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CAUSE NO. 05CV0337

MIGUEL ARENAZAS, ELIZABETH) IN THE DISTRICT COURT
RAMON, DAVID G. CROW and)
JUANITA G. CROW, et al.)
VS.) 212TH JUDICIAL DISTRICT
BP PRODUCTS NORTH AMERICA)
INC., B.P. CORPORATION)
NORTH AMERICA INC., DON)
PARUS, AND JE MERIT)
CONSTRUCTORS, INC.) GALVESTON COUNTY, TEXAS

CAUSE NO. 05CV0337-A

IN RE: BP AMOCO EXPLOSION) IN THE DISTRICT COURT
MARCH 23, 2005)
COORDINATED DISCOVERY) 212TH JUDICIAL DISTRICT
PROCEEDINGS)
GALVESTON COUNTY, TEXAS

ORAL DEPOSITION OF

LORD JOHN BROWNE

APRIL 4, 2008

1
2 ORAL DEPOSITION OF LORD JOHN BROWNE, produced as
3 a witness at the instance of the Plaintiffs and duly
4 sworn, was taken in the above-styled and numbered
5 cause on April 4, 2008, from 10:36 a.m. (CST) to
6 11:45 a.m. (CST), before Stephanie Barringer,
7 Certified Shorthand Reporter in and for the State of
8 Texas, reported by stenographic means at the office
9 of Riverstone, 3 Burlington Gardens, London W1S, 3EP,
10 6th Floor, pursuant to the Texas Rules of Civil
11 Procedure, per Rule 11 agreement and the provisions
12 stated on the record or attached hereto.

13 Since this deposition has been realtimed and you
14 may be in possession of a rough draft form, please be
15 aware that there may be a discrepancy regarding page
16 and line numbers when comparing the realtime draft
17 and the final transcript. Also, please be aware that
18 the realtime screen and the unedited, uncertified
19 rough draft transcript may contain untranslated
20 steno, a misspelled proper name and/or nonsensical
21 English word combinations. All such entries are
22 corrected in the final certified transcript.

23
24
25

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EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
1	Notice of Deposition	22
2	Letter dated 3/12 addressed to Brent Coon from Steve Fernelius	22
3	Curriculum Vitae	22
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12	Email from Jack Berry, Subject: Safety Performance Alert!	49
13	Document entitled, "Examples of Report Language to Avoid."	55

1 THE REPORTER: Could counsel
2 please state who is present?

3 MR. COON: Brent Coon and Eric
4 Newell for Plaintiffs.

5 MR. FERNELIUS: Steve Fernelius
6 and Jim Galbraith are counsel by telephone for BP.

7 MR. COON: That's all here.
8 London?

9 MR. DENNY: Stephanie is here.
10 This is Otway Denny for BP.
11 Lord Browne is next to me. Peter Bevan and Gary
12 Hodgson, in-house with BP, are also sitting in. So
13 that's it.

14 MR. COON: Let's preface this
15 deposition with a little salutation.

16 THE WITNESS: Good afternoon. My
17 legal name is Lord Browne of Madingley, but I am
18 commonly known as John Browne. And you can call me
19 John Browne or Mr. Browne, whichever suits you.

20 MR. COON: It's your preference.
21 It's your deposition. So you tell us if you want
22 to be referenced as Lord Browne or John Browne.

23 THE WITNESS: John Browne or
24 Mr. Browne.

25 MR. COON: Very -- very well. We

1 will go by Mr. Browne.

2 And do you guys have a copy of the
3 documents there, Otway?

4 MR. DENNY: She's got her box and
5 she will show them to us and then we'll show them
6 to the witness.

7 MR. COON: Fair enough.

8 And we have -- I guess we will
9 start out then with swearing the witness under
10 oath.

11 THE REPORTER: Okay. Sir, could
12 you raise your right hand --

13 MR. FERNELIUS: Yes, and just as a
14 logistical act, Brent, should we have --

15 Stephanie, are you in a position
16 to keep the time?

17 THE REPORTER: Yes.

18 MR. DENNY: Yeah, she will keep
19 the time on the record.

20 MR. FERNELIUS: Great.

21 MR. DENNY: Okay.

22 THE WITNESS: (Raises right hand.)

23 THE REPORTER: Do you solemnly
24 swear that the testimony you are about to offer
25 will be the truth, the whole truth and nothing but

1 the truth so help you God?

2 THE WITNESS: I do.

3 THE REPORTER: He's sworn.

4 MR. COON: Okay.

5 LORD JOHN BROWNE,

6 having been first duly sworn, testified as follows:

7

8 EXAMINATION

9 Q. (BY MR. COON) Good evening, Mr. Browne.
10 This is Mr. Coon. We are talking to you from
11 Houston.

12 Do you understand that we are
13 taking your deposition via teleconference today?

14 A. Yes, I do.

15 Q. And you've had an opportunity to meet
16 with counsel prior to your deposition today and you
17 have some of those counsel in attendance at the
18 deposition with you there in London; is that
19 correct?

20 A. That's correct.

21 Q. Because we are in Texas talking to you by
22 telephone, there may be some communication issues
23 during the course of the transcript. I also have a
24 tendency to talk fast which may be even further
25 expedited due to the time constraints of your

1 deposition today.

2 So if you don't understand the
3 question, please let us know; and we will be happy
4 to rephrase. It's very important that you
5 understand the questions because we will be relying
6 upon the answers that you give.

7 Fair enough?

8 A. Very good. I understand that. Thank
9 you.

10 Q. Also, Mr. Browne, with your attorneys in
11 attendance, you have the right to consult with them
12 during the course of the questioning today; and
13 feel free to do so. Just let us know in advance.

14 Fair enough?

15 A. Thank you very much.

16 Q. And also, sir, it helps to continue to be
17 as responsive as you have been so far; and that is,
18 answer out loud, answer orally as opposed to nods
19 of the head and if you can, sir, please be as
20 directly responsive to the questions as you can.
21 If they are simply "yes" or "no" questions, you may
22 be able to answer in such a capacity and that will
23 further expedite the process today.

24 If you feel like you need to
25 elaborate on certain other issues, your counsel at

1 the end of inquiry will reserve the opportunity to
2 do so.

3 Fair enough?

4 A. Very good. I understand that.

5 Q. Okay. And, Mr. Browne, do you have any
6 health issues? Are you under any medications today
7 that would inhibit your understanding of the
8 questions or your capacity to answer?

9 A. No.

10 Q. And, Mr. Browne, have you given testimony
11 before in either this matter -- do you understand
12 we are deposing you principally regarding the
13 explosion that happened in Texas City in March,
14 2005? Have you given testimony in that capacity
15 before, sir?

16 A. No, I haven't.

17 Q. Have you given testimony in a court of
18 law before under any circumstances?

19 A. I have.

20 Q. Can you tell me how many times in the
21 past, sir?

22 A. Very few. I think in a court of law I
23 have given testimony, or by way of deposition, in a
24 civil case about two or three years ago here in
25 London. It was an American case, but it was done

1 in London. And before that, I think many years ago
2 in America.

3 Q. And what was that civil case you just
4 referenced, sir?

5 A. It was something --

6 Q. What was that about?

7 A. It was something to do with
8 discrimination.

9 Q. That was some sort of discrimination
10 charge against you personally or against the
11 organization you worked for?

12 A. It was against, actually, one of the
13 subsidiaries of the BP Group.

14 Q. And where was that claim pending, sir?

15 A. I can't actually remember, Mr. Coon. I
16 am sorry. I -- somewhere in America, but I can't
17 actually remember which jurisdiction in America.

18 Q. And, sir, have you testified outside a
19 court of law via a deposition or affidavit on any
20 other circumstances?

21 A. I have given -- I have made a statement
22 under -- in an English case, which was a private
23 case that I was involved in over a year ago.

24 Q. Did that involve the tabloids over there,
25 sir?

1 A. It involved the Associated Newspaper
2 Group.

3 Q. Yes, sir.

4 Was that the one involving Justice
5 Eady?

6 A. That's correct.

7 Q. Okay. And you testified in that case via
8 affidavit or by affidavit; is that correct?

9 A. I don't believe it is. It was a
10 statement and I don't believe it has a class of an
11 affidavit, but I am not a lawyer. It's best to
12 check with a British lawyer.

13 Q. Yes, sir.

14 And I believe you also have
15 provided, I believe, an affidavit in this
16 particular case, that being the case we're here to
17 depose you on, and that was regarding our earlier
18 efforts to depose you.

19 Do you recall giving an affidavit
20 in that circumstance?

21 A. I do recall -- I do recall an affidavit,
22 but I don't recall its substance I am afraid.

23 MR. COON: And, Gentlemen, we have
24 not discussed this prior to the deposition; but we
25 would ask that the witness today -- based on past

1 issues associated with his testimony, he would read
2 and sign.

3 Can we have that agreement?

4 MR. DENNY: We have already asked
5 Stephanie and told her we would do that.

6 Q. (BY MR. COON) Mr. Browne, have you been
7 asked to testify in front of any of the U.S.
8 Congressional investigations associated with BP?

9 A. I think I have. I think a -- requests
10 have come in some time ago, but I did not do it
11 because the president of BP America did it in my
12 stead.

13 Q. Would that be Mr. Malone?

14 A. That was Mr. Malone and I think prior to
15 him, Mr. Pillari.

16 Q. Okay. Are there any present outstanding
17 requests by any U.S. Congressional committees for
18 you to attend and testify?

19 A. Not to my knowledge.

20 Q. Mr. Browne, could you give us your full
21 vested title, please, sir?

22 A. My full title at the moment?

23 Q. Yes, sir.

24 A. I am Edmund John Phillip Browne, the Lord
25 Browne of Madingley. I am also entitled to this --

1 the address, the "Right Honorable" and the suffix,
2 "Knight."

3 Q. And is that a title vested by the queen,
4 sir?

5 A. It is.

6 Q. Congratulations. I take it that's rather
7 an honor?

8 A. Thank you.

9 Q. Do you -- do you have any nicknames, sir?

10 A. I don't.

11 Q. Well, I bring that up because I had the
12 opportunity to read some of the voluminous articles
13 in the general press about you, and one is the "Sun
14 King."

15 Have you been known to be called
16 the "Sun King" before?

17 A. I think the newspapers -- I believe the
18 Financial Times used that some time ago; but
19 nobody, I think, uses it, certainly to my face, and
20 I don't regard it as a nickname.

21 Q. Okay. Did you have any understanding or
22 reference as to why you were called the "Sun King"
23 in the press?

24 A. I think -- I have no idea, of course.
25 You would have to ask the authors of that article.

1 Certainly there was a photograph
2 of me appearing in front of the BP logo, which,
3 when half obscured with a body, looks like a sun
4 with rays.

5 Q. Fair enough.

6 And, Mr. Browne, you also, I
7 understand, had some detractors in your profession,
8 have you not, sir?

9 A. I expect, sir.

10 Q. And a nickname that I have seen from some
11 of your detractors is "Elf."

12 Are you familiar with that?

13 A. No, I have never actually heard it.

14 Q. The first time that you have heard that
15 anyone -- any of your detractors had referenced you
16 as Elf, E-l-f?

17 A. That's correct. I don't believe I have
18 ever heard that referred to me.

19 Q. Fair enough.

20 Any other nicknames that you
21 have -- that you recall ever being known by either
22 from friends or your associates?

23 A. No, I can't recall; and I don't think I
24 have been referred to with a nickname.

25 Q. Okay. And I take it you have no aliases.

1 Fair statement?

2 A. I have no aliases. That's correct.

3 Q. Mr. Browne, I need to go briefly back
4 into your other background as well.

5 Do you have any brothers or
6 sisters, sir?

7 A. I have no brothers and no sisters.

8 Q. And you are still unmarried; is that
9 correct?

10 A. I am still not married. That is correct.

11 Q. You have a secretary, Sarah Paynter; is
12 that correct?

13 A. That's correct.

14 Q. Is she still your secretary, sir?

15 A. Yes, she is.

16 Q. And your personal assistant, is that
17 still Fezzani Reyad?

18 A. No. Those -- that man -- that gentleman
19 works for BP and is with BP.

20 Q. Okay. Do you have a personal assistant
21 at this time?

22 A. No, I do not.

23 Q. How long has Sarah been with you, sir?

24 A. I think about nine -- eight to nine
25 years, I think. I can't recall exactly when she

1 started.

2 Q. And do you still have a butler?

3 A. And I still have a butler. Yes, I do.

4 Q. And your chauffeur, sir?

5 A. No, I have a different chauffeur.

6 Q. Okay. On occasions in the past, with
7 these persons who are close to you, on some
8 occasions, have you ever discussed BP business?

9 A. No. Well, obviously with Sarah Paynter
10 when she was an employee of BP, she was aware of a
11 lot of business because she dealt with
12 correspondence and e-mails and meeting minutes,
13 filing and so forth; but with the other people, I
14 don't discuss BP business.

15 Q. And, Mr. Browne, with respect to your
16 other social acquaintances, in reviewing some of
17 the media articles and stuff, just trying to read
18 up about you some, it appears that you have a
19 rather broad spectrum of social and other personal
20 friends.

21 Would that be a fair statement?

22 A. Yes. Yes, I think you get to know a lot
23 of people in -- I am 60 years old, and so obviously
24 I know a lot of people.

25 Q. And I take it that you had occasion to

1 socialize with the numerous celebrities around the
2 world. I've seen where you are friends with Elton
3 John and Gwyneth Paltrow and Hugh Grant and others?

4 A. I don't regard those as friends. I have
5 been acquainted with them. I have met them.

6 Q. Have you had occasion to, for instance,
7 visit Elton John's home --

8 A. No --

9 Q. -- as his personal guest?

10 A. -- I have met -- I have been inside his
11 apartment in Venice once.

12 Q. Mr. Browne, who do you reside with now,
13 sir? Anyone?

14 A. I am sorry?

15 Q. Do you have any -- do you take residence
16 up with anyone at the present time?

17 A. Yeah, someone is living with me. That is
18 correct.

19 Q. Who would that be, sir?

20 A. His name is Mr. Neen Haguin (phonetic).

21 Q. And are you at liberty to discuss with us
22 the nature of that relationship, sir?

23 MR. DENNY: Brent, frankly, I
24 think that's getting a little personal; and I
25 would --

1 MR. COON: That's fair enough.

2 MR. DENNY: -- I would instruct --

3 MR. COON: I am looking for
4 support --

5 MR. DENNY: -- him not to answer.

6 MR. COON: That's fine. Just
7 looking for witnesses.

8 Q. (BY MR. COON) You know, Mr. Browne, we
9 understand about your relationship with
10 Mr. Chevalier -- and I am not intending here today
11 to go into a lot of depth there -- but he had a
12 number of things to say about you to the press in
13 issues associated with the BP explosion. So I feel
14 that we are compelled to bring that up to some
15 degree today. Okay, sir?

16 A. (No verbal response.)

17 Q. When is the last time you talked to
18 Mr. Chevalier?

19 A. Gosh, I think it must be well over a year
20 ago.

21 Q. I had the opportunity to talk to him here
22 in Houston, sir. Were you aware that he has come
23 to Houston to talk to the attorneys in this case?

24 A. No, I wasn't aware of that.

25 Q. Do you blame him at all for your

1 resignation at BP, sir?

2 A. I think I have said all I have said about
3 this. I resigned from BP because I thought it was
4 the right thing to do at the time.

5 Q. Mr. Chevalier has related to us and the
6 press that you talked to him about BP matters.

7 Is that true?

8 A. I expect I did talk to him in the most
9 general terms about BP matters.

10 Q. Have you ever spoken to U.S. political
11 officials regarding BP matters?

12 A. I believe, yes, I have. I mean, I have
13 spoken to, amongst other people, the Secretary of
14 Energy and the Secretary of State and staff members
15 of Congressmen and Senators and so forth.

16 Q. Yes, sir.

17 Have you had the opportunity to
18 discuss BP related matters with our president?

19 A. I have.

20 Q. George Bush?

21 A. I have.

22 Q. Or the vice president, Mr. Cheney?

23 A. Yes, with both people I have discussed
24 different degrees of generality of BP matters with
25 them.

1 Q. Okay. And did you also discuss those
2 matters with other foreign dignitaries, such as
3 those in other countries, in Asia, Indonesia, and
4 elsewhere?

5 A. Yes. As -- as relevant to the matters at
6 hand.

7 It's a very general question; and
8 I will give you a very general answer, which is
9 "Yes, it's relevant."

10 Q. Have you ever discussed with U.S.
11 officials anything associated with the BP
12 explosion?

13 A. No, I don't believe I have.

14 Q. Have there been any efforts made, or
15 discussions, with the possibility of setting up an
16 arrangement where you would discuss the BP
17 explosion with any U.S. officials?

18 A. Not to my recollection.

19 Q. When, sir, would have been the last
20 occasion that you would have talked to our
21 president or vice president?

22 A. I think I spoke to the vice president --
23 I can't actually remember, but it must have been a
24 year -- well over a year -- a year -- well over a
25 year and a half ago or maybe over a year ago.

1 I think I only saw the president
2 once and it was several years ago and I haven't
3 seen him since then.

4 Q. Mr. Browne, would you consider any of our
5 present U.S. elected officials friends of yours?

6 A. I always regard elected officials as
7 elected officials. I don't make friendships in
8 that -- in the way I would regard friendships, but
9 I make acquaintance with them.

10 Q. What about with respect to the U.K. or
11 British officials such as Mr. Blair, Prime
12 Minister Blair? Do you have a relationship with
13 Mr. Blair?

14 A. As prime minister, I believe I had a very
15 business-like relationship with him and other
16 members of the cabinet and members of the
17 opposition as well.

18 Q. And did you ever discuss any of the BP
19 explosion matters in Texas City with U.K.
20 officials?

21 A. I don't believe I did. Nothing of
22 substance at all other than, I think, to note that
23 it had occurred and how sad we were about the
24 tragedy.

25 Q. To your recollection today you were not

1 ever asked by any UK officials to visit with them
2 regarding what happened in Texas City?

3 A. No, I don't believe so. I can't recall
4 such an occasion.

5 Q. Mr. Browne, we had a copy of what was
6 remitted to us recently as a CV.

7 MR. COON: And, Stephanie, I am
8 going to ask if you would please mark Exhibits 1
9 and 2 to the file, which are the deposition notice
10 and the March 12th letter from Steve to myself.

11 MR. DENNY: Do you want me to hand
12 him 1 first, Brent, or the CV?

13 MR. COON: I just need those for
14 the record. If we can just mark 1 and 2; 3 is
15 going to be his CV.

16 (Exhibits 1 through 3 marked for
17 identification.)

18 MR. DENNY: Okay.

19 MR. COON: We can have that marked
20 and have him just identify it and confirm it's
21 accurate.

22 MR. DENNY: All right.

23 THE WITNESS: What do I do?

24 MR. DENNY: Oh, I assume he wants
25 you to identify what Exhibit Number 1 is.

1 A. It is.

2 Q. And that is a holding company that is
3 associated with The Carlyle Group, is it not, sir?

4 A. Carlyle is a shareholder in the company.

5 Q. I believe George Bush, Sr., is a
6 shareholder in The Carlyle Group, is he not, sir?

7 A. I don't know, I am afraid.

8 Q. Do you know something about the
9 shareholders in The Carlyle Group, sir, that you
10 work for?

11 A. Well, we don't work for The Carlyle
12 Group. The Carlyle Group is a shareholder in
13 Riverstone Holdings, L.L.C., and I am the managing
14 partner of Riverstone Holdings, L.L.P., which is
15 owned by the L.L.C.

16 Q. Yes, sir.

17 And if you go to the Carlyle
18 website, you can see the list of their locations
19 around the world; and one of them that they,
20 interestingly, list is Riverstone.

21 Do you know why that would be?

22 A. I don't know. I haven't seen their
23 website.

24 Q. Okay. Do you know some of the
25 shareholders in The Carlyle Group, sir?

1 A. I know the -- I met, several times, the
2 founders, Mr. Dan D'Aniello, Mr. David Rubenstein
3 and Mr. Bill Conway.

4 Q. Okay. Do they actually pay your check or
5 do you operate off profits of Riverstone itself?

6 A. We operate quite separately from Carlyle.

7 Q. Do you draw a salary or is it operating
8 off of profits?

9 A. I draw a salary, but also profits.

10 Q. And Riverstone works in conjunction with
11 Carlyle as a partner, correct?

12 A. From time to time.

13 Q. And how was it that you acquired the
14 position with Riverstone, sir?

15 A. I was invited to come and discuss with
16 them the possibility of having a position with them
17 and I concluded it was a good thing to do.

18 Q. And who were the representatives that
19 invited you in, sir.

20 A. Mr. David Leuschen and Mr. Pierre
21 Lapeyre.

22 Q. Did Mr. James Baker have anything to do
23 with that, sir?

24 A. None at all.

25 Q. You know who our former Secretary Baker

1 is, don't you, sir?

2 A. I am very aware of Mr. James Baker; and,
3 no, he has nothing to do with Riverstone.

4 Q. Mr. Baker is, in fact, a shareholder in
5 Carlyle, is he not, sir?

6 A. I don't know, I am afraid.

7 Q. Do you have any understanding of his
8 relationship with Carlyle, sir?

9 A. No, I don't.

10 Q. Did you know he was associated with
11 The Carlyle Group?

12 A. No, I didn't.

13 Q. Are you not aware that he was a legal
14 advisor to Carlyle Group?

15 A. I was not aware of that.

16 Q. Okay. Now, Secretary Baker was the
17 person who headed up your independent investigation
18 for the explosion, was he not, sir?

19 A. He was indeed.

20 Q. Did you have anything to do with his
21 selection into that position, sir?

22 A. I telephoned him to invite him to take
23 the position.

24 Q. And why was it that you chose
25 Secretary Baker to lead the investigation, sir?

1 A. Well, the choice wasn't wholly BP's. It
2 was in discussion with the Chemical Safety Board
3 and I have forgotten who else.

4 He was one of several people being
5 looked at as a man of considerable standing to
6 undertake that investigation.

7 Q. Fair enough.

8 Mr. Baker -- but, you know, I know
9 Don Holstrom. He is a friend of mine who led the
10 investigation, and he had nothing to do with
11 picking Secretary Baker for this.

12 So you are not saying the CSB
13 steered you to Mr. Baker, are you, sir?

14 A. I don't know. I think there were
15 discussions in the staff. That was what actually
16 happened.

17 Q. Okay. Well, Secretary Baker is the one
18 that you knew prior to your assistance in selecting
19 him to head this investigation?

20 A. I certainly knew him in advance of that.
21 I had dealings with him, and I found him a very
22 proper and correct person.

23 Q. Okay. Now, Secretary Baker also had his
24 own institute at the time, did he not?

25 A. I am not -- I am not sure. I mean, I --

1 the answer is I don't quite know.

2 Q. You are not aware of something called the
3 Baker Institute?

4 A. I was aware of the Baker Institute. I
5 don't quite know what it does.

6 Q. Okay. Were you aware -- I know John
7 Manzoni was a man at BP that he reported to you at
8 the time of the BP explosion, was he not?

9 A. Yes, he was.

10 Q. And he was someone who directly reported
11 to you in the chain of command, didn't he, sir?

12 A. He did.

13 Q. Were you aware that Mr. Manzoni chaired
14 Mr. Baker's energy task force within that
15 institute?

16 A. No, I wasn't.

17 Q. Are you aware of any of Mr. Manzoni's
18 dealings with Secretary Baker in the institute?

19 A. No, I wasn't.

20 Q. Had you known that Mr. Manzoni already
21 had a prominent position with Secretary Baker's
22 institute, would you have avoided selecting
23 Mr. Baker out of concerns of an appearance of
24 conflict of interest?

25 A. It's a little hypothetical because I

1 didn't know; but I -- my procedure would have been
2 to examine the facts as they were and make a
3 judgment determination at that time.

4 Q. I appreciate that, Mr. Browne; but you
5 understood that there would be scrutiny associated
6 with the investigation in such an important matter,
7 didn't you, sir?

8 A. Absolutely.

9 Q. And certainly you would want for the
10 public to believe what the Baker report contained
11 for the general public to have some reasonable
12 belief that Mr. Baker was fair and open-minded in
13 his investigation, wouldn't you, sir?

14 A. I absolutely would and I believe that
15 all -- all steps were taken to make sure that that
16 was actually the case.

17 Q. Okay. Well, you understand why some
18 people here in the States would be suspicious of
19 the candor of the Baker report if, in fact, BP had
20 prior dealings with Secretary Baker.

21 You would understand that,
22 wouldn't you, sir?

23 MR. DENNY: Objection, form.

24 Go ahead. You can answer it.

25 A. I think -- let me try and analyze this by

1 bit.

2 I think in one life, of course, it
3 was not possible to find -- well, I would imagine
4 it's not possible to find anyone who has done
5 nothing -- has absolutely done nothing with BP.
6 The question is one of degree, and the question
7 then is one of continuing relationships and the
8 questions, I think, of one's putting the right
9 procedures and practices in place to make sure that
10 independence is preserved and there is no undue
11 influence.

12 Of course, I --

13 Q. Sir --

14 A. -- I fully recognize that almost
15 regardless of what you do, if you have a viewpoint
16 that an investigation is not independent, then
17 indeed you will always maintain that viewpoint.

18 Q. Yes, sir.

19 And speaking of independence and
20 the degree of independence that's reflected, we do
21 know that Secretary Baker is an attorney and
22 partner at a law firm in Houston that does business
23 with BP, correct?

24 A. That, I am not sure of. I believe it had
25 done business with BP prior to the activity of the

1 inquiry, but it did not do business with BP during
2 the inquiry. What happened -- what it's doing now
3 after I have left BP, I don't know.

4 Q. Did you personally talk to
5 Secretary Baker regarding the course of the
6 investigation?

7 A. No. I talked to him on appointment, and
8 then I talked to him as chairman of the inquiry
9 panel when I spoke to the panel twice. I have gave
10 evidence to them twice, I believe. Twice. Yes, it
11 was twice.

12 Q. And could you summarize what it was that
13 the panel inquired of you?

14 A. They were quite extensive periods of time
15 I was with the panel. I think one was about three
16 hours long; and the other one was, I can't
17 remember, maybe two hours long, covering a variety
18 of management issues to do with the company and its
19 values. And I really can't remember the detail.
20 It was such a long time ago, I am afraid.

21 Q. Have you had any conversations with
22 Secretary Baker since the publication of the Baker
23 report?

24 A. No, I haven't.

25 Q. Don't you agree, sir, that when a

1 high-ranking officer, such as Mr. Manzoni, at BP,
2 is chairing the lead investigator's personal and
3 private task force at the time it's conducting the
4 investigation, that creates some appearance of a
5 conflict of interest?

6 MR. DENNY: Objection, form.

7 A. I don't believe that I can judge that
8 because as I have said, I -- first, I wasn't aware
9 of the facts. I would have to examine the facts.
10 And secondly, I believed -- certainly I believed at
11 the time, and I still believe, that the task force
12 of the inquiry panel was very independent.

13 Q. (BY MR. COON) Did you ever have any
14 personal discussions with Mr. Baker outside of
15 those where there were a broader -- a broader
16 audience of the panel there?

17 A. Not so -- I don't believe so. I can't
18 remember any conversations like that.

19 Q. Mr. Browne, who would you consider your
20 closest business associates at this time?

21 A. Right now? Mr. --

22 Q. Yes, sir.

23 A. -- David Leuschen and Mr. Pierre Lapeyre
24 and Mr. Michael Hoffman.

25 Q. And those three, could you tell me what

1 each one of them do and your relationship with
2 them?

3 A. I can tell you what they do. They are
4 residents of New York City. That's where -- the
5 place of business. They are the three senior
6 partners, two founding partners and one of the most
7 senior partners in Riverstone Holdings.

8 Mr. David Leuschen and Mr. Pierre
9 Lapeyre founded the firm. They were formerly
10 partners of Goldman Sachs.

11 Mr. Michael Hoffman has been with
12 the firm for a very long time -- well, in relative
13 terms. The firm was only founded, I think, in the
14 year 2000. And prior -- previously being with
15 Blackstone and previously with several other
16 investment banks. Mr. Hoffman and I co-head the
17 renewables and alternative energy fund, Fund
18 Number 2; but we also participate in all the
19 activities of the firm.

20 Q. And did you know this gentleman through
21 your relationship as a former director at Goldman
22 Sachs, sir?

23 A. No, I didn't. They had actually left
24 Goldman Sachs almost the moment I became director
25 of Goldman Sachs.

1 Q. Okay. You were a director at Goldman
2 Sachs from 1999 to 2007 according to your resume;
3 is that correct?

4 A. That is correct. I would say since they
5 found this firm in the year 2000, I think it was,
6 they -- obviously that's pretty well immediately as
7 I joined the board.

8 Q. And you resigned from your position in
9 2007; is that correct?

10 A. That's correct. That's correct.

11 Q. And what was -- what was the basis of
12 your resignation, sir?

13 A. I resigned on the -- for the same reason
14 I resigned from BP. It was an appropriate thing to
15 do given the facts and circumstances of the case
16 with Associated Newspapers.

17 Q. And, Mr. Browne, there was also a
18 director position with Intel Corporation from 1997
19 to 2006.

20 What was your basis for
21 resignation with that position?

22 A. Now, that was different. That was
23 because there was too much travel involved, and it
24 was traveling to -- to discharge the activities of
25 a director, I had to travel to the West Coast of

1 America from London six to eight times a year and
2 that was just getting too much for me.

3 Q. Mr. Browne, in the five-year period -- I
4 am going to say from the time that you left BP, the
5 five years prior to that time, who would have been
6 the person that you would have been most
7 comfortable talking to about issues associated with
8 your job?

9 A. Well, it varied with time. Obviously my
10 deputy --

11 Q. Sir, we are talking about the 2002 to
12 2007 time frame. So if you need to go year by
13 year, that's fine as well.

14 A. Yes. Forgive me. I will get the dates
15 mixed up. But obviously my deputy, Rodney Chase,
16 who was with me for many years. I obviously talked
17 to him extensively. And my deputy, Richard Bolvock
18 (phonetic), I also spoke to him extensively.

19 Q. I am sorry, sir. What is the deputy?

20 A. The deputy chief executive officer of BP.
21 That's the Number 2 person.

22 Q. Yes, sir.

23 A. So they were very close to me. And I
24 discussed matters with the chairman of BP,
25 Mr. Peter Sutherland; and with Dr. David Allen, the

1 head of planning; Mr. Dick Balzer, a consultant
2 with the company; Mr. Ian Davis, the head of
3 McKinsey; with my direct reports; with the general
4 counsel, Peter Bevan.

5 I didn't have one person in
6 particular that I would discuss everything with.

7 Q. How often would you meet with
8 Mr. Manzoni?

9 A. I would meet with him, of course, at the
10 regularly scheduled GCE's meetings, which happened
11 usually every two weeks, sometimes more frequently,
12 depending on activity.

13 I would meet him during the
14 various committee meetings that we had to review
15 investments, to review investor relations, to
16 review personnel. We had quarter -- two-day -- up
17 to two-day quarterly business review for the whole
18 of the refining and marketing segment; and I would
19 meet him then. And then I would meet him -- when
20 matters would arise, my door was always open for my
21 direct reports.

22 Q. Mr. Browne, after the merger of BP/Amoco
23 in 1998 and 1999, there were a number of budget
24 cuts that emanated from London to the refining
25 sector here in the States.

1 You are aware of that, are you
2 not, sir?

3 A. I am certainly aware of the budget
4 cuts -- well, the cost cuts which were for the
5 group as a whole.

6 Q. Yes, sir.

7 And it's my understanding in
8 reading documents that these came from the highest
9 level of BP P.L.C.; is that correct?

10 A. Certainly. We had to look -- we had to
11 look at the company as a whole and on the basis of
12 benchmarks, which is comparing the cost performance
13 of the firm against others.

14 It was clear that without doing
15 anything particularly novel, it was necessary to
16 reduce costs to get it competitive with others and
17 to bring a degree of discipline into the management
18 of the firm. We did -- so we looked at that and
19 made a determination to reduce costs.

20 MR. COON: Object to the
21 responsiveness after "yes."

22 (Exhibit Number 4 marked for
23 identification.)

24 Q. (BY MR. COON) Mr. Browne, we have
25 Exhibit Number 4 that is called the Texas City

1 Business Unit Business Strategy document; and I
2 want to call your attention just to the third dot
3 on the first page when it talks about the merger.

4 It states that the senior
5 management team communicated strategy for the BP
6 Group. And the third dot says, "Reduce business
7 unit cash cost for the year 2001 by at least
8 25 percent from the year 1998 levels."

9 Do you see that, sir?

10 A. I do.

11 Q. And, in fact, that was a request or a
12 mandate that came from London as part of the merger
13 and acquisition of Amoco, isn't it, sir?

14 A. I don't believe that's what this piece of
15 paper says, and it wasn't actually done this way.
16 I believe these are the downstream strategies and
17 goals, not the group goals.

18 Q. Okay. Were you aware of any orders going
19 to any of the refineries in the United States after
20 the merger to cut their operational cost
21 25 percent?

22 A. No, I wasn't, not in detail at all.

23 Q. Okay. Have you ever been provided with
24 any of the lists of what the various individual
25 refineries were doing in response to requests to

1 reduce their budget after the merger?

2 A. Not to my knowledge. I can't remember
3 seeing such a list.

4 Q. Okay. Were you ever made aware of what
5 BP Texas City did in response to the budget
6 reduction requests out of London?

7 A. Not -- not to my knowledge.

8 Q. Were you aware that the plant manager at
9 Texas City initiated dozens of different
10 cost-cutting measures after receipt of this
11 request?

12 A. I wasn't aware of that.

13 Q. Were you ever made aware that they
14 reduced the maintenance spend at BP Texas City as a
15 result of that request?

16 A. No, I wasn't aware of that.

17 Q. Were you aware that they reduced their
18 staff operations in the control room at the ISOM
19 unit by 50 percent as a result of that request?

20 A. I wasn't aware of that.

21 Q. Were you aware that they curtailed, cut
22 back or completely killed a number of training
23 programs at BP Texas City as a result of that
24 request?

25 A. I wasn't aware of that.

1 Q. Have you ever been made aware of that up
2 until today, Mr. Browne?

3 A. I have been made aware of some of this
4 following the tragedy at Texas City.

5 Q. And how was it these things were called
6 to your attention, sir?

7 A. They were brought to my attention by
8 people talking about the context of Texas City and
9 in the light of the Baker panel analyses.

10 Q. Mr. Browne, when were you first
11 personally made aware that there may be some
12 problems at Texas City?

13 A. I -- I mean, I was never made aware
14 directly. I went down to Texas City and I can't
15 remember which year it was, but it was shortly
16 after the merger. And I was made aware of issues
17 to do with the so-called RHU, a very complex piece
18 of the plant that was designed by Amoco research,
19 and its reliability. That's about all I was
20 vaguely made aware of.

21 Q. Mr. Browne, did you know Paul Maslin?

22 A. I didn't know Mr. Paul Maslin.

23 Q. Have you been made aware of anything that
24 Mr. Maslin has testified to regarding this
25 investigation?

1 A. No, not to my knowledge. No.

2 Q. Okay. Mr. Maslin gave a deposition in
3 this case and his title at the time last year was
4 the head -- he was technology vice president for
5 refining in London.

6 Were you aware of that?

7 A. No, I wasn't.

8 Q. I take it you are not aware that he was
9 actually the plant manager at a refining facility
10 outside of London in a town called Corrington in
11 the late 1990s?

12 A. I am sorry. I wasn't aware of that.

13 Q. I take it you are not aware that he gave
14 deposition testimony in this case discussing the
15 budget cut that came to him in 1999 to the refining
16 sector?

17 A. I -- I wasn't aware of that.

18 Q. Did you know that Mr. Maslin, when he was
19 refining plant manager at Corrington, received a
20 budget cut request from Mr. Ford?

21 Did you know Mr. Ford?

22 A. I knew Mr. Ford. Mr. Ford worked for me,
23 reported directly to me. He was head of refining
24 and marketing immediately after the merger with
25 Amoco.

1 Q. And I take it that Mr. Manzoni
2 subsequently replaced Mr. Ford; is that correct?

3 A. That's correct.

4 Q. Mr. Maslin said that back in 1989
5 Mr. Ford held the position and the order to cut his
6 budget came from Mr. Ford.

7 Do you know anything about that?

8 A. I don't.

9 Q. He said that the 25 percent budget cut
10 request that was made by Mr. Ford was impossible to
11 meet.

12 Were you aware of that?

13 A. I was not aware of that.

14 Q. Mr. Maslin testified that it was
15 ridiculous to try to cut the budget at his plant.

16 Were you aware of that?

17 A. I was not aware of that.

18 Q. Mr. Maslin testified that there had been
19 a long period of downcycle in the energy sector
20 preceding the BP/Amoco merger.

21 Were you aware of that?

22 A. Yes, I was.

23 Q. He testified that as a result of that
24 downcycle in that sector that a lot of refineries
25 had already cut their operational budgets to the

1 bone prior to the merger.

2 Were you aware of that?

3 A. I wasn't aware of that.

4 I was aware that margins were very
5 weak in the refining sector for many years.

6 Q. Yes, sir.

7 Mr. Browne, when BP acquired Amoco
8 in 1999, as a result of the margins already being
9 tight for a number of years, was there an
10 understanding by high levels at BP that there may
11 have already been some significant reductions or
12 deferrals in the routine maintenance spend?

13 A. That, I don't recall.

14 I do recall having audits
15 generally of all the assets to make sure that they
16 were safe.

17 Q. Yes, sir. That's what I wanted to ask.
18 That hasn't been discussed a lot in the case.

19 What type of due diligence did BP
20 undertake in acquiring the refineries in the United
21 States to know what the condition was at the time
22 of purchase?

23 A. Well, we, of course, didn't -- we
24 acquired much more than the refineries in the
25 United States. The bulk of the acquisition was to

1 do with exploration and production activity
2 globally and there was quite a due diligence, but
3 it was relatively top down.

4 These being public companies with
5 extensive reporting and regulatory requirements, we
6 did, I think -- and I think -- I can't recall
7 now -- an audit of the regulatory compliance.

8 Q. Mr. Browne, did you ever hear about a
9 document called a good practice sharing assessment
10 or a Veba report coming from Texas City --

11 A. No, I didn't.

12 Q. -- around 2002?

13 A. No, I didn't.

14 Q. Were you aware that this was a document
15 that was shared with Mr. Manzoni in his position at
16 BP in 2002?

17 A. No, I wasn't.

18 Q. Were you ever made aware that this
19 outside consulting assessment ascertained that
20 there had been a decade of underinvestment in the
21 infrastructure at Texas City?

22 A. No, I wasn't.

23 Q. Were you made aware that there were
24 literally hundreds of millions of dollars of
25 deferred maintenance cost that accumulated at Texas

1 City as a result of long-term deferred budget
2 expense on maintenance there?

3 A. No. Since I didn't see the report, I
4 obviously wasn't aware.

5 Q. Mr. Browne, when was it that you were
6 first made aware that BP Texas City had, in fact,
7 ten years of deferred maintenance in their
8 infrastructure?

9 A. Well, I -- I don't think I was ever made
10 aware of that fact. I can't recall that fact or
11 opinion.

12 I was made aware of the state of
13 the plant when -- after Colin Maclean became the
14 manager of the plant.

15 Q. Do you blame Mr. Manzoni for not bringing
16 it to your attention that the BP Texas City
17 facility was hundreds of millions of dollars behind
18 in deferred maintenance?

19 MR. DENNY: Objection, form.

20 Go ahead.

21 A. Mr. Manzoni had delegated authority to
22 deal with matters in the refining sector as well as
23 in the marketing sector. Obviously the BP Group is
24 a very, very big group; and I think refining, at
25 best, perhaps, account -- globally, accounted for

1 10 or 15 percent of the assets of BP.

2 Q. (BY MR. COON) Yes, sir.

3 Well, if Mr. Manzoni was
4 personally made aware of how much deferred
5 maintenance spend was involved at Texas City and it
6 involved hundreds of millions of dollars, is that
7 something that you would have wanted him to tell
8 you?

9 A. Well, I think he certainly told --
10 certainly would have discussed with me -- and I
11 can't recall a discussion that stated refining,
12 generally and globally, but I would expect him to
13 take actions appropriate for the refineries.

14 Q. Mr. Browne, after this document came out
15 in 2002 that put Mr. Manzoni on notice of the
16 hundreds of millions of dollars in deferred
17 maintenance spend at Texas City, we understood that
18 you then initiated a process of separately looking
19 at Texas City from the rest of the refineries in
20 the BP Holdings; is that true?

21 A. That is not true.

22 Q. Were you aware -- do you know Rick Hale?

23 A. I have met Mr. Rick Hale.

24 Q. Do you understand that Mr. Hale had a
25 plant manager or BUL position at Texas City prior

1 to the explosion?

2 A. I don't recall that, I am afraid.

3 Q. Did you know Mr. Hale had stated that you
4 looked at the indicators at Texas City separate and
5 apart from the rest of the refining sector in the
6 year prior to the explosion?

7 MR. DENNY: Objection, form.

8 A. I don't believe I did. I mean, I really
9 don't recall that; and I don't know how Mr. Hale
10 drew this conclusion.

11 Q. (BY MR. COON) Okay. So you are
12 testifying to us today that you did not ever look
13 at the Texas City budget, what's going on at Texas
14 City, separate from the rest of the refining?

15 A. No, I don't believe I did.

16 You know, I -- normally, I would
17 look at the refining sector generally and be told
18 of its general shape.

19 Q. How many times have you been to the Texas
20 City facility, sir?

21 A. I think I have been there twice.

22 Q. Okay. We know that you came out in March
23 of 2005, correct?

24 A. I did indeed. I arrived the day after
25 the explosion.

1 Q. And we will talk about that briefly.

2 When was the other time that you
3 also came out, sir?

4 A. I am afraid I can't remember, but it was
5 obviously some time before then.

6 Q. Do you recall what brought you to Texas
7 City in the occasion prior?

8 A. Yes. I had a practice of trying to get
9 around to all the assets in the whole world on a
10 steady rotation. There are a lot of them, several
11 hundred assets to go visit.

12 Q. And, Mr. Browne, when you looked at Texas
13 City, do you have a recollection of the rather poor
14 state, visual state or condition of that facility
15 at that time?

16 A. No, I didn't actually. I was shown
17 around by the manager then. I think it was
18 Mr. Scruggs. And I didn't see that it was
19 unusually -- I didn't come away with an impression
20 that is lasting with me that it was unusually
21 different.

22 Q. Did you know Mr. Carter who worked with
23 Mr. Scruggs?

24 A. I don't know.

25 Q. George Carter?

1 A. I don't think I did.

2 Q. Did you have any understanding as to why
3 it was that Mr. Carter was invited to leave
4 BP Texas City?

5 A. No. I really don't know who he was, I am
6 afraid.

7 Q. Mr. Browne, I am going to show you
8 Exhibit Number 12.

9 MR. COON: Stephanie, could we
10 have that one tendered to him, please?

11 THE REPORTER: (Complies.)

12 (Exhibit Number 12 marked for
13 identification.)

14 MR. FERNELIUS: Brent, do you want
15 to renumber that in sequential order?

16 MR. COON: It's going to be easier
17 for me to go in this order because she has them
18 marked with the same numbers.

19 MR. FERNELIUS: Okay.

20 MR. COON: And if we can get an
21 agreement for the record that we may not attach all
22 of the documents and even reference all of the
23 exhibits. So they may not all be in sequential
24 order.

25 MR. DENNY: That's fine.

1 Q. (BY MR. COON) Okay. Mr. Browne, we have
2 a -- what is marked as Exhibit Number 12. The top
3 of the page has from Berry, Jack.

4 Do you see that document, sir?

5 A. Yes, indeed.

6 Q. If we go down towards the bottom of it,
7 there's a -- the last paragraph, it says:

8 "Interesting point from Rick Hale."

9 And the paragraph then reads: "We
10 have 18 BP refineries in the world. Lord Browne
11 looks at the monthly data for 17 of 18 refineries
12 altogether. He looks at TCR" -- that is Texas City
13 refinery -- "data separately each and every month!"

14 Did I read that correctly, sir?

15 A. You did indeed.

16 Q. This is dated February 25, 2003. We
17 talked about this; and as I am understanding your
18 testimony today, you are saying that is an
19 inaccurate statement; is that correct?

20 A. Well, certainly to the best of my
21 recollection, this is an inaccurate statement. I
22 don't recall doing this.

23 Q. Mr. Browne, there was another document
24 that came out after the Veba study. It was called
25 the Telos report.

1 When were you first aware of the
2 Telos report at Texas City?

3 A. I was aware there was a report called the
4 Telos report probably in 2005 or '06, something,
5 again, to do with the Baker panel.

6 Q. Were you made aware that it was a very
7 damning view of the operational condition of Texas
8 City by the employees that worked there prior to
9 the time of the explosion?

10 MR. DENNY: Objection, form.

11 A. I was made aware that it was a
12 survey-based document and had statements in it
13 which were disturbing.

14 Q. (BY MR. COON) Do you recall that one of
15 the things that was disturbing is that the
16 consultants' perception of the employees was that
17 they were afraid of going to work there and feared
18 for their safety and health?

19 A. I am afraid I can't remember what little
20 detail that was communicated to me on that. I just
21 can't remember it.

22 All I can remember is that there
23 was some disturbing findings in that report.

24 Q. Mr. Browne, let's go to the day of the
25 explosion.

1 Q. And you told the press that BP was going
2 to take responsibility for what happened out there;
3 is that correct?

4 A. I can't remember the exact words I used.
5 I know that I was very, very moved by everything;
6 and on a very human basis, it was clear to me that
7 it happened on our refinery site and we had -- we
8 had to be responsible to -- to do what was
9 necessary to clean this up and to help people
10 through this tragedy.

11 Q. Sure.

12 And, in fact, one of the things
13 that you said is that you have a simple rule at BP,
14 quote, We are responsible for what happens in the
15 boundaries of our plants, end quote.

16 A. That's --

17 Q. Do you recall saying that?

18 A. I do indeed.

19 Q. Is that something that BP lives by?

20 A. I hope it is -- I believe it is living by
21 that.

22 Q. Is that something that BP should be
23 standing by even today?

24 A. Well, you have to ask BP that question.

25 Q. Do you believe that's something they

1 should stand by today?

2 A. I believe it's something we -- that BP
3 should stand by today, but I am no longer --

4 Q. Is it something that they --

5 A. -- but I am no longer with BP.

6 Q. Is it something that you as a head
7 officer of BP would have stood by throughout your
8 tenure there?

9 A. I believe so.

10 Q. Mr. Browne, do you have an understanding
11 that Mr. Manzoni was already in the United States
12 on vacation at the time of the explosion?

13 A. I'm afraid I didn't know.

14 Q. Were you ever made aware that he
15 complained to some of his friends that it
16 inconvenienced him to come down there at your
17 request during his vacation?

18 A. I was made aware of that subsequently
19 through the press.

20 Q. Was that disappointing to you?

21 A. If it is actually true, it would -- it
22 was very disappointing -- it would be very
23 disappointing.

24 Q. Okay. Did you ever see Mr. Manzoni's
25 deposition or talk to him about it to confirm

1 whether or not it was true?

2 A. No, I haven't seen Mr. Manzoni's
3 deposition; and I didn't actually talk to him about
4 it.

5 Q. Mr. Browne, we have another document. I
6 am going to call this --

7 MR. COON: Stephanie, what was the
8 last one we left off on after 12 -- or we did 12?
9 Is this 13? I don't have this one marked.

10 If I can have the court reporter
11 show Mr. Browne a document that we don't have
12 marked. It's called, "Examples of Report Language
13 to Avoid."

14 Do you have that one, Stephanie?

15 MR. DENNY: She's looking, Brent.

16 THE REPORTER: I don't see it.

17 It's not numbered?

18 MR. COON: It's between 16 and 17
19 in your file.

20 THE REPORTER: Okay.

21 (Exhibit Number 13 marked for
22 identification.)

23 MR. DENNY: This will be
24 Exhibit 13, for the record?

25 MR. COON: Yes, sir.

1 MR. DENNY: Okay.

2 Q. (BY MR. COON) Mr. Browne, I'm showing
3 you Exhibit 13, which has previously been
4 identified in this litigation.

5 Have you seen that document
6 before, sir?

7 A. No, I haven't.

8 Q. Let me represent to you that these are
9 words that BP investigators were admonished not to
10 use in their reports.

11 Are you ever aware of
12 investigators conducting investigations into
13 incidents that BP admonished not to use certain
14 types of language?

15 A. No, I wasn't.

16 Q. Have you ever conducted any
17 investigation, sir?

18 A. A very, very long time ago.

19 Q. And what was that in regards to, sir?

20 A. Something to do with the Forties Field in
21 the United Kingdom in the early Eighties. I can't
22 remember what it was. It was -- it was an accident
23 of some sort.

24 Q. Mr. Browne, after the Baker panel
25 released this report, you gave a press conference;

1 and one of the things that you said in that press
2 conference was that BP, quote, gets it, end quote.

3 Do you recall saying that?

4 A. Yes, I do.

5 Q. And you also said that you personally,
6 quote, got it, end quote.

7 Do you -- do you know what it was
8 that you were saying to the press that BP got and
9 that you got?

10 A. We got that we had to learn from the
11 tragedy, that we had to take the recommendations of
12 the Baker panel deeply seriously, and we had to do
13 everything we promised to do. We got it that we
14 had to do better as BP in process safety
15 management, and that was the heart of the findings
16 in the Baker panel.

17 Q. And you understand what process safety
18 management is, do you not, sir?

19 A. I do.

20 Q. You understand that process safety
21 management is extremely important in operating
22 refineries?

23 A. I do. It's very important indeed.

24 Q. You would agree, sir, that with an
25 understanding of process safety management and how

1 important it is to adhere to strict process safety
2 management principles, that at the end of the day,
3 it's really unfair to blame operators for process
4 safety management failures, isn't it, sir?

5 A. It obviously depends what sort of
6 failures there are because there are both short and
7 long way failures in process safety. It entirely
8 depends on the detail.

9 Q. Did you also understand that the root
10 cause analysis blaming the operators is not the
11 appropriate analysis, is it, sir?

12 A. I think it depends on what the root cause
13 analysis shows and the incident under
14 investigation.

15 Q. Okay. Well, in this particular case, you
16 are aware of all the problems that BP Texas City
17 had with their infrastructure that contributed to
18 this incident, are you not, sir?

19 A. I am not -- I am not aware of all the
20 problems, no. I am aware of -- I can't recall, but
21 I read the Baker panel report. I can't recall its
22 content now. So I am aware -- I was aware at one
23 stage what was in that; therefore, what the issues
24 were.

25 Q. And, sir, did you read the CSB report?

1 A. I think I -- the CSB report was described
2 to me in a meeting. It was very, very long, I
3 believe.

4 Q. Well, for starters, sir, you understood
5 that BP Texas City had deliberately avoided the
6 utilization of a flare, which would have greatly
7 reduced, minimized or avoided this explosion.

8 MR. DENNY: Objection, form.

9 Q. (BY MR. COON) Are you aware of that?

10 MR. DENNY: Objection.

11 A. I am aware of an opinion that, in fact,
12 the blowdown stack, had it been replaced with a
13 flare, the explosion would not have occurred at the
14 blowdown stack.

15 Q. (BY MR. COON) And you are also aware
16 that you were overworking the employees on that
17 shift and on that unit, weren't you, sir?

18 A. I wasn't aware of that at all.

19 Q. You are not aware that the person charged
20 with operating the gauges that day had worked
21 30 days consecutively, 12 hours or longer shifts?

22 A. No, I wasn't aware of that.

23 Q. Wouldn't that concern you, sir?

24 A. It would concern me to have personnel who
25 were tired.

1 Q. Sure.

2 In fact, you would not approve of
3 working your employees so many hours consecutively
4 for so many days, would you, sir?

5 A. Obviously not. Employees need to be --
6 have appropriate breaks to be --

7 Q. In fact, BP --

8 A. -- refreshed.

9 Q. In fact, BP has specific regulations with
10 their drivers that expressly precludes them from
11 working those kind of hours due to fatigue
12 considerations, doesn't it, sir?

13 A. I believe it does. It's part of the
14 driving safety standard.

15 Q. Sure.

16 And it's just as dangerous to run
17 a unit as it is to drive a vehicle, isn't it, sir?

18 A. It is.

19 Q. So why would BP not adhere to the same
20 fatigue factors and considerations for their unit
21 operators as they do their drivers?

22 A. As I said, I wasn't aware of this -- the
23 statement you just made about the operator working
24 for 30 consecutive days.

25 Q. Were you aware that the high alarms were

1 not working on that unit, sir?

2 A. No, I wasn't aware.

3 Q. Were you ever made aware that the
4 sightglass was obscured, sir?

5 A. No, I wasn't.

6 I mean, I read about some of these
7 things in the subsequent reporting after the
8 incident.

9 Q. Okay. And you were certainly aware that
10 they were parking trailers and occupying them with
11 contractors in violation of their own rules,
12 weren't you, sir?

13 A. I was aware of it only after the incident
14 as part of the reports in the -- that I have read.

15 Q. Sure.

16 And, Mr. Browne, after
17 understanding all of these failures at Texas
18 City -- let me back up. There is one other thing I
19 want to talk about.

20 The Bonse report. You sent Bonse
21 out to conduct an independent investigation into
22 the personnel, executives at BP, didn't you, sir?

23 A. No, I didn't.

24 Q. You had nothing to do with Mr. Bonse
25 conducting an internal affairs inquiry of the

1 executives at BP that could have been responsible
2 for the explosion?

3 A. No, I didn't.

4 Q. Who did?

5 A. I believe Mr. Manzoni commissioned this
6 report.

7 Q. Did you have any say in the Bonse
8 investigation?

9 A. No, I didn't.

10 Q. Okay. Did you get a copy of the Bonse
11 report?

12 A. No, I didn't.

13 Q. Have you ever been made aware of what
14 Mr. Bonse's recommendations were?

15 A. Yes, I have.

16 Q. And Mr. Bonse recommended that a number
17 of executives at BP be terminated for their
18 competency or decision-making that came out of the
19 investigation from the Texas City explosion, didn't
20 you, sir?

21 MR. DENNY: Objection, form.

22 A. I believe that was the case. I have been
23 informed of that.

24 Q. (BY MR. COON) Okay. He recommended
25 Mr. Hoffman be fired, didn't he, sir?

1 A. That, I don't know in specific. I know
2 that they were to be -- that people -- I have
3 forgotten quite the phrase used. Whether they
4 should be disciplined or terminated, I can't
5 remember.

6 Q. You can't recall that Mr. Bonse
7 recommended that Mr. Hoffman, Mr. Gower, Mr. Parus
8 and Mr. Willis all be terminated from employment at
9 Texas City in BP?

10 A. I can't remember it exactly. As I say, I
11 think I was informed of it, that -- that they
12 should be -- that -- I think that they should be
13 terminated.

14 Q. Okay. Wouldn't you have wanted to --
15 Mr. Browne, if I am in your position and I had
16 somebody like Mr. Bonse saying that all of these
17 key executives at BP needed to be fired, I would
18 want to talk to him about it and I would want to
19 make sure to do the right thing.

20 Would you put yourself in the same
21 position?

22 A. Well, I mean, here's the problem I am
23 having: I can't quite remember the time scales
24 because I don't recall the Bonse report being
25 published during my tenure entirely. I think

1 towards the end of my tenure it was, but I can't
2 remember.

3 Q. Now, Mr. Parus had been on leave of
4 absence from that plant for two years after the
5 explosion during your tenure.

6 Why were you leaving him to
7 continue to draw a check in light of his failings
8 there?

9 A. Well, I think many people are put on
10 leave of absence with pay while investigations are
11 taking place about their conduct. That would be --
12 that's happened several times before inside BP.

13 MR. DENNY: Brent, can we have a
14 real quick time check from Stephanie?

15 MR. COON: Yes, sir.

16 MR. DENNY: How are we doing on
17 time?

18 THE REPORTER: One hour, one
19 minute.

20 MR. DENNY: One hour, one minute.

21 MR. COON: One hour, one minute.

22 All right. Guys, give me five
23 minutes to wrap up, if you don't mind.

24 MR. DENNY: I will give you five
25 minutes to wrap up, and we will hang up in five

1 minutes.

2 MR. COON: There you go. Thank
3 you.

4 Q. (BY MR. COON) Mr. Browne, did you know
5 Greg Coleman and Ian Rushby?

6 A. Yes, I did.

7 Q. Did you know that either of them made
8 comments to Mr. Bonse that they felt that you did
9 not give due consideration to safety or process
10 safety in the operation of the refineries?

11 MR. DENNY: Objection, form.

12 A. I knew that Mr. Coleman apparently had
13 said that I didn't -- I didn't take care of safety
14 or something, and I also know that he wrote a
15 letter to someone, I think the general counsel,
16 afterwards retracting that statement.

17 Q. (BY MR. COON) Now, Mr. Manzoni was
18 referred to the board for punishment.

19 Did you know anything about that?

20 A. No, I didn't. I don't even know it
21 happened in my -- during my tenure.

22 Q. Also, there were the issues of the value
23 of the human life; and that's come up in the case.

24 Are you aware that BP had
25 placed -- placed a price on manpower within the BP

1 system?

2 A. I was certainly aware of it after the
3 Piper Alpha incident in the North Sea in the early
4 Eighties. When, as a result of that, it was, I
5 think, required by the British government to use a
6 certain value of life in an analysis of risk.

7 Q. Did you think that using a value of life
8 was a cold-hearted method for calculating risk
9 assessment?

10 A. I personally think it's quite
11 objectionable.

12 Q. Did you ever take issue with that once
13 you were made aware that BP utilized such a measure
14 in their cost risk analysis?

15 MR. DENNY: Objection, form.

16 A. First, I don't -- I don't recall when BP
17 used this. I do recall it being required under
18 regulation and law in the United Kingdom North Sea.

19 I don't know how long that's been
20 used for, and I don't know whether that was used
21 beyond the period which I was aware of it. And I
22 always thought it was a very objectionable thing to
23 do.

24 Q. (BY MR. COON) Mr. Browne, with respect
25 to the ongoing investigations with the FBI, the

1 Department of Justice and others, did you have any
2 discussions with any of the investigative legal
3 authorities about any of the BP matters, being the
4 BP explosion or the Alaskan pipeline problems or
5 the gas trading problems?

6 A. No, I didn't.

7 Q. Have you -- who kept you apprised of what
8 was going on at BP Texas City? Who would have been
9 your point person?

10 A. Well, in operational times, it was --
11 obviously after the tragedy, I -- well, we -- I was
12 kept informed at least quarterly by Mr. Manzoni.

13 Q. Now, you had Mr. Mogford conduct an
14 investigation at Texas City after the explosion,
15 correct?

16 A. That's correct. And he kept me informed
17 about the progress of safety in Texas City.

18 Q. Did you have any discussions with
19 Mr. Mogford with respect to the content or
20 direction of that investigation?

21 A. No, I didn't. That was independent. He
22 did his investigation and published his report.

23 Q. In reviewing Mr. Mogford's report, did
24 you come up with any decisions that needed to be
25 made with respect to disciplining anyone in the BP

1 system?

2 A. No, I didn't. This was something which
3 was at a level well below the level of my
4 authority.

5 Q. Mr. Browne, I could probably ask you
6 questions for days. I know our time is about up.
7 I am going to do one more thing.

8 You know, I represented and still
9 continue to represent a lot of people that were --
10 either lost loved ones or lost family members in
11 this explosion. You understand that, don't you,
12 sir?

13 A. I understand it.

14 Q. And one of those was a little girl named
15 Eva Rowe.

16 Have you heard her name before,
17 sir?

18 A. I have read it in the newspaper.

19 Q. And you understand that she lost both of
20 her parents in this explosion and has had a lot of
21 difficulty coping with those losses.

22 You understand that, don't you,
23 sir?

24 A. I understand that.

25 Q. She has asked me to do her a favor, and I

1 am going to ask the court reporter to give you an
2 envelope that she wants you to have.

3 MR. COON: So, Stephanie, would
4 you please make sure that Mr. Browne gets that at
5 the end of this deposition?

6 THE REPORTER: Yes.

7 Q. (BY MR. COON) Mr. Browne, I would ask
8 you, sir, that when we conclude this deposition,
9 that you take the envelope that she has given you
10 and look at it.

11 Would you do that for us, sir?

12 A. Of course I will.

13 MR. DENNY: And, Brent, I assume
14 that's not to be attached to the deposition.

15 MR. COON: It is not; but again,
16 it's something that she --

17 MR. DENNY: Okay.

18 MR. COON: -- I told her that if
19 and when we had the opportunity to talk to
20 Mr. Browne that she would make sure that he gets
21 that.

22 Q. (BY MR. COON) Mr. Browne, have you
23 understood all of my questions today, sir?

24 A. I did.

25 Q. Have you answered them to the best of

1 your ability?

2 A. I have.

3 MR. COON: We thank you for your
4 time, sir; and that's all we have.

5 MR. DENNY: Thank you, fellows.

6 We will reserve any questions
7 until a later time. Thank you.

8 (Whereupon, the reporter leaves
9 the envelopes for Mr. Browne's review.)

10 (Deposition concluded at
11 11:45 a.m. CST.)

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EXAMINATION
CHANGES AND SIGNATURE

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PAGE LINE CHANGE

REASON

LORD JOHN BROWNE

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I, LORD JOHN BROWNE, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

LORD JOHN BROWNE

THE STATE OF _____)
COUNTY OF _____)

Before me, _____, on this day personally appeared LORD JOHN BROWNE, known to me or proved to me on the oath of _____ or through _____ (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he/she executed the same for the purpose and consideration therein expressed.

Given under my hand and seal of office on this _____ day of _____, _____.

NOTARY PUBLIC IN AND FOR
THE STATE OF _____

My Commission Expires: _____

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CAUSE NO. 05CV0337

MIGUEL ARENAZAS, ELIZABETH) IN THE DISTRICT COURT
RAMON, DAVID G. CROW and)
JUANITA G. CROW, et al.)
VS.) 212TH JUDICIAL DISTRICT
BP PRODUCTS NORTH AMERICA)
INC., B.P. CORPORATION)
NORTH AMERICA INC., DON)
PARUS, AND JE MERIT)
CONSTRUCTORS, INC.) GALVESTON COUNTY, TEXAS

CAUSE NO. 05CV0337-A

IN RE: BP AMOCO EXPLOSION) IN THE DISTRICT COURT
MARCH 23, 2005)
COORDINATED DISCOVERY) 212TH JUDICIAL DISTRICT
PROCEEDINGS)
GALVESTON COUNTY, TEXAS

REPORTER'S CERTIFICATE
ORAL DEPOSITION OF
LORD JOHN BROWNE
APRIL 4, 2008

I, Stephanie Barringer, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, LORD JOHN BROWNE, was duly sworn and that the transcript of the deposition is a true record of the testimony given by the witness;

That the deposition transcript was duly submitted on _____ to the witness or to the attorney for the witness for examination, signature, and return to me by _____.

That the following is the computer-calculated amount of time used by each party at the time of the deposition:

- Mr. Brent Coon (1 hour, 5 minutes)
Attorneys for Plaintiffs
- Mr. Otway Denny (No time used)
Attorneys for Defendant

1 That pursuant to information given to the
2 deposition officer at the time said testimony was
3 taken, the following includes the parties at the
4 deposition:

5 FOR PLAINTIFFS:

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7 Mr. Eric Newell (via telephone)
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13 FOR DEFENDANT BP PRODUCTS NORTH AMERICA, INC.:

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21 - and -

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 BP IN-HOUSE COUNSEL:

 Mr. Peter Bevan
 Mr. Gary Hodgson

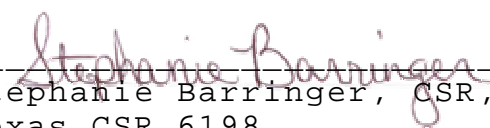
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That a copy of this certificate was served on
all parties shown herein on _____ and
filed with the Clerk.

I further certify that I am neither counsel for,
related to, nor employed by any of the parties in the
action in which this proceeding was taken, and
further that I am not financially or otherwise
interested in the outcome of this action.

Further certification requirements pursuant to
Rule 203 of the Texas Code of Civil Procedure will be
complied with after they have occurred.

Certified to by me on this _____ day of
_____, _____.



Stephanie Barringer, CSR, RPR, CLR
Texas CSR 6198
Expiration: 12/31/08
U.S. Legal Support
Firm Registration: 122
363 N. Sam Houston Pkwy., Ste. 900
Houston, Texas 77060
Main number: 713/653-7100
Fax number: 713/653-7143

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FURTHER CERTIFICATION UNDER TRCP RULE 203

The original deposition was/was not returned to the deposition officer on _____.

If returned, the attached Changes and Signature page(s) contain(s) any changes and the reasons therefor.

If returned, the original deposition was delivered to Mr. Brent Coon at Brent Coon & Associates as the custodial attorney.

\$_____ is the deposition officer's charges to the Plaintiffs for preparing the original deposition and any copies of exhibits;

The deposition was delivered in accordance with Rule 203.3, and a copy of this certificate, served on all parties shown herein, was filed with the Clerk.

Certified to by me on this _____ day of _____, _____.

Stephanie Barringer, CSR, RPR, CLR
Texas CSR 6198
Expiration: 12/31/08
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363 N. Sam Houston Pkwy., Ste. 900
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