UNITED STATES OF AMERICA
NATIONAL TRANSPORTATION SAFETY BOARD
<pre>NATIONAL TRANSPORTATION SAFETY BOARD * * * * * * * * * * * * * * * * * * *</pre>
via telephone Thursday, December 1, 2022
FREE STATE REPORTING, INC.
Court Reporting Transcription D.C. Area 301-261-1902 Balt. & Annap. 410-974-0947

## **APPEARANCES:**

BART BARNUM, Investigator National Transportation Safety Board

CHARLES ARNOLD, Investigating Officer United States Coast Guard

Chief Warrant Officer United States Coast Guard

MICHAEL CENEC, Designated Person Ashore Seacor Marine

TIM DEPAULA, ESQ., Outside Counsel Seacor Marine

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I	I
	4
1	INTERVIEW
2	(10:05 a.m.)
3	MR. ARNOLD: Good morning. My name is Charles Arnold. I'm a
4	marine investigator with the United States Coast Guard. Today is
5	Thursday, December 1st at 10:05 a.m.
6	We're conducting an interview with Mr. Joey Delaune for the
7	lift boat Robert incident that occurred on or about November 20,
8	2022.
9	Mr. Delaune, I just want to let you know our investigations
10	stemmed around finding the cause or causes of an incident. Trying
11	to find a cause or causes of an incident and provide
12	recommendations to prevent those incidents from reoccurring.
13	This is an unusual incident because no one was on the vessel
14	at the time. However, we'd like to get a background of everyone
15	you know, to, to lead up to the evacuation.
16	As mentioned before, we will be recording this incident
17	this interview, and so we can understand best and recap what
18	you're saying because what you're saying is important to us.
19	Everybody on the call besides you or besides if you're
20	turn to talk to have your phones muted so we don't have any
21	background noise.
22	INTERVIEW OF JOEY DELAUNE
23	BY MR. ARNOLD:
24	Q. Mr. Delaune, do you have any questions?
25	A. No sir.
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	5
1	Q. All right. So, first, let's talk about your background and
2	qualifications.
3	A. Okay. You want me to go ahead with it?
4	Q. Yeah. So, so, what is your position on the lift boat <i>Robert</i> ?
5	Let's start there.
6	MR. ARNOLD: I'm sorry. I'm sorry. You're right. Let's do
7	a round and see who's on let you know who's on the phone.
8	Mr. Barnum.
9	MR. BARNUM: Yeah. Again, for the recording this is Bart
10	Barnum with the NTSB's office of marine safety. B-A-R-N-U-M,
11	Barnum. Thank you.
12	MR. CENEC: Michael Cenec. Seacor Marine, DPA.
13	MR. DEPAULA: And this is Tim DePaula of Murphy, Rogers.
14	Counsel for Seacor.
15	MR. Chief Warrant Officer
16	Coast Guard, Houma investigations.
17	MR. ARNOLD: And, just to let you know, Mr. Delaune,
18	Mr. is here in the office with me.
19	MR. DELAUNE: Okay.
20	BY MR. ARNOLD:
21	Q. So, what is your position on the lift boat <i>Robert</i> ?
22	A. My position, I am a AB crane operator. So, my day-to-day,
23	you know, whenever I get up in the morning, is basically, I get my
24	JSA's ready. Inspect all of my cranes and do whatever needs to be
25	done be it you know, boat operations, or platform operations.
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	6
1	Things like that. Whatever needs to be done, actually, you know,
2	we do it.
3	Q. What type of licenses do you hold?
4	A. I have a AB unlimited. I carry RFPNW. STCW Things like
5	that. I got you know, my crane and my rigging, obviously but
б	other than that, I don't have like, radar or you know, anything
7	like that.
8	Q. Are you certified to
9	A strictly AB crane.
10	Q. Okay. Are you certified to use all of the cranes on the lift
11	boat <i>Robert</i> ?
12	A. Yes, sir. Every single one of them.
13	Q. How long have you been assigned to the Robert?
14	A. Who. I'm not real sure. I've been on there for quite a few
15	years now. I would say, at least, at least 4 or 5.
16	Q. And, how much time on the water do you have?
17	A. 13 years.
18	Q. Has all of that time been on lift boats?
19	A. Yes, sir.
20	Q. What was the lift boat before the <i>Robert</i> ?
21	A. I was on the <i>Jill</i> , which is the sister ship to the <i>Robert</i> .
22	Q. Jill?
23	A. Yeah. The lift barge <i>Jill</i> .
24	Q. Okay. So, for this location here on South Marsh 137, how
25	long evacuated on November 18th how long had you been on
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1 location?

2	A. Do you mean as a whole? Or, do you mean just for that hitch?
3	Q. All right. Well, let's first go that hitch.
4	A. Okay. For that hitch, started November 2nd, I believe.
5	Q. All right. And you were out there on a previous hitch?
6	A. Yes. Yes. We've been on that platform for, I would say, at
7	least since 8 weeks or so? Maybe, maybe longer?
8	Q. Okay. Were you out there when the <i>Robert</i> arrived on
9	location?
10	A. Yes.
11	Q. All right. So, let's talk about the last hitch when it
12	started November 2nd. Just run me through your daily work
13	operations. Well, first of all, do you work day shift or night
14	shift?
15	A. Work day shift.
16	Q. And that's what's the hours for that?
17	A. From 0600 to 1800.
18	Q. All right. So the time you got out there on November 2nd,
19	run me through your daily routine and some things that you did
20	while you were offshore.
21	A. Well, typically, we would, like I said, do anything that
22	needed to be done with the platform or help out in other areas of
23	the vessel, as far as, chipping, grinding, painting, doing
24	sanitary cleaning up and and we would you know, maintenance
25	our cranes. We have a bi-weekly crane maintenance. And then we
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have a bi-weekly written report. Also, the, along with the 1 2 written report we have inspections on the binders and the chains and everything that we have for -- equipment down. We make sure 3 4 we go through all of that. Make sure everything is there, 5 accounted for. And all in working condition. 6 Now, we did have weather come through a few days where we did 7 have to pull the walkway, or the float bridge, whatever you want 8 to call it. And set that down on deck and then jacked down. 9 Because working at that height the boat was you know, it was 10 swaying too much to be able to do any crane work. So, we had to 11 jack down and you know, wait on weather.

But, other than that, our day-to-day operations don't change very much.

14 Q. Okay.

A. It's pretty repetitive. Only thing that really changes for the most part, is what we do with the third party contractors on a day-to-day basis.

18 Q. So, talk about your cranes. Were you utilizing every crane? 19 Just one crane?

A. It just depends on what we are doing that day. For the most part, the 340, the starboard bow crane, we didn't use it very much, at all. If any.

I remember the first day we got on board, I had to move the grocery box from the port side, put it on starboard side so we can do groceries.

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	9
1	Other than that, the 340 stayed in the rack and it was
2	down for the most part. We 60B on the starboard stern when
3	weather is favorable. We would do a little bit of work with that
4	60B, whether it be bringing materials up to the wheelhouse. A lot
5	of personnel transfers from crew boat to the lift boat or vice
6	versa. And then, yeah, anything like that with the 60. The 10
7	ton on the port mid-ship we rarely use. The most, most of the
8	time you know, we use that whenever the was on board. We have
9	to get rigging off of a rack or something like that with that
10	little 10 ton. Maybe sometimes move equipment here and there.
11	But the primary was the 1100L on the port bow. Our big
12	crane. That's what we were using to service the platform and help
13	the contractors with anything that they needed with the P&A.
14	Q. Okay. And, some of that work well, everything was
15	discussed in the safety meetings, daily safety meetings?
16	A. Yes, sir. Anything our day-to-day operations, our safety
17	meeting and any kind of operations during the day was talked
18	about during that meeting. We would find out if we had a crew
19	boat coming, if we had personnel or if we had equipment to load or
20	back load from lift boat to crew boat or vice versa we would
21	find out at that meeting, that morning.
22	And then our day-to-day operations as far as the P&A on the
23	well, as well.
24	Q. So that 1100L, does it have a wind gauge on it?
25	A. Yes, sir.
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1 Q. I know you mentioned earlier, so, can you explain to me -- I 2 don't know much about cranes, and as I'm asking you the questions, 3 explain it to me like I don't know anything. Because in this 4 particular -- I don't know much about it.

5 So, the difference between stopping work because of swaying 6 and wind. Was the issues for stopping work and jacking down, was 7 it due to the swaying or was it due to the wind?

8 A. Well, it just depends. See, we have a threshold. Seacor,
9 and our policy, it's pretty much up to the crane operator to
10 determine whether the wind is strong enough to continue operation.
11 So it's up to our discretion.

But, on the lift boat, we have to go by the more stricter policy, which was the third party contractor, I believe the company's name was Supreme Drill Services. And their threshold was 30 miles an hour.

So when the wind was blowing 30 miles and steady 30 mile an hour, we would have to shut down for that. But we wouldn't have to jack down.

Now, when it comes to working in a platform, and the boat is swaying, enough for us to stop work. That's when I would call. I can work pretty well in the wind, but whenever it comes to the sway of the boat, that's when you've got to kind of take notice of the blocks, how much they weigh, you know, the big block, 13,000 pounds, the small block which ain't too bad, it's only a few hundred pounds.

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1	But, with as high as we were in the air, legs, and
2	stretched out as much as we were with the crane, whenever you
3	stretch out there real far, you know, and you're going down
4	enough, the blocks get to moving pretty good because the sway of
5	the boat the blocks mimic that. So, any way the boat is
6	swaying, that's where the block's going to go. So, you would have
7	to once it got to a point where you know, you couldn't do it
8	anymore, you just couldn't. So, the safest thing was to stop
9	operations, put the crane in the rack, and just wait for the
10	swaying to subside.
11	Q. And that would, that would be at the decision of the crane
12	operator.
13	A. Yeah.
14	Q. Now, with the swaying, is when you stop operations, is
15	that considered under the SMS, stop work authority?
16	A. Yes.
17	Q. So, y'all would have to go through the stop work authority.
18	Explain that process to me.
19	A. So the crane stop work authority. If I was to say that it
20	was too rough, whether it be the wind, the swaying, we would have
21	to stop operations until either the winds subsided or the swaying
22	of the boat was good to go over to. Where we could continue.
23	You know, it would have to be where I felt comfortable enough
24	to be able to get in that crane and be able to control it well
25	enough to be able to do the work on deck.
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1 That's pretty much it in a nutshell. I mean, there would be 2 no more operation. 3 Ο. Okay. 4 Until -- and then once we did start operations, something Α. like, we would all, you know, get together talk about it, you 5 6 know, try it out. And if the weather got worse again, then we 7 would stop again. If the weather got bad, or if the swaying got bad? Yeah, if 8 Ο. 9 the weather got bad or the swaying. 10 If the weather gets bad, the boat's going to feel everything. Α. 11 0. Okay. 12 So, whether it be the winds, or the seas. If the wind's Α. 13 pushing on the boat, you've got the seas, whether it be 5 foot, 2 14 foot, 3 foot, it don't matter. The boat is always going to move. 15 It's very rarely where you get a day where it's really, really, 16 really, calm and the boat's just still. 17 All right. Ο. 18 You know, especially in the winter season, where in the Α. 19 winter season, the boat's moving in a 5 foot sea, the current, the 20 wind, the seas, all of that takes an affect whenever you're 21 running a crane on board a lift boat. 22 Understood. Do you log any of the operations in any type of 0. 23 loqbook. 24 Yes. Α. 25 Ο. So, there's a separate crane log? FREE STATE REPORTING, INC. Court Reporting Transcription D.C. Area 301-261-1902

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	13
1	A. Yes.
2	Q. Is it one log for each specific crane?
3	A. Yes. Well, no. There's one log in each crane. There's one
4	book for each crane, so you don't get them mixed up. You have one
5	book inside the cab for each crane.
6	Q. And does that include your pre-use inspection, things like
7	that?
8	A. Pre-use inspection we do on the helm. Which is, we do that
9	in the wheelhouse.
10	Q. Okay. So, for the time you were out there from November 2nd,
11	approximately how many times did you I guess I'm trying to
12	did you stop mostly due to wind, or did you stop mostly due to
13	swaying?
14	A. The sway of the vessel.
15	Q. And because of swaying of the vessel different from wind, you
16	had to move the gangway and jack down.
17	A. In some instances, yes.
18	Q. Right. Whereas if it's just wind
19	A. Wind wasn't, it wasn't every time.
20	Q. Got you.
21	A. Whenever we would sway bad enough to be able to you know,
22	have to stop, back the cranes. We wouldn't jack down every single
23	time.
24	Q. Right. Tell me about the point do you remember the time
25	or the date when you first were aware that y'all were
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	14
1	considering I say y'all, when you were notified of bad weather
2	coming in and potential evacuation?
3	A. I would say for me, it was probably around that Monday or so.
4	Q. Can you tell me your duties at that point, once you get the
5	word? Or, if you did anything different?
6	A. Well, once we got the word that we were going to be
7	evacuating, everything changed. As far as job scope.
8	So, at that point, my job wasn't to P&A the well on the
9	platform. My job was to start securing the boat for evacuation.
10	So, we worked with the third party contractors to put some stuff
11	on the platform, just to get stuff off of the deck of the boat.
12	Make it easier for us to be able to place equipment, tying things
13	down and get it secure enough so we can leave.
14	Q. Was there any discussion about taking some of the equipment
15	that was on the boat and place it on the platform because of the
16	weather, or vice versa? Anything on the platform to the boat? Or
17	any of that type of discussion?
18	A. Oh, yeah. Yeah. We discussed that and then, like I said, we
19	put equipment on the platform just to get out of our way and so we
20	can because we have so much equipment that we have on the boat
21	that we had to get rid of some stuff to be able to move stuff
22	around to be able to bind it down.
23	Q. Understood. And you maintained the shift work, the 06 to
24	1800?
25	A. Yeah. Well, not only that, but yeah, and to move an extra as
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	15
1	well. You know, so whenever it came to the day before we
2	evacuated, I believe it was a, was that Friday. So Thursday, we
3	got with the contractors and that's whenever we started you know,
4	getting everything ready and moved around. And, when everybody
5	was gone, third party, we all got together and we worked over to
6	be able to bind everything down and get it secure so we can leave
7	the next day. And even the next morning we were still getting
8	things put in place so we could leave.
9	Q. Is that kind of a checking and double check? Making sure
10	everything's
11	A. Yeah.
12	Q done?
13	A. Making sure dotting i's, crossing t's.
14	Q. So as the crane operator, where there any issues discussed in
15	any safety meetings while on location about the any safety
16	concerns about the, using the crane with the boat as high as it
17	was? Any safety concerns at all?
18	A. No. I mean this is our job, this is what we do. So, we do
19	everything that we can as safely as we possibly can. So, at no
20	times did we feel that anybody was in danger as far as crane
21	operations or, you know, the boat was too high in the air to be
22	able to conduct the operations if we felt like that.
23	I mean, it was because of the swaying of a block and we just
24	had to wait on weather to be able to do our job.
25	Q. Okay. That's all I have right now. I'll pass off to
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	16
1	Mr. here. He's got a couple of questions he wants to
2	run by you.
3	BY MR.
4	Q. Hello sir. You mentioned that a couple of times we had to
5	move the gang the walkway, when we're lifting the boat up and
6	down?
7	A. Uh-huh.
8	Q. Is that something that you physically had to do? Or we
9	meaning the crew?
10	A. Well, I mean, being an operator, I'm in the crane hooking up
11	to it and putting it down on deck.
12	Q. Okay.
13	A. You know, the third party contractor is the ones that are out
14	there rigging. And, well, rigging up to it so I could pick it up
15	and move it and put it down wherever we need to put it.
16	Q. All right. Do you recall, on, when you first arrived that
17	was November 2nd, right?
18	A. Yes.
19	Q. When you first got there, do you recall the distance from the
20	lift boat to the platform?
21	A. Yeah.
22	Q. And it I'm not it doesn't have to be exact. Just a
23	rough estimate.
24	A. Well, I'd say at the closest point, the platform from the
25	front of the boat, I would say somewhere in the ballpark of 10 to
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	17
1	15 feet.
2	Q. Okay. What about oh, go ahead.
3	A. And that's not at the highest point of the platform, I guess.
4	I guess it would be a little bit closer.
5	Q. Okay. With the
6	A. We weren't able to reach the top part of the platform.
7	Q. Yes. With the walkway, about how big of a distance was there
8	on a gap between the vessel and the platform then? In that area?
9	A. I don't know what you mean.
10	Q. Is that the 10 to 15 feet on that you guys to cross on the
11	walkway?
12	A. No. The walkway itself, I think it was about 30 feet.
13	Q. The 30 feet distance from the vessel to the platform using
14	the walkway area? Is that accurate?
15	A. Negative. Negative. Okay, so, the walkway was on top of the
16	main structure of the platform level.
17	Q. Okay.
18	A. And the walkway was from the platform to the vessel, to the
19	lift barge Robert. Okay? But it was in about, I would say 15
20	feet or so
21	Q. Okay.
22	A and it was on top of a, a little a platform that had a
23	staircase that went to it.
24	Q. Okay. So, it was a, almost like a permanent fixture, and
25	then you guys would do the walkway to fit into there.
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1	А.	Right.
Ŧ	А.	RIGHL.

2	Q. All right. Understood. Now, between November 2nd and the
3	18th, whether you noticed it from being in the crane, or whether
4	you noticed it walking the on the walkway or whatever, did you
5	ever notice the distance change? Whether increase or decrease
б	A. No.
7	Q showing that the vessel moved?
8	A. No.
9	Q. Okay. So, with all you mentioned that the vessel was
10	always doing a little bit of movement, whether it's 3 foot or
11	A. Right.
12	Q or heavy seas the way you guys were
13	A. Right.
14	Q experiences. The vessel was always
15	A. The boat itself didn't shift.
16	Q. Okay.
17	A. Didn't move. Now, the sway of the vessel, you would be able
18	to notice the difference between the sway of the vessel and then
19	if the vessel shifted.
20	Q. Okay.
21	A. It's be a drastic difference.
22	Q. And during this time, the vessel never shifted, it just
23	swayed and returned to place?
24	A. Just swayed. Nothing out of the ordinary. Like I said, been
25	doing this for 13 years, just on scope, and the vessels always
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	19
1	flip.
2	Q. Okay. That's everything I had, thank you.
3	MR. ARNOLD: So, I got something came to mind real quick,
4	Mr. Delaune.
5	BY MR. ARNOLD:
6	Q. But, running the cranes. How long have you had your crane
7	certification? I don't think I asked that.
8	A. Oh, man. As long as I've been on lift boats.
9	Q. Okay.
10	A. It was shortly after I was hired. The first time I was
11	Montco, and then I was Montco ever since and then Seacor bought
12	out Montco, so. I've been on lift boats 13 years now, and so.
13	Q. Understood. So, y'all were elevated at the top, or to the
14	top of the platform. The platform has 2 decks, right? Do you
15	remember how the platform looked? Meaning, meaning that it had 2
16	decks.
17	So, if y'all were at the top, and you had some swaying, was
18	there any discussion or was it even possible, I guess it's 2
19	questions, of jacking down the boat to the well deck and using the
20	crane from there? To kind of minimize the swaying?
21	A. We wouldn't have been able to do the job.
22	Q. Okay. And the crane on the platform
23	A. If we were to jack down that far, the crane wouldn't have
24	been we were close enough to the platform to where we couldn't
25	swing the crane around. The crane boom then would've touched the
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	20
1	top deck.
2	Q. Got you.
3	A. Of the platform.
4	Q. And the platform crane, that was was that working at all?
5	A. No. Negative.
6	Q. And, this crane 2, from the lift boat <i>Robert</i> were y'all using
7	that to pull casing? And stuff as well from the, the well work
8	they were doing?
9	A. We never pulled casing.
10	Q. Did y'all use it for any type of well work, as well?
11	A. Yes. I mean, we put as the operations that we were doing
12	was mill. There was no inoperation.
13	Q. Okay.
14	A. So, we would put drill pipe down the hole. And once we got
15	to the certain depth, they would put the mill onto the drill pipe
16	and section mill. And then once they got a section, we would put
17	a pump joint onto the drill pipe, and continue on milling.
18	Q. Okay. By milling you mean drilling through? Or going down
19	hole?
20	A. Yes. With the mill, there's a drill bit on the end of the
21	drill pipe.
22	Q. Okay.
23	A. And, once you got down to a certain depth, I mean, that's all
24	it is, its milled. It's one big drill it looks like.
25	Once you got down to the certain depth, they were drilling
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	21
1	out concrete.
2	Q. Got you. Okay. Those are the last 2 questions I had to came
3	to mind.
4	MR. ARNOLD: Mr. Barnum, do you have any questions?
5	MR. BARNUM: Yes, sir.
6	BY MR. BARNUM:
7	Q. Thank you, Mr. Delaune. A couple of questions here.
8	The You said you'd worked for Montco before Seacor. When
9	you worked for Montco were you on the Robert as well? Or was that
10	the Jill?
11	A. Yes. I was on the <i>Robert</i> for a hitch or 2 before I went to
12	the Jill. But, I mean, not long enough to say anything about it.
13	It was just a hitch or 2.
14	Before the <i>Jill</i> I actually came out.
15	Q. Okay. So, I understood the <i>Jill</i> is the sister vessel,
16	correct? 335'?
17	A. Yeah.
18	Q. Okay. And you were on the <i>Robert</i> before the <i>Jill</i> with
19	Montco, had you operated in similar conditions as the Robert was
20	on the day of the casualty?
21	A. I've operated in those conditions on every lift boat I've
22	ever been on.
23	Q. How many hitches
24	(Crosstalk)
25	A. Sir?
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	22
1	Q. There's 217 foot water depth in the 25, 28 foot penetration.
2	That deep of water, had the lift boat Robert when you were on
3	it
4	A. The only 2 boats that can achieve that is the <i>Robert</i> and the
5	Jill.
6	Q. Okay. And had you been in those same situations before?
7	A. Yes.
8	Q. Okay. When it was Montco or Seacor?
9	A. Both.
10	Q. Okay. And, how about weather? Did you experience weather?
11	Significant weather like this event?
12	A. Yes.
13	Q. Okay. And, you know, 20 foot waves, high wind
14	A. Never have I been on a vessel with 20 foot waves. 26 foot
15	waves, whatever, like that. Now, 12? Maybe 15. But the general
16	idea is you don't want to be on a vessel with 20, 25 foot waves.
17	You just don't.
18	Q. Okay. Obviously, certainly they've been forecasted before.
19	You must have liberated and seeked refuge on those vessels before?
20	A. Yeah.
21	Q. Okay. Company, structure-wise, were there any differences
22	when Seacor bought out Montco? In your job, your capacity, did
23	you notice anything safety-wise, or, what kind of changes were
24	made when the ownership changed?
25	A. If anything, safety-wise, or anything like that, I mean,
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1 things got better.

2 Q. Okay. Any particular way you can say?

A. No. Well, I mean as far as full on structure -- you know, talking about structure, the safety aspect and everything has always kind of been the general same. You know, you always want to go out there and do the best job possible in the safest manner you possibly can.

8 You know, Montco was operated like that. So does Seacor. 9 But the structure of the company has changed, I felt like, 10 being as big as Seacor is that, there was more, more structure to 11 the company. More, it's hard to I guess, describe, but -- it just 12 felt like there was more there, you know. Because Montco was a 13 small, small, company compared to Seacor. They got they're stuff 14 together you know, a little bit better than what Montco did. 15 Understand. Yeah. All right. Ο.

Shifting gears a little bit. So, my understanding, you were on the crew that initially jacked the vessel down, the platform. And there's been a couple of different locations that they attempted to jacked down. Would you consider -- was that like, was that normal? When you come to a platform to have to do it 2 or 3 times, or, usually get it on the first try?

22 A. No. It's difficult.

23 Q. In what way?

A. You have to, you really have to assess the bottom. Youreally have to take into account everything that's around you.

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	24
1	What is down there? You have to actually, you have to really know
2	before you jack up into the location.
3	So, if it takes 2, 3, 4, 5, 10 tries, it don't matter.
4	Q. Okay.
5	A. The
6	Q. I've never been on a lift boat, especially in operations,
7	definitely not operations, so thank you for that.
8	So, taking the week before the casualty, when they were
9	starting to talk about weather and evacuations and whatnot. The
10	safety meetings was there any talk about, you know, not wanting
11	to liberate because there had been some challenges in finding the,
12	a suitable place to work and a suitable bottom to jack up on?
13	A. Say it again for me?
14	Q. I'm just curious, was there any talk about, when there was
15	time to evacuate I know before you said that usually the lift
16	boat will just liberate and seek safe refuge.
17	In this instance that obviously didn't happen. So I was
18	wondering if there was talk about you know, not wanting to do
19	that, to liberate the legs, because there had been difficulty
20	finding suitable bottom and suitable location where the vessel
21	could work the platform?
22	A. No. I mean, there was no talk of like, suitable locations to
23	find refuge in, is that what you're getting at?
24	Q. No, no. I'm just curious if anybody said, well, you know, we
25	don't want to you know, we don't want to lose our spot here on the
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	25
1	bottom because this is a good spot and if we liberate
2	A. No.
3	Q go seek refuge, we're going to have to you know, find a
4	new spot, do this all over again.
5	A. No, no, no. See, the thing is, whenever you stick a lift
б	boat, the pads in the mud
7	Q. Yeah?
8	A those pads, especially on the <i>Robert</i> and <i>Jill</i> , they're so
9	big that we would go directly, straight back to our spot. There
10	would be no there's big pad indentions in the mud that is down
11	there. So we would get Fugro, or whoever, to star fix us, and we
12	would get that location and run the pads down, and we would find
13	those same exact pads depression.
14	Q. So it's already like, a foundation there for you.
15	Understood, thank you for that.
16	A. Yeah. The foundation's already there.
17	Q. Yep. Good. Okay.
18	When was the job scheduled to be done? Was that information
19	passed down in your safety meetings, or
20	A. Brother, you asking the wrong one. I have no clue.
21	Q. Yeah. No. It's just I didn't know if you know, we want
22	to get this done in a week, we get a if the client was giving
23	the Seacor folks on there any pressure to stick around because
24	they wanted to get the job done.
25	A. No. Not that I know of.
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1 Okay. All right. That's the only questions I had for you Q. 2 Appreciate your time again, thank you. sir. 3 Α. No problem. 4 MR. ARNOLD: Mr. Tim, do you have any questions? 5 MR. DEPAULA: No, sir. I do not. Thank you. 6 MR. ARNOLD: Mr. Delaune, is there anything that comes to 7 mind that -- about this incident or the -- I say the incident but 8 the evacuation period, the weather, that comes to mind that we 9 haven't asked you today that you'd like to bring up? 10 MR. DELAUNE: No, sir. 11 All right. Is there anything that, in this MR. ARNOLD: 12 case, that you would have done differently as far as operations? 13 MR. DELAUNE: No, sir. 14 Is there any recommendations, or any suggestions MR. ARNOLD: 15 that you would have for Seacor, contractors, or the Coast Guard 16 about this incident? I'm sorry, about the weather issue and the 17 response? 18 MR. DELAUNE: No. Unless you could change the weather 19 report, we can get a closer look, you know, like a -- instead of a 20 7 day forecast, giving us a month in advance. 21 MR. BARNUM: I bet. 22 MR. ARNOLD: Unfortunately --23 MR. DELAUNE: I don't think that's within your power. 24 MR. ARNOLD: I think the weather is above all of our pay 25 grades at this point. FREE STATE REPORTING, INC. Court Reporting Transcription D.C. Area 301-261-1902

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	27
1	MR. DELAUNE: Yeah.
2	MR. ARNOLD: Thank you very much. Appreciate your time.
3	That's all the questions I have, unless anyone else Mr. Barnum
4	has an alibi. We'll go ahead and close this interview.
5	It's at 9:48 a.m. And again, Mr. Delaune, thank you for your
6	time. We're glad that everyone got off safely.
7	MR. DELAUNE: Thank you.
8	MR. ARNOLD: And, be safe continuing your work offshore.
9	MR. DELAUNE: Yes, sir. Thank you.
10	MR. ARNOLD: All right. Signing off.
11	(Whereupon, at 9:48 a.m., the interview was concluded.)
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## CERTIFICATE

This is to certify that the attached proceeding before the

NATIONAL TRANSPORTATION SAFETY BOARD

IN THE MATTER OF: SINKING OF THE SEACOR MARINE LB *ROBERT* NEAR LAKE CHARLES, LOUISIANA, ON NOVEMBER 20, 2022 Interview of Joey Delaune

ACCIDENT NO.: DCA23FM007

PLACE: via telephone

DATE: December 1, 2022

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

Angela Allen Transcriber

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