

Part 6

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RODNEY SIDLE

group guidelines concerning the booking of proved reserves?

A. I don't recall for the period in which I was actually on the committee whether that occurred. The committee reorganized in 2004 such that I was an invitee to the committee, but I was not a member of the committee. And during that period, when I was an invitee, I do recall that discussions about changes to the guideline document were made.

Q. Those discussions, did they occur subsequent to Project Rockford?

A. Yes, they did.

Q. Did the reserves committee, while you were a member, interact directly with the OUs within the group?

A. Yes. Yes, they did.

Q. Just so I can get a sense of it. Was it the OUs that came to the committee with specific questions concerning whether to book proved reserves?

MR. SMITH: Objection to form.

A. I'm not certain I can say they came directly to the committee. There was a chain of

13:23:34 1
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RODNEY SIDLE

communication within the line organization of Shell E&P that ultimately got questions raised to higher levels, and when it got to a level that caused the committee to need to be engaged, they were. Now, whether that came directly to the committee or up through the coordinator, John Pay, or other means, I just don't know.

Q. Thank you.

(Sidle Exhibit 16, document, four pages, was marked for identification.)

BY MR. MacFALL:

Q. Mr. Sidle, you've just been handed a document that's been marked for identification as Sidle Exhibit 16. I would ask you to take a look at that document, sir.

I would note for the record that there is no indication of the author or recipient, as far as I can tell, on the document, but I would ask, after you've had an opportunity to review it, if you can tell me if you've ever seen it before.

(Witness reviewing document.)

13:25:43 1

RODNEY SIDLE

13:25:45 2

MR. SMITH: While he's reviewing the

13:25:46 3

document, I would just note for the record

13:25:50 4

that the document has no Bates number, or

13:25:54 5

anything on it to indicate what its origin

13:25:57 6

is. Not even one of those numbers that you

13:26:03 7

see attached to e-mails sometimes.

13:26:09 8

MR. MacFALL: You are correct. I am

13:26:11 9

fairly confident that the document was

13:26:13 10

reproduced from your production. We can

13:26:14 11

substitute a document with a proper

13:26:18 12

identifier number, if we can locate one.

13:26:19 13

If Mr. Sidle does not recall the

13:26:21 14

document in any event, then it may be a

13:26:24 15

moot point, and we'll just move along.

13:26:26 16

MR. SMITH: I just wanted the record

13:26:26 17

to reflect it.

13:26:28 18

A. Yeah, I've never seen this before.

13:26:30 19

Q. That's fine. You can put that side,

13:26:40 20

then.

13:26:42 21

Let me ask, separate and apart from

13:26:45 22

the document itself, to the extent that there

13:26:47 23

are certain entities identified in the document,

13:26:49 24

let me just ask you if there are entities that

25

you're familiar with, or organizations you're

13:26:51 1
13:26:54 2
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13:27:00 4
13:27:02 5
13:27:06 6
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13:27:11 8
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13:28:30 24
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RODNEY SIDLE

familiar with.

Do you know what GDWS is?

A. I've never seen that before.

Q. Okay. How about SOI?

A. SOI -- the SOI reference, I'm aware of, whether that's what they mean here or not, is Shell Offshore Inc., which is one of the subsidiaries of Shell Oil Company that dealt in the offshore portions of the Gulf of Mexico.

Q. So that was part of SEPCO?

A. Yes. It was part of SEPCO.

Q. There is a reference in the document to something called SDW-WDU. And that appears at the third page of the document. Do you know what that acronym stands for, sir?

A. No, I don't.

Q. That's fine. You can put that document aside. Thank you, Mr. Sidle.

(Sidle Exhibit 17, e-mail with attachment, Shell Visit Programme - DPR Staff, four pages, was marked for identification.)

13:28:30 1

RODNEY SIDLE

13:28:30 2

BY MR. MacFALL:

13:28:32 3

Q. Mr. Sidle, you've just been handed a

13:28:34 4

document marked as Sidle Exhibit 17 for

13:28:35 5

identification. I would ask you to take a look

13:28:37 6

at this document, sir, and tell me if you

13:29:28 7

recognize it.

13:29:54 8

(Witness reviewing document.)

13:29:55 9

A. I've reviewed the document. I do

13:29:56 10

recall it. Yes.

13:29:58 11

Q. For the record, the document is an

13:30:03 12

e-mail, the most recent of which is dated

13:30:08 13

July 28, 1999 from Mark Varner to several

13:30:12 14

individuals, including yourself. The subject is

13:30:17 15

Meeting with Nigerian visitors - July 29 & 30 -

13:30:22 16

1154 BTC.

13:30:25 17

Do you actually recall the visit by

13:30:31 18

the Nigerian officials that's referenced in this

13:30:32 19

document, sir?

13:30:34 20

A. Yes, I do.

13:30:35 21

Q. That visit involved an official of

13:30:39 22

the Nigerian government. Correct?

13:30:40 23

A. Yes, it did.

13:30:44 24

Q. Specifically a Mr. Ogunjana of the

25

Department of Petroleum Resources?

13:30:46 1

RODNEY SIDLE

13:30:48 2

A. Yes.

13:30:58 3

Q. Did you have a role in the visit by

13:31:05 4

the Nigerian officials to SEPCO?

13:31:06 5

A. Yes, I did.

13:31:07 6

Q. Okay. Could you please describe

13:31:09 7

that for me?

13:31:14 8

A. If you look at the last page of

13:31:19 9

Exhibit 17 you'll see an agenda. That agenda

13:31:22 10

highlights the fact that I spoke to them on two

13:31:24 11

different topics on the two days that they were

13:31:30 12

in Houston, one that had to do about the Shell

13:31:32 13

Oil Company, SEPCO, reserve reporting practices,

13:31:37 14

and then on the next day about value assurance

13:31:38 15

reviews.

13:31:43 16

Q. Do you know what the purpose of that

13:31:45 17

visit was?

13:31:49 18

A. Yes. It was intended to showcase

13:31:56 19

Shell's technologies that, in this particular

13:31:59 20

case, were available for determination of

13:31:59 21

reserves.

13:32:06 22

Q. That showcase involved -- withdrawn.

13:32:09 23

That showcase took place in Houston.

13:32:10 24

Correct?

25

A. Well, there were multiple meetings.

13:32:15 1

RODNEY SIDLE

13:32:17 2

The portion of it that was Houston is summarized

13:32:20 3

on that page that I pointed out as the agenda,

13:32:22 4

that's the last page of this document.

13:32:27 5

Q. Now, with respect to the

13:32:29 6

presentation that you gave, the first

13:32:35 7

presentation, it says introduction to SOC

13:32:38 8

reserve management and reporting practices. And

13:32:41 9

I believe the SOC, is that Shell Oil Company?

13:32:44 10

A. That is Shell Oil Company.

13:32:49 11

Q. Do you recall why the visitors from

13:32:53 12

Nigeria were provided with a presentation

13:32:58 13

regarding the Shell Oil Company reserve

13:33:05 14

reporting practices?

13:33:07 15

A. The only knowledge that I had was

13:33:12 16

that it related to the intended showcasing of

13:33:17 17

technologies and to tie that to what were the

13:33:22 18

Shell Oil Company, SEPCO, reporting practices,

13:33:26 19

and then make the link between technologies and

13:33:30 20

the support of processes within the SEPCO

13:33:34 21

reserve reporting activities that linked to the

13:33:35 22

use of those technologies.

13:33:42 23

Q. Were you familiar with the proved

13:33:46 24

reserves reporting practices in use in Nigeria

25

during 1999?

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13:33:58 3
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13:34:46 18
13:34:48 19
13:34:51 20
13:34:52 21
13:34:53 22
13:34:57 23
13:35:01 24
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RODNEY SIDLE

A. No.

Q. Do you recall if during your presentation there was any discussion of -- withdrawn.

To the best of your knowledge, did Shell's Nigerian operations report proved reserves pursuant to the group guidelines?

MR. SMITH: Objection to form.

Q. You can answer.

A. I had no knowledge of their practices.

Q. Was there any indication given to the Nigerian officials that the Shell Oil practices were done pursuant to the SEPCO guidelines?

A. Could you ask the question again, please?

Q. I'll rephrase it. Do you recall if you distinguished between the group and SEPCO guidelines during your presentation?

A. No, I don't.

Q. Could you, very generally, summarize for me what it was that you said during your presentation?

13:35:03 1

RODNEY SIDLE

13:35:07 2

A. We focused on practices, reporting

13:35:12 3

practices, and the link to technologies. So as

13:35:16 4

an example, we would point to a technology of

13:35:19 5

being able to make subsurface measurements that

13:35:22 6

would aid in the determination of the presence,

13:35:25 7

or the amount of oil and gas that were there,

13:35:29 8

and then link that to the activities we had to

13:35:33 9

make a reserve determination, review the data,

13:35:36 10

do the reporting, the databases, and all of that

13:35:39 11

sort of thing. That refers to the first

13:35:41 12

presentation that I had.

13:35:43 13

Q. Now, with regard to the second

13:35:45 14

presentation, which according to the agenda took

13:35:46 15

place the following day.

13:35:47 16

A. Mm-hmm.

13:35:48 17

Q. The topic was value assurance

13:35:56 18

reviews. Do you recall -- again -- withdrawn.

13:35:58 19

Can you generally summarize the

13:35:59 20

substance of the presentation that you made at

13:36:01 21

that time, if you can recall?

13:36:04 22

A. I don't actually remember much of

13:36:07 23

the details about that. It was a very short

13:36:10 24

presentation. I think it was simply touching on

25

the fact that SEPCO used value assurance

13:36:15 1

RODNEY SIDLE

13:36:16 2

reviews.

13:36:22 3

Q. Now, with respect to the technology

13:36:23 4

that was showcased in connection with the

13:36:28 5

reporting of reserves, were such technologies in

13:36:40 6

use at other OUs, and by other, I mean non-SEPCO

13:36:40 7

OUs?

13:36:41 8

MR. SMITH: Objection to the form

13:36:42 9

and foundation.

13:36:43 10

A. I don't remember exactly what

13:36:47 11

technologies were reviewed with the visitors at

13:36:50 12

that time, and I didn't know at that time what

13:36:52 13

technologies were used elsewhere within the

13:36:54 14

group outside of SEPCO either.

13:37:00 15

Q. Separate and apart from these two

13:37:03 16

presentations, did you accompany the visitors

13:37:06 17

from Nigeria on any portion of their visit in

13:37:08 18

Houston?

13:37:11 19

A. There is a -- I'm sorry?

13:37:12 20

Q. In Houston.

13:37:13 21

A. In Houston?

13:37:13 22

Q. Yes.

13:37:16 23

A. Yeah, we went to lunch at a Texas

13:37:19 24

barbecue, and they really enjoyed it.

25

Q. If I could ask you to turn to the

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13:37:49 5
13:37:52 6
13:37:57 7
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13:38:18 14
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13:38:32 18
13:38:33 19
13:38:49 20
13:38:56 21
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13:39:10 24
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RODNEY SIDLE

next-to-last page in that document. At the bottom of the page appears a chart under the caption Timing and Program. And if you look at the third entry from the bottom, it says 29-30/July 1999 Shell Oil, there are two subjects listed. "Mature/end-game assets."

The second is "Reporting to Regulators: Challenges."

Do you recall if you attended any presentation besides those that you gave, touching on the second bullet point?

A. No, I don't recall attending anything that touched on that.

Q. How about with regard to the first bullet point; do you recall attending any presentations that addressed mature/end-game assets?

A. No, I don't.

Q. If I could ask you, sir, to turn to the prior page in that document. It's an outline of the travel schedule for the 29th and 30th of July. It shows technical discussions in SEPCO, and that is the fifth entry from the bottom of the page.

13:39:12 1

RODNEY SIDLE

13:39:17 2

Then it references a free --

13:39:20 3

Houston, New Orleans, and a free day in New

13:39:20 4

Orleans.

13:39:24 5

Beneath that for August 2nd and 3rd,

13:39:27 6

1999 there's an entry for "Technical Discussions

13:39:31 7

in Shell Deep Water."

13:39:34 8

Did you participate in that portion

13:39:35 9

of their visit?

13:39:36 10

A. No I did not.

13:39:48 11

Q. I'm sorry. I realize we're going

13:39:50 12

backwards, but if you could turn to the prior

13:39:59 13

page. About halfway down the page is a caption

13:40:01 14

Visit Themes. Do you see that, sir?

13:40:01 15

A. I see it.

13:40:03 16

Q. The second-to-last bullet point

13:40:07 17

under that caption states, "The Shell Group is

13:40:12 18

not more optimistic than the competition on the

13:40:14 19

reserves assessment (we appear to be more

13:40:18 20

conservative than the competition.)"

13:40:22 21

Do you recall any presentations

13:40:26 22

which conveyed this theme to the visitors from

13:40:27 23

Nigeria?

13:40:30 24

A. No, I do not.

25

Q. Did any portion of the

13:40:31 1

RODNEY SIDLE

13:40:33 2

presentation -- withdrawn.

13:40:36 3

Did any portion of the visit in

13:40:46 4

which you were involved concern a discussion of

13:40:49 5

the group's reporting of reserves versus

13:40:50 6

SEPCO's?

13:40:58 7

A. I don't recall that topic at all.

13:41:15 8

Q. Thank you.

13:41:16 9

MR. SMITH: Can I just observe for

13:41:19 10

the record that this flight from Aberdeen

13:41:21 11

to Houston that's on this agenda is the

13:41:25 12

most atrocious booking I've ever seen.

13:41:27 13

Aberdeen to London to Zurich to Atlanta to

13:41:30 14

Houston? I mean were they alive when they

13:41:35 15

got there? Unbelievable. Sorry.

13:41:36 16

MR. MacFALL: That's quite all

13:41:36 17

right.

13:41:38 18

MR. SMITH: I know levity has no

13:41:40 19

place in a deposition, but still --

13:41:41 20

THE WITNESS: They really did enjoy

13:41:52 21

the barbecue. Really.

22

23

(Sidle Exhibit 18, e-mails, two

24

pages, Bates number SMJ00040769 through

25

SMJ00040770, was marked for identification.)

13:41:53 1

RODNEY SIDLE

13:41:53 2

13:41:53 3

BY MR. MacFALL:

13:41:59 4

Q. Mr. Sidle, you've just been handed a

13:42:02 5

document marked as Sidle Exhibit 18 for

13:42:04 6

identification. I would ask you to take a look

13:42:08 7

at that, sir, and tell me if you recognize it.

13:42:36 8

(Witness reviewing document.)

13:43:49 9

A. I've reviewed it.

13:43:50 10

Q. Do you recall this document, sir?

13:43:50 11

A. Yes, I do.

13:43:54 12

Q. For the record, the document is an

13:43:59 13

e-mail from Alan Lockwood to Ian Hines, Derek

13:44:05 14

Newberry and Jerome Coggins dated November 3,

13:44:09 15

2000. The subject is Reserve Booking Meeting

13:44:11 16

with Anton Barendregt. The document

13:44:14 17

specifically discusses a meeting that occurred

13:44:16 18

in connection with possible reserves bookings

13:44:19 19

for Angola Block 18.

13:44:21 20

Do you recall attending that

13:44:22 21

meeting, sir, which according to the e-mail

13:44:27 22

occurred on November 3, 2000?

13:44:27 23

A. Yes.

13:44:30 24

Q. The e-mail indicates that, in

25

addition to Mr. Barendregt and Mr. Lockwood,

13:44:33 1

RODNEY SIDLE

13:44:35 2

there are, including yourself, several other

13:44:40 3

attendees.

13:44:42 4

Going down the list, the first one

13:44:45 5

is Ian Hines. Could you please identify that

13:44:46 6

individual for me?

13:44:49 7

A. I believe Ian was one of the

13:44:53 8

projects leads that worked on Angola.

13:44:55 9

Q. Did Mr. Hines work for SDS, do you

13:44:57 10

know? At that time.

13:44:59 11

A. I don't know what Shell organization

13:45:00 12

he worked for.

13:45:05 13

Q. Did Mr. Hines work out of Houston?

13:45:07 14

A. Hm-mm.

13:45:11 15

(Pause.) I believe so, but I'm not

13:45:12 16

entirely sure.

13:45:15 17

Q. How about Mr. Newberry?

13:45:18 18

A. Derek also worked on the Angola

13:45:19 19

project.

13:45:20 20

Q. Do you recall what organization he

13:45:22 21

worked for at that time?

13:45:25 22

A. Shell has so many organizations,

13:45:27 23

I -- I don't know exactly who he worked for.

13:45:30 24

Q. Okay. Again, do you recall if he

25

worked out of Houston?

13:45:32 1

RODNEY SIDLE

13:45:36 2

A. Yeah, I believe Derek did work out

13:45:36 3

of Houston.

13:45:39 4

Q. How about Mr. Coggins?

13:45:43 5

A. I don't recall his position.

13:45:45 6

Q. Do you recall if he worked out of

13:45:45 7

Houston?

13:45:46 8

A. No, I don't.

13:45:52 9

Q. And finally, Mr. Knight?

13:45:58 10

A. Barry. Yes. He -- I believe he was

13:46:04 11

in Shell Deepwater Services, and he -- let's

13:46:06 12

see. I don't know if he worked in Houston or

13:46:08 13

New Orleans, but it was in the US.

13:46:11 14

Q. Okay. Thank you. The body of the

13:46:15 15

e-mail talks about the events at the meeting,

13:46:18 16

and it specifically references analog work

13:46:21 17

prepared by Dave Powell. Do you know

13:46:22 18

Mr. Powell?

13:46:22 19

A. No, I don't.

13:46:27 20

Q. It then goes on to state that that

13:46:32 21

work is the basis for the team's range in

13:46:34 22

recovery efficiency and ultimate recovery per

13:46:36 23

well.

13:46:37 24

Did you have an opportunity to

25

actually review the analog work done by

13:46:40 1

RODNEY SIDLE

13:46:43 2

Mr. Powell?

13:46:48 3

A. I saw what was presented at this

13:46:52 4

meeting. I don't recall review other than that.

13:46:57 5

Q. Do you recall what materials were

13:46:59 6

presented at this meeting? And I do realize

13:47:00 7

it's a while ago.

13:47:01 8

A. No, I don't.

13:47:06 9

Q. Okay. The e-mail then references

13:47:09 10

discussion that took place regarding the

13:47:12 11

maturity of the technical work. Do you have any

13:47:14 12

recollection of that discussion, sir?

13:47:17 13

A. Basically my recollection is as

13:47:20 14

noted here, that what was shown to this group at

13:47:24 15

that time was not technically mature, however,

13:47:29 16

some suggestions for work that could be done

13:47:32 17

that then would need further review were offered

13:47:40 18

to see if something that would qualify as

13:47:41 19

technically mature could be generated.

13:47:44 20

Q. And were those discussions about the

13:47:51 21

possibility of doing work to book some portion

13:47:54 22

of the volumes at Angola, as opposed to the

13:47:59 23

entirety of what was being proposed to be

13:47:59 24

booked?

25

MR. SMITH: Objection to form.

13:48:00 1

RODNEY SIDLE

13:48:03 2

Q. Would you like me to rephrase that?

13:48:03 3

Do you understand the question?

13:48:04 4

A. Why don't you rephrase it, please.

13:48:06 5

Q. Okay. There's a reference in the

13:48:11 6

second page of the document to the project being

13:48:13 7

"cherry picked."

13:48:13 8

A. Mm-hmm.

13:48:15 9

Q. Or being a cherry-picked

13:48:18 10

development. Did that mean that what was being

13:48:26 11

discussed here was development of a portion of

13:48:30 12

the volume at Angola Block 18 for purposes of

13:48:34 13

booking proved reserves?

13:48:35 14

MR. SMITH: Objection to form.

13:48:39 15

A. The -- the reference to

13:48:42 16

"cherry-picked" development was indeed to -- a

13:48:46 17

reference to development of -- a plan of

13:48:50 18

development for only a smaller portion than the

13:48:52 19

entirety, but that portion in which there was

13:48:54 20

high confidence, the most data and the most

13:48:58 21

maturity, in terms of technical work.

13:49:09 22

Q. Was there a specific quantity of

13:49:11 23

volume that was discussed in connection with the

13:49:13 24

cherry-picked development?

25

A. There may have been, but I don't

13:49:15 1

RODNEY SIDLE

13:49:16 2

recall what it was.

13:49:18 3

Q. Do you recall if there was any

13:49:23 4

discussion of pressure to book reserves at

13:49:24 5

Angola Block 18 at this meeting?

13:49:26 6

MR. SMITH: Objection to form.

13:49:28 7

A. I don't recall that that was

13:49:32 8

discussed at this meeting. I don't recall.

13:49:33 9

Q. Do you recall if that was ever

13:49:34 10

discussed?

13:49:37 11

MR. SMITH: Objection to form.

13:49:39 12

A. Within what time frame?

13:49:43 13

Q. Within '99, 2000.

13:49:52 14

A. '99, 2000. It may have been in

13:49:54 15

2000. I do recall a general reference to the

13:49:57 16

fact that there's interest in booking reserves

13:50:00 17

at Angola Block 18 being made. I don't remember

13:50:03 18

the exact timing that I heard that comment made.

13:50:05 19

Q. Do you recall from whom you heard

13:50:05 20

that comment?

13:50:06 21

A. No, I don't.

13:50:13 22

Q. Was there any indication of who it

13:50:21 23

was that was expressing that interest?

13:50:24 24

A. I don't recall.

25

Q. Do you remember the context in which

13:50:33 1

RODNEY SIDLE

13:50:38 2

you heard that comment? Let me rephrase that.

13:50:41 3

Do you recall if you heard that

13:50:47 4

comment in the context of attempting to find

13:50:50 5

reserves at Angola Block 18 to be booked as

13:50:54 6

proved?

13:50:56 7

MR. SMITH: Objection to form.

13:51:05 8

A. I don't recall exactly the context

13:51:05 9

of the comment, because there were things said

13:51:05 10

during the presentations, there were things said

13:51:07 11

at side conversations during breaks. I remember

13:51:12 12

the comment being made, and I heard it. So I

13:51:13 13

don't remember much more than that.

13:51:19 14

Q. Okay. Do you recall if the

13:51:25 15

technical work for Angola Block 18 was performed

13:51:30 16

by SDS?

13:51:36 17

A. I know there was some SDS staff that

13:51:38 18

contributed to it, because there were some that

13:51:41 19

were present at this meeting. But again, which

13:51:44 20

Shell subsidiary Shell people worked for, for

13:51:46 21

purposes of the meeting, I just wanted to see a

13:51:48 22

technical story. I didn't care what

13:51:51 23

organization they were with. I don't know

13:51:54 24

exactly how much was SDS, or how much or how

25

little.

13:51:55 1

RODNEY SIDLE

13:51:58 2

Q. Was Angola Block 18 a deepwater

13:51:59 3

project?

13:51:59 4

A. Yes, it was.

13:52:05 5

Q. Do you recall if in or about

13:52:09 6

November of 2000 there were any Shell

13:52:14 7

organizations besides SDS that had expertise in

13:52:16 8

deepwater development?

13:52:22 9

A. There were a variety of Shell

13:52:25 10

technology organizations that would have

13:52:30 11

supported the technologies needed to be used to

13:52:41 12

explore for, analyze, drill wells. Development

13:52:43 13

is not just one thing. It's part of an entire

13:52:48 14

process. So I don't remember specifically if

13:52:51 15

there were technology organizations focused on

13:52:53 16

development. I know there were other technology

13:52:55 17

organizations that covered the broad spectrum of

13:53:00 18

technologies you would use to analyze a new

13:53:02 19

discovery and determine what it might produce.

13:53:04 20

Q. Could you identify some of those

13:53:05 21

organizations for me, please?

13:53:07 22

A. Yeah. The technology organization

13:53:11 23

like SEPTAR and its counterpart in Rijswijk had

13:53:14 24

a variety of technical services that they

25

provided around drilling optimization and

13:53:17 1

RODNEY SIDLE

13:53:20 2

reservoir simulation used, and a variety of just

13:53:24 3

basic engineering and scientific tools and

13:53:27 4

analyses, all of which formed the toolkit, if

13:53:30 5

you will, that the people needing to appraise

13:53:34 6

things like an Angola Block 18, or any other new

13:53:35 7

discovery, would use.

13:53:38 8

Q. Would it then be -- withdrawn.

13:53:39 9

You said that they provided the

13:53:43 10

toolkit. Would application of those tools to a

13:53:46 11

specific project then fall to some organization,

13:53:50 12

besides SEPTAR, and its counterpart in Rijswijk?

13:53:51 13

A. Yes, it could. Yes.

13:53:55 14

Q. Were you aware if the Shell

13:53:59 15

organization in Angola had the technical

13:54:09 16

expertise to develop or to create a development

13:54:14 17

plan with respect to Angola Block 18?

13:54:17 18

A. I had no idea what the Shell Angola

13:54:20 19

team -- what its composition or its expertise

13:54:20 20

was.

13:54:59 21

Q. Okay. Thank you.

22

23

(Sidle Exhibit 19, packet of

24

documents, Bates number RJW01000797 through

25

RJW01000801, was marked for identification.)

13:55:00 1

RODNEY SIDLE

13:55:00 2

13:55:00 3

BY MR. MacFALL:

13:55:13 4

Q. Mr. Sidle, you've just been handed a

13:55:16 5

document marked as Sidle Exhibit 19 for

13:55:19 6

identification. I would ask you to take a look

13:55:50 7

at it, sir, and tell me if you recognize it.

13:58:46 8

(Witness reviewing document.)

13:58:47 9

A. All right. I've looked at this

13:58:48 10

collection of documents.

13:58:51 11

Q. Do you recognize these documents?

13:58:51 12

A. I'm sorry?

13:58:52 13

Q. Do you recognize them, sir?

13:58:54 14

A. Some of them I do. Some of them

13:58:55 15

I've never seen before.

13:58:56 16

Q. Okay.

13:58:57 17

A. It's a collection of things that are

13:59:01 18

disassociated and have simply been collected

13:59:03 19

from a variety of things related to Block 18.

13:59:05 20

Q. Turning to the first page, the

13:59:10 21

handwritten notation. It says RD/S Angola.

13:59:10 22

A. Mm-hmm.

13:59:11 23

Q. Do you know whose handwriting that

13:59:11 24

is?

25

A. No, I don't.

13:59:13 1

RODNEY SIDLE

13:59:16 2

Q. Do you know what RD/S refers to?

13:59:19 3

A. I believe that stands for Royal

13:59:19 4

Dutch/Shell.

13:59:21 5

Q. Turning to the second page of the

13:59:27 6

document, there are two e-mails that appear on

13:59:32 7

that page. Do you recognize that e-mail string?

13:59:34 8

A. Yes. The ones where I've

13:59:36 9

participated in the e-mails, I do recognize

13:59:36 10

those.

13:59:38 11

Q. Okay. Why don't we focus our

13:59:40 12

attention on those.

13:59:42 13

The first of the two e-mails

13:59:43 14

appearing on that page is from Mr. Barendregt to

13:59:50 15

you dated November 21, 2000. It says Subject:

13:59:58 16

re: Comments on Draft Report and Att3.

14:00:03 17

Mr. Barendregt, in the first paragraph, thanks

14:00:06 18

you for comments received so far.

14:00:11 19

Let me ask you: Is the draft that

14:00:18 20

Mr. Barendregt is referring to the document that

14:00:20 21

begins following that next page, which is

14:00:24 22

captioned Angola Block 18 - Initial Reserves

14:00:25 23

Booking, 1/1/2001?

14:00:27 24

A. I'm not entirely sure, because the

25

document there is dated the 17th of January,

14:00:30 1

RODNEY SIDLE

14:00:35 2

2001, and the note that was sent to me was on

14:00:37 3

November 2000. So it's possible it could have

14:00:41 4

been an earlier draft, or it may mean something

14:00:42 5

else. I just don't know.

14:00:46 6

Q. Do you recall if the document,

14:00:49 7

whether this version or not, that appears in

14:00:53 8

this exhibit, that Mr. Barendregt is referencing

14:00:59 9

was in fact some draft of the Angola Block 18

14:01:04 10

initial reserves booking?

14:01:12 11

A. Since the exchange of e-mails

14:01:15 12

relates to Angola, I think it's likely that it

14:01:17 13

did.

14:01:19 14

Q. Do you have a specific recollection

14:01:20 15

one way or the other?

14:01:24 16

A. I -- obviously I received these

14:01:27 17

documents. Exactly what was attached to them, I

14:01:27 18

don't remember.

14:01:32 19

Q. Okay. Thank you.

14:01:34 20

Directing your attention to the

14:01:37 21

second paragraph in that e-mail, Mr. Barendregt

14:01:42 22

references a possible reserves review on Angola

14:01:47 23

in December in Houston.

14:01:51 24

Do you recall if such a review took

25

place?

14:01:51 1

RODNEY SIDLE

14:01:52 2

A. Yes, I believe it did.

14:01:57 3

Q. Did Mr. Aalbers attend that review?

14:02:01 4

A. I believe Anton and Remco attended

14:02:02 5

that meeting. Yes.

14:02:03 6

Q. Did you attend that meeting?

14:02:04 7

A. No, I did not.

14:02:09 8

Q. Do you know why that reserves review

14:02:12 9

occurred in Houston?

14:02:22 10

A. I believe it was to look at the work

14:02:32 11

of the Angola team, which had the data and

14:02:33 12

network in Houston.

14:02:34 13

Q. The last sentence in that paragraph

14:02:38 14

reads: "Seems they're under pressure from high

14:02:43 15

up to book something ..." followed by an

14:02:44 16

ellipse, which is what you had indicated you had

14:02:47 17

heard before. Do you recall if this was the

14:02:49 18

first time you had heard that in this e-mail, or

14:02:50 19

do you recall if you had heard it previously?

14:02:52 20

A. I don't recall. As I said, I

14:02:55 21

remember the comment being made. I didn't

14:02:57 22

remember exactly when or in what context.

14:03:03 23

Q. You responded on that same date in

14:03:06 24

the e-mail that appears above Mr. Barendregt's

25

e-mail, and you wrote -- my copy is, I believe,