

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

_____	)	
In re:	)	Chapter 11
	)	
EXTRACTION OIL & GAS, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 20-11548 (CSS)
	)	
Reorganized Debtors.	)	(Jointly Administered)
_____	)	<b>Re: Docket No. 1998</b>

**CERTIFICATE OF NO RESPONSE REGARDING REORGANIZED DEBTORS’  
SIXTEENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN  
LATE FILED CLAIMS PURSUANT TO BANKRUPTCY CODE SECTIONS  
105(A) AND 502(B), BANKRUPTCY RULES 3003 AND 3007, AND  
BANKRUPTCY LOCAL RULE 3007-1**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *Reorganized Debtors’ Sixteenth Omnibus (Non-Substantive) Objection to Certain Late Filed Claims Pursuant to Bankruptcy Code Sections 105(a) and 502(b), Bankruptcy Rules 3003 and 3007, and Bankruptcy Local Rule 3007-1* [Docket No. 1998] (the “Omnibus Objection”) filed by the Reorganized Debtors (the “Reorganized Debtors”). The undersigned further certifies that he has reviewed the Court’s docket in this proceeding and no answer or other responsive pleading to the Omnibus Objection appears thereon. Pursuant to the notice to the Omnibus Objection, responses to the Omnibus Objection were to be filed and served no later than August 13, 2021 at 4:00 p.m.

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, are: Extraction Oil & Gas, Inc. (3923); 7N, LLC (4912); 8 North, LLC (0904); Axis Exploration, LLC (8170); Extraction Finance Corp. (7117); Mountaintop Minerals, LLC (7256); Northwest Corridor Holdings, LLC (9353); Table Mountain Resources, LLC (5070); XOG Services, LLC (6915); and XTR Midstream, LLC (5624). The location of the Reorganized Debtors’ principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.



**WHEREFORE**, the Reorganized Debtors respectfully request that the proposed form of order attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: August 23, 2021  
Wilmington, Delaware

*/s/ Stephen B. Gerald*

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**WHITEFORD, TAYLOR & PRESTON LLC<sup>2</sup>**

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<sup>2</sup> Whiteford, Taylor & Preston LLC operates as Whiteford Taylor & Preston L.L.P. in jurisdictions outside of Delaware.

**Exhibit A**

**Proposed Order**

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

In re:	)	
	)	Chapter 11
EXTRACTION OIL & GAS, INC. <i>et al.</i> , <sup>1</sup>	)	Case No. 20-11548 (CSS)
	)	
Reorganized Debtors.	)	(Jointly Administered)
	)	
	)	<b>Re: Docket Nos. 1998 &amp; __</b>

**ORDER SUSTAINING REORGANIZED DEBTORS’  
SIXTEENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION  
TO CERTAIN LATE FILED CLAIMS PURSUANT TO BANKRUPTCY CODE  
SECTIONS 105(a) AND 502(b), BANKRUPTCY RULES 3003 AND 3007, AND  
BANKRUPTCY LOCAL RULE 3007-1**

Upon the objection (the “Objection”)<sup>2</sup> of the above-captioned reorganized debtors (the “Reorganized Debtors”) for entry of an order (this “Order”) (a) disallowing the Late Filed Claims set forth on **Exhibit 1** attached hereto; and (b) granting related relief, all as more fully set forth in the Objection; and upon the First Day Declaration; and upon the declaration of Thomas Behnke; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the

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<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, are: Extraction Oil & Gas, Inc. (3923); 7N, LLC (4912); 8 North, LLC (0904); Axis Exploration, LLC (8170); Extraction Finance Corp. (7117); Mountaintop Minerals, LLC (7256); Northwest Corridor Holdings, LLC (9353); Table Mountain Resources, LLC (5070); XOG Services, LLC (6915); and XTR Midstream, LLC (5624). The location of the Reorganized Debtors’ principal place of business is 370 17th Street, Suite 5200, Denver, Colorado 80202.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Objection.

Reorganized Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Reorganized Debtors' notice of the Objection and opportunity for a hearing on the Objection were appropriate and no other notice need be provided; and this Court having reviewed the Objection and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is SUSTAINED.
2. The Late Filed Claims set forth on the attached **Exhibit 1** are hereby disallowed in their entirety.
3. KCC is authorized and directed to modify the claims register for these chapter 11 cases in accordance with the terms of this Order.
4. To the extent that a response is filed regarding any Late Filed Claim listed in the Objection and the Reorganized Debtors are unable to resolve the response, each such Late Filed Claim, and the Objection by the Reorganized Debtors to each such Late Filed Claim, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014.
5. Any order entered by this Court regarding the Objection shall be deemed a separate order with respect to each Late Filed Claim.
6. Nothing in the Objection or this Order shall be construed as an allowance of any Claim.

7. The Reorganized Debtors' right to object in the future to any Late Filed Claim listed in the Objection or on the exhibits attached hereto on any ground, and to amend, modify, and/or supplement the Objection, including to object to amended or newly filed claims is fully reserved.

8. To the extent that the Objection does not comply in all respects with the requirements of Bankruptcy Local Rule 3007-1, the requirements of Bankruptcy Local Rule 3007-1 are waived.

9. The Court shall retain jurisdiction over all affected parties with respect to any matters, claims or rights arising from or related to the implementation, interpretation, and enforcement of this Order.

**Exhibit 1**

**Late Filed Claims**

Extraction Oil & Gas, Inc. 20-11548  
Sixteenth Omnibus Objection  
Exhibit 1 - Late Filed Claims

NAME	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1 ERIC GREENE CAMI GREENE JT 225 MADERA WAY WINDSOR, CO 80550	1/25/2021	Extraction Oil & Gas, Inc.	2607^	\$ 2,131.45	Claim was filed after the General Bar Date August 14th, 2020.
^ Claim 2607 is filed on the Seventeenth Omnibus Objection, Exhibit 1 - No Liability Claims.					
2 J & J ENTERPRISES PROPERTY MANAGEMENT LLC 7251 W 20 STREET BLDG L #200 GREELEY, CO 80634-4625	10/1/2020	Extraction Oil & Gas, Inc.	2496^	Undetermined*	Claim was filed after the General Bar Date August 14th, 2020.
^ Claim 2496 is filed on the Seventeenth Omnibus Objection, Exhibit 2 - No Liability Royalty Claims.					
3 STEPHEN SOUTHARD STEPHEN E SOUTHARD JR 1160 HICKORY WAY ERIE, CO 80516	1/17/2021	Extraction Oil & Gas, Inc.	2604^	Undetermined*	Claim was filed after the General Bar Date August 14th, 2020.
^ Claim 2604 is filed on the Seventeenth Omnibus Objection, Exhibit 2 - No Liability Royalty Claims.					
TOTAL				\$ 2,131.45*	