CAT REPORTING TRANSCRIPT
RE

COMMISSION OF ENQUIRY TO EXAMINE AND ENQUIRE INTO ALL OF THE CIRCUMSTANCES WHICH LED TO THE TRAGIC INCIDENTS WHICH OCCURRED ON FRIDAY FEBRUARY 25TH 2022 AT FACILITIES OWNED BY PARIA FUEL TRADING CO. LTD LOCATED AT NO. 36 SEALINE RISER ON BERTH NO. 6, WHICH LED TO THE DEATHS OF THE FOUR (4) EMPLOYEES OF LMCS LIMITED

THURSDAY, DECEMBER 01, 2022

PARTIES PRESENT:
Ms. Vijaya Maharaj — Assistant Commission Counsel

Ms. Gretel Baird — Counsel for Mr. Terrence Rampersadsingh
Secretary:

Terrence Rampersadsingh — Interviewee

TERRENCE RAMPERSADSINGH INTERVIEWCONDUCTED BY VIJAYA MAHARAJ

Q. Just for the record, I am Vijaya Maharaj, attorney-at-law, assistant counsel for the Commission. Mr. Rampersadsingh—

A. Yes.

Q. —the first question I have, would it be correct to say that you were the maintenance planner for Paria, and you would—that would have been in the maintenance department?

A. Yes.

Q. With Paria? And you would have reported to the maintenance lead, Mr.—

A. Manmohan.
Q. —Manmohan Balkaran. Who would in turn—so that's yes?
A. Yes.
Q. And he, in turn, would have reported to Mr. Wei, Michael Wei?
A. Michael, yeah.
Q. So he was the technical and maintenance manager of your department?
A. Yes. I was on contract with Paria—
Q. Right.
A. —for that period of time.
Q. So how long did you work for Paria?
A. Approximately three years.
Q. Three years prior to the incident?
A. Yeah.
Q. And in the same role as maintenance planner?
A. Yes.
Q. And did you, previous to that, work for Petrotrin?
A. Yes.
Q. In what role, in what capacity and were how long?
A. Approximately 30 years.
Q. Uh-huh.
A. Um, both as maintenance planner and the mechanical supervisor, plant fitting supervisor.
Q. And as plant fitting supervisor. So you were—is it that you functioned in both roles or one was before the other?
A. I was a plant fitting supervisor—
Q. First?

A. —first, and then mechanical planner after.

Q. Okay. So how long were you a plant fitting supervisor for?

A. From approximately 2011 till approximately '12 or '15, somewhere thereabouts.

Q. Okay. And what sort of functions did you perform in that role?

A. As the mechanical supervisor, plant fitting supervisor?

Q. As the plant fitting supervisor, yeah.

A. Pipe fitting works, turn arounds.

Q. Okay. And this would have been—when you say pipe fitting work could you just give me an idea what that means?

A. What the, the [*Inaudible*] is a bit different from your—

Q. Yes.

A. All the, all the pipe related maintenance work for the refinery—

Q. And this would have been onshore or offshore?

A. Onshore.

Q. Onshore.

A. At that present time it was onshore.

Q. Okay, onshore. Okay. With respect to the—when you were the maintenance planner, let's start with Petrotrin first—

A. Yes.

Q. —what sort of functions did you have under Petrotrin?

A. As the maintenance planner—

Q. Yes.

A. —producing schedules—

Q. Right.

A. —updating the schedules, doing scope of works contracts, site visits.

Q. Okay. And would this have been in respect of onshore or offshore work?
A. Mainly onshore.
Q. Mainly onshore. Okay. So let's talk a little bit about the role of maintenance planner for Paria. So you said you were in that for three years. Was that the same sort of job you would have been doing for Petrotrin?
A. Similar in nature.
Q. Similar.
A. Except the subsea.
Q. Okay. So you said you were there for three years?
A. Yes.
Q. During those three years, was your work mostly in relation to onshore activities or offshore?
A. Offshore.
Q. Offshore?
A. Both, both onshore and offshore.
Q. Both offshore, okay. Both onshore?
A. And offshore.
Q. And offshore. Okay. So for how long had you been engaged in offshore activities?
A. I can't really recall.
Q. Can't recall?
A. But most of my time it was between offshore.
Q. For the three years?
A. Yes. I did about a year onshore but I was also assisting with offshore work offshore.

Q. So most of the years—most of the time for the three years would be between both?

A. Yes. Plus I was assigned to offshore for about two years.

Q. Okay. Fine. To offshore for about two years?

A. Yes.

Q. And would this have been—the nature of the work for those two years would it have been in the nature of changeout of pipes on underwater pipes similar to what the project was in this February?

A. Somewhat similar. Except for, except the hyperbaric chamber is a different, um—

Q. Okay, so similar, so the work was—your offshore experience was offshore for the last two years. Was it in relation to subsea work?

A. Some.

Q. Some subsea work. Okay. But you were saying not necessarily with using the hyperbaric chamber?

A. Correct.

Q. So the first time you experienced works, well you were involved in works utilizing the hyperbaric chamber was this project?

A. No. We did a project in 2020.

Q. Okay.

A. I worked alongside a project engineer for that one.

Q. So was this project engineer—sorry, was this—this project in 2020, was this one involved LMCS?

A. Yes.

Q. And was this the works which were being done at this time?

A. Yes.

Q. So, were those—prior to—was that the only other project prior to the 2021, 2022 LMCS project that you were involved in, in respect of subsea works?

A. We had a changeout of the ethel chem lines.

Q. Okay.

A. That was lines that were run below the sea.

Q. Okay.

A. But not involving a hyperbaric chamber.

Q. So the only place with the hyperbaric chamber works were the 2020 project. Now, I want to now move to your role in relation to this project. Some of the Paria personnel have given some evidence in that. I just wanted to take you to that first and then to ask you some questions in respect of that role. So, I'm looking at Mr. Wei's witness statement which is on page one two seven six of Volume IV. So he says here at paragraph 24, "The role of the maintenance lead was to review—sorry. Right, sorry, paragraph 23. He says:

> "The role of the planner was to develop the scope of works, support the tendering process and to oversee the execution of the project by the contractor."

Would you agree with that description of your role?

A. Yes.

Q. Right. So it was developing the scope of works, supporting the tendering process and then overseeing the execution of the project. Right. So, let's start then with the scope of works.

Can you explain to me how the scope of works were developed?

A. From previous works done.

Q. Right.

A. Whatever we learned from that, site visits, we request the work order requests from Operations, what the details they need to be changed.

Q. Right. So you said it was previous work done, whatever you learned from that previous work.

A. Yes.

Q. Site visits you said?

A. Site visits they did.

Q. Uh-huh.

A. Part of my job is gathering all the—we have a computerized maintenance system—

Q. Uh-huh.

A. —as Operations system notification within the system. We convert it to a work order and we're actually going on the information on the work order that they brought in to be repaired and stuff, go out and verify it and then do the scope of work.

Q. So Operations—

A. Operations are the initiators—

Q. Right.

A. —of the work request.

Q. So they would have identified that this work needed to be done?

A. Yes.

Q. So then you would have—you said then you would use the previous work done—

A. Yes.

Q. —at site visits and you would have put together the scope of works?

A. This is from input from both Operations, HSE and technical department.

Q. Right.

A. Now, as the guy who developed the scope, I do it to the best of my ability. I don't approve the scope of work, huh. After, after I do the scope of works, compile the steps, um, I have Operations, HSE review it. As long as I'm satisfied with it I send it to my lead.

Q. Okay so you need to repeat that. So you would—

A. I would develop the scope.

Q. You would develop the scope and then you would send it to your lead afterwards?

A. Yes.

Q. So, in developing the scope, you said—is it that you—when you say the previous work done, what previous work were you using to develop the scope?

A. The specific jobs that we did on the 2020—

Q. The 2020 LMCS job that you spoke about?

A. Yes. Additional scopes that we have also with pipe fitting works, we also reviewed those. We look at the steps, consult with technical department for inspection points that I may have missed.

Q. Okay. So the scope of works, is it—

A. And experience.

Q. And experience. So how different was this scope of works from the 2020 scope of works?

A. We had some topside piping that we needed to change out on both berth 5 and berth 6.

Q. In this?

A. In this one and they added on that was not done, that was not required on the one in berth 5.

Q. I see. So the 2020 works involved just the subsea changeout—

A. Yes.

Q. —at the time. But the 20—well this project—

A. This project.

Q. —involved both changeouts of the topside pipeline?

A. Piping.

Q. And the subsea?

A. And on the other side of berth 5, where the work was done. So it is an additional work, but it wasn't just the same—

Q. Understood. So who developed the scope of works in the 2020 project?

A. Myself and the project, in collaboration. Actually the project engineer that we had at the time, he developed it and I helped we did it out.

Q. Understood.

A. And for the same process again, we helped Operations, because when we go to develop the scope, we normally go, the Operations personnel as the first [*Inaudible*], right, and one of

my guys, my technician guys, and we go in and he describes exactly what he wants because the notification may not have all the details that we need, the recorder, he might not have all the details so we plan a site visit with the Operations department to go and finalize it. We do many site visits by the way. We need to develop the scope, if you don't understand something you need to go back out again with Operations and to see what—

Q. I understand. So you're saying again the main difference between these scope of works and the 2020 scope of works was that this involved additional scope?

A. Additional scope.

Q. To the topside piping?

A. Topside piping. I think too the—where the leak was to where it was planned was about 10 feet deeper than what we did previously. I think it was about, somehow I think it's 5 feet or 10 feet. I can't recall too properly.

Q. So the underwater works were a bit, you say they were deeper?

A. Oh yeah, about 10 feet.

Q. In this project?

A. Yes.

Q. About 10 feet.

A. Yes.

Q. I just wanted to take—for us to discuss the—to go to the scope of works themselves so I'll just—I just have a few questions about them. The scope of works is at page 564 in the core bundle, Volume II. So if you look at page 564, this is the scope of works which were developed and then approved by Paria. Is

this correct?

A. Wait, wait, wait.

Ms. Baird: Five six four, yeah. So the document starts at 558 and you're at page five six?

A. Or, I'm sorry, I'm there.

Q. No problem. So the scope is actually—it starts at page 564 of the document.

A. Yes, Ma'am.

Q. Right. I just had a few questions here. Now the scope of works were broken up into three sections. Do you recall that?

A. Yes.

Q. Right. So section A, which is the changeout section of subsea riser and tie-in piping on Sealine number 36 at berth 5 and 6, this is the works which the men had been involved in on the 25th of February. Would you agree? Yes.

A. Yes.

Q. So when I look at the isolation list there and you see that it has under—you see number one, number two and then you see estimated volume of product between isolation points 2,000 barrels. Are you seeing that?

Ms. Baird: What particular number paragraph are you?

Q. Right under Section A. It's right here. Estimated, seeing it? Right. Your finger's right there now.

A. Yeah, I'm seeing it.

Q. Right. So if you look at that, can you tell me what the estimate—what that is an estimate of? Estimated volume of product between isolation points two—

A. I could just set it from this one? Operations really who do these calculations for us.

Q. Okay.

A. But from the general idea is the length of the line by the diameter is actually [*Inaudible*] how much in the line. From their isolating on berth 5 to the isolation point on berth 6.

Q. So the—and where would the isolation point be? Are you talking about the top of the riser?

A. Top of the riser.

Q. So the top of the riser is from 5 to 6?

A. Yes.

Q. So you are saying that your—you believe that's what it is?

A. That's what it is.

Q. So the pipeline contained under—subsea part of the pipeline—

A. Yes.

Q. —contained 2,000 barrels of content?

A. Yes.

Q. Okay. And then—

A. Operations, um, and just for clarity—

Q. I understand.

A. —Operations is who calculate the full—

Q. So that was—

A. —do the proceeds, they do the isolation listing.

Q. Right.

A. They do the [*Inaudible*]

Q. Right. So Operations would have had this input in the scope of works?

A. Yes.
Q. Okay. So if we look at 3.1.5—
A. Uh-huh.
Q. —it says properly, on that same page 564—
A. Yes, Ma'am.
Q. —properly coordinate works with Paria Operations, maintenance and HSE personnel to perform the following activities including but not limited to isolation, deisolation, depressurization, pressurization and draining, filling product from line 36 at berth 6 at berth 5. So my question is, in the formulation of the development of the scope of works, was part of the scope asking for that subsea line that we just described between berth 5 and berth 6, from the isolation point, to be drained?
A. No Ma'am.
Q. It was not? So what was your understanding of the scope of works? What was the scope of works asking for?
A. My understanding was to drain sufficiently enough to install the plugs just below the area to be repaired.
Q. Okay. Understood.
A. And actually this might be kind of impossible to do.
Q. Uh-huh.
A. To know this can't be done from, from the method that they have.
Q. From the method that they, that LMCS proposed?
A. LMCS proposed in the method statement.
Q. Okay. So if I, if we—I just have a couple more questions on

the scope of works. If we go then to page 570—

A. Yeah.

Q. —what is here is really Paria's responsibility that's set out?

A. Uh-huh.

Q. It says at number 4.5 there, "provide personnel to oversee isolation, deisolation, depressurization, pressurization and draining and filling product from the lines at berth 5 and berth 6." Can you um, can you explain to me what that responsibility would have involved in respect of the draining of the line?

A. Operations would have—will identify all the points that needs to be isolated.

Q. Uh-huh.

A. The contractor would be responsible for draining the line to required height of field required.

Q. Right.

A. Right. And we will provide all the permitry, all the mechanical support that they require.

Q. But is that a process that would have been overseen by Paria? I mean, it says oversee here.

A. Yes, it we be determined by the Operations department.

Q. By Operations department?

A. Yeah.

Q. Okay.

A. They, they are the persons who have to line up the clamps, the valves and stuff for the product to go in.

Q. Okay. So if we go to page 598 and you see Addendum One there?

A. Yes, Ma'am.

Q. Addendum One speaks there about—they said that these are the following queries that were raised for clarification and it has to be—the addendum has to be signed and submitted with the technical tender submission. Can you explain to me how this addendum is, why it is produced?

A. During the site visit and the reading of the scope, if—this is open to all contractors. Now this will be clarified a bit better by Mr. Manmohan Balkaran but basically this is a—questions that they don't understand or they need clarification on, they could send a list of questions. These—all these people who were invited to bid, they could send their questions to us and we answer it as best as we could to the various departments.

Q. Okay. So if we look at question one there, query: "Who is responsible for pumping back from the berth to clear the lines with water?" Response: "The contractor is responsible for the safe removal of hydrocarbon contents from the line and to ensure that the line is clear and dry." Clear and dry—

A. Yes

Q. —what does that—what does this response mean.

A. Well as I said before, this is the jargon we use because everybody is familiar with the steps and stuff like that, mechanically side. Basically what this means is where are they going to do repairs and install the plug, the line must be clear and dry to that point.

Q. So this—so you're saying this means that where they are going to—

A. Carry out repairs.
Q. —carry out repairs.
A. That section there must be clear and dry of all hydrocarbons. And that's for our HSE policies to gas free the line.
Q. In the development of the scope of works by the—we're talking about your input into the scope of works, would it have been developed in such a manner to account for a Delta P or a differential pressure hazard?
A. At the time of the development of the scope I didn't have an indication what was Delta P.
Q. So when you were developing the scope of works you did not have an awareness of what a Delta P or differential pressure was?
A. At that time.
Q. When did you have that awareness?
A. Unfortunately after the incident.
Q. After the incident. Do you know whether, in reviewing the scope of works, because you'd indicated would have been—different department had a—different personnel in the department had a role to play.
A. Uh-huh.
Q. In reviewing the scope of works, do you know if, if any person in Paria would have taken this into account?
A. I really can't say.
Q. You can't say. The tendering process, after the development of the scope of works we have the tendering process. So the scope of works which would have been developed and approved was

then used to commence the tendering process, is that correct?

A. Yes.

Q. And LMCS submitted a bid for the project and included in their bid would have been a method statement, a risk assessment, an emergency response plan, among other documents. Do you agree?

A. Yes.

Q. Did you play a role in reviewing those documents?

A. No, Ma'am.

Q. So Mr. Michael Wei's evidence, if I could just take you to his witness statement, he stated in his evidence that the method statements and the JHAs and the dive plan submitted by LMCS were reviewed and accepted by Paria's technical and maintenance department. Is that correct?

A. Yes.

Q. That is correct. Okay. So you're saying that you were not involved in the reviewing and the acceptance?

A. No.

Q. You were not involved in the reviewing process?

A. No, not at that level.

Q. Not at that level?

A. Yes. There may have been, like after it was, um, tendered off, not tendered, evaluated and stuff like that, I may have some input and he may have asked—Manohar may have certain questions or something like that but I do not evaluate it at all. I used to just price and stuff like that. I have no—

Q. So who—so in terms of, for instance, determining the

suitability of the method statement or the risk assessment, you were not involved in that process?

A. At that point in time, no. I was involved in the second part.

Q. Okay. So—

A. When the, when the tender was awarded—

Q. Uh-huh.

A. —you're now sending a detailed method statement.

Q. Right. I'm going to get to that. But the bid documents, the documents that came in with the bid, the method statement, the risk assessment, et cetera—

A. No.

Q. —you did not. Do you know who is the, in the, um—

A. Manmohan—

Q. —in your department?

A. —would a have done that with Michael Wei. I believe both of them would handle that.

Q. Okay.

A. And contracts department.

Q. Okay. And you assist in the—and you assist in the, in an interview, some interview notes that you did with OSHA, you recall dealing with OSHA?

A. Yes.

Q. I notice that you had made mention in those notes about somewhere around page 11—I'll just summarize—

A. Yes.

Q. —what you said. You'd indicated that there was an accident that occurred in July 2021?

A. Yes.
Q. And then, following that accident, Paria changed its strategy and was now requiring method statements, risk assessments, to be submitted for individual tasks—
A. Yes.
Q. —in the project?
A. Yes, that is correct.
Q. That is correct. So is that how—I've seen other method statements such as, we're going to get to them, like line clearing, for line clearing, for the actual change-out of the riser with the job hazard analysis accompanying them. Is that how those documents came into existence?
A. Yes.
Q. So there was a change in policy after?
A. After.
Q. Is it previously—previous to that incident, would it be that you would not have necessarily had individual method statements?
A. Yes.
Q. And what was the purpose were asking for these individual method statements in job safety analysis?
A. It's just to get from the HSE department.
Q. Sorry?
A. HSE, I think it came out from the OSH recommendations and in collaboration with our HSE department that they required all those paperwork.
Q. I wanted to go to the method statement, the original method statement which was submitted along with the bid which is at

page five five nine of the Volume II. So this is the—no, sorry—

Ms. Baird: That's the wrong document. It is the scope of works.

Q. That's the scope of works. It is at page six five zero. Do you recognize this document as being the method statement submitted by LMCS at the first stage?

A. I can't recall.

Q. You can't recall. So if you just—

A. Not in the first, not at the first level.

Q. So go to page six five nine.

A. Six five nine?

Q. Yes.

A. Yes.

Q. Does it look familiar now? Is it six five nine you have there?

A. Yes.

Q. Does it look familiar? Does this look familiar now?

A. It does, does, um, follow some similar formats but it's not the same.

Q. It's not the same?

A. From, from [*Inaudible*] it have steps in between this, you know, things so it's basically some of it.

Q. This is some of it?

A. Some of it that's required for our work to be done.

Q. So if you look, for instance, at, um, I just wanted to go through section A and you see "Procedure for removal of line content between berth 5 and berth 6", on that same page 569 some—

midway through the page.

A. Uh-huh.

Q. Right. It says: "Removal of liquid content from Sealine 36, diameter 30-inch line, sufficient removal to allow replacement of corroded section." And then: "Secure valves on berth 5 and berth 6. Remove tie-in piping between the top of the riser and the berth and blanking of flanges on the both berths." Can you explain to me what you understood that—what you understand that to mean?

A. Can I read it over?

Q. Uh-huh.

A. Remove tie-in piping, that section?

Q. Yes.

A. Right. The risers on the subsea side that come from the shore, the sea floor, comes up to the berths and those tie-in piping is what goes to the manifold from the berths. Right?

Q. What is a manifold?

A. When in different return, berths come together. Operation could explain a little bit better but I could give you a—

Q. Yes.

A. —a layman's terms. On these berths we have different manifolds and different loading arms. So the line comes in from the riser, from the different berths, different platforms all onshore comes to the riser, goes in to a topside piping that goes into the manifold on the berth end.

Q. So there's the riser?

A. Right.

Q. Which is subsea?

A. Yes.

Q. And then that is—that comes into topside piping you say?

A. Yes, that comes in the topside piping. It's a big elbow that comes, because it's going vertical and then it needs to change direction to a 90-degree angle to go to the platform.

Q. So there's topside piping which leads to the, the—

A. The manifold on the, on the—

Q. —manifold?

A. —on the rig. Right? So you remove those and you install [*Inaudible*] between [*Inaudible*]

Q. So you say to the second bullet point is removing the tie-in piping?

A. Yes and inserting the blanks and flange. This is to totally isolate the line.

Q. Okay. And then it says: "Flat bolts, install drip tray at the flange at the top of the riser and connect content to topside. Number six, 36."

A. This basically is a big drip tray, well it always have product in the line so you break the bolts away from you and you have that product draining in so it won't contaminate—

Q. Uh-huh.

A. —it won't contaminate the sea.

Q. Okay. And then it says: "Remove spool completely once drained."

A. Yes.

Q. And the spool is, which part is the spool?

A. Is the same thing. The topside piping and the spool is the same thing. I said read the language is, is, meaning the same.

Q. Removing the topside piping?

A. Yeah. So the spool is all the piping and the plug goes from the topside piping to wherever the riser and manifold meet.

Q. The removing?

A. Removing.

Q. Removing the topside pipe?

A. Yes.

Q. Then it says: "Using air driven pump, pump out approximately 300 barrels of line content. Contents to be pumped into Paria Fuel Trading Company Limited's slops barge and is carried over to the lube oil jetty where its line content will be removed by Paria Trading Company Limited supply vacuum truck." So where are you understanding this 300 barrels of line content is to be removed from?

A. Right. So this is actually the section which part they drain the riser to get the desired height, and some of the draining of this goes into some floating slop barge that we have.

Q. I'm a little bit confused there because I think you—so you've explained that we have the subsea pipe which, is that the pipe that is this U-shaped underneath the, the—

A. Yes.

Q. Under the water. And then you said we have some topside piping?

A. Yes.

Q. Which connects to a manifold?

A. Yes.
Q. So this 300 barrels of line content, which part of the system do you understand that will be coming out of?
A. The, the U section.
Q. The U section?
A. Yes.
Q. Now—okay. So the 300 barrels of line content being removed from that new section, do you have any idea how much content that would—is really being removed from the—
A. We have an average, so Operations could help you all through this again more, but we have an idea each slop barge is about 25 barrels of oil, so we multiply how many trips we make back to shore.
Q. So each slop barge is about 25?
A. Twenty-five.
Q. Okay, but—
A. Approximately, huh.
Q. Okay. So let's just, um, put a pin right there. The question I'm asking is, if, if LMCS is proposing to remove 300 barrels from the underwater U pipe, U-shaped pipe, between berth 5 and berth 6, do you have an idea of how much, how much would be left in the riser then?
A. I can't say. I don't know the approximate volume inside there.
Q. Okay.
A. But this is the full, this is the full form that was submitted—
Q. It's—yes.
A. So this is a little vague here because it was not only—the oil

was not only removed, the product in the line was not only removed, but the slop barge, it was actually pumped into another line.

Q. So—and what is seen, and we'll come to that—is that there was a bit of a change in the method?

A. Yes. These things does be so dynamic, right.

Q. Uh-huh.

A. At times—at the time of doing this, this evaluation or this, this scope, right, they, they may have found different ways in the procedures or they may have thought of different ideas and—

Q. So let's look at the next bullet point. Right? It says: "Once the level in the riser has dropped to 35 feet below sea level, a line plug will be installed." Right. So what did you understand that to mean?

A. I can't recall this part here but—

Q. Oh, you can't recall this part?

A. Yes. All I remembered is that long as we have enough room to install the plug before we do—where the repairs are to be done, that is what, after discussions with the contractor and stuff.

Q. So if you look at the, if you look at the bullet point before—

A. If you want me to interpret this, eh?

Q. Yes. I'm asking you what's your understanding.

A. Right. This is 35 feet below the sea level.

Q. Right. And that's where they're going to install the line plug?

A. Yes.

Q. So if it is—

A. From the flange?

Q. Do you know how much feet, or I should say how many barrels of line content would have to be removed for you to achieve that last bullet point which is for the riser to be dropped 35 feet below sea level?

A. I can't say as to what the volume is.

Q. So which department at Paria would have assessed this part of the method statement?

A. Operations.

Q. Operations?

A. Uh-huh.

Q. Are you aware of how much, um, are you aware of how much barrels of line, of line content would have to be removed to achieve 35—a 35 feet ullage below sea level? No. So just generally speaking, by virtue of this method, what were you understanding LMCS to be proposing in respect to the removal of the line content?

A. It was just—from discussions and stuff with them, it was just to remove enough product from the line to install the plugs below the area to be repaired. It was not necessary to remove all the product from the line because you're not going there.

Q. So you say this is from your discussions with them?

A. Paria.

Q. So this would have been after the project. So you're telling me—

A. Not after the project.

Q. Sorry, after the contract was awarded?

A. Yes.

Q. Okay. So that your understanding of the method, based on your discussions with them subsequently?

A. Yeah.

Q. Understood. So if we move on to the execution of the project, and you would recall that you agreed that you said one of your roles was to oversee the execution of the project. I just wanted to take you through the evidence that other—that Mr. Wei has given with respect to how that was done. If you go to paragraph 67 and 68 of Mr. Wei's witness statement. He says, "On the ground my"—sorry, it's at page—you found it?

A. Yes.

Q. It's page one zero eight. On the ground, my department monitored and reported?

Ms. Baird: Eighty-seven, right?

A. Yes.

Q. Yes.

> "On works through the Kenson technicians Rajiv Mangalee and Houston Majardsingh who reported to Paria planner Terrence Rampersadsingh. They were mostly situated on site and rotated between berths 5 and 6 which are offshore and the offshore services docks also called Badger docks which is on land. The said maintenance technicians received daily verbal reports from LMCS for the progress of the works. They used these verbal report, together with their own observations, to produce Daily Work Reports. They then submitted these Daily Work Reports to the planner during the

course of the project."

Would you agree with that with that evidence—

A. Yes.

Q. —as to how you were—

A. Yes, it's not only the con—it's not only the technicians getting, um, verbal reports, nah. At the end of the day from the, it is the—it's from only one person. You could say that is from the contractor's supervisor.

Q. Okay.

A. All right? So they get their feedback from the contractor supervisor and stuff and stuff. They also have to liaise with the inspection department and Operations department and then they will report to me.

Q. Okay. So you are supported by Mr. Mangalee and Mr. Majardsingh?

A. Yes.

Q. So they were your subordinates?

A. It had to be, yes.

Q. Right. And they took instructions from you?

A. Yes.

Q. And directions from you?

A. Yes.

Q. But they—so even though they were employed by Kenson, they were in your department? They worked in the maintenance department of Paria?

A. Yes.

Q. And they would have been—they were maintenance

technicians, is that correct?

A. That is correct.

Q. So, before I go to how they supported you, I wanted to find out about how you would say you oversaw the execution of this project.

A. No, no, conducting site visits, both at Badger docks and on the platform, liaising with the management of LMCS to get instructions, all right, and, and reviewing daily reports and liaising with Operations and other required departments to programme and plan the job. They also do—I also—um, we have weekly meetings.

Q. With who?

A. With all the team leads and I would also give a report on how far we reach.

Q. When you say team leads, meaning team leads of Paria?

A. Of Paria.

Q. Right.

A. On a daily basis I would discuss with Mr. Manmohan and Mr. Michael on how the work has been progressed.

Q. So you had your support mates who were Mr. Mangalee and Mr. Majardsingh supporting you in your functions, in your roles, with relation to this project. Would it be correct to say that they were also supported by personnel from Operations in the HSEQ department?

A. Yes.

Q. The thing is we, we—at the time we did not have a project engineer for that job, so some of the responsibilities was, was

for me.

Q. What would have been the function of project engineer?

A. He would have a overseer for that whole project with support from me.

Q. Okay.

A. You can't just—and the technician—

Q. So the previous 2020 job that you did, there was a project engineer?

A. Yes.

Q. What are your qualifications?

A. Mechanical engineer technician.

Q. A mechanical engineering technician?

A. I have BSc in computer information systems and I have T and T project management commissioner accreditation and multiple, um, scope writing and [*Inaudible*]

Q. So were you in effect performing the duties of the project engineer on this job?

A. I don't want to say that.

Q. Sorry?

A. I don't want to say that but I was assisting as best as I can.

Q. You were assisting as best as you could?

A. Yes.

Q. But in the previous job, in the previous 2020 jobs—

A. Uh-huh.

Q. —you would have supported the project engineer—

A. Yes.

Q. —in the verbal—in his role?

A. Yes.
Q. Which includes—included what you were doing in this project?
A. Yes.
Q. What type—what sort of expertise would the project engineer have had that you did not have?
A. I can't recall because—but I'm sure who, who interviewed into the position would have asked those kind a pertinent questions. I can't say. I know that he was—he was a former Petrotrin employee and probably has experience and he was a mechanical engineer.
Q. Does Paria have a control of work system?
A. Yes.
Q. Yes. Can you tell me what that system is, what it involves?
A. It's the major one of the permit to work system.
Q. So the permit work is part of the control of work system or it is the control of work system?
A. Part of and it is the main control of work. We have, we have different steps from, from the notification straight on down to the signing of the [*Inaudible*].
Q. Notification of what?
A. As I said earlier on, Operations have a job to do, they will put in a notification, notifying us of a job to be done.
Q. Right.
A. We review it, convert it to a work order and that is how we plan our job from that work order.
Q. So you're saying all of that forms part of the control of work system?

A. Yes. Because Operations could have a job to be done, the priority might not be correct so my boss, um, Mr. Manmohan, he plan and reviews all the jobs that goes to meeting, comes from me, so between him, mihself and Operations, we identify what is the priority, how soon it is to be done, what could be backlogged and those things. So that is also a part of the control of work meaning if the work is not supposed to be done, it doesn't be done.

Q. And does the requirements for method statement and risk assessment and JHAs, that all form part of the control of work system?

A. From what I understand, yes.

Q. You had training on Paria's permit to work system?

A. Only the permit to work system.

Q. In the permit to work system. I wanted to go to Mr. Balkaran's evidence at paragraphs 41, 42 and 43. I'll just get you the page. Yes it's page one four three six. Well if we start with one four three five, yeah, and you'll see paragraph 38 there.

A. Para 38?

Q. Yes, 38. Now if you go, he says:

> "Upon issuance of the purchase order to LMCS, I assigned the job of overseeing and facilitating the execution by LMCS of the project to Terrence Rampersadsingh. One of Terrence's main roles was to ensure that the tasks performed by LMCS were in accordance with the contract and in particular Paria's scope of works technical, the permits to work issued by

Paria for the job and Paria's permit to work procedure."

Do you agree with this?

A. Yes.

Q. He also says:

"While Terrence may have been the focal point in the maintenance department, overseeing and facilitating the execution of the works by LMCS was a multidepartmental task involving Paria's HSE and Operations department as well. In this regard the technical and maintenance department had weekly meetings on Wednesdays with the Operations department to discuss and plan the windows of time when the berths would be clear of traffic so that the maintenance work would proceed without hindrance and activities that could be accomplished by the contractor during the upcoming weeks. These meetings were attended by the offshore team lead and Operations team supervisor both of the terminal Operations department and the planning assistance and the planner both of the technical and maintenance department."

You agree with this? Yes.

A. Yes.

Q. In the next paragraph he said:

"Meetings were also held every Thursday at a higher level. These meetings were held for planners, engineers, leads and managers to discuss the schedule of normal Operations in conjunction with the activities associated

with the project. An update was usually provided by Terrence one the progress of the project at this meeting."

Agreed?

A. Remember I mentioned earlier on—

Q. Yes.

A. —about the meeting.

Q. You did. And at 41 he says:

"Terrence was supported by Houston Majardsingh and Rajiv Mangalee both of Kenson."

And then at 42 he said:

"Terrence, Houston and Rajiv were responsible for carrying out Paria's responsibility under the scope of works technical, clause 4.4 in conjunction with Operations, inspection and HSE personnel where applicable."

At 43 he states:

"Rajiv Mangalee and Houston Majardsingh performed the following specific roles and others during the execution of the project.

1. Apply for and accepted permits to work.
2. Issued Paria supplied materials to LMCS as per contract.
3. Performed day-to-day monitoring of the works along with terminal Operations personnel such as Kurt Scott and HSE personnel such as Andre Dopson.
4. Provided daily progress reports and updates to

Terrence.

5. Liaise with Operations inspection and HSE personnel as to the progress of the works and compliance by LMCS with Paria's policies and procedures.

Do you agree with all of this?

A. Yes.

Q. In terms in the framework of Paria's permit to work procedure, so the framework of that procedure, your duties and functions, did it fall under any specific roles?

A. Not under the permit to work system.

Q. Not under the permit to work system.

A. From what I'm—from what I'm aware of with the permit to work system.

Q. Okay. So you did not have any specific role under the permit to work system but at paragraph 38 which I just read, Mr. Balkaran is saying that one of your roles was to ensure that the task was performed, were being conducted in accordance with the permit to work procedure. So does that mean the whole of the permit to work procedure?

A. No, no. That only needs—the permit to work is broken up in parts of it. And I would review the permit to work, and, and see that our sec—side of our section internal processes.

Q. So what is—that's what I was asking. What was your section? So what, that's why I asked what was your role?

A. My role was not to make out permits and sign permits and stuff like that. But that doesn't mean I couldn't review it, I could

look at it and see that the description in the task is properly done.

Q. So in terms of the permit to work procedure that you were—your role involved ensuring that there was compliance with that procedure, was that in respect to all aspects of the permit to work procedure?

A. No. I don't know if I answer that correctly.

Q. Okay, right. Right, go on and then I will take it—

A. So I'll give you a idea. All permits must be accompanied with JHA, method statement and stuff like that. My responsibility in those things was to get updated method statements, updated JHA, review them, pass it on to the relevant Operations HSE department for them to also review. Long as those things are reviewed, they were assembled together in a package and my technicians will get it signed and stuff like that. So I—while I'm part of the permit to work procedure that requires method statement and stuff.

Q. So your technicians, meaning Mr. Mangalee and Mr. Majardsingh, what I saw from Mr. Wei's evidence, sorry, Mr. Balkaran's evidence, was that part of their duty was applying for the permit to work?

A. Yes.

Q. Right? So they were—they would have performed the role of the applicant under the permit to work procedure. You agree with that?

A. [*No audible response*]

Q. How did you monitor the day-to-day Operations of LMCS

during the project?

A. Feedback, calling on the phone, site visits, feedback from our technicians.

Q. Okay.

A. Feedback from Operations, feedback from the jetty.

Q. So when you say call them on the phone and, um—you mean calls from technicians or LMCS?

A. Both.

Q. Both?

A. Yeah. Because we have radio.

Q. So you—were you physically present, did you physically visit the site and so on?

A. Not every day.

Q. Okay.

A. But periodically. Sometimes depending on what I see important for my job scope, according to aligning with my job scope, I'll try to be there more.

Q. And your, um, technicians, Mr. Mangalee and Majardsingh, would they have been physically present there?

A. Yes, that's a—

Q. Continuously?

A. Continuously as how best they could be there.

Q. Okay.

A. Right? So the project, it wasn't just the project we were assigned to. We had all the other jobs in the port. We handled all maintenance activity. So if we have other repairs or other things to do—

Q. So the day-to-day monitoring was done by, based on what you're telling me, was done by your—the technician—
A. Yes.
Q. —continuously on the site?
A. Yes there everything.
Q. And also you would have monitored through—by visiting the site periodically.
A. Yes.
Q. And also—and also—
A. Communication.
Q. —by communications?
A. Yes.
Q. You would call?
A. And also too I think the scope of work also recommended or, sorry, stated, that the contractor must have a supervisor there continuously at all times.
Q. So who was that supervisor?
A. At the time I can't recall who exactly was there. We had a little break in the, um, thing, and I can't recall who was there. I believe it was Matthew, um, Matthew.
Q. Gonsalves?
A. Not—Gonsalves.
Q. Gonsalves? He was the supervisor?
A. I think he was, yeah, at the time.
Q. Was he the one that you would have spoken to?
A. Yes. Either him or more—most of the time to get away from crosstalk and his communications, I only deal with both LMS

senior and junior.

Q. That's Kazim Ali Sr.?

A. Kazim, yes.

Q. And Kazim Ali Jr.?

A. Yeah and my technicians deal with supervisor Mitchell for the miscommunication and stuff like that.

Q. So in terms of the monitoring, so your, um, your technicians, Rajiv and Houston, they would have been monitoring from the perspective of the applicants on the permit to work system?

A. Yeah, they deal with the applicant.

Q. So they would have been monitoring in that perspective? The operational—the personnel from Operations such as Mr. Kirt Scott, what would have been his monitoring? How would he have been monitoring?

A. I can't, I can't say—

Q. You can't say?

A. —directly his job responsibility. That would have been under the Operations department.

Q. Okay. And what about HSE? For instance, Mr. Balkaran says that Mr. Andrew Dopson may have also been on the site.

A. Yeah. He's the guy who does loot of gas quality checking and air sampling and stuff like that. I don't know how they operated. That would be under HSE department how, how often the, the air monitored.

Q. So how, how did you ensure throughout the project that there was compliance with the permit to work procedure?

A. Somebody was there all the time. Someone was there—

according to how their schedule made up.

Q. Okay. Somebody from your department?

A. My department.

Q. Okay. And their role would have been to do what there?

A. They're there to monitor and liaise between them and our department, Operations, inspection.

Q. Okay.

A. So they were just ready to assist whatever the need.

Q. And as you said, they would have been performing the role of the applicant—

A. Yeah.

Q. —under the permit to work system?

A. Anything you think of they want to [*Inaudible*], they want materials, if they want permission to do something new, right, they bring it to me, we plan it.

Q. I just wanted to take you to the permit to work system then. So at page 28, this is the permit to work procedure at page 28 to 29 of the core bundle Volume I. So under section paragraph 5.1, you see the heading "The Applicant" there?

A. Yes, Ma'am.

Q. Yes?

A. Yes.

Q. So we'll come back to this when I get to the 25th but I just wanted to ask you a couple questions here. When you see—well, paragraph 5.1 sets out the functions, the roles and responsibilities of the applicant to a permit to work. You would agree with that?

A. Yes.

Q. And in those situations, according to the evidence, it was either Houston Majardsingh or Rajiv Mangalee who would have been the applicant for permits to work for this project, yes?

A. Yes.

Q. Okay. So when you look there at the last bullet point, it says:

> "Ensure that pre start meetings are concluded with the work crew to discuss the job."

Is that a reference there to the toolbox meetings?

A. Yes.

Q. So before the job starts there's usually a toolbox meeting and one of the responsibilities of the applicant would have been to ensure that toolbox meeting is conducted?

A. Yes, and be present.

Q. And to be present and to ensure as well that the work-plan for the day is discussed?

A. Yes.

Q. And if you look at page 29, the one, two, three, the fourth bullet point:

> "Continually monitor the job to ensure that it's performed in a safe manner and within the conditions prescribed in the work permit, certificates, JHA, risk assessment, he may sign a renewal section indicating that he has audited the job."

So, would this have been—would you agree that this would have been the job of the applicant either Majardsingh or Mangalee if whoever was the applicant to the work permit for

that particular day to continually monitor?

A. Well, it's, it's how—now, they say continually monitor.

Q. Uh-huh.

A. But this was asking JHA mee—I'm sorry, in permit to work training.

Q. Yes.

A. And it was identified that the applicant does not have to be there full-time.

Q. Okay.

A. Because he has other jobs to do on topside and they also mentioned that that is why the contractor has a full-time supervisor on the job at all times.

Q. Okay.

A. So this was a grey area for me too when Alvin was doing the permit to work training.

Q. You said you would—you ensured that they were continually present?

A. My guys?

Q. Yes.

A. Yes. But as best as, as best as our schedule going. We weren't there all the sin—all the time, but when they could they're there because you could more than do periodic checks.

Q. So would you say, though, that they would always be—so even if your person is not there, we know that there was Operations there as well or HSEQ, would there always be somebody there? Was the schedules, was the schedules organized in such a way that somebody would always be there?

A. I can't say for sure. I can't recall. But I know the guys who working together they would always have some little—

Q. Agreement?

A. —agreement to work. I can't say for sure.

Q. Okay. But in terms of the monitoring, are they monitoring to ensure that the work is being conducted in a manner prescribed by the, by the, um—well, being conducted in accordance with the permit to work?

A. Yes.

Q. So in accordance with the job that is being—that is authorized for that day?

A. The day, yes, the job that's authorized for that day—

Q. Uh-huh.

A. —they would look at that section and what we had to do and they would also discuss, before we go out they would also discuss what are the jobs do be done for the day.

Q. So they would be aware of the jobs to be done?

A. Yes.

Q. And the sequence of the jobs to be done as well?

A. Not really the sequence because it is their dynamic also. It all depends on the day of the job, Operations may have some different, um, requirements that required. We might not be able to do it or we could do some parts of it. So it depends.

Q. Okay.

A. Nothing is followed in sequence.

Q. But it must be a job that is authorized on the—

A. On the day of the—

Q. —on the day of, all right, the work permit?
A. Yes, it must be authorized.
Q. And in terms of the conditions in the risk assessment, they would be familiar with the risk assessment? So they would be familiar with any hazards that are present and—right you get to say yes for the—
A. Oh, sorry, yes.
Q. —just say yes for the recording could cover it. So they would be—they would be familiar with the risk assessment and the hazards that have been identified?
A. They were all given the scopes, the scope of work, the updated method statement, the JHAs, the lifting plans. Whatever required to accompany the permit for that day, they will, they will have, they will have copies of.
Q. So—and they review it?
A. And review it. Okay.
Q. And they would be—so they would be aware of all precautions that are supposed to be—
A. Yes.
Q. —maintained on that day?
A. Yes and it's also seconded by HSE department because they have to do the checks before we could get gas free conditions and stuff.
Q. Okay.
A. So it will always be seconded by somebody else.
Q. So if it is that Mr. Mangalee or Mr. Majardsingh or even if you are present there and you observed that something is being done

which is not, which is contrary to the permit to work or contrary to the risk assessment, do you have the authority to stop the work?

A. Anything that is unsafe in our idea, our ream of things that we see or we know about—

Q. Yes.

A. —we have the authority to stop it or have it corrected or if not I'm not too sure get advice from the HSE department.

Q. In the technical scope of works, one of the requirements, I can take it back to you if you can't recall, was that the contractor was supposed to have a live feed of the works being done in the habitat. Do you recall that?

A. Yes.

Q. What was the purpose of having that live feed?

A. Well, when you mean live feed?

Q. So when the men are working in the habitat there's a live feed?

A. Not, not, not the, not broad KA ST. When you mean live you mean broadcast to everybody—

Q. No, no, just an—

A. It was just a connection from the hyperbaric chamber to on top the stage, because—

Q. Right. And would you—would Houston and, um, Houston Majardsingh and Ravi Mangalee, would they, would they be—would they—would they be viewing that footage?

A. Periodically.

Q. Periodically viewing it?

A. Yes.

Q. To, to monitor?
A. Yeah, the dive monitor and the contractor supervisor.
Q. Who's the dive—what do you mean through the dive monitor?
A. The guys who were—the guy who's in charge of the diving Operation.
Q. From LMCS?
A. From LMCS.
Q. So, um, the—
A. From what I'm aware of, he and the supervisor, the contractor supervisor, should be there also.
Q. All the time. So your—what you're saying is that your, um, mechanical technicians, Houston Majardsingh and Ravi Mangalee, would periodically view that footage?
A. Yes.
Q. But they would have to—would you not agree they would have to view that footage in order to ensure that the requirements are being—in order to ensure basically that there is, um, compliance with the work permit?
A. Well they could do that periodically.
Q. Periodically?
A. Basically the main condition for there was to get a gas free condition in case they have welding work to do or a gas free fresh air-condition so guys inside there could do their job.
Q. Yes.
A. That was the main the main task for them. And the hyperbaric chamber had a continuous air monitoring on top to see what the oxygen level was inside. So from our view of them that was,

yeah. I think that that role was more left to the supervisor, the contractor supervisor. He would—

Q. I'm about to go to a new section. Would you like to have a little break now?

A. Please, just a—just—

Q. I think so.

A. —just to get up to walk on.

Q. Yeah, yeah, that's fair.

A. N no, no I could use the washroom there?

Q. Yeah, of course, of course. Can you get a tea or coffee?

A. No, no, no, I'm good.

Q. Are you sure?

A. I'm fine. Just, just need to.

Q. No problem. So we'll take a little brake now and—

A. Five minutes?

Q. Ten—take 10 minutes.

Ms. Baird: But if you want, you want the 20 just to use—

Mr. Rampersadsingh: Okay, right, thank you.

[*Interview suspended*]

[*Interview resumed*]

Q. So you spoke about—earlier you told us that there was, well the concern that there was an incident in July 2021?

A. Yes.

Q. And that incident caused a suspension of the jobs, yes?

A. Yes.

Q. Did the works resumed, would it be accurate to say in January 2022 in respect of the change-out of the line?

A. Work resumed, yeah.
Q. In January?
A. Sometime in January.
Q. The next stage of the works were the line clearing. Would you agree with that?
A. Yes.
Q. With respect to the line clearing, you oversaw that aspect of the job?
A. No, Operations.
Q. Did you monitor that aspect of the job?
A. Yes, we did with the technicians and mihself, we did some monitoring.
Q. Some monitoring?
A. Whatever required, all right, hoses, fittings, whatever.
Q. So the, um, the permit to work for the line clearing, your technicians—
A. Yeah.
Q. —would have applied for that permit to work?
A. Yes.
Q. Okay. So your overseeing of the line clearing exercise, again would have been to ensure that it was done in accordance with the permit to work procedure?
A. The permit to work procedure and the drainage procedure.
Q. And the drainage procedure?
A. Yes, that's acceptable to the draining procedure and isolation [*Inaudible*]
Q. Okay. Um, you say it was—the line clearing process you said

was done mostly, well the overseeing was done mostly by Operations?

A. Yes, they direct us what lines to be closed, where to put the isolation—

Q. Could you please repeat what your role of the maintenance department was in relation to the line clearing?

A. The contractors were assigned to us—

Q. Right.

A. —so we had to do the permitting work for him, for the contractor.

Q. Would you agree that the line clearing was conducted between 18th of January to the 3rd of February? Does that sound about right?

A. Somewhat. In that area.

Q. And would you agree that it was done in two phases?

A. Yes, Ma'am.

Q. Yes. So I want to get to the instructions and I've also seen some—the Paria instruction that you referred to and also I see some method statements on the line clearing. I just want to discuss with you. Before we get to that, can you just describe to me what Phase I entailed and what Phase II entailed?

A. Phase I basically entailed blowing with air from berth 5 straight through the riser straight through berth 6 and into 66 Sealine.

Q. So it's blowing air?

A. Yes. Literally blowing air, initially blowing air from berth 5 to berth 6. Put it, put it as that way because I dent want to call the wrong line name.

Q. That's fine. Okay.
A. So basically it's blowing air at a described pressure according to the procedure to drain the line from oils, right.
Q. Drain the line?
A. Not to drain the line, to, to displace some of the product out. You could never clear that whole line with the air.
Q. Okay. So Phase I says was the clearing of the line?
A. Right.
Q. Sorry the air blowing from berth 5 to berth 6. You mentioned into Sealine?
A. Sixty-six I believe it is. That has to be confirmed. I not too sure—
Q. Okay.
A. —that is the correct line I'm saying.
Q. Okay. So from—
A. So it basically is blowing from berth 5—
Q. To berth 6?
A. —straight to berth 6.
Q. Into Sealine?
A. Sixty-six.
Q. What was Phase II?
A. Phase II is from to blowing with adapted manifold that goes down into the line with a length of hose and blowing straight into 66 Sealine.
Q. Blowing air with an adapted manifold going into where?
A. Sixty-six Sealine.
Q. But where is that adapted manifold—

A. It's, it's a, big flange cover—
Q. —blowing into?
A. —blowing—it's a big flange cover with a hose going down into it.
Q. Into berth 5?
A. Into berth 6. Berth 5 is isolated now.
Q. Okay.
A. An Operation guys could more describe it for you.
Q. So, after Phase I, berth 5 was isolated?
A. Yes.
Q. What do you mean by isolated?
A. Installed, installation of split blanks and stuff going back.
Q. So it's blanked off?
A. Blanked off.
Q. So it was—and line, and line—and then Phase II you're saying was blowing air with an adapted manifold into berth 6?
A. Yes. The riser, the riser here—
Q. Uh-huh.
A. —we had an adapted flange cover with a hose—
Q. Uh-huh.
A. —and an air connection and it blows air into the riser and that straight into 66 Sealine.
Q. So Phase I was the—was the air blowing from berth 5 to berth 6 into Sealine 66, you believe so, and that was to remove line content from where? Because before you told me it's the under, the underwater—
A. Yes.

Q. —part that the, the topside piping and a manifold.
A. Yes.
Q. So that Phase I is the removal of content from where?
A. From my interpretation the goal was just to get the levels down enough to install the works, to do the works. So to get some of the product out, because these lines don't have drains or anything. They're continuous lines. Right?
Q. So your understanding that both Phase I and Phase II were to remove—
A. The line content.
Q. —line content—
A. Yeah.
Q. —from where?
A. From—the line from berth 5 to berth 6.
Q. The underwater?
A. The underwater section.
Q. So how was the topside piping drained?
A. Manually and also with the—within Phase—also with Phase I blowing.
Q. So the topside piping was drained manually and also with Phase I—
A. Blowing.
Q. —blowing?
A. Yeah. From my understanding.
Q. Okay. And then Phase II—then content was removed from the riser, the underwater riser?
A. Yes, yes.

Q. Um—
A. And Phase II blowing.
Q. In Phase II or Phase I?
A. Phase I, well some will come, good—not all will come. It will reach a certain height which part the one higher than the other and it will not flow. So you could get a certain amount out from that exercise and then you get—you fine-tune the rest on the second phase of blowing.
Q. Okay. So it will be, you're using Phase I—
A. As the initial—
Q. Phase I you achieve?
A. Might be the initial way but that would not get the required.
Q. The required?
A. Um, height that's being required.
Q. In riser—at the riser?
A. At the riser.
Q. At berth 6?
A. Yes.
Q. So your understanding was that the riser at berth 5, the line content was being removed. How much of the line content was being removed in the underground pipeline?
A. I, I, I can't recall.
Q. You said earlier—
A. I wouldn't—it would not—all I could say it would not be enough. It would not have been enough.
Q. Sorry, I'm just going back to your understanding of how much line content LMCS was going to remove from the underwater

U-shaped pipeline?

A. The understanding again is just enough oil, just enough product, to install the plugs below the area to be repaired.

Q. Okay. And, um, your understanding from this was from discussions?

A. Discussions.

Q. With them?

A. We had about three or four kick-off meetings, all right, to discuss the job, both Operations, mihself and HSE and Mr. Wei and Manmohan from teams [*Phonetic*].

Q. You were aware if, how much, how much—in the riser, one feet of content in the riser, are you aware of how much barrels that would translate to?

A. No. I never worked it out.

Q. You never worked it out. Would anybody in Paria have been working that out?

A. I think the technical team they may have worked it out.

Q. The technical team?

A. Yes.

Q. From which department, from—

A. Our same department.

Q. From your department—

A. Yes.

Q. —would have worked it out?

A. Yeah. If it, if it asked, but I don't know if it was asked or who required.

Q. Was any—was there any monitoring how much content, actual

volumes, were being removed or barrels of content from the system?

A. Right. This is the vague area and so you'd have to ask Operation. Normally it's a big, long line from here—this is a distance line and you're blowing product from—blowing air into the product line and your measuring point is quite on land. So that is how we get measurements from. So when you conduct with Operations how high the tank height is, that's how we have an idea how much product is moved. But—

Q. How high which tank is? Do you mean on land?

A. Yes. So all, all the oil that is being removed from the line goes to a storage tank onshore.

Q. And this was the case in both Phase I and Phase II?

A. Both, yes.

Q. Earlier you'd mentioned slop barges.

A. Right, slop barges like when I say manually drain it, that's where really all had to be in.

Q. So—

A. So it's drained into the slop barge at the bottom.

Q. So that's that topside piping you're talking about?

A. Yeah.

Q. So some of the topside piping—so the content of the topside piping, was that moved—removed entirely?

A. No it wasn't.

Q. No it was not.

A. So it had—it always had remnants in it.

Q. Oh there's always remnants?

A. Yes, very little.

Q. So do you know whether there was any monitoring by any department—

A. Yeah, yeah Operations.

Q. —in Paria as to how much content was being removed?

A. Yeah, both offshore and onshore would be monitoring.

Q. Offshore and onshore?

A. Yeah because it suit the [*Inaudible*].

Q. And this is which department again?

A. Operations.

Q. So Operations department, offshore and onshore, would have been monitoring how much line content was being removed in the line draining process?

A. Yes. All right.

Q. Would they have been, would they have been able to identify if more product was being removed and would achieve a 35-feet space in the riser?

Ms. Baird: I just want to interject here. I don't know if you're asking him to speculate what Operations would have been able to determine.

Mr. Rampersadsingh: Yes.

Q. So—okay, well let me ask this, so was there any coordination with your department in respect of how much of the line content was being removed?

A. No. They didn't give me that. I know they were manually dipping the line and checking the height of it.

Q. Okay.

A. Right?
Q. Who was manually dipping?
A. Contractors.
Q. The contractors.
A. Yes. They were manually and reporting it to Operations.
Q. When you say dipping the line, you mean where?
A. At the riser.
Q. At the riser berth 6?
A. Yeah, berth 6. So they take the cover off, they send down a line with it and they measure that section.
Q. Okay.
A. So that's how they know exactly how much the riser is.
Q. Okay.
A. Right? By say Operations will have to tell us—but you just get a guide how much, if oil is moving at all, if product is moving from the line.
Q. Okay. And would the—okay, well we'll get to that shortly. So you say Operation does have a way of measuring the content that is being removed. Yes.
A. At the storage tank.
Q. At the storage tank. And in the slop barges as well as the—
A. At the slop barge because we know the volume of the slop barges.
Q. And you said the volume was 25 barrels?
A. Twenty-five, approximately 25.
Q. Approximately. Okay. So before, when you had mentioned—well you'd agreed that the—that there were method statements

prepared subsequent to specific tasks. There was a method statement that was disclosed in relation to line clearance. Do you recall that? Do you recall if there was? I can take you to it. It's in the second volume. So it's at page 1028.

Ms. Baird: One zero?

Q. Two eight. Of Volume III, the core bundle.

A. Yes Ma'am.

Q. Yes, you see there method statement 108 to install air injection manifold at berth 5?

A. Into the manifold and stuff like that.

Q. Yes. And remove content to Sealine 36 between berths 5 and 6 Phase I. Do you recall this method statement?

A. [*No audible response heard*]

Q. So when you look at page 139, right, if you split the page there, you'll see at 21, it says:

> "Communicate with Paria's representatives to make necessary manifold adjustments to allow contents of Sealine 36 to—is displaced in Sealine 66 and then to shore."

A. Uh-huh.

Q. Do you recall this document?

A. Yes.

Q. Do you know if this document formed part of the—I'm trying to understand if this document was part of the method which was approved and accepted by LMCS. Are you aware if it was? Sorry, by Paria.

A. By Paria?

Q. Yes.
A. Yes.
Q. Are you aware if it was?
A. Yeah, I think this was.
Q. It was?
A. Yes, but—
Q. So it's dated the 1st of December, 2021.
A. After the [*Inaudible*]—we also have a procedure—
Q. Yes.
A. —that is done by Operations department.
Q. So I'm going to go through that. I'm just trying to understand—
A. Yes.
Q. —in terms of the line clearing what was the method that was used?
A. So it's similar.
Q. It's a similar?
A. Similar, similar.
Q. So this came in on the 1st of December. Do you see on the bottom there?
A. Yes.
Q. So you recall this method statement?
A. Yes, I—
Q. You do?
A. Yeah, I, I think I—I sure I have—I, I did it.
Q. And this was, this was accepted by Paria from your recollection?

A. Yes.
Q. Yes?
A. As I said it will be from all of us. This one really more is with Operations also.
Q. Okay.
A. But I will review it too.
Q. Understood.
A. This was accepted.
Q. So if you look at page 1030 you will see this is the, um, job safety analysis.
A. Uh-huh.
Q. And this would be done, this is in respect of Phase I, you see job task there?
A. Yes.
Q. Line clearance. So—and then if you flip again you have to at page 1033 this here is the—a Paria instruction?
A. Yes.
Q. In respect of the clearing of Sealine 36 between berth 5 and berth 6?
A. Yes.
Q. Yes?
A. Uh-huh.
Q. Okay. Is this the instruction that you were mentioning before?
A. Yes.
Q. Okay.
A. Now these things were discussed in collaboration with Operations in the physical kick-off meetings. I can't recall the

date but it was some time in December also or January.

Q. Uh-huh.

A. Before we started the air blowing. We all meet again and discussed this again.

Q. You discussed this.

A. Before this proceeding—

Q. So this was on the 7th of January so it's after the first method statement?

A. Yeah.

Q. And when I go to page—you said Operations would have developed—

A. Operations would have designed it.

Q. —and designed it. So is this—is this the procedure that was followed that your department—

A. From what—from what I could recall, yes.

Q. So okay, this is the procedure that your, your, your department was, um, ensuring that there was compliance with?

A. Well were working alongside the Operations department.

Q. Operations?

A. Yeah.

Q. And the first method statement I showed you—

A. Uh-huh.

Q. —did that also form part of the procedure that was being monitored, the procedure to be followed?

A. It, it would have been some input to this here—

Q. Okay.

A. —right, but it might not be in sequence with this or whatever,

or, or whatever adjustment needed to be done, they would have redone it over again here.

Q. In this document?

A. In this document.

Q. So you're saying that this document replaced that one?

A. Well not the, I shouldn't say replaced—

Q. Uh-huh.

A. —but works alongside, eh.

Q. Okay. Right.

A. The best Operations decided.

Q. Okay.

A. Described.

Q. And then you said it's Operations by just—

A. Described.

Q. —you say overseeing the project. I just wanted to ask you couple questions in relation to it. When you look at page 1036—

A. Now, overseeing alone is not my responsibility. I meant more the mechanical side.

Q. Yes.

A. But overseeing, this is by a combined effort of everybody.

Q. I understand that. So you're saying that the, the overseeing of the project was a combined effort between Operations, maintenance and HSEQ?

A. Yes.

Q. And it was a joint—

A. [*Inaudible*]

Q. And that's what Mr. Balkaran has stated in the paragraph that I showed you. So—

A. Sorry.

Q. I understand what you're saying. So if you look at paragraph three at page 1036—

A. One zero three six, yes.

Q. —it says drain upper section of the riser—

A. Right excuse, Ma'am, what, um—

Q. Sorry, 1036 at paragraph three.

A. One zero three six, eh?

Ms. Baird: Paragraph three.

Ms. Maharaj: Yeah

Ms. Baird: From "Drain the upper section".

Mr. Rampersadsingh: Or hor, sorry.

Q. So:

> "Drain the upper section of the riser at berth 5, branch line to berth 6 to the slops barge. Loosen enough of the flange located on the western side of the block valve and allow to drain into slop barge via catchment [*Inaudible*] hose."

Is that the topside piping that they're referring to there? So that is the procedure that you would drain the topside piping and this would be at berth 5?

A. Yeah.

Q. So there's topside piping at both berth 5 and berth 6?

A. Yes.

Q. Yes. So yes to both questions?

A. Yes, to both.

Q. And then if you look at paragraph—it then says: "Removal of elbow and Sealine on 36 Sealine riser at berth 6."

A. Which paragraph?

Q. Right underneath there, sorry?

A. Six point four?

Q. Six point four two.

A. Yes.

Q. And it then says:

> "Drain the upper section of the Sealine riser to the slop barge, open the valve on the stubbing section location below the flanges on the vertical section of the riser. Unbolt, rig and remove elbow section of the 36 Sealine riser."

So my question here is, is this the draining of the topside piping at berth 6 and then you remove the tie-in piping?

A. Yes.

Q. Okay. So yes?

A. Yes.

Q. Okay. And then if you look at, on the next page at 1037, you would see number six there.

A. One zero?

Q. Three seven, number six.

A. Yes, 6.6.

Q. Yes; er, yes, 3.5 and I'm looking at six. Apologies.

Ms. Baird: Six point five and you're looking at six?

Q. Yes. There's a subparagraph six there.

A. Sorry.

Q. "Open tank 100, well 111 valve to receive line content of Sealine 36."

Is that what you were talking about before, is it?

A. Yes.

Q. That in Phase I it would—it was taken to—

A. Both Phase I and Phase II.

Q. At both Phase I and Phase II that the content was—

A. So it would go to 66, yes. And I said 66 Sealine is a very long line from offshore to onshore.

Q. Okay. So here they're talking here about—this is where we're actually—so we disconnected the system by removing the elbows?

A. Yes.

Q. That's the procedure we went through before. And now here this is actually the removal of the content from the?—

A. Riser.

Q. —from the riser. Okay. And then I see A:

"Periodically monitor the level of the product in the riser by a gorging port."

So there was also monitoring of the level of the riser while this is happening?

A. Yes.

Q. So then I see at page 1041, if you go to 1041—

A. Yes.

Q. —do you recall this method statement? It says for the beginning at the top there, "Method statement 115, to remove

contents of the Sealine 36 between berths 5 and 6 Phase II."

A. It does look familiar.

Q. It looks familiar?

A. Yeah it does, right? I'm saying there's a lot of method statements I looked at before because we had a lot of revisions and stuff.

Q. Right.

A. So it does look familiar.

Q. And you think that this was also reviewed and accepted?

A. This, I think this was also reviewed.

Q. And is it basically the same method that you described as contained in the instruction?

A. In the first part alone is the same thing as, um, berth 6.

Q. Okay.

A. Yes so it's basically [*Inaudible*]. But berth 6 is where they had the end cap with the dip tube as [*Inaudible*] at this point. That's the one that talk about the manifold that that it goes on top the riser.

Q. Right.

A. So that's the difference between berth 5 and berth 6.

Q. Right saw this one here, you're saying that this was used—this would have been used in the—this is the method that would have been in the other Phase II?

A. Yes. It looks familiar.

Q. Right. Do you know if any, with respect to the Paria instruction which I know was prepared by Operations, but are you aware that any risk assessment was done by Paria in respect of that

instruction?

A. No, I can't say.

Q. Okay. [*Crosstalk*] I am so sorry. With respect to the original method statement, you had told me that you weren't involved necessarily in the process of reviewing and accepted the original?

A. That's the first original?

Q. Yes.

A. No.

Q. No. What about these? Were you involved in that process?

A. Yeah, I must have been involved in some as—I can't recall exactly where, where, but I, I, I'll be part of it.

Q. You would have been part of it?

A. Yes.

Q. Okay. Do you know whether in the—I know I asked you in respect of the original one. But in respect of this—these instructions and these two line clearing method statements, and the risk assessments which accompanied them, do you know if any—was it any differential pressure or hazard, Delta P hazard would have been taken into account in them?

A. After all the meetings and all the different discussions and stuff like the both Operations, everybody, no.

Q. No. Okay. So we have here now the next thing that I'd like to go to is the—let's go back to the original method statement where, I don't know if you recall when I showed it to you, it talks about a technique of using an air-driven pump. So I'll show it to you. Volume II at page six five three. We're

looking again at page six five nine.

A. Three?

Q. Yes. Six five nine. If you see the second to last bullet point, it says using an air-driven pump? So that was the original procedure which had been proposed. But then in the structure and in the method statements that we just looked at for the—

A. This was not here.

Q. No. We used instead—well, what was used instead was air blowing?

A. Eh.

Q. A method of air blowing. Do you know what is the—

A. No, this could mean also a compressor.

Q. Okay.

A. Using a air-driven pump, whatever, so, I don't know if is that what's put—their intention was.

Q. Okay. So you know if there was any specific reason for the change in using the air-driven pump to the air blowing, that technique?

A. No, not—

Q. Not to your knowledge?

A. Not to my knowledge.

Q. Okay. Understood. I'm going now to the Paria daily meeting. The daily work reports which were prepared by Houston Majardsingh and Ravi Mangalee, were they prepared on a daily basis and submitted on a daily basis?

A. Yes they were, they were emailed to me, Manmohan and CCd to our assistant planner and, if required, Operations may need

some time, like for in the instance the drain operations, we may have emailed them it.

Q. Okay. Right.

A. It was something done every day. It's a daily report.

Q. And who at Operations in respect of the line clearing was overseeing that process?

A. It would be the team lead.

Q. The team lead?

A. Yeah. I can't remember who it was at the time. It could either be Visham or Jason.

Q. Is that Jason Beckles?

A. Beckles.

Q. So if we go to the Paria Daily Work Report, I just wanted to go through them with you.

A. Sure.

Q. They are at—so I'm going to start at page 994 of Volume II. This is the 18th of January on the [*Inaudible*].

A. Yes.

Q. Right. So you see number three there?

A. Yes.

Q. So it says: "Air blowing contents of Sealine 36 from berth 5 to berth 6."

A. Uh-huh.

Q. And then on the job status it says it's ongoing.

> "Air blowing started at 12.55. These are Operations setting up to drain to tank 111 and air blowed until 1800 hours, a total of 798 barrels of oil was drained to the

tank."

A. Uh-huh.

Q. So the total of 798, so this would have been emailed to you either by—I can't tell from the face of it who prepared this.

A. This was emailed. I don't know who did it.

Q. Right.

A. But it would have been emailed to me and these figures we would have gotten from Operations.

Q. From Operations.

A. Yes.

Q. So if we're talking here about the air blowing from—this is Phase I air blowing, correct?

A. Yes.

Q. So this, this, this barrels, the 798—

A. Yes.

Q. —that would have included barrels being drained from both topside and possibly the U, underwater subsea pipeline?

A. I can't say.

Q. Okay.

A. Because it could be the whole line that goes to shore. All we know—from my understanding, all we know is that this amount a oil was measured in the tank.

Q. As, as, as, as having been, um, taken from Paria's system at berth 5 and berth 6?

A. Not berth five and berth 6 but the whole line, the whole complete section of line.

Q. Okay.

A. So the line, I can't tell you the distance, but it is a huge, it is huge. If that sounds—I'd say about 4 miles outside.

Q. So you mean when you're air blowing into 5, into 5—

A. Into six.

Q. —up to six and then—

A. And then six is.

Q. —Sealine 36, the main?

A. It doesn't necessarily mean all the oil from there, from the riser, from berth 5, the riser from berth 5 to berth 6, it doesn't really represents that is the volume of oil removed from there.

Q. But does it represent the volume of oil that the process would have resulted in removing from the system?

A. It will not be the whole system. It wouldn't be that section alone. It would be the whole, the whole line, the whole line that goes to shore. That's from my understanding.

Q. Okay.

A. So it doesn't really reflect how much product was removed from the riser.

Q. No, no—

A. [*Inaudible*]

Q. —not necessarily the riser. So I mean from the, would it reflect—remember before you told me that the, that there's the undersea—

A. Yes.

Q. —U-shape and the topside and the manifold. So this air blowing—

A. Yes.

Q. —whether it's removing from the underwater—

A. Section.

Q. —subsea section or the topside piping—

A. Or, or the, the other section that goes to shore to the tank.

Q. Right, okay. So it could—you mean it's basically what was removed—

A. From the—

Q. —from the system included Sealine 66?

A. Yes.

Q. As a result of the air blowing?

A. Yes.

Q. So the 798 barrels of oil which was drained to the tank, you can't say specifically what part of the system it came from?

A. Uh-huh.

Q. But would it be accurate to say that that 798 barrels which was removed would have been as a result of the air blowing?

A. I'll have to say yes because—

Q. Yes.

A. —that is the report I got.

Q. Okay. I understand. And then if we go to page 996 I have:

> "Air blowing contents of the Sealine 36 from berth 5 to berth 6."

And you say on the—that's at number three, and then on the job status it says:

> "Ongoing air blowing at faulty pier five. Started blowing 10.30 a.m. Waiting for offshore to line up camp. Levels was checked at bleed valve on topside piping. No oil

was being blown. Levels was checked at the bleed valve on riser. Oil was flowing slow."

Does that suggest that at that stage that the topside piping at berths 5 and 6 would have been drained?

A. May have.

Q. May?

A. May have.

Q. Okay.

A. It's not necessarily saying that.

Q. So all of these reports in respect of the line draining you would have forwarded to—you would have shared with Operations? That's what that means?

A. Well Operations, we get this information from Operations.

Q. You mean what has been put in this report?

A. Yeah. Well do as the—especially the air blowing side like how much barrels removed and stuff like that.

Q. Okay. And then if you go to page nine nine seven, you see number three?

A. Yeah.

Q. Right. So, it says:

"Air blowing contents of Sealine 36 from berth 5 to 6. Air blowing started at 11.00 a.m. due to installation of slip blank and air blowed until 5.30 p.m.. A total of 108 barrels of oil was drained."

A. Uh-huh.

Q. So again you can't say which part it came from, no?

A. No.

Q. Right. But it would have been—what is being displaced here is that—into the tank is as a result of the air blowing?

A. Air. Yeah.

Q. Okay. And then we are going now to page 1001, number one, removal of topside piping. And it says:

> "Completed"—at the job status. "Removed topside piping and solid blank top end going towards berth and install blank with six-inch box flange with two hoses inside riser to Phase II air blowing."

A. Just say the number again, one zero?

Q. I'm sorry, 1001, number one?

A. Number one, huh-huh.

Q. Do you see there it says, "Removal of topside piping" and then on the—that's on the description, and on the job status it says "Completed. Removed topside piping and solid blank—

A. No, I'm mistaken. That is one—

Q. —0001?

A. Item number one? One zero zero one?

Q. Page 1001.

A. Or, or, my bad.

Q. That's okay.

Ms. Baird: So it was probably the page after the last one.

A. Yes.

Q. So it was topside 581:

> "Job status. Remove topside piping and solid blank top end going towards berth and install blank with six-inch cross flange with two hoses inside riser to Phase II air

blowing."

A. Yes.

Q. So this is the start of Phase II air blowing here.

A. And the boss flange what I refer to is the manifold.

Q. Okay. So if we go to the next page—just flip over the page—

A. Yes.

Q. —one, well I won't read one but it seems to be saying that it's starting there again with the phase—it's talking about the Phase II air blowing.

A. Yes.

Q. And then at number four, this is at berth 5 and it says the description is:

> "Remove six-inch solid blank, open bars and insert dip stick. Level was checked and pipe estimated to be three-quarters full with oil content."

So this is at berth 5 where measurement was taken?

A. No. This is berth six. Five is out of the picture here now.

Q. So that's an error then?

A. Yeah.

Q. Where it says berth 5—

A. Just now.

Q. —is the location?

A. Yeah. Okay, so I'll have to confirm this but this to me is—looks like my error. This was, any—all measurements was done on berth 6—

Q. Okay.

A. —from what I could recall.

Q. Okay.

A. There was no need to measure on berth 5.

Q. Okay. At page 1003, that's just the next page, you see number one, "Description Phase II air blowing—

A. Yeah.

Q. —from Sealine 36 to Sealine 66?

A. Uh-huh.

Q. And then at the job status it says:

> "Air blowing was conducted between 11.00 a.m. to 3.00 p.m. on [*Inaudible*] and received 376 barrels of oil."

So, again, would you say that this is a reflection of how much oil was received due to the process—

A. Yes.

Q. —of the air blowing, Phase II?

A. From my understanding.

Q. Okay. And let me look at five, number four on that same page—

A. Uh-huh.

Q. —but it says berth 5 again, so you'll have to verify it. We ask if you can say—well, if you say if it's an error or not and then the description says:

> "Remove the six-inch solid blank, open valve and insert dip stick. Levels checked after draining at PD80 and pipe estimated to be a quarter full with oil content to continue draining tomorrow."

Can you tell me what that means?

A. They just measure again, from with the same air blowing

process.

Q. At berth 6? You think—you think the—

A. They measured by berth 6.

Q. Berth six?

A. Yeah.

Q. And it's now—so it's showing that the riser at berth 6 has—was only had a quarter full of content?

A. Yes.

Q. Right. But if you look at five there, it says:

> "Draining contents of Sealine 36 in slop barge. Connect hose of the two valves and place end in the slop tanks, open valve and draining." The job status says: "Two slop barge was filled with approximately a hundred barrels of oil."

Is that from Phase II air blowing?

A. This is from Phase II air blowing but this is a different location. This is the main viaduct pile deck 80. So this may not have been related to, um, to the air blowing for our side and I say this will have to be cleared up by Operations.

Q. So you can't confirm that there's—

A. I can't confirm this but I know, um—

Q. You can't confirm that number five is in respect of the air blowing at berth 5 and 6?

A. I think this is an error with number five where we did the measurements, and item number five would have to be confirmed with Operations why they did this.

Q. Okay.

A. This was just reports we got.

Q. Okay. So you're not sure, you can't say—

A. I'm not sure. I can't say.

Q. —if it came from the air blowing?

A. No.

Q. Okay, right. If we go to the next page now at number one it says:

> "Phase II air blowing from Sealine 36 to Sealine 66. Air blowing was conducted between 1.00 and 3.00"—well, um—"1300 hours and 1500 hours. Offshore noted that they received 55 barrels of oil."

So this would have been the process—the Phase II process would have resulted in offshore [*Inaudible*]. And then, number four, this is berth 5, relocation berth 5:

> "Remove the six solid [*Inaudible*] blank, open valve insert dip stick."

You think that's an error as well, that it should be berth 6?

A. Berth six.

Q. Okay.

> "Level was checked"—job status says—"Level was checked after draining at PB80 and oil content was approximately eight below sea to 8 inches below sea of riser."

What does this mean?

A. Level was checked—

Q. What does that mean?

A. The T is the joint.

Q. The joint where?

A. I not too sure what T he's referring to but T is the joint, the pipe joint on riser. I don't think it have a T joint there that I remember either, unless they took it off of the manifold and it had a T or—that, that, that is what I believe he meant here.

Q. Sorry, could you just explain to me?

Ms. Baird: Just be clear about what you're saying in the—

Mr. Rampersadsingh: Yeah.

Ms. Baird: If you're not sure about something you say that.

Mr. Rampersadsingh: Yeah.

A. I not sure but I just speculating here, which is not right what I doing but I believe it's the same manifold where we're taking all the dips before is the same spot they're talking about.

Q. The same manifold?

A. Yeah. Where they were taking the previous dips from—

Q. Yeah at berth 6.

A. —I believe it's the same place, yeah, at berth 6.

Q. When it says level checked after—let's just take it in half, right. Let's take the first half.

"Level was checked after drainage at PB number 80."

What does that mean?

A. Pile bent 80.

Q. Pile bent 80?

A. Yes.

Q. Bent?

A. That's how they number it on the, um, the—on the main dialogue that's the numbering of the piles. It's just a reference

point. It's just a reference point.

Q. So draining was occurring there as well?

A. Well from this, yes, they were checking something. Yeah, they had to be checking something.

Q. Okay.

A. Right? I can't recall what it is, right, but the level was checked at draining pile bent 80 and oil content was approximately 8 feet below T on riser.

Q. Right. So are they talking here—is there a riser at PB80?

A. Yes, there is. This will have to be cleared up by Operations. I don't want to—

Q. By Operations?

A. —speculate on this or anything like that.

Q. All right. So—

A. This was just recorded to us. I don't want to, um, say what they were doing here. I might be incorrect.

Q. Okay. In Phase II air blowing, would—the system at that point would be disconnected from PB80 when they're starting Phase II air blowing?

A. Yes, by, by berth 5.

Q. And then number five, there's draining content, see the description, it says mechanical, and the first location MVUPB80?

A. I missed that, Ma'am.

Q. The same page, sorry, 1004.

A. Yes.

Q. And it says—

A. What number?
Q. Number five.
A. Yes.
Q. And it says: "Re location you see MV—
A. Yes.
Q. —where it says pile bent 80—
A. Uh-huh.
Q. And then description is:

> "Draining contents of Sealine 36 with the slop barges. Connect hose on to two valve and place end at the top into slop tanks. Open valve and drain."

A. Yes.
Q.

> "Two slop barge was filled with approximately 100 barrels."

A. Right, so that is basically the same question from on top was there before. So I don't want to say—
Q. You don't want to speculate?
A. —what they were doing.
Q. Do you know if at any point that the content of the—in Phase II air blowing the removal of the contents was not to Sealine 66 but the slop barges?
A. It would be both.
Q. Or both were used?
A. Yeah, it will be both, plus because of the limited amount the slop barge could hold—
Q. Yes.
A. —it would not be, be used.

Q. So both were used. Right, 1005?

A. Yes.

Q. We had just in one there but we just have berth 5 and 6, Phase II air blowing from Sealine 36 to Sealine 66 is at page 1005 on the 4th of February. You have air blowing was conducted between 10.30 a.m. and 2.30 p.m. There's no record here of how much barrels of oil was removed from the system.

A. Yeah, not, not every time that we get—

Q. Not every time you get a?

A. —we get, um, oils in the tank.

Q. Sorry?

A. Not all the time you get product in the tank.

Q. O or, I see.

A. No.

Q. So not every time that you get, not every time that you get a result—

A. Yeah.

Q. —from air blowing which removes content. But every time that content is removed, that would have been—

A. Yeah.

Q. —recorded, measured by, um, Operations, yes?

A. Uh-huh. Yes.

Q. Okay. And then we have page 1006,:

> "Berth 6 removal of piping from the Sealine 36 into Sealine 66."

The 5th of February, number one, description and the job status is:

"Remove hoses from inside riser and install 30-inch solid blank at the end. Remove temporary hoses, piping, check valves, going to six-inch stub to 66 Sealine and solid blank end."

A. Yes.

Q. So is this basically coming to the end of the air blowing?

A. Yes.

Q. Now if—that same document, just if you go to page 1012, it's the same daily report for the 13th of February.

A. Yes.

Q. Right, so you see number one there at berth 6, the information on the hyperbaric chamber, it says:

"Remove solid blank, insert migration plug, insert plug, cut [*Inaudible*] from old riser, cut and remove old riser support, install hyperbaric chamber. Weld and support from hyperbaric chamber to riser support pile."

Would you agree that on the 13th of February, 2022 is when the plugs were installed and the hyperbaric chamber was installed on the riser at berth 6?

A. Yes, the plugs were installed first then the hyperbaric chamber.

Q. Do you know if there was any measuring of the contents of the riser at berth 6 before the plugs were installed?

A. I can't confirm but—

Q. Would that have been recorded here by—do you know if that would have been recorded here by—

A. No. But I'm not sure they would have done it but I can't recall, um, I can't—

Q. Not necessarily everything is recorded?
A. No.
Q. No. Okay, so the next day of the operations would appear to be at berth 6, the 15th of February. That is when—
A. Berth 6?
Q. Yeah, at berth 6. Well, I'll see on page 1—
A. Point 1014?
Q. Sorry?
A. One, is it 1014?
Q. Yeah. So berth 6 there at number one is when you had the riser was cut and lifted and secured in chamber, the pipe was prepared and the slip-on flange was installed and welded out, then the solid blank, a dive pen was done on the flange and the divers went in and then we have some recordings there of when they entered and when things were done. So, it was here that the—on that day these are the works that were done at berth 6 on the 15th of February.
A. Yes.
Q. And you were present, is it correct, at the start these works?
A. Some of them. I can't recall exactly which ones I was there—
Q. Right.
A. —but some of them I were there.
Q. So the, the, um—if you look for instance at page 1021, this is a report here from Mr. Dopson to his HSEQ lead. This is the first paragraph. You say that—
A. One zero two one?
Q. One zero two one, the letter dated 15th—well report, the daily

activity report.

A. Okay.

Q. You're seeing it? Sorry, it's a little bit—the print is a bit unclear, not very clear.

A. Uh-huh.

Q. But you look at the first paragraph. This is a daily activity report from Mr. Dopson, HSE technician, to his HSEQ lead?

A. So I was there that day.

Q. Yes. And then you see in the first paragraph there he says that you were present at the toolbox meeting and that you would have spearheaded the—well the, that meeting basically.

A. Uh-huh.

Q. So the topic was mainly the efficient teamwork and the actual job steps were discussed on that day.

A. Yes.

Q. Now the next—sorry.

A. Yes.

Q. Yes. The next day of work would have been the 25th of February, 2022. What was that LMCS—well on this project by LMCS.

A. Sorry the next day of work would be the?

Q. Twenty-fifth?

A. The day of the incident.

Q. The date of the incident.

A. Yes.

Q. There was a little bit of a delay between the works, well between the 15th and the 25th.

A. Yes.
Q. Do you recall why?
A. Yes. They mobilized without permits.
Q. They mobilized without permits. Is it correct that LMCS were asking for a four-day window to complete the job from when the plugs went it?
A. I can't recall.
Q. You can't recall that?
A. No.
Q. Okay. Was there any concern on the 25th, on the 25th about the, about the lapse of 12 days from the 15th?
A. Not that I aware of.
Q. Or any concern about the integrity of the plugs?
A. To me, to me, no.
Q. That was not an issue?
A. I don't know if that was communicated to somebody else but that was—it did not trickle down to me.
Q. It didn't trickle down to you. Did you have any concerns about the 12-day period, the lapse?
A. At that time, no.
Q. Okay. So there is—I have to refer again to Mr. Wei's evidence. At paragraphs 52 to 56 in his witness statement, I think it's the fourth bundle and it's at page—the first witness statement in that document, 52 to 56. Right, so on the 25th—the 24th of February at the weekly planning meeting he says—sorry, you're not there yet.
Ms. Baird: What paragraph number?

Q. Fifty-two. One two eight zero.
A. One two eight zero?
Q. Uh-huh.
A. Just now. I'm there. What number?
Q. Sorry he says on the Thursday, the 24th of February—
A. Yeah, okay.
Q. —there was a weekly planning meeting and you, well:

> "…the planner informed the meeting including myself works were to resume on the 25th."

A. Uh-huh.
Q. And then at 53 he says:

> "On the 24th of February a meeting was also held between Paria and LMCS representatives where the planned schedule of the work on the weekend were discussed and outlined."

And then he outlines the works there.

> "And the meeting was attended by the planner and LMCS representative Kazim Ali Sr., Kazim Ali Jr. and Ahmad Ali."

Do you recall that meeting?
A. Say the names again please?
Q. Sorry. Look at 54.
A. Okay. Fifty-four. Kazim Sr. and Jr.
Q. And Ahmad.
A. Yeah, three representatives and myself.
Q. Do you recall that meeting?
A. Yes.

Q. And that was on the 24th?
A. That's on the 24th.
Q. Okay. And then if you look at paragraph 55—
A. Yes.
Q. —he says that you, the planner, assigned your technicians to oversee the day's work, prepare the relevant work permit it says and—
A. Yes.
Q. —certificates, apply the relevant materials and coordinate the activities. And then at 66 there you list the sequence of the tasks that were meant to be done from the 25th of February up until the completion of the works. And you would notice, for instance, that if you look at number ten, they were supposed to—the sequence included that you would lower the new riser section and make up the flanges?
A. Yeah.
Q. So basically you would connect the riser, and then at 50 you would remove the chamber and—well there are other steps involved, but at 20 you would remove the migration barrier and inflatable isolation plug?
A. These things were not discussed.
Q. Those were not discussed?
A. Not the, not the removal of the, um—
Q. No, no, no, sorry. So this is the sequence of events, if you look at 56, which he says were to be done on the 25th of February up until the completion of all of the works.
A. Well this is what he says?

Q. This is what Mr. Wei is saying?

A. Or no, that, that was not—on my, my, um, was not up to there, up, the discussion of removal of the plugs was—

Q. So you hadn't gotten to that discussion?

A. —was not discussed as yet.

Q. I understand. So, if we go back now, so on the—let's go back to the meeting that you would have had with LMCS on the 24th.

A. Yes.

Q. What was discussed at that meeting?

A. Could, could I, um—because I have my, um, my logs.

Q. Sure.

A. I could use it? I can't remember everything but I could tell you some of it offhand.

Q. That's fine.

A. All right? This was prepared just before I left Paria, right? Right. So I have it here: "Discussed and see planned schedule for works for weekend activities", and for the day was to remove the—because it's a lot of steps I'm seeing here. Right? But my, my job was remove the old riser section, install the new, um—sorry, move old riser section, install new riser section in hyperbaric chamber, hydrotest flange on riser and couple new riser section to flange and guarantee flange. That was the day [*Inaudible*]

Q. Could you just repeat that for me?

A. Sure. Remove old riser section from the hyperbaric chamber.

Q. Uh-huh.

A. Because that was done before.
Q. On the 15th?
A. Right. And this was discussed and agreed on in the meeting with me with Kazim, both Kazim junior, senior, and Ahmad.
Q. Okay.
A. Right? So remove the old riser section on the hyperbaric chamber, reinstall the new riser section in the hyperbaric chamber and that was prepared previously. Hydrotest and install the flange. That's why I had inspection personnel with me on site. And then couple the new riser section to the riser flange and guarantee flange.
Q. And you guaranteed the flange?
A. Yes.
Q. So that's all that you—
A. All was planned for.
Q. —[*Inaudible*] on the 25th. And would that necessarily have also—necessarily would you have had to blank it off on the 25th as well?
A. How you mean blank it off? I don't know—
Q. So, at the end of the job after you, um, you effectively guarantee it—
A. Yeah.
Q. —would you then have to blank off the flange for the next—
A. It will not have been able to blank on top because it's a open end. If they ran down [*Phonetic*] like we call it in the nursery.
Q. So at the end of that—this work day, the pipeline would have been opened?

A. Yes but the stuff blowing there.
Q. So even you—
A. From my—
Q. So even if you come out of the, even if they had, um, taken off the compressor for the chamber—
A. Yeah.
Q. —and it had flooded—
A. They would not have been flooded because I installed the new section riser.
Q. Or because it would have been connected?
A. Yes.
Q. So you—
A. And that above sea level.
Q. I see what you mean. Okay. I understand.
A. And there was no need to cap the end because we—
Q. I understand?
A. —[*Inaudible*]
Q. So it wasn't—so the step was to connect everything?
A. Yes.
Q. Sorry, I'm just hearing pressure testing but you would have connected—so you would have connected—you would have had to do a pressure test before they connect?
A. Yes.
Q. And then another pressure test when they connect?
A. No.
Q. No.
A. Only one.

Q. Only the one?

A. Yeah the new—the spool section that was fabricated outside, the new section, that was fabricated outside and hydrotested outside.

Q. I see.

A. So those tests were carried out and painted.

Q. So when you connect them you could [*Inaudible*]. Okay. So did you just—so you only discussed on that day the works to be done on the 25th?

A. Yes.

Q. Was it that you—were you—

A. Mostly discussed on the 25th because we have so many delays, we have so many—

Q. Right.

A. —uncertainties on it.

Q. Okay.

A. So at the end of that day we would have—we'd have—I would a meet with the guys on the phone and discuss again for forward. All these are just tranche—

Q. At the end of the day. So this is a physical meeting?

A. Which one?

Q. The meeting on the 24th?

A. Yes.

Q. And then you spoke—you would have spoken to them on the phone at the end of the day as well you said?

A. Depends.

Q. Okay. So but did you speak—did you also plan out what would

have been done on the, the—

A. Sat—yes so just a rough draft, basically on the Saturday and the Sunday.

Q. So what was supposed to be done on the Saturday?

A. The Saturday, I don't have it. The Saturday was to really remove the hyperbaric chamber.

Q. Okay.

A. I think I dedicated a whole day to do that.

Q. Uh-huh.

A. Right? And that's a discussion from the, um, with the contractors. I think that was planned for the whole day just in case we get into any issues and the Fri—and Sunday was to cut the riser to length for measurements and install the topside piping—

Q. Okay

A. —flange.

Q. Okay.

A. And to help—so all of that—

Q. On the Sunday?

A. On the Sunday and we had to—I called out the inspection department to be on, on, on call to do that test because every time you do a flange you have to do a hydrotest.

Q. Had you discussed when the plugs would have been removed, on what day?

A. We didn't discuss it at, as, as yet.

Q. You didn't discuss the removal of the plugs at all?

A. As yet, as yet.

Q. So when would you—when would you have envisaged that you would have had that discussion?

A. On—after Sunday.

Q. After Sunday?

A. Sunday how far the work goes.

Q. Okay. So that was the meeting that was planned?

A. Yes.

Q. That was your meeting on the 24th?

A. Yes and that was relayed on to Operations after I came back, that was relayed to Operations, HSE, because we have to mobilize a little bit earlier, both to Operations and [*Inaudible*], and my technicians really to make sure all the relevant permit, all the relevant, um, stuff they require, bolts, nuts, whatever we have we have it there because it would have been a busy day.

Q. And—well I'll get to that when we—I want to move now to the 25th. So I would like us to take a little, short break, just for 5 minutes so—

A. Uh-huh.

Q. —if you feel you want a little longer?

A. I'll just go outside.

Q. I will try to move as quickly as possible from the 20—on the 25th.

A. That's a hard day too.

Interview suspended.

Interview resumed.

Q. So on the 24th you told us what the sequence—well the task for the 25th, 25th and 26th had been discussed and what it was and

you said that you took a note of that. Well did you take a note of that or you were reading from a note?

A. I took a note of it.

Q. You took—on that day?

A. Yes. That was discussed and this is what the, the job contractor outlined.

Q. Okay.

A. So I took a note of it, right, um—

Q. Was it a manuscript note or how—

A. No just, it's jot down.

Q. You jotted down. And then what you were reading for, you just read from a document and you said that that document you prepared just before you left Paria?

A. Yes, yes.

Q. So that would have set out basically from your recollection and your note what it is was discussed?

A. Yes.

Q. Okay. The method statement for the jobs that were being conducted, well, which was being conducted on the 25th, which is a continuation of what occurred on the 15th of February, you would agree that was a continuation of those works, of the change out of the riser work?

A. It may have some—it doesn't follow a sequence so it may have in between.

Q. Right. But this is the section A works from the scope of works basically?

A. Yeah.

Q. So the method statement which was prepared by LMCS specifically for the—for this part of the job, I just wanted to discuss that with you, it's at volume, Volume III, number 1048, so is this the method statement which was reviewed and approved by Paria for the change out of the riser?

A. I think version zero.

Q. Sorry, it says method statement 116.

A. Yes hut what I seeing is version zero.

Q. Revision zero?

A. Yeah, revision one I, I [*Inaudible*]

Q. Well, I think this was the document which was attached to the permit to work. So the permit to work, the permit to work had, according to Mr. Wei, had this document attached to it, 4th of January, 2022.

A. Okay.

Q. I can show you where he said that.

A. Okay.

Q. So this is the method statement which has been reviewed and accepted by Paria. Would you agree with me, if you look at page 1051, that—it's listed at 56 and 57—the removal of the plugs and then at part five there, you see it goes on to list the steps for the inversion of the new riser section.

A. I not following you somehow.

Q. Yes, so if you look at—okay—

A. Five and six.

Q. —let's take it from the page before. If you take it from the page before, 1051.

A. Uh-huh.
Q. Right. You will see Roman numeral iv and above, "To remove leaking section of the riser." This is the removal of the—would this be the removal of the bad part of the riser, the part that was leaking? These are the steps for the removal of the bad part?
A. What number again? Just tell me?
Q. Roman numeral iv on the top there?
A. Yes, right, what, what number? Right, yes.
Q. So we're just looking at the heading that says—
A. Yes.
Q. And then I'm saying that all the steps, 37 to 65 on the next page are the method in respect—it's the steps to be taken, the method in respect to the removal of the leaking section of the riser?
A. What, what are you trying—what are you saying?
Q. I'm just asking if you had noted, if you, if you would notice that on page 56—
A. That these are the steps?
Q. —these are the steps?
A. Yes.
Q. And that the steps which were being—the steps in this document show that you would have the removal of the plug first and then would install the new section of the riser.
A. From, from this here? No, I can't—I won't be able to say yes because this is—the method statement is a kind a dynamic. Long as it has all the procedures in it, what we required, it was not because on the day on question it was on 54, we stopped work on 54.

Q. Right.
A. And then we went across to 61.
Q. Okay.
A. And we removed across all the things and, and we go by the work, the job we discuss on the, the day—
Q. Okay.
A. —according to the permit to work system.
Q. So what you're saying that even though the method would have listed a sequence—
A. Yeah.
Q. —which had the plugs being removed before the riser was connected, that this is not, that this is not what you went by?
A. No.
Q. You would have gone by what was discussed on the 24th?
A. Yes. Because this not—this not following sequence.
Q. So this isn't following the sequence that you discussed on the 24th?
A. No.
Q. On the, the 24th when you discussed the sequence, what was the—why did you want the—why was that, why was that sequence the sequence that you decided upon?
A. I did not decide that.
Q. You didn't decide upon that. Was there a reason that you—that the plugs—that you wanted the plugs to remain in there?
A. As I tell you it was not discussed on that day and um, I just—
Q. On the 24th?
A. On the 24th. It was not discussed at all and we only list the

contractor give me the—

Ms. Baird: And when you say "this" here, what are you referring to here?

Mr. Rampersadsingh: The removal of the plugs.

Q. Okay. So the removal of the plug was not—

A. Was not discussed.

Q. —discussed on the 24th and it was not to—it was not brought up at all?

A. No.

Q. Was the—a reason for what—well, the reason for the plugs being there, remaining in the pipe on the 25th, or not being removed, I mean, was that discussed?

A. No.

Q. The reason for it? So it just was not brought up again?

A. This was not brought up.

Q. So who, who identified those as the tasks to be done on the 25th?

A. Contractor.

Q. The contractor identified that?

A. Yeah. He said this is what he had. He'll bring [*Phonetic*] up work—he had enough manpower for this certain task to do.

Q. I see. On the 25th?

A. On the 25th.

Q. So in respect of the plugs, did you, did you at that time know what the function of the plugs were?

A. Yes.

Q. What was the function of the plugs?

A. Basically three reasons.
Q. Uh-huh.
A. To get gas free conditions. To create a physical barrier so things wouldn't drop down, tools and stuff, and to also, when you're inside the chamber, the air would not be contaminated with the fumes in the line.
Q. Okay. So on the 25th, the morning of the 25th, were you present? You did not—you were not at Paria in the morning?
A. No, I wasn't required to.
Q. You wasn't required to on that day. Okay. Were you—so the applicant for the—are you familiar with the work permit for that day? Would you have seen it at all?
A. No, I would not have.
Q. You would not have seen it?
A. I would have never seen it, but they would have gone on instructions actually on what I made out.
Q. On the 24th?
A. On the 24th.
Q. With respect to the migration barriers, the plugs, what was your understanding as to when they were going to be removed?
A. At that time it was not discussed.
Q. It was not discussed?
A. Yes.
Q. So that was not necessarily something that you took into consideration?
A. Yes.
Q. As to when they were to be removed. Would you have had any

objection on that day if the, if the contractor said he was removing the plugs on the 25th?

A. As long as we have the right—as long as it was planned, we had the right procedures, you're getting your clearance and the operations clearance.

Q. So if when you discussed it and you said he is the one—well, LMCS would have said this is the work plan—

A. Yes.

Q. —because he wanted—we have the manpower, the resources to do this on the 25th, had he said, we're going to remove the plugs on the 25th, what would have been the procedure you would have followed?

A. The same permit to work system to make sure it gas free, all the HSE policies in place, Operations know about the job.

Q. So on the 24th, after you discussed the work plan with him and he set it out, what—you, you would—well, Mr. Wei said that you would have told him about this meeting?

A. Uh-huh.

Q. So you would have informed him about what the work plan was?

A. Yes.

Q. Would you have informed anybody else?

A. Of course I would.

Q. Who would you inform?

A. For my, my line, my line, my lead and my manager.

Q. All right.

A. Every job before we discussed it.

Q. And would you have informed Operations?
A. Operations, HSE and technical too.
Q. Okay saw if, once they had approved—
A. Once they have a proved it.
Q. —then—and they, and they had approved the work plan for the 25th. So on the 25th, I just wanted to show you the, um, the permit to work that had been issued on that day. So the permit to work is in Volume III at page 1074. So section A of the application—well you would see at section C that Houston Majardsingh was the applicant—
A. Yes.
Q. —to the permit to work. Section A of the permit to work, would that have been filled out by Houston?
A. Yes.
Q. And if you see at number one, "Requirements for equipment isolation and clearance, isolated by blank flanges, spool, removal valve", and it says no, and then it says the line is drained, and then it says the next one is, "Cleared of process, hazardous material yes", it says migration barrier to be used, you see that?
A. Yes, but section B—
Q. Uh-huh.
A. —is not done by us.
Q. Right. So is it that—so Houston would have just—Mr. Majardsingh would have just pulled up section A?
A. Yes.
Q. Right. And then all the other sections would have been filled

out by the site authority who would have been on this document I think Mr. Ramadan, so section B, one, two, three, four would have been filled out by Mr. Ramadan. I just wanted to, if you can keep this open but also have your Volume I open and go to page 30, no, sorry, 28 and you would see—so this is Houston here—

A. Yes.

Q. —who would have been working under your direction, is the applicant to initiate the job activity by completing section A of the work permit, so that's the section A that you said that he would have completed. And that information from section A you would have gotten from—would that information have been given by you based on your meeting of the 24th?

A. Yes.

Q. The applicant must have the necessary competence to execute the job or to supervise the execution of the job. So would Houston have had that competence?

A. From what I'm told—

Q. Uh-huh.

A. —he's a third party contractor.

Q. Yes, yes.

A. They have their own criterias turning. Mr. Manmohan would be better able to answer that question for you.

Q. So you can't speak to that question?

A. No. From what I've been told is basically seven years' experience or a full MET.

Q. MET?

A. Diploma.
Q. Diploma in?
A. Mechanical engineering technician.
Q. I understand. So he would have had—would he have had the knowledge of the steps and the methods and the—
A. Yes, he—I have known him from, um, in Petrotrin.
Q. Okay. And that he would be knowledgeable of the hazards associated with the job and the necessary control of these hazards?
A. Yes. The, the—before the job start I would have given him, either an email or a hard copy, the full scope of work, all the JHAs, all the method statements and whatever accompanying documents that is required. Any concerns or anything like that they could always refer to me or we could always get help and assistance with it. But they will have to go, they have to go through the scope of works to see what is the objective.
Q. So, right, so he would he aware, from those documents—
A. Yes.
Q. —what the method is, what the job—what the hazards are?
A. Yes, from the—
Q. And the control measures—
A. Yes.
Q. —for the hazards, yes?
A. Yes.
Q. Earlier when we first started you told me that you did not know at the time what a Delta P was or differential pressure. So would it be correct to say that at this time you did not know that

there was a hazard in, in the—

A. Yes.

Q. —a differential pressure hazard [*Inaudible*]

A. Even from looking at the JHA also, and that would have no relation to the JHA.

Q. Right?

A. From what I, I could see.

Q. So Houston Majardsingh, from your knowledge, he, he—right, so that you, you can't speak to him—

A. I can't, I can't say speak—

Q. —if he would have been aware that there was this hazard there. Okay, fair enough. Right. So then it says he shall be responsible for the job and for the safety of the people who work on the job. Right. "The applicant is appointed by the respective department manager is typically from the technical and maintenance department"—which is your department, right? But he can also be a representative from the HSEQ department, [*Inaudible*] coordinator.

And I went through this with you earlier where you had confirmed that these are some of the duties that you had—that your department and you in the overseeing of the project would have been responsible for. So one of them, for instance, is the, where we look at page 29 and we talked about the monitoring to ensure that the permit to work is being complied with. On the permit to work, on the same document I told you to keep open, you see where it says migration barrier to be used?

A. Yes.

Q. Right. So, if Houston had seen that the migration barrier was being removed, would he have had the responsibility to stop the job?

A. I can't answer for him.

Q. No, no. If. You don't know what he did but you are—he is your subordinate. He's the applicant. So as the applicant, if it is that the permit to work says the migration barrier is to be used and you see it, so if you were there and you saw it being removed, would you be res—

A. If—

Q. —would you be responsible—is it your duty in those circumstances to stop the job?

A. Yes, because if it's me—

Q. That's what I mean.

A. —on my behalf—

Q. Yes. Correct, yes.

A. If I saw the migration barrier was going to be removed—

Q. Yes.

A. —if it's not written in the permit to work system, that is a breach of our permit to work system.

Q. Okay. Did Houston at any point that day call you and indicate that any issues before the incident occurred or that anything was being removed that should not have been removed?

A. No.

Q. Was there anything—was—any site conditions had changed, nothing?

A. Nothing like that.

Q. Okay. And you were there—well, we—you hadn't personally seen this before so you can't say for sure what method statement was attached to it?

A. No.

Q. No. And also, if Mr.—if you were at the toolbox meeting, Mr. Majardsingh, according to the toolbox form, was the person who was at the toolbox meeting, would you agree with that, on the 25th of February?

A. I, I can't—

Q. You can't say?

A. —say.

Q. Okay. If you were—you were at the toolbox meeting on the 15th—

A. Yes.

Q. —would it have been, if you were there or would it have been Mr. Majardsingh's—would he have been response—should he, if he heard that a task was being discussed for that day to be done which was not in—authorized by the permit, to stop and say, you can't proceed with it?

A. Yeah.

Q. Yes.

A. Just, just say it over. If it's to be—

Q. Okay. So if it is that at the—

A. Yes.

Q. —at the—the applicant being Mr. Majardsingh in this circumstance—

A. Yeah, at the, at the toolbox meeting.

Q. —is at the toolbox meeting where the work to be done that day the work-plan is being discussed, and he—one of the things which are being discussed at that toolbox meeting is the something which is not planned for that day, or not authorized for that day, should he object, based on his function at the meeting?

A. I can't, I can't say for him either.

Q. No, well I'm talking about—

A. But generally, as long as it's not according to the permit to work rule, as long as it's not written in the permit, it is not allowed.

Q. It's not allowed.

A. You're not supposed to.

Q. You're not supposed to use—

A. Supposed to say so.

Q. Right. So the applicant, based on the permit to work system—

A. Yes.

Q. —should object?

A. Yes.

Q. Okay. Okay. So with respect to the incident on the 25th when it happened, how did you hear about it?

A. I was given a call—I was called—I was notified by phone.

Q. By—who notified you, do you remember?

A. The, um, assistant planner.

Q. And you were, you weren't on the compound?

A. I wasn't there.

Q. And you, um—did you come out?

A. Yes I did.
Q. You did. Okay. What time did you get to Paria?
A. I can't, I can't recall—
Q. You can't recall?
A. —exactly, but it's after the incident. I get to [*Inaudible*] by within a half an hour.
Q. You live nearby?
A. Yes.
Q. Do you know if the permits were pulled after the incident?
A. I heard it was. I I—
Q. So you heard?
A. —I wasn't.
Q. But you were not in the part of that decision?
A. I did not even know about that.
Q. Okay. But there was more than one permit would have—so it would have been individual permits for diving except for this, instance?
A. Yes.
Q. So if you had to—so you don't know the permits were pulled, you're saying that the permits—
A. I didn't know.
Q. You heard but you're not sure?
A. Yes.
Q. You were not part of that decision. Okay. You can—you want to just tell me what happened when you arrived?
A. It was a very emotional time, right? I actually start to cry in the lobby. You're not getting a break, especially with me because

the guys know I have—what I passed through from why I can't stop like that, I mean [*Inaudible*] it was very, very emotional first and then I think I just really came there to see what assistance I could give.

Q. Okay.

A. Right? The command team they were already organized.

Q. So you weren't part of the command team?

A. I wasn't—

Q. You were not part of the—

A. I was just there to assist—

Q. That's it?

A. —whatever I could have done.

Q. And you went out to berth 6?

A. I did go to berth 6, yeah.

Q. I see from Catherine Balkissoon's statement that you went out—

A. Or yes.

Q. —together with her?

A. I did right—yeah.

Q. How long were you on berth 6 for?

A. I think I stayed the night or the morning and just assisting or whatever I could do.

Q. You stayed until the morning?

A. Yeah, I think so, yes.

Q. Yeah?

A. Yeah. I can't remember the exact time I came off from—as I say it was so—yeah, like something happen and you're in kind

a this dream world kind a way, what, what happening. So I can't remember exactly what time I came off. I know I came off in the morning. I know I couldn't a sleep the rest of the day and then I kept—and I came back out the next day for the night shift.

Q. So when, when you, um, when you arrived at Paria before you accompanied Ms. Balkissoon, what was your understanding of what happened?

A. All I know is we couldn't find the divers.

Q. You couldn't find them?

A. Yes.

Q. Was there any discussion about where they could be at that point?

A. I didn't [*Inaudible*].

Q. You did not?

A. I was concerned where the guys were—

Q. Okay.

A. —and what happened.

Q. So you went, so you went into berth 6?

A. Yeah.

Q. And when you arrived there can you just talk me—talk us through if any—what you would have seen or heard?

A. Well we were—when we was going there we were, um, on the base, um, we were notified that one of the guys came out.

Q. Right.

A. And we headed offshore and, um, we had issues to get to access the platform and stuff like that.

Q. To?
A. To, to get on to the platform itself.
Q. You mean the berth?
A. The berth, sorry.
Q. How come, why were there issues?
A. They had boats parked up alongside and we had to jump across and stuff like that, so the boat could not have gone alongside and, um, it was a very, very sad moment. Everybody solemn, nobody talking much, everybody's head down and it was not—nothing. That's basically what I could remembered.
Q. And you—did you speak to any LMCS people when you got there?
A. Not really, no.
Q. You didn't speak to anybody?
A. Not really.
Q. Did anybody—did any of them come to you and speak to you?
A. Well the normal parts to make sure that the compressor running and thing and supplying the air, those kind a things, but we didn't discuss anything about the incident or anything like that.
Q. You didn't?
A. I didn't want to—for mihself personally I didn't really want to, um, to get—divulging what happened and how, how it is and whatnot.
Q. Did—do you know—did you see or observe when you got any, any, um, any discussions about a rescue plan by LMCS?
A. No, I was just really concerned about the air compressor running.

Q. Okay.
A. I didn't get involved in that. All of those commands was—were—was—came—
Q. When you got there, where were you stationed? When you got there, where were you mostly?
A. On the barge.
Q. So you were—were you with the other Paria people or—
A. Intermittently.
Q. Intermittently?
A. Yes.
Q. So you were aware, you're aware or privy to any—were you there when any discussions were happening between Paria and LMCS?
A. Not really. They were, they were doing that on their side.
Q. So you're not aware of any—
A. Yeah.
Q. —of any, any discussions between LMCS—
A. I really didn't want to get involved. As I said and what I've been through, I didn't want to hear anything like that.
Q. When you got there, did you observe any LMCS people in the water?
A. I can't tell if there was LMCS or other people but I—
Q. But there were people in the water?
A. There were some people in the water doing—all right.
Q. And do you remember how long they were in the water for, no? Um, any observations in respect of the coast guard that you saw? Were the coast guard there?

A. I remember seeing the coast guard.
Q. You remember seeing them?
A. Yeah, but I can't remember how many guys. I just—it's like a blur. You just can't—
Q. Did you hear any conversations between the coast guard or LMCS or Paria that you could assist with?
A. Um-um.
Q. No?
A. No.
Q. No?
A. It was a very somber kind a hazy kind a feeling that you know the guys there and—and I know the guys pretty well, you know, we had a very good work relationship. I just kind a turned off about what happened.
Q. But you—okay, so you weren't necessarily part of the, the, the, the, the Paria team that was there—
A. No.
Q. —um, communicating with the IMT or just, or, or, or—
A. I had no, no, um—
Q. No role in that?
A. I was just there just to lend some services basically what we wanted, the compressor.
Q. Okay. And was there—what services did you give in respect of the compressor?
A. Just make sure it have enough fuel.
Q. Yeah? Let me just look at my notes a bit. Did you observe anybody from LMCS being told that they couldn't dive into the

pipeline?

A. I couldn't inform—

Q. Nothing like that? Okay. Fine. Okay, so I have one last question for you. Had you seen the OSHA preliminary reports in this matter?

A. No. Part of my psychiatrist doctor report—

Q. Uh-huh.

A. —was—some of the—

Q. Not to—not—

A. Not look at things, get off of social media, don't look at the news and do things, so I really don't, don't know what the OSH had. I didn't look at the statement. I don't know.

Q. Okay. Well, there's just, there's just one, one observation in relation to your—to the planning of the scope of work and one of it was that—I'm just going to get it for you. Let me just get it. I just want to hear your comment and response to it, right? They state it here, just in respect of you, the only thing that I've seen on this—well, here, is that the applicant for the permit, Paria planner, Mr. Terrence Rampersadsingh, stated that he does not have experience in offshore subsea maintenance work. Do you want to comment in relation to that?

A. I can't say why he would, um, would say that. I don't know if he asked the question wrong and I answer him—

Q. Right.

A. —wrongly or, or what. I, I don't know. I don't know why he—why he—

Q. So based on what you told me, you had had—you did have

previous experience—

A. Those are the—

Q. —with Paria?

A. What you described.

Q. What you described and then the 2020 job?

A. Yes.

Q. Okay. I don't have any further questions.

Ms. Maharaj: Gretel, you wanted to clarify anything?

Ms. Baird: Um, no, no. I'll wait to see the transcript and then—

Q. Let me just have a quick look here. [*Pause*] Do you have anything else you want to add, that you want to say?

A. No, I'm okay. I appreciate it come and meeting me here like this.

Q. Right.

A. You've been a big help.

Q. All right. Let me just get Ms., um—

Interview concluded.