IN DE DOWAL DIFFCHIQUELL	)	C: N. 04 274 (TAD)
IN RE ROYAL DUTCH/SHELL	)	Civ. No. 04-374 (JAP)
TRANSPORT SECURITIES	)	(Consolidated Cases)
LITIGATION	)	Judge Joel A. Pisano
	)	
	)	

## **DECLARATION OF SARAH BELL**

- I, SARAH BELL, declare and affirm as follows:
- 1. I am employed by Sakhalin Energy Investment Company Ltd.

  ("SEIC") in The Hague, the Netherlands. SEIC is 27.5% owned by the Royal

  Dutch/Shell Group of Companies ("Shell"). From September 2001 through April

  2005, I was employed as a Reservoir Engineer at Shell Development Australia

  ("SDA").
  - 2. I hold a degree in physics from Oxford University.
- 3. I understand that an issue in this case involves 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. I am making this declaration in connection with Shell's submissions on this issue. I previously was deposed in this matter on November 2, 2006. I understand that the Court and the parties have access to the transcript of that proceeding.
- 4. Unless otherwise stated, I make this declaration on personal knowledge and am competent to testify as to the matters set forth herein.

Case 3:04-cy-00374-JAP-JJH Document 344 Filed 10/10/2007 Page 2 of 5 SDA is a company owned by Shell that engages in exploration and

production ("E&P") activities in Australia, where SDA is headquartered.

- 6. While employed by SDA in Australia, I coordinated the process by which SDA compiled and submitted its Annual Review of Petroleum Resources ("ARPR") to Shell's E&P headquarters in the Netherlands. The ARPR contains the year-end summary of a Shell company's oil and gas resources, broken down into categories such as proved reserves, expectation reserves and scope for recovery.
- 7. Among the oil and gas resources for which SDA submitted information during my employment as a Reservoir Engineer was the Gorgon gas field. I am informed that Shell restated the proved reserves for the Gorgon field as part of the reserves recategorization that took place in 2004.
- 8. During my employment by SDA, the process of compiling and submitting SDA's ARPR was directed from SDA's corporate headquarters in Australia, with input from the Group Reserves Coordinator's office in The Hague, the Netherlands. No part of SDA's ARPR was compiled in or submitted from the United States.
- 9. During the entirety of my employment by SDA through March 18, 2004, no United States-based entity or personnel assisted SDA or me in estimating of SDA's proved reserves or other oil and gas resources.
- 10. To my knowledge, no work was performed for SDA during my period of employment by a Shell service company known as Shell Deepwater Services ("SDS"), whether relating to the Gorgon field or otherwise.

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- 10. To my knowledge, no work was performed for SDA during my period of employment by a Shell service company known as Shell Deepwater Services ("SDS"), whether relating to the Gorgon field or otherwise.

Case 1:04-cvToogy4knowledge, nooworken/as/sperformed for StDAoduringanty 4pcried of employment by a Shell service company known as Shell Exploration and Production Technology, Applications and Research ("SEPTAR") or by personnel located at a facility known as the Bellaire Technology Center, whether relating to the Gorgon field or otherwise.

- 12. In or around August 2002, I took part in an exploration review in Houston, Texas, that analyzed certain undiscovered acreage in which SDA was contemplating an investment. This review did not relate in any way to the Gorgon field or to any other fields for which SDA reported proved reserves during my period of employment, and the review did not address the estimation and reporting of proved reserves in any respect.
- 13. Other than the review discussed in paragraph 12, to my knowledge, no work was performed for SDA during my period of employment by any other entity based in the United States, whether relating to the Gorgon field or otherwise.
- 14. On November 2, 2006, I was shown a document Bates-numbered V00310521-V00310585, which consists of an email attaching a document entitled "Greater Gorgon Asset Reference Plan September 2003."
- 15. This document does not affect my conclusions that I have no recollection of SEPTAR's having any involvement in the Gorgon field and that I had no direct involvement with SEPTAR while working at SDA. Although I did not prepare this document, I would note that it concerns the entire Greater Gorgon area, not just the Gorgon field mentioned above. Furthermore, the references to SEPTAR

technology resource" [V00310551], not in the context of the estimation and reporting of proved reserves.

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

Sarah Bell

Executed:

une, 2007