

Our Energy Future

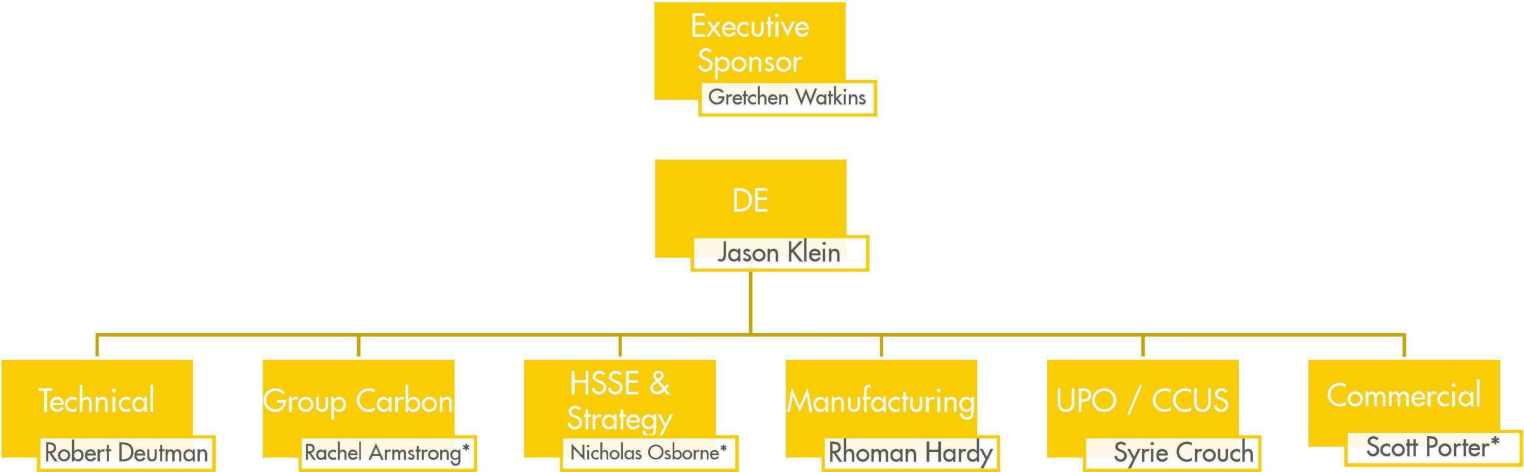


Project El Camino DRB Pre-read issued July 12, 2019

DE: Jason Klein
BOM: Jan Sherman

El Camino Integrated DRB

Pre-Read



*New DRB members

Agenda (60 Minutes)

- ❑ Welcome & introduce new DRB members (5 min)
- ❑ HSSE (5 min)
- ❑ Risk & opportunities
- ❑ Project Update (20 min)
 - ❑ CO2 PSV and 45Q
 - ❑ Capture concepts
 - ❑ Concept evaluations & recommendations
- ❑ Capex ceiling
- ❑ OP19 submission

- ❑ DRB Decisions/Steer (30 min)
 - ❑ Does the DRB endorse the recommended CCUS concepts to take to next phase of evaluation?
 - ❑ Does the DRB agree with risks and opportunities presented?
 - ❑ Does the DRB agree to sponsor the Denbury valuation (NBD)?
 - ❑ Does the DRB support the OP19 submission?

What do we want?

- DRB endorsement on CCUS concepts to take to next phase of evaluation
- Decisions/Steer
 - Risks & opportunities
 - Support for OP19 submission

Pre-read for information

- ❑ NFI Economic assumptions CO2 PSV & 45Q

Key Messages (1)

- Risks & Opportunities: No showstoppers. Most items common to all concepts.
- Alignment with Group Carbon and Economics SME that economic evaluation will combine Shell PSVs and Legislative 45Q Tax Incentive
- Shell project more likely onshore EOR or gas storage in Louisiana
 - Multiple capture sources up to 6 MMtpa (Geismar, Convent, Norco, industry gas) with opportunity for "pooled" capture at Convent (Shell, Praxair, AirProducts)
 - Small EOR ~0.8 MMtpa (cheapest CO₂, close to source, right sized for "Theremin" field)
 - Medium gas storage up to 1.5 MMtpa (multiple sites close to source, low cost to operate, simpler execution) – scalable for future CO₂ volumes (i.e. LC LNG 500 ktpa, Azure GtL 2 MMtpa)
 - External stakeholders have high level of interest (State of Louisiana, CO₂ Sequestration Act, LSU geological studies, etc.)
 - Steer Request: Drop internal work on swamp and offshore EOR, can reopen if material change in key assumptions.
 - Steer Request: Drop internal work on saline aquifer storage; monitor external opportunities (BEG, LSU, etc.)
- Industry coalition more likely Texas EOR or offshore storage
 - Large opportunity but requires more than 45Q to incentivize
 - Many onshore EOR fields in Texas Gulf Coast (Denbury, Hilcorp, etc.)
 - External stakeholders have high level of interest (OGCI Kickstarter, State of Texas, Greater Houston Partnership, etc.)
 - Denbury line will enable volumes to move West from Louisiana to Texas – tariff and access uncertainty remains
 - Peer Group Competitors have mis-aligned interests, i.e. XoM interest in offshore storage 10-15 mmtpa, Oxy interest in infrastructure to Permian, Total interest in Lake Charles LNG (non-operator), CVX monitoring, BP watching
 - Steer Request: Leverage industry on offshore storage (OGCI Kickstarter, GCCC BEG, XoM, etc.)

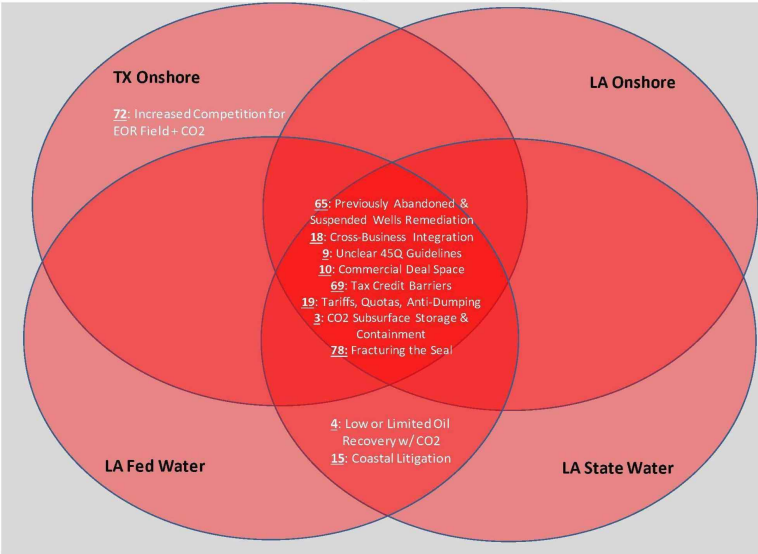
Key Messages (2)

- Scaling up Capture increases cost per unit CO₂
 - No economy of scale, more CO₂ requires more investment
 - Opportunities to reduce costs to be assessed next (site visits, integration at Convent, connection with Cansolve Improvement Initiative)
 - Steer Request: Early indication of Capex ceiling would defer highest cost CO₂ capture (i.e. Norco, low purity streams)
- Denbury assets well positioned
 - Existing pipeline enables connection of best capture and best EOR sinks
 - Webster field attractive for ~1-2 MMtpa concept with capacity to expand to include other Texas fields
 - Support Request: Kick-off valuation of Denbury and commercial options to access GC infrastructure and EOR fields

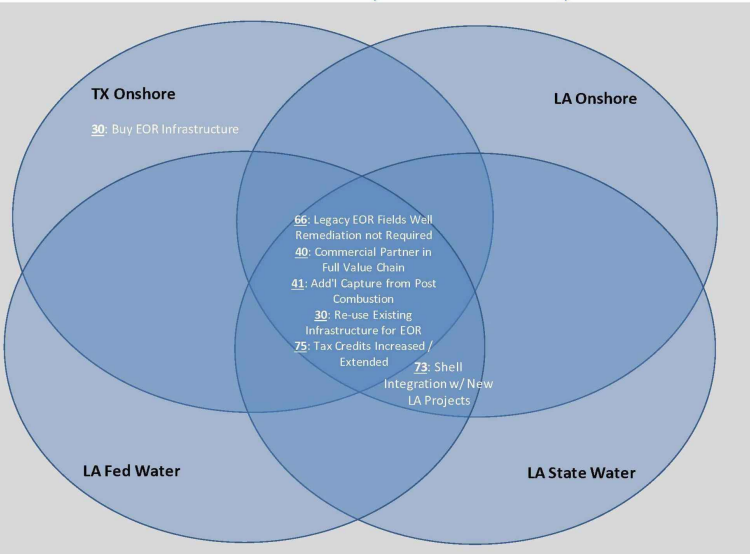
Risks & Opportunities Update

- TECOP workshop in late-April
- No show stoppers currently
- Most items are common to all options

THREATS (Critical & Severe)

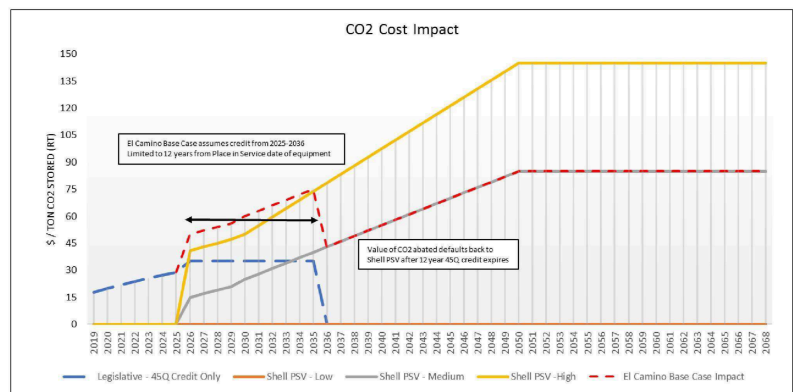


OPPORTUNITIES (Critical & Severe)



Economics: CO2 PSV and 45Q

- Value of the CO2 emissions avoided is a critical component of project justification
 - Reduce Carbon Footprint as a Value Driver
- Economics are based on combination of Shell PSVs and Legislative 45Q Tax Incentive
 - Base Case is defined as Shell PSV Medium plus 45Q
- Shell PSVs represent a future Carbon Tax environment and are included in all project evaluations
- 45Q is best viewed as a short term Carbon Capture investment incentive
 - Tax credit is on top of and separate from Shell PSV
- CO2 Stakeholders have been engaged regarding current view of value representation
 - See El Camino CO2 Alignment Document for additional details on treatment of CO2 reduction

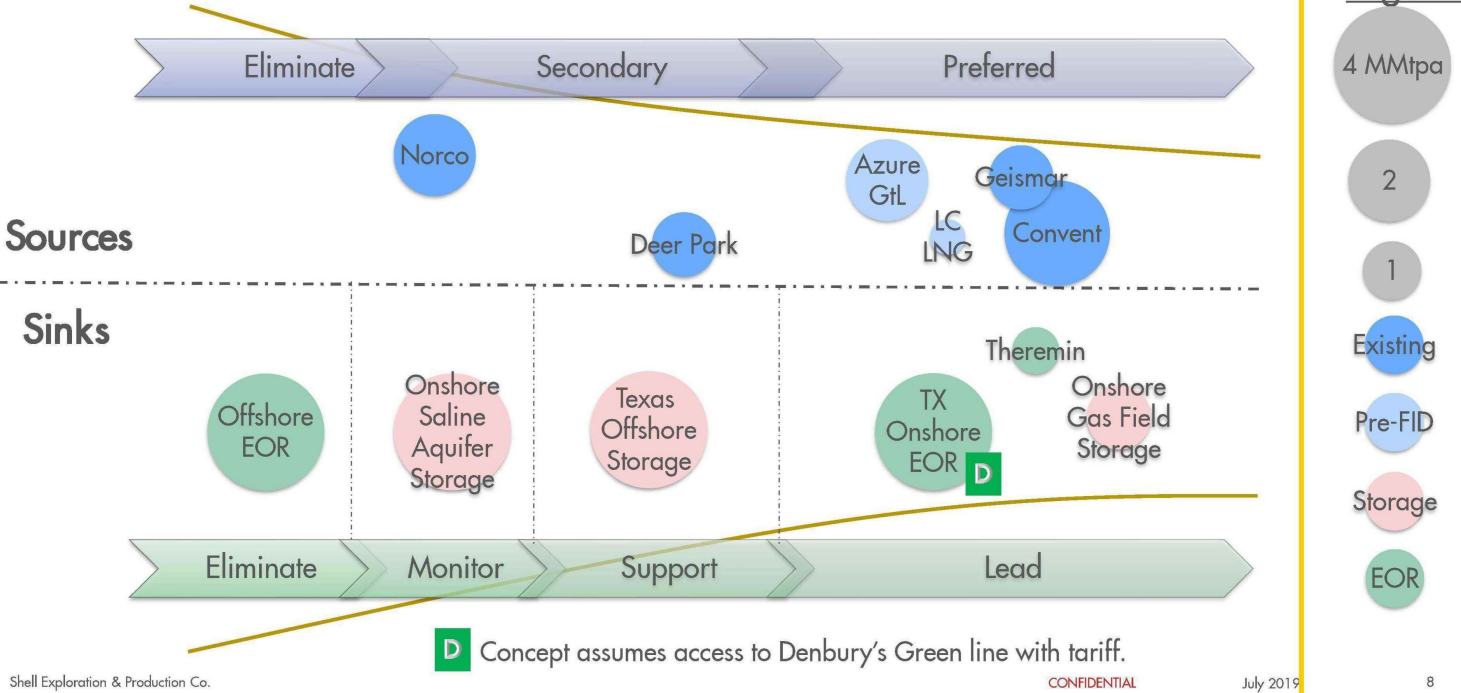


CONFIDENTIAL

7

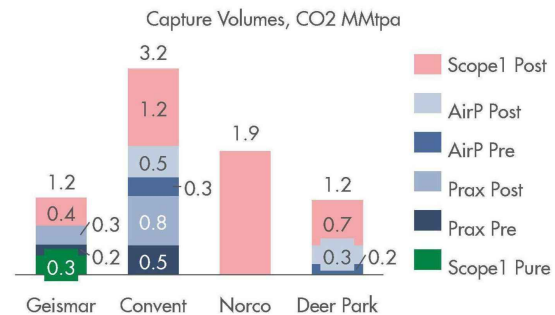
SOC-HCOR-056638

Concepts Funnel - Assess



Capture Concepts

- Multiple capture sources up to 6 MMtpa in LA (Geismar, Convent, Norco, industry gas)
- Opportunity for integrating capture equipment at Convent (Shell, Praxair, AirProducts)
- Pre & Post-combustion split (40:60) for CO₂ from Hydrogen (assumption to be confirmed at site visits)
- Cheapest 1 MMtpa links Geismar and Convent

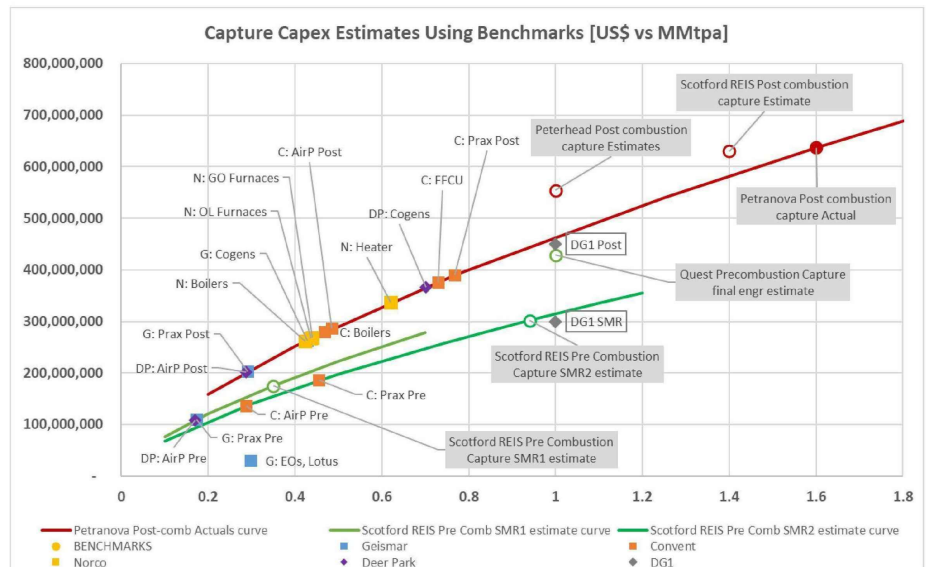


Type	Geismar (1.2 MMtpa)				Convent (3.2 MMtpa)					Norco	Deer Park (1.2 MMtpa)			Capex [B\$]		\$/tpa	Sink Options		
	EOs+Lotus	Praxair	Scope 1		Praxair	Air Products	Scope 1	Scope 1	Air Products	Scope 1	Pre-c	Post-c	Post-c				LA Onshore EOR	TX Onshore EOR	Onshore Storage (Gas field)
Capturable [MMtpa]	0.3	0.2	0.3	0.4	0.5	0.8	0.3	0.5	1.2	1.9	0.2	0.3	0.7						
Capex [MM\$]	30	110	200	260	190	390	140	290	660	1130	110	200	370						
LA EOR or storage (0.8 MMtpa)	X				X									0.2	290		X		X
LA storage (1.5 MMtpa)	X				X	X								0.6	400				X
LA to TX EOR (2.3 MMtpa)	X				X	X	X	X						1.0	450		X		
LA to TX EOR (4.4 MMtpa)	X	X	X	X	X	X	X	X	X					2.3	520		X		
LA-TX EOR (4.3 MMtpa)	X	X	X	X	X	X	X	X			X	X	X	2.3	530		X		

*Emerging projects: Lake Charles (0.5 MMtpa), Azure GtL (2+ MMtpa)

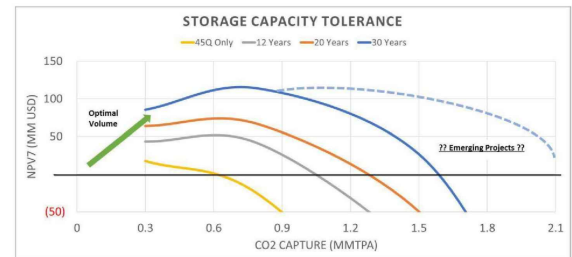
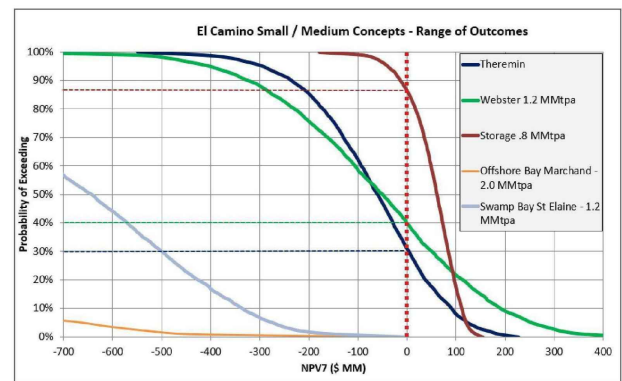
Capture Costs – Current estimates and Next steps

- Capture costs estimated by scaling by volume from similar projects
- REIS SMR estimates (pre-combustion), Petranova actuals (post-combustion)
- Estimates reflect: size of capture source (bigger yields cheaper unit cost), and pre-combustion is cheaper than post.
- Next step: site visits, source-specific capture process design, equipment lists, cost estimates with space, utility & learning curve considerations.
 - Potential to reduce capture costs by integrating Convent (shared equipment for Shell, Prax and AP, and clarifying pre- vs post-combustion split.
 - Risk of increasing costs due to identifying process and/or utility complexities.
- Cansolve ToR just kicked off cost reduction project on Shell's post-combustion capture technology. El Camino offers best opportunity to deploy with ~4 MMtpa Scope1 post-combustion CO2 in LA and TX.



Shell project more likely onshore EOR or gas storage in Louisiana

- Small onshore EOR ~0.8 MMtpa (cheapest CO₂, close to source, right sized for "Theremin" field) potentially feasible
 - Opportunity for improvement in cost performance
- Medium gas storage up to 1.5 MMtpa at current cost to capture (multiple sites close to source, low cost to operate, simpler execution) potentially feasible
 - Low Risk with 45Q revenue stream but also limited upside in this concept
- Gas storage scalable for future CO₂ volumes (I.e. LC LNG 500 ktpa, Azure GTL 2 MMtpa)
- Swamp & Offshore EOR cases show very low probability of NPV > 0 (<1%)
 - Too expensive; EOR revenue does not justify high cost to go offshore
 - **Steer Request:** Drop internal work on offshore & swamp EOR, can reopen if material change in key assumptions.
- Onshore saline aquifer storage screened as unattractive
 - Issues include: pore-space ownership, extent of aquifer vertical isolation (seals), lateral plume extent
 - **Steer Request:** Drop internal work on saline aquifer storage; monitor external opportunities (BEG, LSU, etc.)



Shell Exploration & Production Co.

CONFIDENTIAL

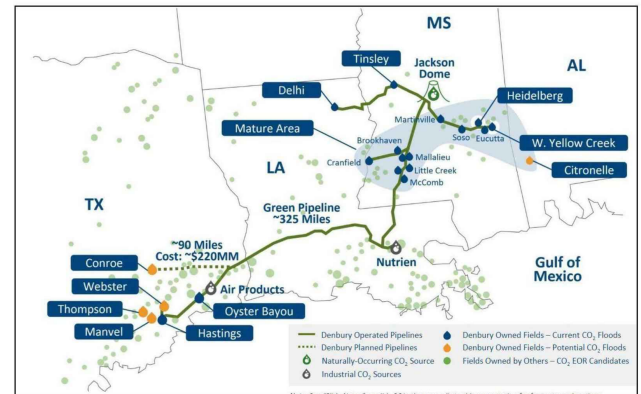
July 2019

11

SOC-HCOR-056642

Industry coalition more likely Texas EOR or offshore storage

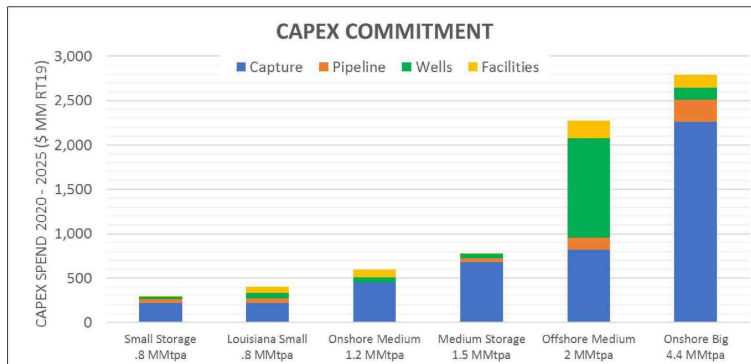
- Large opportunity but requires more than 45Q to incentivize
- Many onshore EOR fields in Texas Gulf Coast (Denbury, Hilcorp, etc.)
 - Webster field (Denbury) is attractive for 1-2 Mmtpa concept with capacity to expand to include other Texas fields
- Denbury line will enable volumes to move West from Louisiana to Texas – tariff and access uncertainty remains, but connects best capture sources to best EOR sinks
- Peer Group Competitors have mis-aligned interests, i.e. XoM interest in offshore storage 10-15 MMtpa, Oxy interest in infrastructure to Permian, Total interest in Lake Charles LNG (non-operator), CVX monitoring, BP watching, but...
 - External stakeholders have high level of interest (OGCI Kickstarter, State of Texas, Greater Houston Partnership, etc.)
- **Steer Request:** Leverage industry work on offshore storage (OGCI Kickstarter, BEG, XoM, etc.) and guide OGCI to support
- **Support Request:** Kick-off valuation of Denbury and commercial options to access GC infrastructure and EOR fields



Source: Denbury website

Steer Request: Early indication of Capex ceiling

- No economy of scale, more CO₂ requires more investment
 - Cost efficiencies exist in EOR investments but absolute cost will increase
- Allow team to focus concepts and narrow scope
 - Identify where partnerships will be required
- Maintain realistic set of concepts related to size and number of Downstream sites
- Defined as Capital requirements necessary to reach First Injection (2020 – 2025)
 - EOR sites will require annual Capex investment to grow recovery but at much lower scale
- **Steer Request:** Early indication of Capex ceiling would eliminate pursuit of most expensive CO₂ capture (Norco, low purity streams)



- Capture equipment is majority of spend in all concepts
- Offshore figures highlight Wells step change in Offshore and Swamp concepts
- Facilities Capex grows proportional to size of CO₂ injection

OP19 Input

- “Theremin” is proposed case to use as the basis for OP19 (consistent with OP18)
- Alternative case is a gas storage option, which would differ from the case presented in the following ways:
 - Earlier FID and start up
 - Lower Feasex
 - Capex accelerated into 2022
 - Higher Capex related to capture
 - Less Capex related to site development
 - No Upstream revenue

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Revenue	0.0	0.0	0.0	0.0	0.0	9.6	25.7	32.7	39.5	45.3
Tax Credits	0.0	0.0	0.0	0.0	0.0	29.2	32.0	33.3	34.7	36.1
Proxy CFFO	-13.2	-17.0	-96.2	-134.8	-151.2	16.1	29.0	20.5	25.2	10.3
<i>Other Shell FTE</i>										
<i>Scotford REIS Team</i>										
<i>VAR</i>										
<i>P&T</i>	13.2	17.0	19.6	18.0						
<i>Management Adjustment</i>										
Total Feasex	13.2	17.0	19.6	18.0	0.0	0.0	0.0	0.0	0.0	0.0
<i>Field Operations - NFA</i>	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<i>Field Operations - Transport & EOR</i>	0.0	0.0	0.0	0.0	0.0	3.0	3.0	3.7	5.5	6.6
<i>Carbon Capture</i>	0.0	0.0	0.0	0.0	0.0	10.8	10.8	10.8	10.8	10.8
<i>Shell Governance Team</i>										
Total Opex	0.0	0.0	0.0	0.0	0.0	13.8	13.8	14.5	16.3	17.4
<i>Carbon Capture</i>	0.0	0.0	43.2	86.4	86.4	0.0	0.0	0.0	0.0	0.0
<i>Transport and EOR Development</i>	0.0	0.0	30.0	38.7	60.3	61.3	11.7	31.7	31.5	49.5
Total Capex	0.0	0.0	73.2	125.1	146.7	61.3	11.7	31.7	31.5	49.5
Total spend (feasex + opex + capex)	13.2	17.0	92.8	143.1	146.7	75.1	25.5	46.2	47.8	66.9
<i>NFA (kboe/d)</i>	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<i>EOR (kboe/d)</i>	0.0	0.0	0.0	0.0	0.0	0.4	1.1	1.4	1.7	2.0
Total Production (kboe/d)	0.0	0.0	0.0	0.0	0.0	0.4	1.1	1.4	1.7	2.0

OP19 Input – Storage Case

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Revenue	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tax Credits	0.0	0.0	0.0	0.0	0.0	79.3	86.1	89.6	93.2	97.0
Proxy CFFO	-13.2	-17.0	-161.1	-208.3	-265.7	1.0	49.2	67.1	70.2	73.9
Other Shell FTE										
Scotford REIS Team										
VAR										
P&T	13.2	17.0	19.6	18.0						
Management Adjustment										
Total Feasex	13.2	17.0	19.6	18.0	0.0	0.0	0.0	0.0	0.0	0.0
Field Operations - NFA	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Field Operations - Transport & EOR	0.0	0.0	0.0	0.0	0.0	0.5	0.5	0.5	0.5	0.5
Carbon Capture	0.0	0.0	0.0	0.0	0.0	33.8	33.8	33.8	33.8	33.8
Shell Governance Team										
Total Opex	0.0	0.0	0.0	0.0	0.0	34.3	34.3	34.3	34.3	34.3
Carbon Capture	0.0	0.0	135.2	270.4	270.4	0.0	0.0	0.0	0.0	0.0
Transport and EOR Development	0.0	0.0	0.0	18.0	43.5	50.5	0.0	0.0	0.0	0.0
Total Capex	0.0	0.0	135.2	288.4	313.9	50.5	0.0	0.0	0.0	0.0
Total spend (feasex + opex + capex)	13.2	17.0	154.8	306.4	313.9	84.8	34.3	34.3	34.3	34.3
NFA (kboe/d)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
EOR (kboe/d)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Production (kboe/d)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

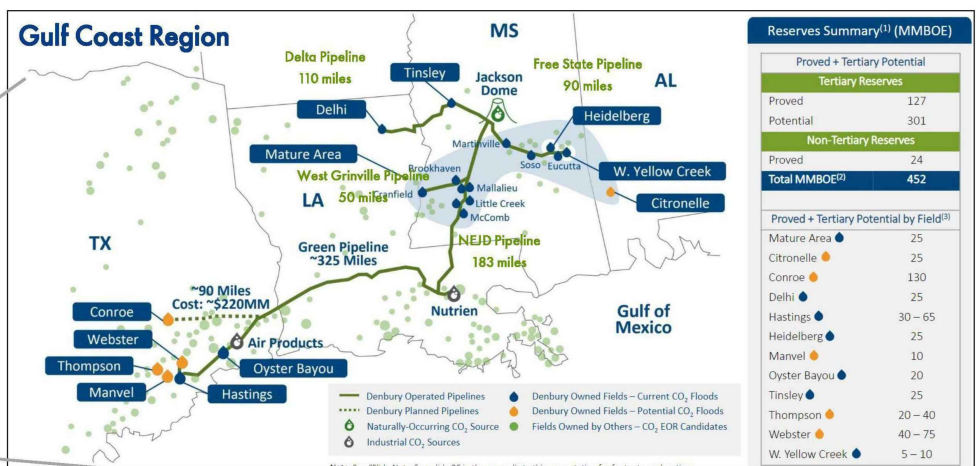
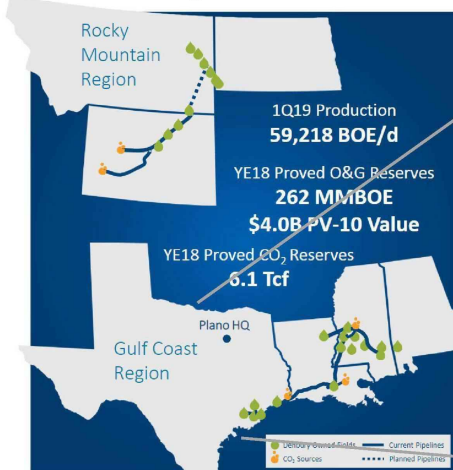
Recommendations for Concepts



	Feasibility Criteria	Range/Target			Louisiana EOR			Onshore Storage			Texas Onshore EOR				Offshore
		Red	Yellow	Green	Onshore Small (0.8)	Swamp Medium (1.2)	Offshore Large (2.0)	Depleted Gas Field Small (0.8)	Saline Aqfr Medium (1.3)	Large Potential	Near DP Medium (1.2)	West Large (4.4)	Near DP + Denbury field Medium (1.2)	Large (4.4)	Storage Large Potential
T	Material Capture Volume	<0.5 MMtpa	0.5-1.5 MMtpa	>1.5 MMtpa	●	●	●	●	●	●	●	●	●	●	●
	Wells (cost and liabilities)	<10 active wells, offshore, >750 P&A wells	10-50 active wells, swamp or deep, 200-750 P&A wells	>50 active wells, onshore, <200 P&A wells	●	●	●	●	●	●	●	●	●	●	●
E	Profitable CCUS	<20% prob NPV+	20-50% prob NPV+	>50% NPV+	●	●	●	●	●	●	●	●	●	●	●
	Schedule meets 45Q Deadline 1/1/2024	No	<6 mo construction leeway	>6 mo construction leeway	●	●	●	●	●	●	●	●	●	●	●
C	Field size requires single field/operator or multiple field/operator	3+ fields / 2+ operators	2 fields / two operators	Single field / one operator	●	●	●	●	●	●	●	●	●	●	●
	Does operator have multiple fields within a concept / multiple fields	1 field	2 fields	3+ fields	●	●	●	●	●	●	●	●	●	●	●
O															
P	Non-commercial external stakeholder reaction	Resistance expected	Unknown; expect pockets of resistance	Community steps up to support	●	●	●	●	●	●	●	●	●	●	●
	Regulatory Approval Complexity	High	Mid	Low	●	●	●	●	●	●	●	●	●	●	●

*Gray = not assessed

Denbury Overview



- Company value ~\$3-4 bln
 - Market cap \$0.6 bln, Debt \$3 bln, Cash \$64 mln
- 59 mboe/d production
- 262 mmboe proven reserves (57% in Gulf Coast)
- 840 mmboe potential reserves (64% in Rockies)
- Utilizes 11 Mtpa of CO₂ (30% industrially sourced)
- Gulf Coast assets are in close proximity to El Camino CO₂ sources

- Experienced operator for tertiary oil recovery
- Own 750 miles of pipeline in Gulf Coast region, access to 950 miles of pipeline
- 21 owned fields across four Gulf Coast states
 - 16 fields currently CO₂ flooding, 5 more fields with potential to CO₂ flood

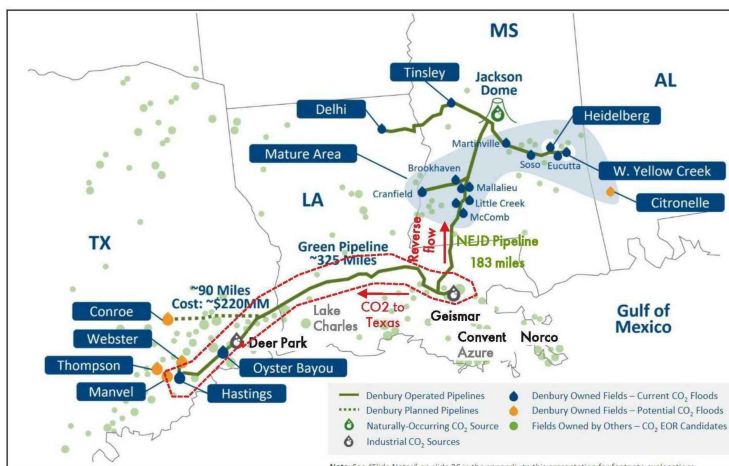
Existing CO₂ Sources in Gulf Coast

- One naturally occurring CO₂ source: Jackson Dome
- Two industrial sources, Nutrien and Air Products, provide 65 mmscf/d of CO₂
- Lake Charles identified as future source for CO₂

CONFIDENTIAL

Shell could leverage Denbury assets for CO2 disposal/use

Pre-Read



Opportunity

- Replace CO2 from Jackson salt dome with industrial CO2 while leveraging Denbury's existing pipeline network and fields
- Longer-term opportunity to reverse flow in NEJD pipeline and send industrial CO2 to oil fields and back into Jackson Dome

Green Pipeline

- 930 mmscfd capacity
- Has "ample" capacity per Denbury 2018 10K

Possible commercial constructs

- Shell sells CO2 to Denbury
 - Tariff to use Denbury pipeline
 - Must monitor CO2 to ensure long-term sto
- Purchase Green Pipeline and Texas fields from Denbury
- Purchase entire gulf coast region from Denbury
- Purchase Denbury corporation...etc.

Steer from prior DRB

Incorporate aspirations to “go-big” instead of just stating a minimum of 1mln in the opportunity statement.

- Reduce Shell’s net carbon footprint by leading a CCUS partnership (public and/or private) for the US Gulf Coast that will enable scalable, profitable, material CCUS project(s) that meet 45Q requirements.

Add Reduction in Net Carbon Footprint (NCF) as a Value Driver.

- Profitable and Competitive CCUS - obtain 45Q tax incentives and maximize government support, reduce cost of capture, lower CO2 EOR unit costs
- Reduce Shell’s carbon footprint; Integrate value chain; Ability to replicate from Shell portfolio

Hydrogen is included in our NCF; therefore do not need to meet 0.6 VIR investment threshold for these third-party volumes.

- Confirmed that hydrogen supplier contracts transfer CO2 costs and impacts to Shell (James MacDonald, Category Manager)
- Scope 1 emissions refer to direct emissions from company’s activities
- Scope 2 emissions are indirect such as from purchased power
- Scope 3 emissions are those created by customers of a company’s product.

The initial set of concepts looked reasonable for pursuing through DG2 with agreement that concepts with Scope 3 (non-Hydrogen) will be deferred.

- Consider any potential impacts from small concepts (ex. Theremin) on a bigger concept. Will we eliminate a bigger concept by focusing on a smaller concept?
- Ensure design criteria allows for flexibility so we can expand in the future if needed; especially important for transportation infrastructure
- DS strategy supports all source sights, but Louisiana is likely easier to do than Texas (given Deer Park JV).

Need to review and signoff OAP and PCAP

- Commercial TA2 identified; signoff in progress

July 10, 2019

El Camino CCS Dashboard

Project Description: Reduce Shell's net carbon footprint by leading a CCUS partnership (public and/or private) for the US Gulf Coast that will enable scalable, profitable, material CCUS project(s) that meet 45Q requirements.

Project Strategic CCS Objective : Mitigate High CO₂ emissions (Scope 1 and 2) in DS M at strategic assets//Supports global CCS industry/establishes replicative business model

Shell role in Project: Initiating / Leading for collaboration with others.

Key Metrics	Unit	Value
Shell Share	%	20-100
CO ₂ avoided, SS (Scope 1&2 or 3*)	Mtpa	1 - 7
Product carbon intensity reduction	Δ t/t	TBD
CAPEX (PV), Total	\$mln	1000 - 7000
CAPEX (PV), SS	\$mln	TBD
OPEX (PV), SS	\$mln	TBD
NPV (on basis of PSV)	\$mln	> 0
UTC (PV/PV)	\$/ton CO ₂	\$40-80
Product Carbon intensity reduction cost	Δ \$/t	TBD
VIR	VIR	>0
UDC (For CO ₂ EOR)	\$/bbl	TBD

X-Directorate Integration Issues across the Full Value Chain

- Priorities for capture from assets within the USGC
- Financial approvals and MOA between UPU and DS M
- CCUS competitiveness in a global portfolio
- Ongoing CP contract negotiations with Hydrogen suppliers need to enable future CO₂ capture

Governance engagements

- Dec 4, 2018 – DG1
- April 2, 2019 – DRB
- July 17, 2019 – DRB, Concept Evals
- Q4 2019 TBC – DRB, Ref Case
- Q1 2020 TBC - DRB
- Q2 2020 TBC – ITR2, VAR2

Organisation

- US Country Chair (Lead UPU + DS/M)
- DE: Jason Klein
- BOM: Jan Sherman
- FEDM Deniz Dindoruk

Finance Summary (by business line and/or JV)

- Shell only EOR – NPV >0
- Coalition EOR – NPV > 0

Aspirational Coalitions

- Praxair & Air Products Capture
- Hilcorp Louisiana & Texas EOR
- XoM Texas offshore storage
- OGCI or other industry infrastructure & policy
- State of Louisiana gas storage
- Denbury infrastructure access & EOR

Project Milestones & Timeline – Shell only / Small Coalition

DG1: Dec 2018 **DG2:Q3/2020** DG3: Q3/2021 FID: Q3/2022
RFSU: Q3/2025

Key Risks

- Field Liabilities
- CO₂ Liability and long-term storage
- Commercial deal space, favorable entry conditions
- Clarity around 45Q credits and how in details one qualifies.
- Cross-business integration
- Capital and opportunity competitiveness
- Regulatory changes - tariffs, quotas, tax law

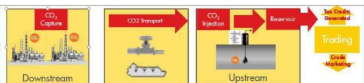
Key Value Drivers

- Profitable and Competitive CCUS
 - Obtain 45Q tax incentives and maximize government support
 - Reduce cost of capture
 - Lower CO₂ EOR unit costs
- Reduce Shell's carbon footprint (Scope 1 & 2 including Hydrogen)
- Integrate value chain
- Ability to replicate from Shell portfolio

Activity Highlights and Focus Areas

- DRB confirmed third-party Hydrogen as part of Shell's NCF
- Assess Phase Risk Workshop held
- Assessing 10 source concepts linked to potential EOR and storage sinks
- Smaller NBD opportunity with Hilcorp continues to be evaluated
- Praxair and Air Products indicated interest in joint CCUS opportunities
- Oxy remains interested in a USGC collaboration opportunity (EOR to Permian) and global marketing (trading) opportunities.
- XoM interested in Texas capture to offshore storage (seeking a "few" partners like Shell)
- OGCI Kickstarter initiated. Oxy pushing GC CCUS to Permian EOR. Other member companies (XoM, Total) trying to figure out how OGCI supports.
- Industry invests in direct-air capture in US (Oxy, CVX, XoM)
- Submitted comments to IRS requests on 45Q; guidance to be issued Q4 or later
- Preliminary economics indicate path to NPV>0 through: 45Q tax credits, pure or pre-combustion capture, and EOR or storage in depleted gas fields

Project value drivers picture



Shell Exploration & Production Co.

CONFIDENTIAL

July 2019

20

SOC-HCOR-056651

DRB Decisions/Steer

- ☐ Does the DRB endorse the recommended CCUS concepts to take to next phase of evaluation?
- ☐ Does the DRB agree with risks and opportunities presented?
- ☐ Does the DRB agree to sponsor the Denbury valuation (NBD)?
- ☐ Does the DRB support the OP19 submission?

