

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**IN RE ROYAL DUTCH/SHELL  
TRANSPORT SECURITIES  
LITIGATION** ) **Civil Action No. 04-374 (JWB)**  
 ) **(Consolidated Cases)**  
 ) **Hon. John W. Bissell**  
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**SUPPLEMENTAL DECLARATION OF JOHN DARLEY**

I, John Darley, declare and state as follows:

1. I am the Director of EP Technology with Shell International Exploration and Production, N.V. As described in my original Declaration submitted to this Court, in this capacity, I serve as the head of technology and technical services for the global Exploration and Production business of the Royal Dutch/Shell Group of Companies (the "Group").

2. Based partly on the questions asked by plaintiffs' counsel at my recent deposition in this case, I understand and am informed that, in connection with the Court's determination of its jurisdiction to consider part of the lawsuit, questions have arisen concerning the involvement of personnel of the Group's former U.S.-based "Shell Deepwater Services" organization in estimating proved reserves for certain deepwater projects of Shell Development Angola ("SDAN") and Shell Nigeria Exploration & Production Company ("SNEPCO").

3. I have access to detailed information concerning the proved reserves originally stated for SDAN and SNEPCO at 31 December 2002.

4. In addition, as described in my original Declaration, I led the internal “Project Rockford” team at Shell that reviewed the Group’s “proved” reserves starting in late 2003, which Project eventually led to Shell’s announcements – starting on 9 January 2004, and culminating on 24 May 2004 – that it would recategorise or restate as many as 4.47 billion barrels of oil equivalent (“boe”) of its “proved” oil and gas reserves, relative to those originally stated for the Group at 31 December 2002 (the “Reserves Recategorisation”). Accordingly, I also have access to detailed information concerning the volumes of “proved” reserves originally stated for SDAN and SNEPCO at 31 December 2002 that were recategorised or restated as part of the 4.47 billion boe Reserves Recategorisation, and which therefore would have composed a portion of that Reserves Recategorisation.

5. As described in paragraphs 3 and 4 above, I am fully familiar with and have personal knowledge of the matters in this Supplemental Declaration and would be competent to testify about them if called upon to do so.

#### **SDAN PROVED RESERVES AT 31 DECEMBER 2002**

6. Based on SDAN’s submission in the Annual Review of Petroleum Resources (“ARPR”) process for year-end 2002, the Group originally stated approximately 121 million boe of “proved” reserves at 31 December 2002 for SDAN. These “proved” reserves were attributable exclusively to the Angola Block 18 project, a joint venture operated by British Petroleum in which SDAN had an interest.

7. As part of the Reserves Recategorisation described in paragraph 4 above, approximately 21 million boe of these originally stated volumes for SDAN were restated at 31 December 2002.

**SNEPCO PROVED RESERVES AT 31 DECEMBER 2002**

8. Based on SNEPCO's ARPR submission for year-end 2002, the Group originally stated approximately 480 million boe of "proved" reserves at 31 December 2002 for SNEPCO. These reserves were attributable collectively to (1) the Bonga project, which is operated by SNEPCO as a joint venture with Esso, Nigeria Agip and Elf Petroleum Nigeria Ltd; (2) the Erha Main project, which is operated by ExxonMobil, and in which SNEPCO has a joint-venture interest; and (3) the Abo Main project, which is operated by Agip, and in which SNEPCO has a joint-venture interest.

9. As part of the Reserves Recategorisation described in paragraph 4 above, approximately 109 million boe of these originally stated volumes for SNEPCO were restated at 31 December 2002.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Kingdom of The Netherlands, Municipality of Rijswijk  
June 6, 2005

  
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John Darley

