

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
<b>EXTRACTION OIL &amp; GAS, INC., et al.,</b>	§	<b>Case No. 20-11548 (CSS)</b>
<b>Debtors.</b>	§	<b>Jointly Administered</b>
	§	<b>Related Docket No.: 1168</b>

**COLORADO INTERSTATE GAS COMPANY’S  
LIMITED OBJECTION TO DEBTORS’ PROPOSED REJECTION OF CONTRACT**

Comes now Colorado Interstate Gas Company, L.L.C. (referred to herein as “CIG”) and files this Limited Objection to Debtors’ Proposed Rejection of Contract and in support of this objection, CIG states as follows:

1. CIG and Debtor Extraction Oil & Gas, Inc. (“Debtor”) are parties to three Firm Transportation Agreements (Agreement Nos. 215940, 215942, and 215945) (collectively, the “Service Agreements”). Debtor filed a motion to reject the Service Agreements on November 24, 2020 [Docket No. 1168] (the “Rejection Motion”).

2. The Service Agreements are governed by the Federal Energy Regulatory Commission (“FERC”) and are subject to a FERC Gas Tariff.

3. CIG will notify FERC of the Rejection Motion and the Debtor’s intent to reject the Service Agreements.

4. CIG does not wish to take a position on or to litigate the issue of whether this Court or FERC has the appropriate jurisdiction to determine the propriety of allowing the rejection of the Service Agreements. However, nothing herein should be construed as a waiver of CIG’s right to litigate that issue in future litigation involving these contracts or other FERC governed contracts.



5. FERC regulations do not address treatment of a contract rejected in bankruptcy. However, 18 C.F.R. 154.602 requires CIG to notify FERC of the cancellation or termination of a FERC governed contract.

6. CIG, subject to objection by the Debtor or this Court, is providing notice to FERC pursuant to the requirement set forth above and to possibly treat this contract as terminated for FERC purposes, subject to CIG's damages claim for the remaining term of the Service Agreements.

7. CIG hereby reserves its right to claim damages in accordance with the terms of the Service Agreements and governing tariff for the remainder of the term of the Service Agreements.

WHEREFORE, PREMISES CONSIDERED, CIG respectfully requests that its rights regarding the rejection of the Service Agreements be preserved as set forth above and for such other and further relief as may be just under the premises.

Dated: December 8, 2020  
Wilmington, Delaware

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**CERTIFICATE OF SERVICE**

I, Christopher A. Lewis, certify that I am not less than 18 years of age, and that on December 8, 2020, a copy of the foregoing document was electronically filed via CM/ECF and served via CM/ECF upon all parties registered to receive CM/ECF notices in these cases, and I caused copies to be served upon the persons listed on the attached service list via U.S. first-class mail, postage fully pre-paid.

Under penalty of perjury, I declare that the foregoing is true and correct.

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/s/ Christopher A. Lewis

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