

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

**IN RE ROYAL DUTCH/SHELL
TRANSPORT SECURITIES
LITIGATION**

**Civ. No. 04-374 (JAP)
(Consolidated Cases)
Judge Joel A. Pisano**

REBUTTAL DECLARATION OF RODNEY SIDLE

I, RODNEY SIDLE, declare and affirm as follows:

1. I am a Senior Reserves Consultant for Shell International Exploration and Production, Inc. ("SIEP"). From late 1999 to 2004, I was the Reserves Manager for Shell Exploration and Production Company ("SEPCo"), part of Shell Oil Company ("SOC"), the United States subsidiary of the Royal Dutch Shell Group of Companies ("Shell").

2. I have previously submitted a declaration in connection with this proceeding. That declaration describes my role and activities as Reserves Manager and Senior Reserves Consultant. I submit this declaration to address specific events that, I understand, are addressed in documents designated by Lead Plaintiff in the above-captioned litigation as part of its submission to the Special Master concerning the nature and extent of any United States conduct from April 8, 1999 to March 18, 2004 relating to the estimation or reporting of proved reserves that Shell later restated.

3. Unless otherwise stated, I make this declaration on personal knowledge and am competent to testify as to the matters set forth herein.

4. During 2002, Shell's Exploration and Production ("EP") business launched an initiative known as Technical and Operational Excellence ("T&OE") designed to improve EP's performance in both technical and operational areas.


5. As part of the T&OE initiative, a group known as the Reservoir Engineering Leadership Team ("RELT") was formed. I was a member of that team, as well as a member of a Reserves sub-team tasked with addressing EP's work process that supported maturing its hydrocarbon resources to production.

6. Both the RELT and its Reserves sub-team held meetings during 2003 concerning EP's efforts to improve, respectively, its reservoir-engineering and reserves-maturation performance.

7. At no time before March 18, 2004 (which I understand to be the end of the putative Class Period in this litigation) did the activities of the RELT or the Reserves sub-team actually determine the proved reserves that were reported by a Shell operating unit to EP headquarters in The Hague, nor the proved reserves that Shell reported externally.

8. Furthermore, at no time before March 18, 2004 did the RELT or the Reserves sub-team hold any meetings in the United States.

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



RODNEY SIDLE

Executed: Katy, Texas

June 22, 2007