

## **ADDENDUM VII**

**EOG RESOURCES INTERVIEW**

**JEFF LEITZELL**

## COMMONWEALTH OF PENNSYLVANIA

## DEPARTMENT OF ENVIRONMENTAL PROTECTION

\* \* \* \* \*

IN THE MATTER OF: \* VIOLATIONS OF THE OIL  
C.C. FORBES, LLC, \* AND GAS ACT, CLEAN  
LAWRENCE TOWNSHIP, \* STREAMS LAW, AIR  
CLEARFIELD COUNTY \* POLLUTION CONTROL ACT,  
\* AND SOLID WASTE  
\* MANAGEMENT ACT

\* \* \* \* \*

## STATEMENT UNDER OATH

OF

JEFF LEITZELL

Taken pursuant to Notice by Sarah Wendorf, a Court  
Reporter and Notary Public in and for the  
Commonwealth of Pennsylvania, at the offices of DEP,  
Moshannon District Office, 186 Enterprise Drive,  
Philipsburg, Pennsylvania, on Monday, June 14, 2010,  
beginning at 11:47 a.m.

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## A P P E A R A N C E S

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## I N D E X

WITNESS: JEFF LEITZELL

EXAMINATION

By Mr. Vittitow

7 - 34

EXAMINATION

By Mr. Jankura

34 - 35

RE-EXAMINATION

By Mr. Vittitow

35 - 36

EXHIBIT PAGE

PAGE

NUMBERDESCRIPTIONIDENTIFIED

NONE OFFERED

## OBJECTION PAGE

ATTORNEYPAGE

NONE MADE

## P R O C E E D I N G S

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ATTORNEY AYERS:

Thanks for joining us again, Jeff, ---

MR. LEITZELL:

No problem.

ATTORNEY AYERS:

--- on the record. And just a preliminary interjectory remarks, we're just here in furtherance of the Department's investigation to what occurred at the Punxsutawney #36H. I think I got that right. I think that's first time I've said it. You know, it's not --- we don't intend to be confrontational or aggressive. We just want to know what happened, and with that, I'll turn it over to John.

MR. VITTITOW:

As I told the rest of them, I'm not an engineer, so we'll try not to get into engineering a talk, but don't read anything into what I'm trying to ask. It's just I'm trying to get things on the record. I'm sorry.

OFF RECORD DISCUSSION

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JEFF LEITZELL, HAVING FIRST BEEN DULY SWORN,

1 TESTIFIED AS FOLLOWS:

2 -----

3 EXAMINATION

4 BY MR. VITTITOW:

5 Q. Jeff, you're an employee of EOG; is that  
6 correct?

7 A. Correct.

8 Q. You work in Pittsburgh or Canonsburg?

9 A. Yes, correct. Southpointe.

10 Q. Where did go to school?

11 A. West Virginia University.

12 Q. How long have you been with EOG?

13 A. A year and eight months.

14 Q. Is this is the first company you've worked for?

15 A. No, I worked for with BJ Services prior to this  
16 for five plus years.

17 Q. Okay. Doing what? What did you do?

18 A. Pumping service aside, I was an associate  
19 engineer for a year, and then I was a field engineer.  
20 And then I was a district technical supervisor out of  
21 their Fairmont City office, which is in central  
22 Pennsylvania, and there, you know, basically did  
23 fracing, cementing, acidizing. And then in the  
24 latter years of that job, I actually was focused in  
25 the Marcellus and stuff as it was getting started up.



1 Q. Okay. You were in charge of the #36H; correct?

2 A. Correct.

3 Q. And you had Barry Rodkey and Charley ---

4 A. Kendrick.

5 Q. --- Kendrick working as well site supervisors  
6 for you?

7 A. Correct. We actually have four well site  
8 supervisors. A couple of them were off.

9 Q. Okay. How often did you talk to them every day?

10 A. It depends on the activity, but normally I talk  
11 to them a least a couple times a day. If we're in  
12 frac operations, normally I'm either on location,  
13 which I'm there all the time, and we talk regularly,  
14 or they'll call me probably morning, you know, early  
15 afternoon and the evening just for updates and stuff  
16 like that.

17 Q. Were you on the #36H when the frac ---?

18 A. Yes, for parts of it. It was a four well pad  
19 and we did two well zippers and two singles, so it  
20 was over a three week period.

21 Q. But you were there quite a bit?

22 A. Yeah.

23 Q. In the #36H, did you have any trouble fracing?

24 A. No, everything went real smooth, looked good.

25 Q. When you started the clean out, you started with

1 a coil tubing unit; correct?

2 A. Correct.

3 Q. What size coil?

4 A. It was two inch.

5 Q. Two inch?

6 A. Uh-huh (yes).

7 Q. Is that standard size you use up here?

8 A. Yeah. Yeah, that's standard.

9 Q. This is standard operating procedure for you all  
10 to start with coil tubing to clean out?

11 A. In the years past, when we first started we  
12 actually drilled out just with rigs. That was  
13 something that we had brought up from the Barnett.  
14 We kind of just mapped our operations after them, but  
15 coil units became more abundant up here and they're  
16 more available and obviously more efficient, so we  
17 were kind of giving them a try to kind of see. Our  
18 last two wells we had drilled out with coil and had a  
19 quite a bit of success.

20 Q. Okay. So they start running out with the coil,  
21 and they got to a certain point and they couldn't go  
22 any further. Why do you think they couldn't go any  
23 further?

24 A. Friction lockup. We knew we were going to be  
25 close on the drill out. I had them run models with

1 multiple friction coefficients in it, and we prepped  
2 the wells with coil, got all the way to the bottom  
3 and stuff, but we knew with the actual motors and  
4 mills and everything on it and the sand in the well  
5 bore and the situation, that we very well could come  
6 short.

7 Q. Okay. So you got where you couldn't go in any  
8 deeper with the coil and decided to put out with the  
9 coil; correct?

10 A. Correct.

11 Q. And you made the decision to move a rig in; is  
12 that correct?

13 A. Yes, that's next phase of it.

14 Q. On your day-to-day operations with your well  
15 site supervisors, are you pretty much directing a  
16 hundred percent their activities or are they kind of  
17 doing some things on their own?

18 A. It's a team effort. You know, we really rely on  
19 our well site supervisors and stuff. These guys have  
20 tons of experience and worked in multiple places and  
21 stuff, so yeah, it's a collective decision with the  
22 whole group.

23 Q. So the standard operating procedure of EOG in  
24 Pennsylvania is if you can't get down with coil, then  
25 you rig up a rig; is that correct?

1 A. Correct.

2 Q. Okay. So you rigged up a rig, and they had to  
3 set a kill plug; correct?

4 A. Correct.

5 Q. Okay. And so you went down and you set a kill  
6 plug and you started getting ready to go in the hole  
7 with the pipe; correct?

8 A. Correct.

9 Q. Did you have to instruct them about the BOPs and  
10 the --- the BOPs and the stripper rubber, or did they  
11 know to do that?

12 A. They know. It's pretty normal operation for  
13 them, and like I said, from a well site and a  
14 workover rig standpoint, they're very experienced, so  
15 they're pretty comfortable with that whole thing. I  
16 don't go in that great of detail.

17 Q. You don't have to tell them to do that?

18 A. Right.

19 Q. So you know they rigged up the BOP, you know  
20 they put the stripper rubber on top.

21 A. Uh-huh (yes).

22 Q. And they go in the hole and they start drilling  
23 the plugs. And you're talk to them during the day?

24 A. Just, yeah, seeing how things are going, the  
25 well conditions.

1 Q. And what did you --- okay. You start about five  
2 o'clock on the first, and you start going in the  
3 hole. At about 11 o'clock that night from previous  
4 conversations or testimonies we've seen, that it was  
5 a decided to go to a 24 hour operation; is that  
6 correct, to your knowledge?

7 A. On the night of the 1st or the 2nd.

8 Q. It must have been the 2nd.

9 A. The 2nd was the day before, yeah, the incident  
10 and stuff. Yes.

11 Q. Okay. Did you make that decision?

12 A. Uh-uh (no). It was a collective decision.  
13 Barry was actually the one was primary on the drill  
14 out for the daylight shifts. Charley, he's our lead  
15 frac consultant, and he was coming out throughout the  
16 day and stuff and spending time on the location. So  
17 they had made a call that they had the two of them  
18 out there and they good rotate enough to where they  
19 could do a 24 shift and get the plugs drilled out  
20 that night.

21 Q. Was there any discussion about the rig hands,  
22 the time they had been on location?

23 A. Not to my knowledge. It was my understanding  
24 there was two crews out there.

25 Q. Okay. Would it have made any difference if you

1 knew that there wasn't two crews?

2 A. Absolutely, yeah.

3 Q. Would it have made any difference if you knew  
4 one crew was going to be on for 36 hours?

5 A. Oh, yeah, for sure.

6 Q. If you had known that information, what would  
7 you have done differently?

8 A. Well, first off, you know, I think we usually  
9 try to go just daylight hour --- if we are daylight  
10 hours, a 12, 14 hour type day. And then if we go  
11 over that, we usually go to a two crew type  
12 rotations. We'll have a consultant or lead and a  
13 crew. So if we were going to go to those extended  
14 hours, that's how we would have actually tried to  
15 structure it.

16 Q. So you didn't intentionally keep a crew there 36  
17 hours, 37 hours ---

18 A. No.

19 Q. --- without relief?

20 A. No.

21 Q. Okay. Let's go to the day of the incident.  
22 They had told you they had gotten down. Did they  
23 inform you --- did they inform you of anything late  
24 in the afternoon of the 3rd about how the well ---  
25 how it was doing?

1 A. I believe Charley probably called me prior to  
2 his phone call to me that evening when everything  
3 started. He had let me know that they were through  
4 all the plugs and everything and they were just  
5 cleaning up the well bore. They were probably 60  
6 foot off bottom, just trying to clean up debris,  
7 getting through the perforations, clean up the  
8 rathole, and everything looked pretty smooth, normal  
9 operations.

10 Q. On June 3rd, which is the day of the incident,  
11 what is the first call that you received that there  
12 was an --- and about what time was that?

13 A. It was right around 6:40, 6:45 or so. I was  
14 actually at a gas station. And Charley called me and  
15 says we may have an issue. And I said, okay, what's  
16 going on. And he said, well, the stripper rubber  
17 started to leak, and so we went ahead and we shut our  
18 pipe rams. And at that point, they went ahead to  
19 just pull up the tubing a little bit and stuff and at  
20 that point, they started to leak also. So he had  
21 lost, you know, his complete annular seal at that  
22 point.

23 Q. When he called you, what was your first action  
24 step? What did you do first?

25 A. My first step was I found out who on location

1 had phones I mean that we could get in communication  
2 with because it's spotty service up there. I told  
3 him that I was going to get on the phone and start  
4 making some phone calls to our people and to keep me  
5 updated, you know, on a minute to minute basis if  
6 anything change. He had notified me at that point  
7 that as soon both of the stripper rubber and the pipe  
8 ram were leaking that he had started pumping brine on  
9 it, which would have been our next step. So he says,  
10 this is what we're doing, this is what we're doing,  
11 and we obviously agreed and concurred on what was  
12 going on and what he was doing to try to revolve it.  
13 So as soon as I got off the phone, I tried to call  
14 our safety and environmental person in this area. He  
15 was actually in Houston. So he was on a plane, so I  
16 couldn't reach him, left a message, and then I tried  
17 calling our production manager, which he's more like  
18 an operations manager, and notified him of what was  
19 going on.

20 Q. Did you get ahold of him?

21 A. Yeah. Yeah, I did.

22 Q. And did he give you any instructions?

23 A. I told him what was going on. At that point, he  
24 --- basically he had told me he was going to contact  
25 our construction or pipeline foreman. His name is



1 Craig Schaeffer. He lived close to the area, so he  
2 was one of the closest EOG fulltime employees that  
3 could, you know, respond and check out the situation.  
4 I had also talked to Charley about, you know, making  
5 sure we got in contact with a well control group just  
6 to at least touch base with them to see if they could  
7 put them on that location so they could walk them  
8 through what was happening if they had any thoughts,  
9 so we had conversated about that also, getting the  
10 numbers.

11 Q. And what time did you talk to the production  
12 manager about that?

13 A. 7:50 maybe.

14 Q. And then you talked to the construction  
15 supervisor just because he was close?

16 A. The production manager did.

17 Q. Did you call anybody else?

18 A. Well, I did. I made a couple calls to  
19 Halliburton and whatnot to get the frac numbers to  
20 Boots & Coots, and then I did get ahold of Boots &  
21 Coots and I chatted with them, assessed them --- or  
22 let them know what was going on in location, give  
23 them both Charley's numbers and another gentleman on  
24 location for them to contact to talk to them just to  
25 see if they thought that there was, you know,

1 something else we would be could be doing or, you  
2 know, we could be implementing. And at that point,  
3 it was more just a consistent structured step of  
4 waiting for their phone calls to come in and see what  
5 was happening with the rig.

6 Q. Did you ever call 911? Did you ever call the  
7 Department of Environmental Protection? Did you ever  
8 call any state agencies?

9 A. No, not at that point in the juncture.

10 Q. Did you ever call?

11 A. No, no.

12 Q. Do you know if anybody called?

13 A. Yes, that's --- my first call was to Nathan,  
14 which is our safety and environmental, and he  
15 normally takes that task. As soon as I called Lenden  
16 (phonetic), I knew he was out of the commission. I  
17 know throughout the process. He had made multiple  
18 attempts to get ahold of sheriff's departments, DEP.  
19 And then finally when all attempts failed, they did  
20 call 911.

21 Q. Once --- were you in constant contact with the  
22 location, but off and on?

23 A. Yeah, I'd say probably to 10 to 15 minutes I was  
24 regularly talking to them.

25 Q. Did you give them any directions as far as what

1 the next steps to do or were you pretty much letting  
2 the guy on location do that?

3 A. They had --- I think before they talked to me  
4 they had --- at the time they were assessing the  
5 situation, so when I spoke with them like after the  
6 first phone call, Charley said we were doing this,  
7 this and this happened and so now we're pumping  
8 brine, which those were pretty much the normal steps  
9 we would have went through in that situation, so they  
10 had already implemented what we would have done  
11 instruction wise.

12 Q. Do you all have this written down somewhere in  
13 case of emergencies, this is just kind of what we  
14 ---?

15 A. This is just kind of what we usually do.

16 Q. At some point, you decided to drive to the  
17 location; is that correct?

18 A. Correct.

19 Q. When did you leave Canonsburg and head that way?

20 A. It was probably 9:30ish.

21 Q. At night?

22 A. Yes.

23 Q. When you arrived on location, about what time  
24 was it?

25 A. 12:30 or so.

1 Q. Okay. And what did you observe when you got  
2 there?

3 A. At that point, when I pulled in down the main  
4 state road and stuff was the first road block where  
5 they had the area sectioned off. I entered at one of  
6 other lease road. I passed that road block and I  
7 came up to the actual location road heading back into  
8 the PHC #36H. And everybody was staged out at the  
9 base of that road, which was --- it was --- I don't  
10 know the actual distance from it, but it was a couple  
11 lease roads from the 36, and you could hear it  
12 chugging back in there and stuff.

13 Q. What was your next activity? What did you do  
14 next?

15 A. Well, I obviously went over and chatted with the  
16 gentlemen that were there, Greg Schaeffer and then  
17 obviously Charley and Barry, and just chatted with  
18 them about the certain situation, what was going on,  
19 the processes they had went through. And at that  
20 point, we decided to move the current road block that  
21 we were sitting at down to another location, the 9H,  
22 to extend the area and then move all our vehicles  
23 away because we knew it was dark and at night and  
24 head back to the pit area, which is probably a good  
25 mile away.

1 Q. At what point did the people approach the well  
2 after you got there? At what point did they go back  
3 into the location?

4 A. In the morning, we had actually went do the  
5 airport to pick up Wild Well Control. They were  
6 flying into the Dubois. And we had --- when I first  
7 called Boots & Coots, I dispatched a first responder,  
8 so the first responder, we had come them first. I  
9 think they showed up in the three or four area, I'm  
10 guessing. I was actually on my way to the airport to  
11 pick them up, but at that point when he first showed  
12 up and then light started breaking, him and Charley  
13 went out to the actual location, the actual road and  
14 assessed the situation from what I understand.

15 Q. Did they come back and brief you?

16 A. Well, whenever we came back, it was myself and  
17 Gary. We came back to location from attempting to  
18 pick up Wild Well Control because they got diverted.  
19 Yeah, they assessed us on what was going on out  
20 there.

21 Q. At this point, who was making the decision at  
22 the location? I mean, for EOG were you making it?  
23 Was Gary was making it? What was the decision ---?

24 A. I'd say at that point in the juncture when Gary  
25 was --- no one was on location, but at the staging

1 area while we were out there, you know, Gary would be  
2 the final word, but we really --- there wasn't a  
3 whole lot of decisions at that point to be made  
4 because we had isolated the area and shut down all  
5 emission sources. We went through our standard  
6 emergency response plan, and at that point, we were  
7 just in the holding pattern waiting for the  
8 specialist to come in.

9 Q. Do you have a standard emergency response plan?

10 A. Yes, as soon as I called our general manager, he  
11 implements that.

12 Q. So at this point Wild Well Control shows up  
13 because they have been diverted somewhere else. They  
14 show up. What happens?

15 A. At that point, we go directly out to the  
16 location and, you know, they immediately get geared  
17 up and assess the situation.

18 Q. And what was the --- what action was taken?

19 A. Well, initially, they walked out and, you know,  
20 they just assessed the whole area, and then the first  
21 thing they tried to do was just shut the frac valve.  
22 The tubing at the point when they left location was  
23 still hooked up to the power swivel and all  
24 connected. The next morning it had actual sheered  
25 just underneath the collar, so there was just pipe we

1 believed in those pipe rams that were still set or  
2 the blind rams, the BOPs. So we weren't sure if that  
3 pipe had fallen because we couldn't see because there  
4 was some flow out of it, so they tried to shut ---  
5 got 13 turns, opened it back, shut again, 13 turns.  
6 It was a 32 or 33 turn valve, so they knew that the  
7 pipe was still in there.

8 Q. So what was the next action?

9 A. We probably spent, you know, a half an hour, 45  
10 minutes, maybe an hour or stuff where they were  
11 trying to put together a game plan. One of the  
12 things that they had talked about was obviously  
13 getting right down next to the rig, checking the gas  
14 levels and stuff with detectors and then possibly,  
15 you know, starting the rig up, getting everything  
16 rigged up and opening those BOPs and see if something  
17 would fall. But while we were also talking about  
18 that process and preparing a check location, we were  
19 talking about multiple other things as far as  
20 bringing in cranes, dozers, different things to  
21 contain the well.

22 Q. A lot of options?

23 A. Yes.

24 Q. So what option did you all finally decide on?

25 A. Well, we actually did make all the phone calls

1 to get a lot of the other equipment out of the way.  
2 We had over a thousand barrels of 13 to 135 fresh  
3 water mud on the way out to the location. We had the  
4 cranes and the dozers and everything that they had  
5 asked for to pick up off. They were talking about  
6 removing the top of the frac stack and then setting  
7 another valve on top of it to isolate. After we had  
8 called and dispatched all that, at that point we had  
9 gotten the gas level, found it was safe and decided  
10 to go down and start the rig and try to air up and  
11 open the BOPs.

12 Q. Is that what you did?

13 A. Yes.

14 Q. And at that point, the incident was over?

15 A. Yes, we were stand on the edge of the location.  
16 They did that, and we basically just saw them go over  
17 by the valve, close it, and we slowly saw the flow go  
18 away.

19 Q. What actions did you take --- clean up actions  
20 did you take after that?

21 A. Well, prior to that even happening, Greg, I  
22 mean, he had already started by --- started to dig  
23 trenches and ditches and he actually worked with a  
24 gentleman from the DEP on placing a couple of them  
25 prior. So we had collection areas at that point.



1 And as soon as we could --- we had the well closed,  
2 our primary concern was getting another isolation up  
3 on top of it because the bottom valve had been  
4 through a lot, so we brought in an another Cameron 7  
5 1/16 valve, put that on, had it fully isolated, and  
6 at that point, we started clean up where we bought in  
7 back trucks and stuff and we were pumping from these  
8 ditches and trenches into our tanks.

9 Q. Do you know what size the frac valve is?

10 A. What size?

11 Q. Yeah, the size.

12 A. It's 10k. Yeah, it's a 7 1/16 bottom valve  
13 master.

14 Q. Would it be --- okay. All right. I'm going to  
15 ask you some questions about EOG policy because  
16 you're the first EOG employee we've had, So i'm just  
17 trying to get a clear picture. What is EOG's policy  
18 as far as steering work over completion operation,  
19 testing BOPs?

20 A. As far as testing BOPs, you know, I don't know  
21 if we have a written standard policy. I know as I  
22 said there was a spoken order of events that we had  
23 always went through and stuff, but as far as on paper  
24 written EOG standard policy, you know, I'm not sure  
25 if there is one, on the completion side at least.

1 Q. Yeah, that's what I'm talking about. Everybody  
2 knows that, but on the completion side?

3 A. Right.

4 Q. In the completion procedures that you write up,  
5 do you normally write that they test the BOPs?

6 A. No, no. They're fairly simplistic to the point  
7 where the main focus is on the actual frac treatment  
8 and then there's the --- you know, moving in, rigging  
9 up your rig and everything, BOPs and everything and  
10 then from there ---.

11 Q. But you don't write test the BOPs to this or  
12 that?

13 A. No.

14 Q. You leave that to your well site supervisors to  
15 do?

16 A. Correct.

17 Q. The needful events?

18 A. And our service companies.

19 Q. Do you know if EOG has a policy on barriers, in  
20 other words, you have to have two barriers on a well,  
21 you have to have three barriers? Are you aware ---?

22 A. I'm not aware of a written policy.

23 Q. In your mind, how many barriers on a completion  
24 post frac clean up do you feel comfortable with?

25 A. At least two.

1 Q. At least two. Do you consider a stripping  
2 rubber as one of those barriers? Would you consider  
3 a stripping rubber as a barrier?

4 A. Up to this point, yes.

5 Q. Post this point?

6 A. No.

7 Q. Good answer. That's probably the appropriate  
8 answer at this point. Given then opportunity to go  
9 back to June 1st or 2nd or whatever, knowing what you  
10 know now, what would you do different?

11 A. I think, well, the first thing is we obviously  
12 have a lot of smart people on both sides that are  
13 evaluating the situation, so I'd really like to see  
14 what everybody's recommendations are, but I  
15 definitely --- there would be, you know, at this  
16 point another barrier involved.

17 Q. Did you ever consider putting snubbing in the  
18 valve, rig assist snubbing in? Is that policy not to  
19 or is that just something you don't do?

20 A. No. Just with our experience in that field and  
21 our comfort level and what we've seen on the previous  
22 wells, the five wells or what we've done in that  
23 field, we normally snubbed out tubing and then  
24 snubbed back in our production tubing, but from a  
25 weight standpoint, I was comfortable in containing

1 the flow. We've never had any issues, so ---.

2 Q. You worked for other companies prior to coming  
3 to work for EOG. How do you find the safety culture  
4 within EOG? Is that something that they're very high  
5 on the --- do you talk about it a lot?

6 A. Second to none, yeah. Safety is first no matter  
7 what, you know. Cost doesn't matter. Everything  
8 goes out the door when it comes to that. First and  
9 foremost is safe operations.

10 Q. Let me back up a 2nd. We're talking about the  
11 barrier deal. You said that you felt you felt that  
12 two barriers were needed. Once that stripping rubber  
13 goes and you're down to one barrier, ---

14 A. Correct.

15 Q. --- would you feel comfortable or did you feel  
16 comfortable in the past continuing to do operations  
17 with one barrier in place prior to the incident? I  
18 mean, was that something that came up that you said,  
19 okay, we're now down to one barrier and the only  
20 thing between us and the world is this pipe ram?

21 A. Yeah, you know, I don't know if we've ever ---  
22 we've talked about it in depth because normally if  
23 the stripper rubber went, you shut the pipe rams and  
24 then they'd sloth it out fairly quick, so you had the  
25 stripper rubber back in and you were back to

1 operations and these are normal ---.

2 Q. Would you --- as someone with experience, would  
3 you feel comfortable stripping through your last ram  
4 on your piece of the fence? In other words, if you  
5 had to pull up even an inch or two inches or five  
6 inches or ten inches, whatever, would you --- if you  
7 had been on location, would you have considered doing  
8 something other than stripping up through the pipe  
9 --- I mean, up through the pipe rams?

10 A. Previously, they had done it before, you know,  
11 so I don't know if it was ever analyzed or looked at  
12 as closely as it has been now.

13 Q. The stripping head that you used, do you know  
14 who the manufacturer is?

15 A. No, the stripper head, I'm not a hundred percent  
16 sure whose it is.

17 Q. Do you know what the stripper rubber is --- what  
18 the manufacturer rates that stripping rubber to?

19 A. I actually from my own knowledge had asked C.C.  
20 Forbes of this, and they said that there wasn't a  
21 rating on that. Now, from speaking with our well  
22 site supervisors and stuff from the Barnett, many  
23 were under the assumption that the standard stripping  
24 rubber was like 2,500 pounds or so and then the Huber  
25 stripping rubber was to --- maybe slightly higher.

1 Q. Would it shock you to know that people who  
2 manufacture stripping rubbers won't write them for a  
3 reason because they ---?

4 A. Right, they're designed ---.

5 Q. They're only good for so much?

6 A. Right.

7 Q. Okay. I didn't know that either, so don't feel  
8 bad. I just found that out in the last week, three  
9 or four days ago, that they don't rate them because  
10 there's too many variables involved.

11 A. Right.

12 Q. So we have a --- this morning we've talked about  
13 testing BOPs, that we have no really standard  
14 procedure for testing BOPs on the completion side?

15 A. Right.

16 Q. Do you feel comfortable within EOG --- and I  
17 know this is --- you've got EOG --- forget they're  
18 here for just a minute. If the powers that be asked  
19 you to do something that you felt was dangerous, do  
20 you feel comfortable that you could go to them and  
21 say I think we need to reevaluate this?

22 A. Absolutely. Absolutely.

23 Q. Okay. Good. I know there have been other  
24 people at other places that have felt like they  
25 couldn't do that, and I just want to be assured that

1 you could go out at your phone, you could go talk to  
2 your supervisor?

3 A. I never worked anyplace I felt like I had more  
4 support.

5 Q. Do you standard --- as a standard policy do they  
6 have --- you said they had an emergency response  
7 plan, but you're not --- they implement that.

8 Somebody else implements that plan; is that correct?

9 A. Correct, yeah. Up to this point, I wasn't  
10 actually --- what do I want to say? I wasn't  
11 actually part of the emergency response plan or I  
12 didn't actually have access to it, and now I do based  
13 on these things. Now, I'm still not the one --- I  
14 normally contact Gary and he'll initiate most of  
15 that.

16 Q. So in EOG policy, either the say vice president  
17 in charge or your safety and environmental person is  
18 the one who implements the emergency response plan?

19 A. Correct, to my understanding.

20 Q. Now, prior to this, did you not have access to  
21 the emergency response plan?

22 A. The actual written emergency response plan step  
23 by step by step, yeah, I did not have access prior to  
24 this incident.

25 Q. Prior to this incident, what did you feel ---

1 did you know who to --- let's say that something had  
2 happened and you were it, everybody else was out a  
3 Pittsburgh Steeler's game or something, and you were  
4 the only one available, you couldn't get a hold of  
5 anybody else. Who would you have called? I mean  
6 ---?

7 A. If you're taking everybody out of Pittsburgh?

8 Q. Yeah, except you. If it was your deal and they  
9 called and said we've got this happening, who would  
10 you have called?

11 A. I would have called Houston or Fort Worth or one  
12 of our multiple divisions. We're very close knit, so  
13 we talk very regularly.

14 Q. That's the point I'm getting to. You would have  
15 called internally EOG before you had called 911 or  
16 whoever?

17 A. At the stage in the issue that we had, yes.

18 Q. At any time during this incident, did you feel  
19 that there were any life threatening ---?

20 A. No, not at all.

21 Q. So the information you were getting back was  
22 we've got an incident, but no one's life is at risk?

23 A. Correct. Like I said, I have all the confidence  
24 in the world in those guys at there, and the first  
25 thing they think of is safety, you know, by far. So



1 I knew if there was even remotely any kind of major  
2 hazard, that they would immediately address that.

3 Q. Do you pick up consultants, non-EOG employees,  
4 on a regular basis?

5 A. No.

6 Q. I mean, so you have the same guys working for  
7 you most of the time?

8 A. Most of the time. Charley actually, he's our  
9 lead. He came from EOG in the Barnett. He came  
10 highly recommended, so he kind of knew the culture.

11 Q. Does EOG --- in Pennsylvania do you all ever ---  
12 when you pick up these people, new consultants or  
13 whatever, do you have a --- do you spend any time  
14 orienting them on policies, procedures of EOG?

15 A. We do just a safety orientation with Nathan  
16 Wells. We sit them down and we go over just a lot of  
17 standard practice and stuff, but a lot of it from a  
18 procedural operational --- we get them out there with  
19 experienced people that we have and let them see kind  
20 of what our procedures are and learn from that  
21 aspect.

22 Q. But you don't have a formal, you know, this our  
23 policy of how we operate and this kind of?

24 A. No.

25 Q. Okay. Looking back, do you feel like that would

1 be of any value to EOG ---

2 A. Sure.

3 Q. --- to say, you now, we have --- we have certain  
4 procedural norms that we do and this is what we do  
5 and is this what we don't know?

6 A. Yeah.

7 Q. I mean, that just a question. There may not be  
8 any value. I'm just asking you.

9 A. I'm an engineer. I'm a documentation  
10 organization guy and structure guy, so yeah, I think,  
11 you know, obviously any procedures that you could put  
12 in place like that and then train your guys on I  
13 think are going to be beneficial.

14 Q. So I'm gathering from what you've said this  
15 morning that most of your time and expertise is used  
16 for the fracing procedure or fracing design, that  
17 kind of thing; correct?

18 A. Yeah, for the most part.

19 Q. And so you spend most of your effort on the  
20 fracing and less --- this is not necessarily bad.  
21 I'm just saying, you're the --- the pulling in the  
22 hole, the preparation and the post frac clean out is  
23 secondary in a way to the fracing?

24 A. From a treatment standpoint, there's lot more  
25 going on during the frac, I'd say, so I'd probably

1 spend me time, yes, out there during that. From a  
2 well site supervisor standpoint, you know, those guys  
3 are well more experienced than myself and from the  
4 workover side, so ---.

5 Q. Do you feel like you turn over a pretty good  
6 part of the responsibility to them in the post well  
7 clean out --- post frac clean out?

8 A. Some. Like I said, it's a team effort. We  
9 really try to make that atmosphere ---.

10 Q. You tell them, okay, guys, we've done the frac,  
11 we got to close the place, you all handle it and call  
12 me?

13 A. Yeah. Well, we're staying in contact. I don't  
14 step on their toes.

15 Q. That's what I'm getting.

16 A. Yeah.

17 MR. VITTITOW:

18 Bruce, you have anything?

19 MR. JANKURA:

20 Yeah.

21 EXAMINATION

22 BY MR. JANKURA:

23 Q. You mentioned earlier and I was going to ask a  
24 question about how detailed your completion  
25 procedures are, and you addressed that a little bit.

1 Could you explain kind of what you normally prepare  
2 for in the completion procedures?

3 A. Sure. It basically just starts off, has all the  
4 information on the well, I mean, everything and  
5 anything as far as casing design all the way through,  
6 starts off with the actual prepping of the job, the  
7 TD, and then it basically moves into the fracing  
8 portion, which it's a regimented schedule of what to  
9 pump, what to go through, you know, whether they're  
10 running acid, where the perks, information like that.  
11 And then once it gets to the end, it basically says,  
12 you know, depending on if we're drilling out with  
13 coil or rig, to run in, set the kill plug, and then  
14 from there move in, rig up the rig, the BOPs,  
15 everything like that, move in, drill out the plugs.  
16 And then from there, it talks about set tubing. If  
17 we're running gas --- basically it's start to finish  
18 on all the details and the numbers behind it.

19 RE-EXAMINATION

20 BY MR. VITTITOW:

21 Q. But you do not go into real big detail about  
22 post frac clean out?

23 A. No, no. There's so many variables in a clean  
24 out. It's tough.

25 Q. Sure.

1 A. A lot of the other stuff, the frac's pretty  
2 structured, and it's pretty --- you can get real  
3 crisp and clean on that, but with a drill out, you  
4 just run into so many different scenarios it's tough.

5 MR. VITTITOW:

6 I can't think of anything else.

7 MR. JANKURA:

8 Well, thank you for your honesty and  
9 your answers.

10 MR. VITTITOW:

11 And I know it probably hasn't been a  
12 lot of fun.

13 A. We just want to, you know, learn as much as we  
14 can from this and get everything fixed.

15 ATTORNEY AYERS:

16 Thank you.

17 MR. JANKURA:

18 Thank you.

19

20 \* \* \* \* \*

21 STATEMENT UNDER OATH CONCLUDED AT 12:20 P.M.

22 \* \* \* \* \*

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24

25

COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF CAMBRIA )

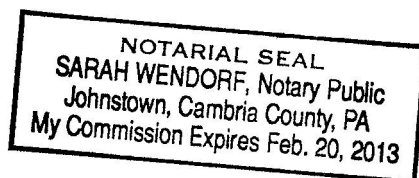
CERTIFICATE

I, Sarah Wendorf, a Notary Public in and for the Commonwealth of Pennsylvania, do hereby certify:

That the foregoing proceeding, deposition of Jeff Leitzell, was recorded by me, I have read this transcript on 06/14/2010 and I attest that this transcript is a true and accurate record of the proceeding.

That the witness was first duly sworn to testify to the truth, the whole truth, and nothing but the truth and that the foregoing deposition was taken at the time and place stated herein.

I certify that I am not a relative, employee or attorney of any of the parties, nor a relative or employee of counsel, and that I am in no way interested directly or indirectly in this action.



A handwritten signature in cursive script that reads "Sarah Wendorf".