

I, Joshua S. Lipshutz, declare as follows:

1. I am an attorney admitted to practice before the this Court *pro hac vice*. I am a partner at Gibson, Dunn & Crutcher LLP and counsel for Defendants Chevron Corporation and Chevron U.S.A., Inc. (the “Chevron Parties”) in this litigation. I make this declaration upon personal knowledge and could and would competently testify to the matters below if called to do so.

2. I file this Declaration in support of Defendants’ Opposition to Plaintiff’s Motion to Remand, filed concurrently herewith.

3. Attached hereto as **Exhibit 1** is a true and correct copy of President Nixon’s public remarks, delivered on November 7, 1973, in which he stated, “Unfortunately, our expectations for this winter have now been sharply altered by the recent conflict in the Middle East. Because of that war, most of the Middle Eastern oil producers have reduced overall production and cut off their shipments of oil to the United States. . . . Today the challenge is to regain the strength that we had earlier in this century, the strength of self-sufficiency. Our ability to meet our own energy needs is directly limited to our continued ability to act decisively and independently at home and abroad in the service of peace” Richard Nixon, President of the United States of America, Address to the Nation About Policies to Deal with the Energy Shortages (Nov. 7, 1973), <http://www.presidency.ucsb.edu/ws/?pid=4034> (last accessed Dec. 17, 2017).

4. Attached hereto as **Exhibit 2** is a true and correct copy of President Ford’s remarks, delivered on May 27, 1975, in which he stated, “Last January 15, I went before your Senators and Representatives in Congress with a comprehensive plan to make our country independent of foreign sources of energy by 1985. Such a program was long overdue. We have become increasingly at the mercy of others for the fuel on which our entire economy runs. . . . I will continue to press for my January program, which is still the only total energy program there is. I cannot sit here idly while nothing is done.” Gerald R. Ford, President of the United States of America, Address to the Nation on Energy Programs (May 27, 1975),

<http://www.presidency.ucsb.edu/ws/index.php?pid=4942&st=foreign+oil&st1> (last accessed Dec. 17, 2017).

5. Attached hereto as **Exhibit 3** is a true and correct copy of President Carter's remarks, delivered on April 5, 1979, in which he stated, "[T]he fundamental cause of our Nation's energy crisis is petroleum—oil and gas. We are dangerously dependent on uncertain and expensive sources of foreign oil. . . . The National Energy Plan, which I proposed in April 1977, was the first major effort to deal with all these problems. . . . Phased decontrol will gradually increase the price of petroleum products. In the short run, it will add a small amount to our rate of inflation, but that is the cost we must pay to reduce our dependence on the foreign oil cartel." Jimmy Carter, President of the United States of America, Energy Address to the Nation (Apr. 5, 1979), <http://www.presidency.ucsb.edu/ws/index.php?pid=32159&st=Iran&st1> (last accessed Dec. 17, 2017).

6. Attached hereto as **Exhibit 4** is a true and correct copy of President Reagan's remarks, delivered on January 28, 1981, in which he stated, "I am ordering, effective immediately, the elimination of remaining Federal controls on U.S. oil production and marketing. . . . Price controls have [] made us more energy-dependent on the OPEC nations, a development that has jeopardized our economic security and undermined price stability at home. . . . [T]he elimination of price controls will end the entitlements system, which has been in reality a subsidy for the importation of foreign oil. . . . Ending price controls is a positive first step towards a balanced energy program . . . designed to promote prudent conservation and vigorous domestic production." Ronald Reagan, President of the United States of America, Statement on Signing Executive Order 12287: Providing for the Decontrol of Crude Oil and Refined Petroleum Products (Jan. 28, 1981), <http://www.presidency.ucsb.edu/ws/index.php?pid=43912&st=foreign+oil&st1> (last accessed Dec. 17, 2017).

7. Attached hereto as **Exhibit 5** is a true and correct copy of President Reagan's remarks, delivered on August 3, 1982, in which he stated, "Restoring America's energy security has been a top priority since I assumed office. We have changed regulations and laws, held discussions with our neighbors concerning a North American accord, and increased cooperation with our friends and allies to enhance our energy security." Ronald Reagan, President of the United States of America, Statement on Signing the Energy Preparedness Act of 1982 (Aug. 3, 1982), <http://www.presidency.ucsb.edu/ws/index.php?pid=42816&st=foreign+oil&st1> (last accessed Dec. 17, 2017).

8. Attached hereto as **Exhibit 6** is a true and correct copy of President George H.W. Bush's remarks, delivered on February 20, 1991, in which he stated, "It's something that is really essential: a national energy strategy, and I want to announce it today. . . . [I]t is designed to diversify America's sources of energy. . . . [W]e are, I will be the first to concede, a long way from total energy independence. Our imports of foreign oil have been climbing steadily since 1985 and now stand at 42 percent of our total consumption. Too many of those oil imports come from sources in troubled parts of the world. . . . To minimize our vulnerability to foreign oil, the disruptions that come from reliance on foreign oil, this strategy takes a multifaceted approach. It will help us to find more reliable sources of energy through uncompromisingly safe and environmentally sound development. Domestic oil production will rise by 3.8 million barrels a day." George H.W. Bush, President of the United States, Remarks at a Briefing on Energy Policy (Feb. 20, 1991), <http://www.presidency.ucsb.edu/ws/index.php?pid=19318&st=energy+policy&st1> (last accessed Dec. 17, 2017).

9. Attached hereto as **Exhibit 7** is a true and correct copy of President Clinton's remarks, delivered on March 18, 2000, in which he stated, "We need to take action now for both the short and the long term, to protect consumers and strengthen America's energy security. In the short term, I'll continue to work with foreign countries to help close the gap

between production and consumption. . . . Today I am announcing important new steps to reduce our reliance on foreign oil and fossil fuels, to protect our environment, and to keep our economy strong.” William J. Clinton, President of the United States of America, The President’s Radio Address (Mar. 18, 2000), <http://www.presidency.ucsb.edu/ws/index.php?pid=58262> (last accessed Dec. 17, 2017).

10. Attached hereto as **Exhibit 8** is a true and correct copy of President George W. Bush’s remarks, delivered on January 23, 2007, in which he stated, “For too long our nation has been dependent on foreign oil. And this dependence leaves us more vulnerable to hostile regimes It’s in our vital interest to diversify America’s energy supply To reach this goal, we must increase the supply of alternative fuels At the same time, we need to reform and modernize fuel economy standards for cars Achieving these ambitious goals will dramatically reduce our dependence on foreign oil, but it’s not going to eliminate it.” George W. Bush, President of the United States, State of the Union Address (Jan. 23, 2007), <https://georgewbush-whitehouse.archives.gov/news/releases/2007/01/20070123-2.html> (last accessed Dec. 17, 2017).

11. Attached hereto as **Exhibit 9** is a true and correct copy of President Obama’s remarks, delivered on March 30, 2011, in which he stated, “We’ve known about the dangers of our oil dependence for decades. Richard Nixon talked about freeing ourselves from dependence on foreign oil. And every President since that time has talked about freeing ourselves from dependence on foreign oil. . . . I talked about reducing America’s dependence on oil when I was running for President, and I’m proud of the historic progress that we’ve made over the last two years towards that goal And today, I want to announce a new goal When I was elected to this office, America imported 11 million barrels of oil a day. By a little more than a decade from now, we will have cut that by one-third. . . . Now, meeting the goal of cutting our oil dependence depends largely on two things: first, finding and producing more oil at home; second, reducing our overall dependence on oil with cleaner alternative fuels and greater efficiency.” Barack Obama,

President of the United States of America, Remarks by the President on America's Energy Security (Mar. 30, 2011), <https://obamawhitehouse.archives.gov/the-press-office/2011/03/30/remarks-president-americas-energy-security> (last accessed Dec. 17, 2017).

12. Attached hereto as **Exhibit 10** is a true and correct copy of President Trump's remarks, delivered on June 29, 2017, in which he stated, "We're here today to usher in a new American energy policy — one that unlocks million and millions of jobs and trillions of dollars in wealth. For over 40 years, America was vulnerable to foreign regimes that used energy as an economic weapon. Americans' quality of life was diminished by the idea that energy resources were too scarce to support our people. . . . We don't want to let other countries take away our sovereignty and tell us what to do and how to do it. That's not going to happen. With these incredible resources, my administration will seek not only American energy independence that we've been looking for so long, but American energy dominance. And we're going to be an exporter — exporter. We will be dominant. We will export American energy all over the world, all around the globe. These energy exports will create countless jobs for our people, and provide true energy security to our friends, partners, and allies all across the globe. But this full potential can only be realized when government promotes energy development" President Trump, Remarks by President Trump at the Unleashing American Energy Event (June 29, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-unleashing-american-energy-event/> (last accessed Dec. 17, 2017).

13. Attached hereto as **Exhibit 11** is a true and correct copy of a document titled "President Obama's Climate Action Plan," released by The White House Office of the Press Secretary, dated June 25, 2013, and available at <https://obamawhitehouse.archives.gov/the-press-office/2013/06/25/fact-sheet-president-obama-s-climate-action-plan> (last accessed Dec. 17, 2017).

14. Attached hereto as **Exhibit 12** is a true and correct copy of a statement by President Trump on the Paris Climate Accord, released by The White House Office of the

Press Secretary, dated June 1, 2017, 3:32 PM, and available at <https://www.whitehouse.gov/the-press-office/2017/06/01/statement-president-trump-paris-climate-accord> (last accessed Dec. 17, 2017).

15. Attached hereto as **Exhibit 13** is a true and correct copy of an excerpt of a document titled, “EPA Regulatory Impact Analysis for the Review of the Clean Power Plan: Proposal (Oct. 2017), available at https://www.epa.gov/sites/production/files/2017-10/documents/ria_proposed-cpp-repeal_2017-10_0.pdf (last accessed Dec. 21, 2017).

16. Attached hereto as **Exhibit 14** is a true and correct copy of the United States Department of Energy’s webpage titled, “History of SPR Releases,” and available at <https://energy.gov/fe/services/petroleum-reserves/strategic-petroleum-reserve/releasing-oil-spr#Exchanges> (last accessed Dec. 17, 2017).

17. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts of a statement of Thomas A. Readinger, Associate Director of Offshore Minerals Management Service, before the House Subcommittee on Energy and Mineral Resources, dated August 13, 2005.

18. Attached hereto as **Exhibit 16** is a true and correct copy of President William H. Taft’s executive order dated September 2, 1912, as excerpted from a book titled “Oil Leasing Lands – Hearings Before the Committee on the Public Lands,” published in 1918.

19. Attached hereto as **Exhibit 17** is a true and correct copy of Act of Mar. 31, 1891, ch. 181, 1891 Cal. Stat. 262.

20. Attached hereto as **Exhibit 18** is a true and correct copy of Act of Mar. 2, 1897, ch. 56, 1897 Cal Stat. 51.

21. Attached hereto as **Exhibit 19** is a true and correct copy of a United States Department of Energy webpage titled, “Strategic Petroleum Reserve,” and available at <https://energy.gov/fe/services/petroleum-reserves/strategic-petroleum-reserve> (last accessed Dec. 17, 2017).

22. Attached hereto as **Exhibit 20** is a true and correct copy of a document titled, “Haynes & Boone, LLP Oil Patch Bankruptcy Monitor,” dated October 31, 2017, and

available at

http://www.haynesboone.com/~media/files/energy_bankruptcy_reports/2017/2017_oil_patc_h_monitor_20171031.ashx (last accessed Dec. 17, 2017).

23. Attached hereto as **Exhibit 21** is a true and correct copy of a document titled, “Haynes & Boone, LLP Midstream Report,” dated October 31, 2017, and available at http://www.haynesboone.com/~media/files/energy_bankruptcy_reports/2017/2017_midstream%20report_20171031.ashx (last accessed Dec. 20, 2017).

24. Attached hereto as **Exhibit 22** is a true and correct copy of a document titled, “Haynes and Boone, LLP Oilfield Services Bankruptcy Tracker,” dated October 31, 2017, and available at http://www.haynesboone.com/~media/files/energy_bankruptcy_reports/2017/2017_ofs_bankruptcy_tracker_20171031.ashx (last accessed Dec. 20, 2017).

25. Attached hereto as **Exhibit 23** are true and correct consolidated copies of excerpts of BP plc’s annual reports, filed on Securities Exchange Commission Form 20-F, for the years 1998–2016. These public filings disclose the following crude oil, natural gas liquids, and natural gas production of BP plc’s subsidiaries and equity-accounted entities:

Year	U.S. Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Total Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	391	2,048	19.09%	80.91%
2015	379	2,005	18.90%	81.10%
2014	410	1,916	21.40%	78.60%
2013	363	2,013	18.03%	81.97%
2012	390	2,056	18.97%	81.03%
2011	453	2,157	21.00%	79.00%
2010	594	2,374	25.02%	74.98%
2009	665	2,535	26.23%	73.77%
2008	538	2,401	22.41%	77.59%
2007	513	2,414	21.25%	78.75%

Year	U.S. Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Total Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2006	547	2,475	22.10%	77.90%
2005	612	2,562	23.89%	76.11%
2004	666	2,531	26.31%	73.69%
2003	726	2,121	34.23%	65.77%
2002	765	2,018	37.91%	62.09%
2001	744	1,931	38.53%	61.47%
2000	729	1,928	37.81%	62.19%
1999	804	2,061	39.01%	60.99%
1998	841	2,049	41.04%	58.96%
Total	11,130	41,595	26.76%	73.24%

Year	U.S. Natural Gas Production <i>(Millions of cubic feet per day)</i>	Total Natural Gas Production <i>(Millions of cubic feet per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	1,656	7,075	23.41%	76.59%
2015	1,528	7,146	21.38%	78.62%
2014	1,519	7,100	21.39%	78.61%
2013	1,539	7,061	21.80%	78.20%
2012	1,651	7,393	22.33%	77.67%
2011	1,843	7,518	24.51%	75.49%
2010	2,184	8,401	26.00%	74.00%
2009	2,316	8,485	27.30%	72.70%
2008	2,157	8,334	25.88%	74.12%
2007	2,174	8,143	26.70%	73.30%
2006	2,376	8,417	28.23%	71.77%
2005	2,546	8,424	30.22%	69.78%
2004	2,749	8,503	32.33%	67.67%
2003	3,128	8,613	36.32%	63.68%
2002	3,483	8,707	40.00%	60.00%
2001	3,554	8,632	41.17%	58.83%
2000	3,054	7,609	40.14%	59.86%
1999	2,369	6,067	39.05%	60.95%
1998	2,401	5,808	41.34%	58.66%
Total	44,227	147,436	30.00%	70.00%

26. Attached hereto as **Exhibit 24** are true and correct consolidated copies of excerpts of Chevron Corporation's annual reports, filed on Securities Exchange Commission Form 10-K, for the years 1998–2016.¹ These public filings disclose the following liquids and natural gas production for Chevron, its subsidiaries, and/or its affiliates:

Year	U.S. Liquids Production <i>(Thousands of barrels per day)</i>	Total Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-US to Total Production
2016	504	1,719	29.32%	70.68%
2015	501	1,744	28.73%	71.27%
2014	456	1,709	26.68%	73.32%
2013	449	1,731	25.94%	74.06%
2012	455	1,764	25.79%	74.21%
2011	465	1,849	25.15%	74.85%
2010	489	1,923	25.43%	74.57%
2009	484	1,846	26.22%	73.78%
2008	421	1,649	25.53%	74.47%
2007	460	1,756	26.20%	73.80%
2006	462	1,732	26.67%	73.33%
2005	455	1,669	27.26%	72.74%
2004	505	1,710	29.53%	70.47%
2003	562	1,808	31.08%	68.92%
2002	602	1,897	31.73%	68.27%
2001	614	1,959	31.34%	68.66%
2000	312	1,159	26.92%	73.08%
1999	316	1,127	28.02%	71.96%
1998	325	1,107	29.36%	70.64%
Total	8,837	31,858	27.74%	72.26%

Year	U.S. Natural Gas Production <i>(millions of cubic feet per day)</i>	Total Natural Gas Production <i>(millions of cubic feet per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	1,120	5,252	21.33%	78.67%
2015	1,310	5,269	24.86%	75.14%

¹ Annual reports for the years 2001–2004 were filed under the name ChevronTexaco Corporation.

2014	1,250	5,167	24.19%	75.81%
2013	1,246	5,192	24.00%	76.00%
2012	1,203	5,074	23.71%	76.29%
2011	1,279	4,941	25.89%	74.11%
2010	1,314	5,040	26.07%	73.93%
2009	1,399	4,989	28.04%	71.96%
2008	1,501	5,125	29.29%	70.71%
2007	1,699	5,019	33.85%	66.15%
2006	763	2,558	29.83%	70.17%
2005	727	2,374	30.62%	69.38%
2004	817	2,369	34.49%	65.51%
2003	933	2,523	36.98%	63.02%
2002	1,003	2,626	38.19%	61.81%
2001	1,065	2,695	39.52%	60.48%
2000	1,558	2,469	63.11%	36.89%
1999	1,638	2,513	65.21%	34.79%
1998	1,739	2,393	72.68%	27.32%
Total	23,565	73,587	32.02%	67.98%

27. Attached hereto as **Exhibit 25** are true and correct consolidated copies of excerpts of the annual reports of ConocoPhillips, filed on Securities Exchange Commission Form 10-K for the years 2003–2016. These public filings disclose the following crude oil, natural gas liquids, liquids, and natural gas production for ConocoPhillips, its subsidiaries, and/or its equity affiliates:

Year	U.S. Crude Oil, Nat. Gas Liquids, & Liquids Production <i>(Thousands of barrels per day)</i>	Total Crude Oil, Nat. Gas Liquids, & Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	458	926	49.41%	50.59%
2015	482	923	52.23%	47.77%
2014	471	893	52.76%	47.24%
2013	438	868	50.47%	49.53%
2012	414	871	47.48%	52.52%
2011	381	860	44.27%	55.73%
2010	381	1,236	30.82%	69.18%
2009	419	1,430	29.31%	70.69%

2008	430	1,353	31.78%	68.22%
2007	455	1,386	32.81%	67.19%
2006	444	1,463	30.34%	69.66%
2005	397	1,230	32.29%	67.71%
2004	386	1,030	37.50%	62.50%
2003	447	1,036	43.12%	56.88%
Total	6,003	15,507	38.71%	61.29%

Year	US Natural Gas Production (millions of cubic feet per day)	Total Natural Gas Production (Millions of cubic feet per day)	Percentage of US to Total Production	Percentage of Non-US to Total Production
2016	1,553	4,277	36.32%	63.68%
2015	1,838	4,501	40.84%	59.16%
2014	1,860	4,463	41.68%	58.32%
2013	1,858	4,534	40.97%	59.03%
2012	1,877	4,718	39.78%	60.22%
2011	1,940	4,981	38.94%	61.06%
2010	2,093	5,342	39.18%	60.82%
2009	2,329	5,625	41.40%	58.60%
2008	2,455	5,740	42.77%	57.23%
2007	2,597	5,781	44.93%	55.07%
2006	2,466	5,671	43.48%	56.52%
2005	1,625	3,712	43.76%	56.24%
2004	1,690	3,767	44.87%	55.13%
2003	1,712	3,855	44.42%	55.58%
Total	27,893	66,967	41.65%	58.35%

28. Attached hereto as **Exhibit 26** are true and correct consolidated copies of excerpts of Exxon Mobil Corporation's annual reports, filed on Securities Exchange Commission Form 10-K, for the years 1999–2016. These public filings disclose the following crude oil, natural gas liquids, liquids, and natural gas production for Exxon Mobil Corporation's consolidated subsidiaries and equity companies:

Year	U.S. Crude Oil, Nat. Gas Liquids, & Liquids Production <i>(Thousands of barrels per day)</i>	Total Crude Oil, Nat. Gas Liquids, & Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	494	2,365	20.89%	79.11%
2015	476	2,345	20.30%	79.70%
2014	454	2,111	21.51%	78.49%
2013	431	2,202	19.57%	80.43%
2012	418	2,185	19.13%	80.87%
2011	423	2,312	18.30%	81.70%
2010	408	2,422	16.85%	83.15%
2009	384	2,387	16.09%	83.91%
2008	367	2,405	15.26%	84.74%
2007	392	2,616	14.98%	85.02%
2006	414	2,681	15.44%	84.56%
2005	477	2,523	18.91%	81.09%
2004	557	2,571	21.66%	78.34%
2003	610	2,516	24.24%	75.76%
2002	681	2,496	27.28%	72.72%
2001	712	2,542	28.01%	71.99%
2000	733	2,553	28.71%	71.29%
1999	729	2,517	28.96%	71.04%
Total	9,160	43,749	20.94%	79.06%

Year	U.S. Natural Gas Production <i>(Millions of cubic feet per day)</i>	Total Natural Gas Production <i>(Millions of cubic feet per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	3,078	10,127	30.39%	69.61%
2015	3,147	10,515	29.93%	70.07%
2014	3,404	11,145	30.54%	69.46%
2013	3,545	11,836	29.95%	70.05%
2012	3,822	12,322	31.02%	68.98%
2011	3,917	13,162	29.76%	70.24%
2010	2,596	12,148	21.37%	78.63%
2009	1,275	9,273	13.75%	86.25%
2008	1,246	9,095	13.70%	86.30%
2007	1,468	9,384	15.64%	84.36%
2006	1,625	9,334	17.41%	82.59%

Year	U.S. Natural Gas Production <i>(Millions of cubic feet per day)</i>	Total Natural Gas Production <i>(Millions of cubic feet per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2005	1,739	9,251	18.80%	81.20%
2004	1,947	9,864	19.74%	80.26%
2003	2,246	10,119	22.20%	77.80%
2002	2,375	10,452	22.72%	77.28%
2001	2,598	10,279	25.27%	74.73%
2000	2,856	10,343	27.61%	72.39%
1999	2,871	10,308	27.85%	72.15%
Total	45,755	188,957	24.21%	75.79%

29. Attached hereto as **Exhibit 27** are true and correct consolidated copies of excerpts of Hess Corporation's annual reports, filed on Securities Exchange Commission Form 10-K, for the years 1998–2016. These public filings disclose the following crude oil, condensate, natural gas liquids, and natural gas production for Hess and its consolidated subsidiaries:

Year	U.S. Crude Oil, Condensate, & Nat. Gas Liquids Production <i>(Millions of barrels)</i>	Total Crude Oil, Condensate, & Nat. Gas Liquids Production <i>(Millions of barrels)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	61	86	70.93%	29.07%
2015	68	101	67.33%	32.67%
2014	54	89	60.67%	39.33%
2013	45	88	51.14%	48.86%
2012	45	110	40.91%	59.09%
2011	34	97	35.05%	64.95%
2010	32	112	28.57%	71.43%
2009	26	107	24.30%	75.70%
2008	15	97	15.46%	84.54%
2007	15	100	15.00%	85.00%
2006	17	94	18.09%	81.91%
2005	20	89	22.47%	77.53%
2004	20	90	22.22%	77.78%
2003	20	96	20.83%	79.17%
2002	24	121	19.83%	80.17%
2001	28	111	25.23%	74.77%

Year	U.S. Crude Oil, Condensate, & Nat. Gas Liquids Production <i>(Millions of barrels)</i>	Total Crude Oil, Condensate, & Nat. Gas Liquids Production <i>(Millions of barrels)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2000	24	96	25.00%	75.00%
1999	24	85	28.24%	71.76%
1998	17	75	22.67%	77.33%
Total	589	1,844	31.94%	68.06%

Year	U.S. Nat. Gas Production <i>(Millions of mcf)</i>	Total Nat. Gas Production <i>(Millions of mcf)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	104	206	50.49%	49.51%
2015	105	228	46.05%	53.95%
2014	66	197	33.50%	66.50%
2013	51	220	23.18%	76.82%
2012	50	244	20.49%	79.51%
2011	42	244	17.21%	82.79%
2010	46	263	17.49%	82.51%
2009	39	270	14.44%	85.56%
2008	34	272	12.50%	87.50%
2007	38	241	15.77%	84.23%
2006	43	239	17.99%	82.01%
2005	53	214	24.77%	75.23%
2004	67	227	29.52%	70.48%
2003	92	264	34.85%	65.15%
2002	136	288	47.22%	52.78%
2001	155	303	51.16%	48.84%
2000	106	249	42.57%	57.43%
1999	124	235	52.77%	47.23%
1998	107	210	50.95%	49.05%
Total	1,458	4,614	31.60%	68.40%

30. Attached hereto as **Exhibit 28** are true and correct consolidated copies of exhibits of Marathon Oil Corporation's annual reports, filed on Securities Exchange Commission Form 10-K, for the years 1998–2016. These public filings disclose the following crude and synthetic oil, condensate, natural gas liquids, and natural gas production for Marathon Oil

Corporation, its subsidiaries, and its equity method investees:

Year	U.S. Crude & Synthetic Oil, Condensate, & Nat. Gas Liquids Production <i>(Millions of barrels)</i>	Total Crude & Synthetic Oil, Condensate, & Nat. Gas Liquids Production <i>(Millions of barrels)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	62	97	63.92%	36.08%
2015	76	109	69.72%	30.28%
2014	68	118	57.63%	42.37%
2013	55	125	44.00%	56.00%
2012	39	118	33.05%	66.95%
2011	27	93	29.03%	70.97%
2010	25	98	25.51%	74.49%
2009	23	90	25.56%	74.44%
2008	23	86	26.74%	73.26%
2007	23	73	31.51%	68.49%
2006	28	86	32.56%	67.44%
2005	28	70	40.00%	60.00%
2004	29	62	46.77%	53.23%
2003	39	71	54.93%	45.07%
2002	42	75	56.00%	44.00%
2001	46	77	59.74%	40.26%
2000	48	75	64.00%	36.00%
1999	53	76	69.74%	30.26%
1998	49	71	69.01%	30.99%
Total	870	1,796	48.44%	51.56%

Year	U.S. Nat. Gas Production <i>(Billions of cubic feet)</i>	Total Nat. Gas Production <i>(Billions of cubic feet)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	115	278	41.37%	58.63%
2015	128	286	44.76%	55.24%
2014	113	295	38.31%	61.69%
2013	114	311	36.66%	63.34%
2012	129	322	40.06%	59.94%
2011	119	310	38.39%	61.61%

Year	U.S. Nat. Gas Production <i>(Billions of cubic feet)</i>	Total Nat. Gas Production <i>(Billions of cubic feet)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2010	133	314	42.36%	57.64%
2009	146	351	41.60%	58.40%
2008	164	359	45.68%	54.32%
2007	174	319	54.55%	45.45%
2006	194	290	66.90%	33.10%
2005	211	324	65.12%	34.88%
2004	231	356	64.89%	35.11%
2003	267	418	63.88%	36.12%
2002	272	441	61.68%	38.32%
2001	289	458	63.10%	36.90%
2000	268	442	60.63%	39.37%
1999	275	458	60.04%	39.96%
1998	272	436	62.39%	37.61%
Total	4,125	7,624	54.11%	45.89%

31. Attached hereto as **Exhibit 29** are true and correct consolidated copies of excerpts of Royal Dutch Shell plc’s annual reports, filed on Securities Exchange Commission Form 20-F, for the years 2005–2016. On pages entitled “Oil and Gas Production Available for Sale,” these public filings disclose the following crude oil, natural gas liquids, and natural gas production for Royal Dutch Shell plc’s subsidiaries, joint ventures, and associates:

Year	U.S. Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Total Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	282	1,684	16.73%	83.27%
2015	286	1,358	21.04%	78.96%
2014	271	1,339	20.23%	79.77%
2013	237	1,396	17.01%	82.99%
2012	222	1,488	14.92%	85.08%
2011	211	1,536	13.74%	86.26%
2010	237	1,619	14.64%	85.36%
2009	273	1,581	17.27%	82.73%
2008	272	1,693	16.07%	83.93%

Year	U.S. Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Total Crude Oil & Nat. Gas Liquids Production <i>(Thousands of barrels per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2007	324	1,818	17.82%	82.18%
2006	322	1,948	16.53%	83.47%
2005	333	1,998	16.67%	83.33%
Total	3,270	19,458	16.80%	83.20%

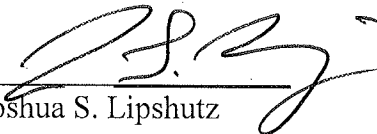
Year	U.S. Natural Gas Production <i>(million standard cubic feet per day)</i>	Total Natural Gas Production <i>(million standard cubic feet per day)</i>	Percentage of U.S. to Total Production	Percentage of Non-U.S. to Total Production
2016	847	10,642	7.96%	92.04%
2015	697	8,380	8.32%	91.68%
2014	989	9,259	10.68%	89.32%
2013	1,081	9,616	11.24%	88.76%
2012	1,070	9,474	11.29%	88.71%
2011	967	8,986	10.76%	89.24%
2010	1,153	9,305	12.39%	87.61%
2009	1,061	8,483	12.51%	87.49%
2008	1,053	8,569	12.29%	87.71%
2007	1,130	8,214	13.76%	86.24%
2006	1,163	8,368	13.90%	86.10%
2005	333	1,998	16.67%	83.33%
Total	11,544	101,294	11.40%	88.60%

32. Attached hereto as **Exhibit 30** is a true and correct copy of a map depicting federal lands in the state of Rhode Island, available at https://nationalmap.gov/small_scale/printable/images/pdf/fedlands/RI.pdf (last accessed Sept. 12, 2018).

33. Attached hereto as **Exhibit 31** is a true and correct copy of a document titled “Fox Point Hurricane Barrier Providence, Rhode Island: Continued Operation and Maintenance Environmental Assessment” (Aug. 2015), written by the U.S. Army Corps of Engineers, and available at

<http://www.nae.usace.army.mil/Portals/74/docs/Topics/FoxPointHurricaneBarrier/Draft-Final-EA-20150814.pdf> (last accessed Sept. 12, 2018).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on September 13, 2018 at Washington, D.C.

By: /s/ 
Joshua S. Lipshutz

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed through the ECF system on the 14th day of September, 2018, and will be sent electronically to the registered participants identified on the Notice of Electronic Filing.

/s/ Gerald J. Petros