICHOLSON:

4 Q. I've just got a couple of more here. I'm switching
5 gears, so bear with me.

6 We've heard from other persons interviewed that --
7 actually, the operator has final say on line operation and that
8 the shift lead could never ask you to start a line that you didn't
9 feel comfortable starting that line or, vice versa, shutting it
10 down. Well, they could always take a more conservative approach.
11 They could override you and shut down a line, but they can never
12 ask you to start a line that you, the operator, weren't
13 comfortable starting. And I guess I'm asking you to tell me if
14 you agree with that statement. Did the operator have final say
15 over line control?

16 A. I disagree with that statement --

17 Q. You do disagree?

18 A. -- completely.

19 Q. Can you elaborate a little bit?

20 A. Many instances I can elaborate on. One that I had an
21 ongoing issue with one of the shift leads was scheduling. They
22 seemed to always schedule line start-up right at 6:00, 6:00, right
23 during shift change, and I had a huge problem with that. I said
24 at least make it 5:00 or make it 7:00, not during a shift change.
25 The reason being I am not going to start up the line if somebody's

1 going to be coming in, or I'm not going to take over a line start-
2 up as I've just come in. That line better be settled down or at
3 least started up to minimum before I take over, or if I'm to start
4 up the line, I will wait an extra 15 minutes if I have to, wait
5 for that operator to come in, sit down, get them to settle in so
6 they can inspect the line and let them go ahead and start with the
7 fresh start, as opposed to taking over something that was just
8 started up and it was still up and down.

9 It was an ongoing issue I had with shift lead and I --
10 Randy Undashuski (ph.) would be the person I had constantly
11 expressed this to and the answer I got from them was is you're
12 just lazy and you don't want to start it up. No, it's not that
13 I'm lazy. I can start it up an hour early if you'd like me to, if
14 we have the crew available, if we have room available, but they're
15 asking for 1700, and I'm sitting here with my shift change ready
16 to go and a new operator is about to walk through that door and
17 you expect me to sit down here for an extra hour to get this line
18 started up and then haphazardly give it to them and say, here, I'm
19 out of here. So --

20 Q. According to what we heard, though, you wouldn't have to
21 start that line up. You tell your shift lead you're not
22 comfortable.

23 A. Yeah, I did many a times. You're just lazy. You have
24 to go ahead and do it. If it's 1700; it's 1700. If it's 1700,
25 start half an hour early. Start an hour early. Okay. I will go

1 ahead and start an hour early, but do I consider the issues here?
2 Do I consider the issues down here? I'm not scheduling. I don't
3 know what's going on with all the tank farms. I'm doing what I'm
4 told and I'm saying -- standing here and saying I disagree with
5 the start-up time because it is unsafe.

6 Going back to line 4, remember the issue I had brought
7 up with the pressure restrictions? Well, the second day I had to
8 start up the line, top to bottom. Well, I came in very stressed
9 that morning. I did not want to do it, and I turned to my shift
10 lead -- Charlene was the one. I said, Charlene, I don't want to
11 do this. I am uncomfortable with starting up this pipeline, and
12 she said, I'll sit here with you. We have to get it going. I
13 said, Char, you're not leaving my side. You're going to sit here
14 and you're going to watch every single move I make because I am
15 scared. And she said down with me. We attempted it once, and it
16 was like learning to ride a new bike.

17 I hit it off cycle; it shut me down. So I would take a
18 deep breath, kind of stressed out; I don't want to do this. We
19 have to do it. Okay. Let's do this again. Second try, again it
20 shut us down because we were just -- it was, it was learning. It
21 was a learning experience for both of us. And then Charlene left
22 and Randy came down and sat down with me because Randy was more
23 familiar. He said, I'm going to sit here and watch with you.
24 Let's do it. Let's do it together. Again, I'm still like this --
25 and I said, actually Ashley can start it up. And Ashley was like,

1 no, I'm sitting on this side; you go ahead. I want to watch you,
2 too. Okay. Fine, let's do this. So we did it. We got it, you
3 know, going and from there on it was a learning experience.

4 Q. So what do you think -- it doesn't sound like that what
5 we've heard is accurate in your case at least. Where do you think
6 the pressure was on the shift leads not to be treating you as the
7 final expert on your line? Were they getting pressure from above
8 or --

9 A. That's again something you'd have to talk to shift
10 leads. That's completely on me would be speculations and saying
11 it's politics. I don't know. I'm not in business. I'm an
12 operator.

13 Q. All right. I think at this point if we want to take a
14 break, I've held you guys up for an hour. So do you need a break
15 or --

16 A. I'm okay.

17 MR. NICHOLSON: Does anyone else want to take a breaks?

18 No? Okay. I'll finish here with what I had, and I'll
19 turn it over to Barry for a little bit.

20 MR. STRAUCH: Yeah.

21 MR. NICHOLSON: He's got some questions.

22 MS. DERHAMI: I hope this is helping.

23 UNIDENTIFIED SPEAKER: Very much so.

24 UNIDENTIFIED SPEAKER: Very good so far, yes.

25 BY MR. STRAUCH:

1 Q. I just have a couple of follow-up questions to what Matt
2 asked you. How did you see the role of the shift leads?

3 A. Bullies.

4 Q. Enforcing stuff?

5 A. Uh-huh. Especially, especially after the Marshall
6 incident. The first year I was there, they were mainly -- I felt
7 that they were very helpful. They were there to help us as a, you
8 know, the go-to person when you're busy and you can't take your
9 phone calls or you need something done or --

10 Q. Uh-huh.

11 A. -- but it seemed more and more as time went on,
12 especially after Marshall, towards me, they felt like bullies.

13 Q. And when did -- after you started, when did Tim Chubb
14 exhibit the behaviors that he did, that you described?

15 A. Tim Chubb was never friendly to me to begin with, but I
16 never worked with him until that year. He was on a different
17 shift, but I directly worked with him on that year.

18 Q. And that was how long before the incident?

19 A. The incident was in July?

20 Q. Yes.

21 A. So it would have been January when we started out
22 working together.

23 Q. Did you have any sense of why he acted towards you the
24 way he did?

25 A. No. I could speculate and say [REDACTED], could be

1 my response, but I don't know, and that wouldn't be politically
2 correct. That's something that you would have to talk to him
3 about. I was not the only girl in that room that was made to feel
4 that way.

5 Q. How do you know that?

6 A. That's just from a friend who is the other girl in the
7 group that talks to me about it.

8 Q. And did she experience -- what kind of behavior did she
9 experience with her co-workers?

10 A. Being put down. Towards Tim Chubb, being put down,
11 being made to feel stupid.

12 Q. Uh-huh.

13 A. Telling her what to do, considering she's his senior.

14 Q. Uh-huh.

15 A. Criticizing her work.

16 Q. And you brought this up to higher-ups?

17 A. I had brought it up to Tim -- Curt Goeson. I had
18 brought it up to Aaron Zimmel, and I had brought it up to Randy.

19 Q. On how many different occasions, approximately?

20 A. Many occasions.

21 Q. What was their response when you brought it up?

22 A. Everybody's different. Deal with it. Learn to work
23 with it. Maybe it's you that's the issue. Try to be nicer to
24 him. Offer to help him more often.

25 Q. But you said when you did try to help him --

1 A. He said no. He would shun me away, and -- yeah.

2 Q. Okay. Are you aware of efforts on the part of Enbridge
3 to encourage the shift leads to be people oriented? I can't think
4 pf a better word to describe it.

5 A. In terms of people management?

6 Q. Yes.

7 A. Well, it's part of their job. Because not only are they
8 technical supervisors, they're also are people managers in doing
9 our reviews at the end of the year.

10 Q. What kind of reviews did you get?

11 A. The first year I got a very, very good review. The
12 second year, I mean, average. I think I had a 3.6 out of 5, the
13 second year. The first year I got a 4.2. The third year, I got
14 my review about a month after I had given my leave of absence so I
15 got 2.2.

16 Q. When you got your reviews, was there a discussion of the
17 performance evaluation?

18 A. Yeah, as to what you think you should get, why you think
19 you should get the thing -- the scoring you're giving yourself,
20 what you've done well, and what do they feel you haven't done
21 well. In terms of you trying to make your case as to things you
22 did not do well was not heard very well.

23 Q. What was the reasons given as to the decline in the
24 score you got in your evaluations?

25 A. To be honest with you, I don't remember, but I know my

1 reason, and that was stress.

2 Q. Uh-huh. When you were interviewed after the incident,
3 you said it was about a month after the incident?

4 A. I think so. I don't recall.

5 Q. And it was the next day you felt this hostility from
6 Curt Goeson?

7 A. Curt -- well, Curt Goeson pulled me into the office and
8 said, well, about that procedure in review, and my mouth just fell
9 open because I do recall them saying it was confidential. And
10 when they say confidential, I mean confidential from everybody,
11 not just within company. And I was just flabbergasted as to why.
12 And then that -- obviously he told a few other shift leads because
13 during my review with Randy Undashuski before I left, he mentioned
14 -- I was like, well, why did you delay my performance review 2
15 months later than everybody else's? Oh, because I was just made
16 aware of this procedure in review that you had mentioned, and I
17 wanted to reevaluate your score.

18 Q. I see.

19 A. Okay.

20 Q. So when you talked to Curt, when he talked to you, did
21 he give you details of what you had disclosed in the interview
22 that could have only come from that interview?

23 A. Yeah, the procedure in review.

24 Q. Okay.

25 A. That was -- the only people I had ever mentioned it to

1 were the people in the interview.

2 Q. Could you tell us what you told the interviewers?

3 A. Basically what I told you, which was when -- you know,
4 what had happened when Aaron came over and I pointed out the
5 procedure in review to him, and I explained briefly what had
6 happened with Bob and I and then he walked away. And then they
7 started asking me questions as to do you think a procedure in
8 review is in place so you can try it out or why do you think
9 there's a procedure in review, and just went down that road. But
10 I don't recall telling that to anybody else.

11 Q. Okay. And the next day when Curt talked to you, what
12 did he tell you about what you had told those people about the
13 procedure in review? What was he -- what did you tell those
14 people that you believe got him upset?

15 A. To be honest with you, I don't recall the details of
16 that conversation because I was so shocked after hearing him say
17 that to me, and all I could think about was so much for
18 confidentiality the whole time he was talking. But he asked me
19 why I had brought up that procedure and what did Aaron do with it,
20 which at that point, I said I don't know because I'm not Aaron.

21 Q. And who was the person who told you to go ahead and -- I
22 believe someone told you to go ahead and employ the procedure even
23 though you said in training it would take 20 minutes or so.

24 A. Bob O'Donnell.

25 Q. And he was the one who told you to go ahead and start it

1 up?

2 A. Because we -- yeah, because I went to go start up after
3 the incident --

4 Q. Uh-huh.

5 A. -- when I had told him, well, we did drain the section
6 of pipe out a lot because of this pig, so it is going to -- they
7 have that procedure which is the 10 minutes --

8 Q. Yeah.

9 A. -- I believe the rule. It's going to take more than 10
10 minutes. So if we have 10 minutes, do you want me to shut down?
11 He said, well, actually this procedure in review states let's look
12 at how much we've drained. So do you have your CMT? And we -- I
13 brought up my CMT to him and said it looks like to be about this
14 much, which equated to about, I think from what I remember, about
15 20 minutes. So he said -- we looked at the numbers and it's going
16 to take 20 minutes.

17 So I started up the line with his approval and him
18 watching, and 15 minutes hit, I remember I called him. I said,
19 Bob, it hasn't come together yet; I'm a little worried. He's like
20 give it a little bit more time. Has it been 20 minutes yet? I
21 said, no, it's been 15 minutes. And I called Fred over and I
22 said, Fred, can you come sit down and watch with me? Do you see
23 anything that is abnormal downstream, let me know, I'm just going
24 to start this slowly. Because line 3 is another -- it's a very
25 old line so it's not you ramp up and let it just go because it has

1 to be a lot of control starting up that line. I'll watch it
2 upstream. I'll see if I can notice any signs that says we should
3 stop this line, and you look downstream. And then, sure enough,
4 at 20 minutes, 19-1/2, it came together and that was it.

5 Q. And what was Bob's -- what authority did he have to tell
6 you that?

7 A. He's a shift lead.

8 Q. Okay. And what is your understanding of the procedures
9 regarding who has the authority to tell you to override an
10 existing procedure?

11 A. Shift leads do because they are the shift leads.

12 Q. And not the operator?

13 A. The operator could have a say but ultimately it's the
14 shift lead's say. As I said, there were many a times where I
15 said, no, I don't feel comfortable doing this, and it was -- got
16 constant saying I don't feel comfortable doing this, but yet I had
17 to do it, that made me to believe that the roles had changed.

18 Q. Now, after the incident, the one you described, there
19 was a turn in people's attitudes to you; and by people, I mean
20 people above you. Were there other people from what you've heard,
21 who you've talked to, who shared a similar fate as you did in
22 terms of the change of attitude by their superiors to them after
23 the incident?

24 A. Well, 6 people have left the room and 26 more people
25 have tried leaving the room since. So that would be the answer

1 you're looking for.

2 Q. And by trying to leave the room, you mean trying to get
3 out of the job?

4 A. Get out of the job, get out of the company.

5 Q. And may I ask how you've heard this without naming
6 names? What were the avenues by which you've heard this?

7 A. By people telling me that they're going to apply for
8 this job and asking me for their help because I was one of the
9 operators that has managed to leave the company. For my job, the
10 current job I have, I know there was 15 other Enbridge applicants,
11 and that's because my own boss has told me himself, and said you
12 were the 1 out of the 15 out of Enbridge we've picked.

13 Q. And what's your current job?

14 A. I'm a control center operator.

15 Q. For a different company?

16 A. That's correct.

17 Q. And this other company, how would you describe their
18 people management versus Enbridge's?

19 A. Fabulous.

20 Q. And what makes it fabulous?

21 A. What makes it fabulous is that there is no stress on the
22 job in terms of daily activities. There is no shift leads. We
23 are our own shift leads and operators. We make decisions
24 ourselves with the help of our management. It's not micromanaged
25 with leads being on us all the time. We have very, very

1 understanding management. We are able to go to them with issues
2 and they will deal with it diligently. But the thing that I find
3 great working for this company is their attitude towards the
4 operators.

5 One very recent example being, it was about a couple of
6 weeks ago, my fellow operator and I were just sitting there.
7 Nothing was going on. We had no maneuvers happening, no issues.
8 Line, everything was running steady. And our manager walks by and
9 he just says, "You know what, you guys? Great work." And I
10 turned to him and I said, Dan, we're not doing anything. He's
11 like you're not causing a leak, are you? You're not blowing up
12 stuff, are you? No. Then great work.

13 Just -- and he -- and every couple of weeks or every
14 week he just walks by and says something like that or just -- our
15 managers are very relaxed. When an issue has come up, for
16 example, thankfully this company I work for has a very, very good
17 track record, but simple things as, you know, swinging to a tank
18 and overfilling a tank -- not overfilling, but over injecting or
19 over delivering a tank by 100, 200 cubes, they don't make a big
20 deal about it. That's not an error report. Just little things
21 like that, where if there is an issue and, you know, they'll sit
22 down and work with you, not: What did you do? Why did you over
23 inject by 100 cubes or 200 cubes? That's an error.

24 Q. Let me ask you one last question before we turn it over
25 to someone else.

1 A. Yeah.

2 Q. Knowing what you know now, having worked for two
3 different companies, and having been through this experience at
4 Marshall, what do you think it would have taken both in terms of
5 technical procedures and people management for this incident to
6 have been prevented? What would happen -- what do you think
7 Enbridge should have done or would have done differently that
8 would have resulted in this incident not occurring?

9 A. That's a very difficult question to answer. I couldn't
10 tell you because I haven't been in this business long enough. I'm
11 not in business. I'm not in management. I've never had a role as
12 a manager. All I know is what I would do differently if I ever
13 ran into this situation myself.

14 Q. Well, from your perspective as an operator, what would
15 you do differently?

16 A. Not be very nonchalant about it and take it seriously
17 and if I'm not sure, get somebody out there.

18 Q. Who specifically was nonchalant about it?

19 A. Well, for them to go ahead and start up a second time,
20 to me, seems to be nonchalant about it. I would have stopped
21 after the first time and gotten somebody out there.

22 Q. On site?

23 A. On site. Because we can't see from here. We don't know
24 what's going on. We can sit down and do calculations three times
25 over but what's happening out there as to what we're seeing here

1 can vary very much, as we can see in this situation. And that's
2 what I would have done differently in that situation, is after the
3 first time, sent that pig tracker out there, give him a call and
4 if he was going to be going out there, send him out there just to
5 go inspect, just to make sure things are okay.

6 Q. Did you have that ability as an operator to ask that
7 someone go out on site and inspect it?

8 A. I suggested it.

9 Q. To whom?

10 A. Aaron Zimmel.

11 Q. What was his response?

12 A. He walked away from me.

13 Q. Why do you think he did that?

14 A. Again, as I said, in those terms, I don't know. That's
15 something you'd have to ask him. You're disliked. He doesn't
16 respect me. I'm a junior. I was the most junior out of that
17 entire group, lack of experience. I -- whether he had a beef with
18 me, I don't know.

19 Q. And when you worked at Enbridge, what was the percentage
20 of the operators who were female?

21 A. When I first started, I think it was about 11 percent,
22 but it's increased since then, especially since Marshall.

23 Q. So when you were there, you were certainly part of a
24 minority if you were only 11 percent?

25 A. Yeah.

1 Q. Okay.

2 A. Which shouldn't make a difference because in the room
3 that I'm at now, I am the only girl.

4 Q. And how are you treated now?

5 A. Very fabulously, respected. The men I work with, the
6 youngest is the age of 30, all married men. I'm treated like
7 their own daughter. They respect my voice. They respect the
8 experience I bring into the room, and they talk to me like I'm one
9 of them. So being a girl shouldn't make a difference.

10 Q. And at Enbridge, how were you treated?

11 A. Not as such. That could very well be with the
12 demographic of the group, being younger boys, I don't know. Boys
13 more my age, younger than that, hormones flying, you know, we're
14 all young kids as opposed to --

15 Q. Old guys.

16 A. -- an older, older group of guys who's got 30-year-old
17 daughters.

18 Q. You just --

19 A. So talk about sexual harassment, yeah; there was that.

20 Q. At Enbridge?

21 A. At Enbridge. Being talked to -- I definitely know
22 there's a significant difference of how I'm talked to by a 27-
23 year-old boy as opposed to a 44-year-old.

24 Q. Okay. Could you give us some examples of sexual
25 harassment you encountered?

1 A. Being whistled at when I walked by. Would that be one?
2 I remember one that was -- oh, actually, two incidents that to
3 this day I can't believe I didn't do anything about. One was I
4 was standing at the shift leads desk talking to [REDACTED] one
5 of the other shift leads about the situation, and [REDACTED],
6 [REDACTED] comes up from behind me and he says, [REDACTED]
7 And I just, excuse me? And there was a picture [REDACTED] on
8 his cup, and he's like, see? I was like, okay, and I just tried
9 to laugh it off. I'm like, all right, that was very
10 inappropriate. Okay. I walked away from that.

11 Another incident I do recall was I had forgot to bring
12 dinner with myself one night and I called my boyfriend to come and
13 drop off my dinner for me. And I went up to [REDACTED] and I said, I
14 need to just run downstairs briefly, grab my lunch. Do you mind
15 if I -- you know, maybe Heath comes in and sees the room and -- he
16 had always wondered what it looks like. And [REDACTED] response was,
17 he's not a terrorist, is he? And I just, I'm sorry, I can't
18 believe you said that, and I just walked downstairs, grabbed my
19 boyfriend and brought him up and I said, see, not a terrorist, and
20 I was just --

21 Q. While you were an operator with Enbridge, the vice
22 president also in charge of the control room was a woman. Are you
23 aware of that?

24 A. Sonja?

25 Q. Yes.

1 A. Yeah.

2 Q. So it seems kind of like a contradiction that an area
3 under her supervision that would be a hostile sexual environment.

4 A. The question is, is she aware of it? And going to --
5 sometimes I regret not reporting it -- was because I felt that if
6 I did report it, again, it wouldn't be kept confidential and would
7 come down to me, to me as the person who reported it. I was
8 forewarned about that. I spoke to a few fellow operators in the
9 room that were older guys who had been there for a long time and
10 knew the politics and I had discussed this with them. I said I
11 don't know what to do. I want to go to somebody about this, and
12 their response was, it's best you don't because you're going to
13 stick your neck out there and you're probably going to get fired.

14

15 Q. Did that get back to anybody?

16 A. To?

17 Q. [REDACTED]

18 A. Yeah.

19 Q. -- [REDACTED]

20 A. Yes. Curt Goeson knew about it and the shift leads knew
21 about it.

22 Q. And did they ever bring it up in discussions with you?

23 A. No.

24 Q. Okay.

25 MR. STRAUCH: That's it for me.

1 MR. NICHOLSON: Karen or Brian?

2 MS. BUTLER: You want to go first, Brian?

3 MR. PIERZINA: Sure. Are you still holding up all
4 right?

5 MS. DERHAMI: Uh-huh.

6 MR. NICHOLSON: Yeah, do we need to -- does anyone need
7 to take a break?

8 MS. DERHAMI: No.

9 MR. NICHOLSON: You're good? Okay.

10 BY MR. PIERZINA:

11 Q. You had mentioned that you had suggested dispatching
12 personnel to look for a leak. Would that be the suspected leak
13 procedure? Is that or --

14 A. It wasn't going in accordance with any procedure. It
15 was just get somebody out there.

16 Q. Okay.

17 A. If we're not sure, let's get them out there.

18 Q. And do you recall like at what point in the shift this
19 would have been? Like --

20 A. I think this was prior to the second start-up.

21 Q. All right. Okay. And you had mentioned people, you
22 know, looking around, you know, concerned. I can just imagine
23 what you're seeing, you know, there's no smiling faces. There's
24 concerned looks. Who -- was there anyone else besides the two
25 shift leads and Tim that you recall, you know, involved in trying

1 to figure this thing out?

2 A. Nope.

3 Q. Okay.

4 A. Everybody else pretty much kept to themselves at their
5 desks.

6 Q. Okay. And I know this is really difficult --

7 A. Besides Jim Knudson --

8 Q. Jim Knudson.

9 A. -- which was the MBS guy, but he has to be involved
10 because that's his role.

11 Q. All right. Do you recall when you might have first
12 begun thinking you had a leak on Line 6B?

13 A. Prior to second start-up.

14 Q. Okay. Somewhere between the --

15 A. Some -- yeah, but then again it wasn't on any -- it
16 wasn't based on any technical reasons as to why I thought it was a
17 leak. It was just --

18 Q. You're putting in a lot of oil and you're not getting --

19 A. You're not getting anything out. So let's get somebody
20 out there.

21 Q. Okay.

22 A. Let's assume it's a leak and disprove it after we know.

23 Q. When you did the proposed procedure restart on Line 3,
24 did you recall getting a MBS alarm on that restart?

25 A. I don't remember.

1 Q. Okay. You know, you talked about a typical pack on Line
2 6B restart might be 350 to 375 cubes. Would that get you an MBS
3 alarm usually?

4 A. In what sense are you asking?

5 Q. I'm just wondering if because it's taken a while to put
6 the column together, if you'd expect to get a MBS alarm before you
7 got the column put together?

8 A. The MBS alarm rang in for various reasons. Sometimes
9 they were just -- they were bogus alarms when the model gets hung
10 up or sometimes when you slow down a unit too quickly, where you
11 kind of send that big drop and it screws up with the MBS. Do I
12 get an MBS alarm if the column doesn't come together in 20
13 minutes? Is that what the question is?

14 Q. Yeah, yeah.

15 A. No, I don't think so.

16 Q. Okay. And I imagine every line's probably different.

17 A. It's not like it would be an alarm telling me after 20
18 minutes that you haven't put the column back together, so this is
19 a leak. It's -- it would never come to that. It was only if, if
20 there was a severe column separation somewhere or, as I said,
21 sometimes a faulty flowmeter or a faulty pressure transmitter or a
22 density or a batch was misaligned, the MBS alarm would ring in.
23 And this is a constant discussion about the MBS alarms because
24 they come in as 5 minutes, 20 minutes and 2-hour alarms. And all
25 it says is a 5-minute MBS alarm; it's not a 5-minute leak alarm.

1 So it's not per se telling you there's a leak. It's detecting an
2 imbalance from what's going in and what's coming out. So there's
3 many factors that could throw it off. So in the case of Marshall,
4 no, I wouldn't get an alarm if the column wasn't back together in
5 350 cubes.

6 Q. Okay. At least not, not unless other criteria --

7 A. May fall into it, yeah. It's not going to tell me,
8 well, your column's not together at 350, so you have a leak.

9 Q. Okay. All right. That's fair. Alarms in general,
10 maybe MBS alarms in particular, do you recall getting -- you know,
11 in your operating experience, did you ever get a MBS alarm that
12 was a leak?

13 A. Not that ones that I got.

14 Q. So --

15 A. The ones I would get would be again simply because of a
16 faulty flowmeter or --

17 Q. Right. So is that true that every MBS alarm that you
18 ever got was actually not a leak?

19 A. The ones that I got, yes.

20 Q. Okay. And any idea, you know, roughly how many? Would
21 we be talking hundreds or --

22 A. Oh, my God. Sometimes probably hundreds in a shift.
23 The funny thing about the MBS alarms was -- I remember this
24 happened a lot on Line 14 because Line 14 was the one that had the
25 VFDs. So you could, you know, pinch back the VFD and it would

1 quickly ramp down the unit and the model wouldn't catch up quick
2 enough with what you had done on the line. So you'd get a 5-
3 minute MBS alarm, and then you'd get residuals, they were called.
4 So in 20 minutes, you're going to get a 20 and then in 2 hours,
5 you're going to get a 2 hours.

6 Q. So from the same action?

7 A. From the same action. So from that same action, not
8 only do you get three 5 minutes, you also get three 20s and then
9 three 2 hours, that are just simply residuals. I mean, right
10 there we got nine for just one action. So --

11 Q. And the three, is that because of the different
12 sections?

13 A. Yes, because it looks at, I think, upstream and then
14 downstream and then you've got the section you're looking at.

15 Q. Okay.

16 A. So, yeah, MBS alarms did sometimes get redundant because
17 you expected they would come in. They would come in.

18 Q. Great. And so do you, as an operator, do you have to
19 refer every -- report every one of those to your shift lead?

20 A. Yeah, we fill out a FacMan for each one of them because
21 it gives you the option of putting in when they came in and when
22 they cleared. But one of the procedures was when you had a MBS
23 alarm, you would notify your shift lead and then your shift lead
24 will talk to the MBS analyzer, and then the MBS analyzer would
25 have a look at what they can see. And from the minute you got

1 your alarm, you started your 10 minutes, which was if the shift
2 leads and the MBS analyzer could disprove a leak, you'd go ahead
3 and continue pumping, but if within 10 minutes they didn't get
4 back to you, you shut down and you waited.

5 Q. Okay. So, so within that 10 minutes -- let me ask you
6 this first. Were there times where you had to shut down because
7 you didn't get an answer back from them?

8 A. Yeah, many times.

9 Q. Okay.

10 A. Yeah.

11 Q. All right. And then ultimately the answer -- you would
12 get an answer back that said it's okay?

13 A. A model error.

14 Q. The model is in error.

15 A. Yeah, it said model error or batch misalignment or a
16 flowmeter is not reading accurately. So I'm going to pull off the
17 flowmeter and put in a FacMan for it so we can get that flowmeter
18 recalibrated.

19 Q. Okay. So you never had to deal with a leak on a MBS
20 alarm. Did you have to deal with a leak operating in general?

21 A. Ever?

22 Q. Yeah.

23 A. No, I haven't. My first experience would be what I saw
24 at Marshall.

25 Q. Okay. So --

1 A. Although there were a few times where bad swings were
2 made and I thought it was a leak, and I was like, oh, my God, stop
3 line, stop line.

4 Q. Okay.

5 A. And then I'd find out it was a bad swing made and this
6 pressure drop was going down and knocking stuff off.

7 Q. So when you're thinking that there's a leak on Line 6B,
8 based on kind of what you're seeing happening behind you, is that
9 due to your training or just --

10 A. Gut feeling.

11 Q. Just a gut feeling.

12 A. That night, I'm going to be honest with you, it was gut
13 feeling. I cannot speak of it in that technical sense. Just the
14 only think I could see the column is not filling where it should
15 be filling.

16 Q. Do you think you're the only one that had that gut
17 feeling?

18 A. No, I don't think so because from -- again, this could
19 just be heat of the moment and everybody wanting to -- being the
20 cool kid on the playground and wanting to get involved with all
21 gossip, but everybody else spoke out, yeah, I had a feeling it was
22 bad -- it was a leak; I had a feeling. But, of course, that night
23 nobody says a word.

24 Q. Right, right.

25 A. Later on, everyone starts speaking out. But, yeah,

1 there was a few others.

2 Q. I guess, Monday morning quarterbacks, huh?

3 A. Yeah. Yeah.

4 Q. So -- and I realize it's however many months ago, but
5 the people that the next day or the next month or whatever,
6 thinking, yeah, I thought it was a leak, how would they even have
7 been involved?

8 A. Being in the room maybe.

9 Q. Just --

10 A. Seeing Tim running back and forth and Aaron running back
11 and forth. But then there was also a lot of other people in the
12 room. I mean it's a big room, but there were lots of other people
13 that said, oh, my God, it was leak; I didn't notice.

14 Q. Okay. We've been told that the idea in the room is
15 that, you know, if there's a problem, that you're supposed to be
16 able to draw on resources within the room, call, you know,
17 somebody else over; you, you know, come and help me. Was there
18 anything like that going on?

19 A. No, which was a surprise for a lot of people in that
20 room that didn't suspect it was a leak, because the only people
21 that were directly involved were Tim, Aaron and Darren and Jim
22 Knudson. I don't recall Ashley Byers, being the other operator
23 who was a Group I operator -- she was in the room, but she was at
24 a different desk. I don't recall her coming over and having a
25 look. I don't recall anybody from Group 2 coming over and having

1 a look or any of the other pipelines. It was solely those four.

2 Q. Okay.

3 A. And occasionally I would be asked a question.

4 Q. You know, we've had you going -- I know there's other
5 things I want to ask you --

6 A. Sure.

7 Q. -- but we've been at this for an hour and a half. I
8 think it's best if I give somebody else a chance.

9 A. Okay.

10 MS. BUTLER: Do you need a break?

11 MS. DERHAMI: No, I'm okay.

12 MR. PIERZINA: Can I go off?

13 MR. NICHOLSON: Yeah, let's go off the record here.

14 Actually we might have to take a break. I might have to download
15 and do this in two parts.

16 MS. BUTLER: Okay. Just to give everybody a stretch.

17 (Off the record.)

18 (On the record.)

19 MR. NICHOLSON: Okay. Ghazal, Part 2, and I think we
20 left off, Brian, were you --

21 MR. PIERZINA: I had passed to Karen, I think.

22 MR. NICHOLSON: Karen?

23 BY MS. BUTLER:

24 Q. Ghazal, I need you to kind of shift your thinking for a
25 minute and go back to the control room and if we were to isolate

1 how you were made to feel and just think about the types of work
2 Tim Chubb did, do you think he was a good controller compared to
3 others as far as controlling?

4 A. Technically speaking he seemed like he knew what he was
5 doing.

6 Q. Okay.

7 A. Personally speaking, no.

8 Q. Okay. So on a technical level, though, he seemed to
9 handle the workflow okay?

10 A. Seemed to. He -- I do remember one thing about Tim all
11 the time. When he was like this, with his hand on his forehead,
12 you knew Tim was stressed, and I saw him like this a lot of the
13 time. So again, going back to what I had said earlier, I
14 unfortunately never got much help from him or was able to help
15 him. So I couldn't speak about --

16 Q. Okay.

17 A. -- about how good he was with his own work. He did
18 criticize my work in terms of he would bring up my screen on his
19 end and say, well, if I were you, I would do this and this and
20 this and that. Well, why? Because it's going to make your line
21 run better. Okay. Would you care to tell me why? Nope.

22 Q. Okay.

23 A. Okay. Well, I'll go do this, this and that and we'll
24 see what happens. Done. It did make my line run better. So
25 would you care to tell me why? Nope.

1 Q. So when he appeared stressed, do you think that was due
2 to the activity on the console?

3 A. Yes.

4 Q. Okay.

5 A. I won't deny it, that group is very, very, very busy.
6 Line 4 especially on its own, you've got -- when I left, there was
7 one, two, three, four, five different delivery locations and four
8 injection locations, and I remember days where I was
9 simultaneously delivering and injecting at all four of these
10 locations and -- at the same time and trying to find a way to make
11 it all work out so I don't have to keep shutting down a certain
12 section of pipe to make the rest of it work. Line 4 is very busy.

13 Line 6A, Line 6A wasn't busy in terms of maneuvers, but
14 because the station spacing is half of -- it's 15 miles as opposed
15 to 30 miles with the other lines. When something happened, when
16 you lost a unit or your PCV slammed, it seemed that it made the
17 upset that much bigger than it was, and it was just a fight. It
18 was just a battle with that line. That line scared me a lot. I
19 was very fearful just because how quickly things happened. Line 3
20 wasn't as busy as 4. 4 is The Big Kahuna that does a lot, so yes.

21 Q. On degree of difficulty, on the different consoles, did
22 they ever talk to you about that?

23 A. What do you mean degree of difficulty?

24 Q. Well, for example, like Line 4 has a lot of maneuvers.
25 6A's spacing is close together. When I've asked questions about

1 consoles in the room that are the toughest to operate, Enbridge
2 has supplied some answers. Did they ever talk to you in the way
3 of this console's difficult; this console isn't so difficult?

4 A. No, because I never asked because I wasn't going to be
5 moved to a different console.

6 Q. Okay.

7 A. After the Michigan incident, it seemed like I was going
8 nowhere with Group 1. So I did ask. They offered to retrain me
9 on some things per my request and I got to train in Group 2. And
10 after I had finished my training there, I had asked if I could
11 possibly move to Group 2 because I found Group 1 was very
12 stressful for me. Well, no, there's a lot of people ahead of you
13 that want to move, so if we moved you, we'd have to do everybody
14 else, and that wouldn't be fair to everybody else.

15 Q. Do you know if they documented that move request,
16 Ghazal?

17 A. I don't know.

18 Q. Okay. When the pig specific-batch element happened --

19 A. Uh-huh.

20 Q. -- I think you said it was on Line 3?

21 A. Line 4.

22 Q. Line 4, okay. When that happened, did the shift before
23 you exchange the information that there was a pig in the line that
24 was specific to the type of batch?

25 A. I wasn't told the information about the pig. I was told

1 that there was going to be a pig going out --

2 Q. Okay.

3 A. -- from a certain station, but not specifics of it.

4 Q. Okay. So it was going out --

5 A. Yeah.

6 Q. -- but they didn't tell you the specifics behind the pig
7 going out.

8 A. No, and that's when --

9 Q. Would they have known that?

10 A. If they had read the field work request, I'm sure they
11 did. But knowing at times how busy that Line 4 got, sometimes
12 you'd be doing maneuvers right into shift change and waiting until
13 you finish the maneuver. At times you didn't have the time to go
14 and sit down and read your field work requests. Sometimes it was
15 just print them off and, you know, skim over them really quickly
16 and pass them on. And most of the work isn't supposed to start
17 until about an hour in, but this pig happened to go out sooner.

18 Q. So when you did a shift change, how long would you say
19 you typically sat with the incoming shift controller?

20 A. That really depended on what was going on for the day.

21 Q. You can give me a range.

22 A. Yeah, sometimes it would be 5 minutes, to 20 minutes.

23 Q. Okay.

24 A. And it really depended on everything that happened the
25 night before and what was going to be happening -- scheduled to be

1 happening the day of.

2 Q. Okay. In the entire time that you worked as a
3 controller at Enbridge, did you ever see them take a scenario and
4 throw it up on the screens that were on the side walls?

5 A. I do actually. It was the night where I was training on
6 6B side, with Steve Gold and, in fact, in Group 2, there was a
7 leak in -- somewhere between Clearbrook and Superior. And after
8 they had shut down, buttoned up, and they had figured out it was a
9 leak, Steve Gold was kind enough that he explained. He brought
10 everybody in and got them to put the scenario up on the screens
11 for everybody and he was kind enough to explain it to us younger
12 operators as to what he was seeing and why it was a leak and how
13 could we, you know, respond to it and how well our operators
14 responded and --

15 Q. Okay.

16 A. -- he talked about it.

17 Q. But they didn't do it the night of Marshall, right?

18 A. Not the night of, no.

19 Q. Okay. All right. When you mentioned calling field
20 people out because you can't see and they could help you be your
21 eyes --

22 A. Smell even, because it was dark.

23 Q. Okay. Is there a general reluctance to call out certain
24 locations or certain times or --

25 A. Not for something like that.

1 Q. Okay.

2 A. For sometimes on communication issues or something that
3 could be left until the morning, it wasn't of utter importance, it
4 wasn't recommended to call. But for something like that, where
5 you suspected there was a leak or there was a leak or a valve
6 closing on a line as you're operating or a valve not opening,
7 those things, yeah, you do.

8 Q. Okay. All right. And when you went through your
9 training, did they cover the 10-minute rule?

10 A. Yes, in the procedures.

11 Q. Did they train you to start a timer?

12 A. Yeah.

13 Q. Did you routinely start a timer?

14 A. Yes.

15 Q. Okay.

16 A. Although sometimes there's a little bit of grayness
17 about that one.

18 Q. Okay. All right. And were there any system problems
19 that you routinely encountered with the SCADA system or CMT?

20 A. No, I don't recall. I will, I will applaud Enbridge on
21 the SCADA system they have and the CMT. I haven't had much more
22 experience with any other SCADA systems, but comparing it to what
23 I'm experiencing now, I will say they do a pretty fine job with
24 their SCADA.

25 Q. Okay. Thank you for that. Have you had a lot of issues

1 with PCV valves?

2 A. Well, Line 4 was after that restriction because we were
3 putting so much pressure on it. But going to 6B, there was a few
4 stations where we found the PCVs weren't quickly acting enough.
5 Again just regular probably wear and tear that was experienced on
6 the job.

7 Q. Were those corrected or did you just learn to work
8 around it?

9 A. Most of the times they were pretty good at correcting
10 them. Sometimes we had to keep putting FacMans in, you know, over
11 and over and over again just to, you know, point out, can you get
12 this done sometime? And sometimes, if I recall, we had -- we had
13 a FacMan person on shift that was supposed to be in charge of --
14 with our group that was in charge of going through the FacMans,
15 reviewing them on a regular basis, seeing what was cleared off,
16 what wasn't, what needs to be followed up. And from my
17 understanding of it, I had to do that a few times myself where I
18 had to call and say, hey, are you guys going to get to this PCV or
19 can you get to this equipment? Well, we're waiting for the parts.
20 Well, let me know as soon as it comes in. Can you get it done any
21 sooner? Can you take any parts from another station and bring it
22 over? But most of the time, pretty good.

23 Q. When you reviewed those FacMans, I forgot what interval
24 you said, but was that per procedure or was that just something
25 you guys did because you had to have your equipment working?

1 A. We just did as a project.

2 Q. Okay.

3 A. And we felt that being -- we had a lot of newer
4 operators coming in the group, and unless you've developed that
5 habit right off the bat, sometimes it's hard to start getting into
6 that habit. We found that there were lots that weren't going in
7 and putting in FacMans or they were and they weren't clearing it.
8 So then there was uncertainty on the next shift or the shift
9 after, why is there a FacMan or why is there a tag associated with
10 this unit? What's going on? Nobody knew. So somebody took it
11 upon themselves to go in regularly, whether it was every shift or
12 once a month, sit down and review that and follow up with the
13 field.

14 Q. Are there -- did you ever routinely study incidents or
15 accidents maybe not on your console but from a lessons learned
16 perspective?

17 A. Well, we had our safety meetings which were once a
18 quarter, and within those safety meetings, sometimes the shift
19 leads did mention near misses or something that had recently
20 occurred that was an error, and they would discuss it with the
21 group and we would have a bit of discussion about it. In that
22 sense, yes. And then we did have our emergency response training
23 which was once a year where we sat down on the simulator and we
24 got to practice looking at leaks and obstructions and some of the
25 other abnormal operating conditions that we'd run into.

1 Q. Okay. You mentioned a bad swing. What does that mean
2 to you?

3 A. It can be anywhere from swinging into the wrong valve --
4 or are you talking about the time where I thought it was a leak?

5 Q. Um-hum.

6 A. Oh, that one. Well, it was the operator closed the
7 valve sooner than opening up my next injection point, so it
8 created bit of a --

9 Q. And when you say operator, do you mean yourself or --

10 A. No.

11 Q. -- do you mean --

12 A. The terminal operator. Okay. Not field, but the
13 operator sitting in the room.

14 Q. Okay.

15 A. Terminal operator.

16 Q. Okay.

17 A. Because at Enbridge we are divided into terminals,
18 pipelines and terminals. Again, you have the beginning and --

19 Q. So that was like a coordination thing?

20 A. Well, it was them making their regular swing and whether
21 it was they closed the valve too soon, didn't open up the other
22 valve soon enough. So it kind of created a bit of a -- I'm trying
23 to use the right technical word for it, but a bit of a drop in the
24 pumps, in the booster pumps.

25 Q. Okay.

1 A. A bit of a void, if you want to call it.

2 Q. Okay. And so I think my last question for you is if you
3 -- I'm sorry, two. MBS role, can you tell me what you saw their
4 role as in the control room?

5 A. To be honest with you, I was very, very gray on their
6 role --

7 Q. Okay.

8 A. -- because prior to them coming onto shift, we had to go
9 to the shift leads with the MBS alarms and then -- they were
10 originally located in different rooms so the shift leads would
11 call or page them and they would get back to us. And then they
12 came onto shift but the procedure still stood that we had to call
13 the shift lead and the shift lead had to call them and then they
14 would call us, which I thought was very bizarre considering the
15 MBS guy is sitting in the room right there with me. Instead of me
16 having to call the shift leads, I can call the MBS guy first, get
17 them to start looking at it, and then call the shift lead and say,
18 hey, this is what happened; I talked to Jim; he's on it; he's
19 going to be looking into it; this is what happened. I thought it
20 was a bit redundant. And then, I mean, there was the MBS alarms
21 that would come in and they would look at it and then the shift
22 lead would have to give you the go ahead to start even though the
23 MBS analyzer just told you that it's not a leak. So it was very
24 gray.

25 Q. Okay. No, that's fair. My last one would be for you

1 because you've had this experience and you're in a unique position
2 in that you were in a room during a major leak. Looking back, is
3 there any specific changes you would tell us about that could help
4 that control room function better?

5 A. Stop deeming everything as an error.

6 Q. Okay.

7 A. And making people fearful to come and talk to them about
8 things. Nobody wants to say anything. Nobody wants to talk up.
9 Nobody wants to help anybody because they're afraid they're
10 sticking their neck out and they're going to get in trouble.

11 Q. So if I characterize that as a fear of reprisal, is that
12 a fair --

13 A. Repercussions, fear of being "hung for it",
14 quote/unquote. Maybe stepping away from putting so much projects
15 on everybody. One of the criteria for being able to get a good
16 performance is picking up a project and doing a project on the
17 side while you're trying to operate. Well, I can tell you, 99
18 percent of the time, I did not have time on shift to sit down and
19 do something else as opposed to operating and focus on my own job,
20 and when I tried, I would miss something and it would be deemed as
21 an error because I was busy working on a project as opposed to
22 focusing on my own job. But if you didn't pick up a project, you
23 were deemed as not a team player and you didn't want to help
24 anybody; you didn't want to help the team. You're not going to
25 get a good review, more than a 3.2, if you don't pick up a

1 project. So maybe cutting back the workload a little bit.

2 Q. Was the --

3 A. Because I think everybody in that room was a fantastic
4 operator but when we're thrown 20 things at the same time,
5 mistakes are bound to be made. We're only human.

6 Q. So regarding the projects that you'd be asked to pick
7 up, did they provide a list and then you chose what you did?

8 A. They started doing that about a -- yeah, first year
9 after -- just prior to Michigan, there was a list of things and
10 people would volunteer to do them, but sometimes if you didn't
11 volunteer, you would be asked why don't you want to volunteer; you
12 should take on a project.

13 Q. Okay. You mentioned already that conceivably scheduling
14 changing a bit versus shift time could be a helpful change.

15 A. And that's something I decided to start speaking to
16 scheduling about as opposed to the shift leads, and I, you know, I
17 think it was one of the supervisors, I said to her, you know, the
18 next time -- it's right in the middle of shift change, just
19 consider doing it a different time. If you want me to go an hour
20 early, let me know; I can do that.

21 Q. Okay. Does anything else come to mind before we -- you
22 always have the freedom to contact us later if you think of
23 something.

24 A. Definitely. I'm just, I'm just trying in my head to
25 compare what I experienced there as to what I experience now as to

1 why I'm succeeding where I am as opposed to at Enbridge. A
2 constant word that keeps coming to my head is fear. I was fearful
3 to come into work because I was afraid I was going to make a
4 mistake and I was going to never hear the end of it. I was going
5 to get a letter; I was going to get my job threatened, versus
6 where I am now, I love going into work. I'll get up an hour early
7 before I have to get up to go into work because I enjoy it so much
8 because I enjoy the environment I work in.

9 Q. Okay.

10 A. And I really enjoy the job because I'm not stressed.
11 I'm not forced to do 20 maneuvers in a day. I have time to sit
12 down and analyze things instead of having to worry about, I've got
13 to make this maneuver next. Oh, my God, I've got to worry about
14 this line. What's going on? And I'm focused on one line now and
15 that's it. So it gives me the time to gather my thoughts, to do
16 what it is I have to do as an operator.

17 Q. Okay.

18 A. Yeah, and going back to the projects, I'm not forced to
19 pick up projects now. If I choose, great. If I don't, you're
20 going to get your review as it is. You're going to get your bare
21 minimum because you're here doing your job and you're doing it
22 safely.

23 BY MR. PIERZINA:

24 Q. Same type of schedule?

25 A. Exact same schedule.

1 MR. PIERZINA: I know we didn't turn over to you, Jay.

2 BY MR. PIERZINA:

3 Q. The one question I wanted to ask you about was overtime
4 and whether or not you had to work mandatory overtime or did you
5 ever -- were you ever asked to work overtime with Enbridge?

6 A. Yeah, with Enbridge I found that there's a lot of sick
7 days. So I was asked a few times, and beginning closer to the
8 start of my career with Enbridge, I took a lot more overtime.
9 Kind of closer to mid to the end, I found that I was so stressed
10 that I didn't want to go there on my days off. It was the last
11 place I wanted to be. So I wouldn't take overtime and it was
12 reflected, because you could see the numbers as to who's been
13 working the amount of overtimes on shift, and I was one of the
14 lower ones and that was for good reason because I didn't want to
15 come in to be there. I'd rather take my days off, relax and come
16 in with a fresh mind on my set, and --

17 Q. Is that a performance measure taking overtime or not?

18 A. I don't know.

19 Q. Okay.

20 A. It could be subjectively. That's up to them, but I know
21 a few times I was actually away from the city and I couldn't come
22 in for overtime, and I was told to leave where I was to come in,
23 that being Jasper, driving from Jasper. "We need you for
24 overtime." "No, I can't. I'm in Jasper." "Well, you have to.
25 We have nobody else." I'm sorry, I can't. I'm on vacation with

1 my boyfriend, leave me alone, and it would be I'm not answering my
2 phone anymore." And it's just constant, constant, constant phone
3 calls and it's like, you know, I'm on my days off, leave me be.
4 And if you called in sick, you got 21 questions as to why you're
5 calling in sick. I did not like that.

6 MR. NICHOLSON: Okay. Jay.

7 BY MR. JOHNSON:

8 Q. Did your job scope change from when you first started to
9 towards the end as far as what you were doing? I know you started
10 as Operator I, I think you called it, or III, whichever, I don't
11 know either.

12 A. I wouldn't say the scope changed. The workflow changed.

13 Q. And in what manner? I mean --

14 A. It became more and more. It seemed that lines -- from
15 when I started, it seemed the lines have gotten busier. There's
16 more happening. We have more shivers (ph.). But the scope, I
17 don't think the scope ever changed. I was there to be an
18 operator.

19 Q. But you felt as though the work on the console got
20 busier?

21 A. Working the console was getting busier, and actually
22 going back to this shift lead thing, I didn't experience as much
23 in the beginning because I was, again, training, but closer to the
24 end I felt that the shift leads had more of a voice than the
25 operators. But the sole scope being I'm there to monitor the line

1 and operate the line safely, that didn't change.

2 Q. You talked about error, it was an error if you swing
3 into a tank too long or too short. Do they -- were you aware that
4 with, you know, potential to degrade crude, that Enbridge would
5 have to track that for shippers?

6 A. That -- yes, and I completely understand what you're
7 saying in terms of that, but I'm talking about the same crude.
8 It's the same crude being injected out of a tank longer than it
9 should have.

10 Q. What do you mean?

11 A. Like you give an extra 100 to 200 cubes of up at Coal
12 Lake by accident and put it into a line.

13 Q. So you don't think that should be considered an error?

14 A. Error wouldn't be the right term. Operator incident
15 report possibly. Error puts it as being --

16 Q. Were those two distinct differences? I don't know.

17 A. Well, in my mind, I'm sure in a lot of people's minds if
18 you told somebody you have an error, well, that makes you fearful
19 as opposed to an operator incident. Oh, it's an incident, you
20 know, I'm not going to be hung for it and let's learn something.

21 Q. Were those documented?

22 A. Yeah.

23 Q. Okay. And you just said sometimes. So did they have an
24 operator incident and error report?

25 A. They didn't have an operator incident -- there was an

1 operator awareness program, but if you had to go into that, you've
2 already had an error.

3 Q. So how did you document it?

4 A. If you had an error?

5 Q. Yes.

6 A. You'd take a piece of paper and you wrote down what
7 happened and what would you do differently and what you learned
8 from it.

9 Q. Is that even on an operator incident would you fill that
10 out? I mean, if you know --

11 A. Yeah, because an operator incident would be an error.
12 I'll give you an example. My first error was on Line 4, two LLB
13 batches back to back, same crude, same material, just one was
14 destined for Superior. The first one was destined to Superior.
15 The second one was destined to Clearbrook. Same kind of crude.
16 One big long -- two separate batches, but one big long batch. The
17 second one we're supposed to take into Clearbrook but the operator
18 and I, Clearbrook operator and I took the first one into
19 Clearbrook because we had a clear density change going from the
20 previous batch into the LLB. Took the first LLB, but there was
21 still the same amount that was supposed to be destined for
22 Superior, still on the line and we swung the LLB with -- the rest
23 of it was going down to Superior. That was deemed as an
24 administrative error even though both shippers still got the LLB
25 they requested, the same amount they requested. We just took a

1 different batch in the line up in because of the density change.
2 We could see the clear density change as opposed to if we had
3 swing in into the second batch, it would have been on time.

4 Q. From the shipper's standpoint, their batch is in there,
5 they wanted it to go to Superior as opposed to Clearbrook and then
6 maybe down to a different refinery. So don't you -- wouldn't you
7 think that's an error?

8 A. No, because it's LLB and LLB. It's not Coal Lake and a
9 sweet or a sour. It's a big 20,000 LLB cube batch. From the
10 minute that first LLB goes in, to the last minute, it is all LLB.
11 It is all black stuff. So whether I swing in, in the middle of
12 that LLB and sip out 9,000 cubes of it, and then let the rest stay
13 in there, it's still all LLB. An error? I think not.

14 Q. That's all I have.

15 A. Operator awareness. Okay, I learned something new
16 today. The shipper wanted the first one. Okay, that's -- it's in
17 their name; I get it. But once it goes in the pipeline, it's all
18 black stuff. It's all oil.

19 MR. JOHNSON: I have no more questions.

20 MR. NICHOLSON: Anyone else? Barry, did you --

21 MR. STRAUCH: No.

22 MR. NICHOLSON: Karen?

23 MS. BUTLER: I'm done.

24 MR. NICHOLSON: Brian.

25 MR. PIERZINA: Go ahead. I know you've got some.

1 MS. DERHAMI: I'll give you another example for the
2 error where we're talking about over injection. The last so-
3 called error I had was the Superior terminal operator over
4 injected in my pipeline by 45 minutes because he failed to set his
5 timer alarm and he failed to set his tank alarm. Why was I deemed
6 in error?

7 MR. JOHNSON: I can't answer that.

8 MS. DERHAMI: And that's my issue with the error
9 reports. It's very gray. Why is it that he failed to put his
10 tank alarms and I have to be dinged for it when I have sent them
11 the time and I've told you, this is when you're supposed to be
12 swinging, but yet he swings 45 minutes later? As far as I'm
13 concerned, as a pipeline operator, I've done my job, which is
14 stating to him when I figure according to my rate it's going to be
15 swung.

16 BY MR. NICHOLSON:

17 Q. But what's the intent of this error reporting?

18 A. I don't --

19 Q. Is it to teach you --

20 A. To teach -- to me, it didn't -- it doesn't teach me
21 anything at that point because, to begin with, I didn't make the
22 mistake. So there's going to be a little bit of hostility on my
23 end to begin with, but did it teach me anything? No. Is it there
24 to teach him something? I hope so, because I hope he didn't make
25 the same mistake again but he may have.

1 Q. This is a report you fill out and then you give to your
2 shift lead. Is that what you said?

3 A. Yeah, we filled it out together.

4 Q. It is part of your permanent record?

5 A. Yeah. And after three of them, you get a letter, which
6 I got a letter as well.

7 Q. A letter. Okay.

8 A. Saying you have another one, you could possibly lose
9 your job.

10 Q. Three strikes, okay.

11 UNIDENTIFIED SPEAKER: I do have some follow-up
12 questions.

13 UNIDENTIFIED SPEAKER: Oh, okay, go ahead.

14 UNIDENTIFIED SPEAKER: No, no, I'm sorry. I thought you
15 were done.

16 BY UNIDENTIFIED SPEAKER:

17 Q. Yeah, I was just going to ask you, so you were on the
18 Line 6B console for a month or 2 months or so prior to the
19 incident?

20 A. On my own and then prior to that, 6 months with a
21 trainer, I think.

22 Q. Okay. And so do you have any idea as to how many times
23 you would have stopped a line or started the line? Not that you
24 were comfortable, I imagine, right?

25 A. As I said, I was never comfortable with 6A even by the

1 time I left.

2 Q. Yeah, I was talking about 6B.

3 A. 6B, I was on my own for about a month at this time,
4 maybe two. I'm going to say no because I always felt
5 uncomfortable on that side.

6 Q. Did you operate that console after the Marshall
7 incident?

8 A. I did, after everything was buttoned up and fixed. I
9 did, yeah.

10 Q. Okay.

11 BY UNIDENTIFIED SPEAKER:

12 Q. A couple of questions. And the first question I wanted
13 to ask you was would it surprise you to see a 0 pressure at
14 Marshall?

15 A. Yes.

16 Q. What would you do about it if you had come on shift and
17 seen that?

18 A. Well, depending -- not depending. Being where Marshall
19 is, and that section of pipe, what would I have done? I've asked
20 myself that question for a year now. And in all honesty, I
21 probably would have done what Tim did the first time, was start
22 up, wait for my 10 minutes, if nothing happened, shut down, button
23 up, send somebody out there immediately.

24 Q. Okay. That's --

25 A. I can say I did not have enough experience as an

1 operator to be able to tell immediately by looking at first look
2 that it was leaking.

3 Q. So the line filler, CMT that showed however much had
4 been drained, that would have been drained into Sarina or
5 Marysville or --

6 A. Wherever they were at.

7 Q. -- somewhere down at the end.

8 A. And CMT shows that.

9 Q. Okay. And -- but in your -- would that have any
10 correlation to trying to fill a column in, in Marshall?

11 A. No, because that's -- procedurally, that's supposed to
12 be our last resort.

13 Q. Okay.

14 A. First, first resorts at that time, we -- they still
15 hadn't come up with the calculating columns at that time. The 10-
16 minute rule was your first --

17 Q. Okay.

18 A. -- and if that didn't happen, then you went subsequently
19 to your other resources to tell you what it is.

20 Q. And then after Line 6B was restarted, after the
21 accident, and with the pressure restrictions that were imposed,
22 how did that change your ability to operate the line?

23 A. At first it was difficult getting used to but one thing
24 Enbridge did really, really well, was prior to the start up, they
25 gave us all a chance to sit down with the training department and

1 practice on a simulator on starting up that line, and if we didn't
2 feel comfortable, we could go ahead and keep practicing and bring
3 the simulator down with us to shift and go at it and sit down with
4 somebody else and do it together.

5 Q. Okay. Line 3 has since been taken off of that console.
6 Was that while you were still there?

7 A. That happened because after the Marshall incident. We
8 kept expressing how busy that console is, and especially with 6B
9 being, what had happened, we should probably pay a little more
10 close attention to it. So after Marshall -- it was about maybe a
11 couple of weeks before I left, when Line 3 moved.

12 Q. Okay. Where did that move to?

13 A. Group 2, I believe.

14 Q. Thank you very much.

15 BY UNIDENTIFIED SPEAKER:

16 Q. I have a couple of questions.

17 A. Sure.

18 Q. During the incident at Marshall, you saw the 10-minute
19 rule being violated. Is that correct?

20 A. I didn't see it. I heard about it.

21 Q. Okay. Are you aware of other incidents when that rule
22 was violated?

23 A. The only incident I can speak of for myself was the pig
24 incident with Cromer --

25 Q. Okay.

1 A. -- which was done on purpose.

2 Q. Were there other procedures that you have been taught
3 that you saw being violated?

4 A. Personally speaking, I would say no. In terms of other
5 operators, I cannot recall. It's not something that you would
6 openly discuss --

7 Q. Okay.

8 A. -- with any of the other operators. So personally I
9 don't know.

10 Q. Okay. And about this letter that you got where you had
11 been cited for three errors, when did you get that letter?

12 A. I got that letter after my third error.

13 Q. When was that? Before or after Marshall?

14 A. Before Marshall.

15 Q. Do you know of other operators who have gotten letters
16 like that?

17 A. Many.

18 Q. Many.

19 A. Uh-huh.

20 Q. So in your opinion, it wasn't uncommon to get letters
21 like this?

22 A. It was uncommon the first year, the first year I was
23 there. But it seemed after a while, especially that last year, it
24 seemed like somebody was getting a letter every month.

25 Q. And how would you hear about this?

1 A. Just gossip. Oh, did you hear so and so got a letter?
2 Did you hear so and so had this error? And they got a letter and
3 they got a second letter and they got a third letter, and I still
4 hear it to this day talking to some of my friends.

5 Q. What happens if somebody gets a third letter? It
6 doesn't sound like the letter actually means that the next error
7 you can lose your job.

8 A. It doesn't, but it's the fear of that. It's the fear of
9 the letter; the talk you get about the letter is what causes that
10 fear and whether you actually get fired or not, I'm not sure
11 whether somebody has. I don't know that. Would I have been fired
12 if I had got another one? Possibly. I didn't stick around to
13 find out. I wasn't going to.

14 BY UNIDENTIFIED SPEAKER:

15 Q. Would you consider swinging a batch -- you used the
16 Clearbrook incident, would you consider swinging a batch to
17 Clearbrook instead of Superior, not following procedure?

18 A. No, if there's no need for a batch going to Clearbrook
19 as per schedule, why would I swing in unless it's an emergency and
20 why -- I don't know why there would be an emergency, why I would
21 need to swing a batch into Clearbrook for no reason.

22 Q. But you swing a batch to Clearbook rather than Superior?

23 A. It was two batches back to back. They were both LLBs.

24 Q. But --

25 A. That was scheduled to go to Clearbrook.

1 Q. It was scheduled.

2 A. So one of the LLB batches was scheduled to go to
3 Clearbrook. It happened in that case it was the second LLB batch,
4 which was -- in total the LLB was 20,500 cubes, 10,000 destined
5 for Superior and 10,000 destined for Clearbrook. We just happened
6 to take the first LLB in and we saw the change and realized, okay,
7 we took the first LLB in. This is not a big deal. It's LLB.
8 It's not like we took a Coal Lake or a gas batch in. So we
9 mentioned to the operator, to the shift leads, and it was a
10 simple, simple scheduling fix which is just let them know, you're
11 still going to get your LLB; it's just going to be maybe a couple
12 of hours later, or we'll speed up the line and we'll get it to
13 you. But, no, it was immediately deemed as an error.

14 Q. Okay.

15 A. But I wouldn't swing into Clearbrook for no reason.

16 UNIDENTIFIED SPEAKER: Just to follow up on that
17 thought --

18 MR. NICHOLSON: Guys, let's go back to Barry. Barry was
19 still in the midst of --

20 BY MR. STRAUCH:

21 Q. And I really don't want to get into the specific
22 incident whether it should be an error or not. Between us, that's
23 just not relevant. Could you tell us the difference between an
24 error and operator incident report?

25 A. Operator incident report is something I deal with, with

1 the current job.

2 Q. Oh, okay.

3 A. At Enbridge, it would be an AOC -- or not AOC -- a OAC,
4 operator --

5 Q. Abnormal operation.

6 A. No, that would be an AOC. It's a database where you
7 keep these error reports that you fill out, and it's supposed to
8 be there for reference for other operators to help them learn.
9 It's an OAC or something. But you write an error report, which is
10 a paper copy that you fill out, you sign and management signs,
11 shift leads sign, and then you go in and you go into your OACs and
12 you fill it out online, not filling out the names of who was
13 involved but filling out the details of what had happened, what
14 was done and what should be done, suggestions for next time. The
15 operator incident report I'm speaking of is at the current job I
16 have.

17 Q. Okay.

18 A. But that is something different.

19 Q. What I'm asking about is the procedure at Enbridge. So
20 the OAC is an Enbridge --

21 A. Yes.

22 Q. -- policy or procedure?

23 A. To be honest, I can't even remember if it's a procedure.

24 Q. Okay. Well, forgive my terminology. But one the
25 operate initiates and the other the supervisor initiates?

1 A. The supervisor initiates it first and you fill it out.

2 Q. The error?

3 A. Yes.

4 Q. Which the OAC, the operator initiates, and it's done
5 online.

6 A. It's like a second part to it. So when you get that
7 sheet of paper and you're filling out your information, as such,
8 the first part says, well, fill it out and what would you do
9 differently, what did you do wrong this time, sign; and then the
10 second part of that sheet says now go into your OAC and fill out
11 an OAC report.

12 Q. You expressed some feeling that instead of errors,
13 Enbridge should have used a less punitive effort to call it and to
14 use a lessons learned approach rather than a punitive approach.

15 A. Yeah.

16 Q. So what was that that you were referring to as the less
17 punitive, more lessons learned approach? What is that called?
18 That's what I'm really --

19 A. And I'm only -- and I can only draw on that from what
20 I'm experiencing now at my work.

21 Q. Oh, okay.

22 A. We do have OIRs. We call them OIRs, operator incident
23 reports, and we do fill them out. We have relief tanks on the
24 line or -- you know, if somebody relieves into a tank by 8 cubes,
25 we still fill out an OIR stating why did we relieve? Like what

1 caused the relief in the tank or -- that being one of the minor
2 things, and of course there is degree of -- different degrees of
3 OIRs that they can fill out, but that being simple. Or even, for
4 example, a guy's working out at my station and all of a sudden he
5 knocks off my station. That's still an OIR. You still fill it
6 out saying, well, this happened. Well, what are we going to do
7 differently next time? Well, maybe I'm going to bypass the EST or
8 I'm going to get more information from the field guy and ask him
9 what is he going to do and is it going to cause any issues?

10 How that is approached where I am now as opposed to an
11 error is, you fill out your sheet, you send it off to your
12 management. Your management reviews it and then it goes up to the
13 entire group for review. You don't get grilled. You don't get
14 letters, why did you do that? It was what did you learn about it?
15 So if you have a really bad mistake, the supervisor, the training
16 supervisor sits down with you and just goes over some things that
17 you might do different the next time.

18 Q. So just for my understanding, you were comparing not an
19 Enbridge procedure with another Enbridge procedure; you were
20 comparing an Enbridge procedure with --

21 A. What I --

22 Q. -- a procedure used at your current employer?

23 A. Again, it's not a procedure. It's more how it's
24 handled.

25 Q. Okay. All right. Yeah, that's -- I don't have any more

1 -- oh, yeah, one other question. The letters, the letter you got
2 from Enbridge, was that part of your permanent personnel file?

3 A. I have one at home and they should have one in my file
4 if they still have my file.

5 Q. Okay. All right. Thank you.

6 A. You're welcome.

7 BY MR. PIERZINA:

8 Q. Ghazal, I just wanted to ask you, as far as -- well, we
9 were talking about the maneuver with the 20,000 LLB batch.
10 Backing up just a little bit --

11 A. Uh-huh.

12 Q. -- you know, prior to your shift, a schedule change had
13 been made to stop, stop Line 6B just ahead of -- the pig just
14 ahead of Niles.

15 A. That was on the night of.

16 Q. Yeah, yeah.

17 A. Okay.

18 Q. And then to restart. That was something that Theresa, I
19 believe, had come up with maybe in discussions with somebody else
20 that would -- I guess you avoid a stop/start was the whole idea.
21 And so I guess my question is, is there an incentive for an
22 operator to come up with, you know, based on their experience, an
23 alternative to the schedule that makes more sense from a line
24 operation perspective, which kind of sounds like what we were
25 doing with this 20,000 LLB?

1 A. And you do. As an operator, in terms of scheduling-
2 wise, you know more than scheduling does because you're right
3 there, and a lot of the time, I mean, the scheduling people aren't
4 operators; they never were, and some are and so they know what
5 exactly happens on the line. And I found sometimes just to make
6 things work, I would call back scheduling and say, well, what do
7 you think about this? We'll try it this way and it's like, oh, I
8 didn't know you could do it that way. Yeah, we can.

9 So then it would be agreed upon to go ahead or, for
10 example, to go into the starts, you know, this works better, so
11 let's try it that way. In terms of that situation, that would --
12 I would say that the operator does have the right if they feel it
13 would work better, unless it's an engineering issue, unless it
14 specifically -- there's a specific reason as to why they can't,
15 but in that situation, maybe slow down the line would have been a
16 suggestion.

17 Q. Okay. So in this 20,000 LLB batch, if you had come up
18 with that plan and called scheduling, what do you think about
19 this, and then done that?

20 A. They would have been fine with it.

21 Q. And there wouldn't have been --

22 A. And which is exactly what happened, because after I
23 spoke to the shift leads and I was made to fill out an error
24 report, I called scheduling myself and said, hey, this is what
25 happened. Scheduling said, ah, don't worry about it; LLB is LLB.

1 Q. Thanks.

2 UNIDENTIFIED SPEAKER: Probably we need to end here
3 pretty quick. We've been going for an hour and a half.

4 MR. NICHOLSON: Yeah, I agree. I think the time is
5 getting away from us and unfortunately we're probably going to
6 have to -- I got more questions, but I don't think I'm going to --

7 MS. BUTLER: I'm done. So you may be the only one left.

8 MR. NICHOLSON: I know. I don't think I'm going to --
9 we've got other people. I think at this point, we'll end the
10 interview and I appreciate it.

11 MS. DERHAMI: You're welcome, and if -- I mean, you have
12 my e-mail and you have my phone number, so feel free.

13 MR. NICHOLSON: And likewise, you've got mine, and what
14 I would say is, as you think of things, and I know you will,
15 you'll think of things, I wish I would have said this or --

16 (Whereupon, the interview was concluded.)

17

18

19

20

21

22

23

24

25

CERTIFICATE

This is to certify that the attached proceeding before the

NATIONAL TRANSPORTATION SAFETY BOARD

IN THE MATTER OF: ENBRIDGE - LINE 6B RUPTURE IN
IN MARSHALL, MICHIGAN
Interview of Ghazal Derhami

DOCKET NUMBER: DCA-10-MP-007

PLACE: Edmonton, Alberta, Canada

DATE: November 17, 2011

was held according to the record, and that this is the original,
complete, true and accurate transcript which has been compared to
the recording accomplished at the hearing.

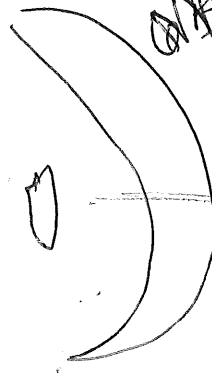
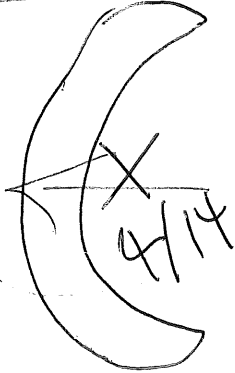
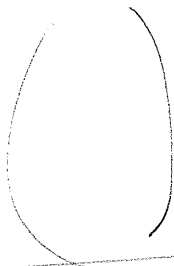
Kathryn A. Mirfin
Transcriber



CROWNE PLAZA®

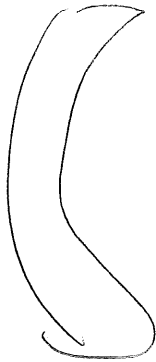
EDMONTON
CHATEAU LACOMBE

THE PLACE TO MEET



AWB

6A, 6B, 17, 3



Nov. 17, 2011

G.D.

