

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

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

**STIPULATION RESOLVING
SCHEDULED CLAIM OF AXIOM STRATEGIES INC.**

This stipulation (the “Stipulation”) is made and entered into by and between (i) the above captioned reorganized debtors (the “Reorganized Debtors”) and (ii) Axiom Strategies Inc. (“Claimant”). The Reorganized Debtors and Claimant are sometimes each referred to as a “Party” and together as the “Parties”. The Parties hereby stipulate and agree as follows:

WHEREAS, on June 14, 2020 (the “Petition Date”), each of the above-captioned debtors (the “Debtors”) filed voluntary petitions pursuant to chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), commencing the above-captioned jointly administered bankruptcy cases (the “Bankruptcy Cases”).

WHEREAS, on July 31, 2020, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs.

WHEREAS, debtor Extraction Oil & Gas, Inc. scheduled Claimant as having a nonpriority unsecured claim in the amount of \$20,000 (the “Scheduled Claim”).

¹ 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.



WHEREAS, on December 23, 2020, the Court entered its *Findings of Fact, Conclusions of Law, and Order Confirming the Sixth Amended Joint Plan of Reorganization of Extraction Oil & Gas, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1509] (the “Confirmation Order”), confirming the *Debtors’ Sixth Amended Joint Plan of Reorganization of Extraction Oil & Gas, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1505] (the “Plan”).

WHEREAS, on January 20, 2021, the Debtors substantially consummated the Plan and emerged from chapter 11 as the Reorganized Debtors in accordance with the terms of the Plan and the Confirmation Order. *See Notice of (A) Entry of Findings of Fact, Conclusions of Law, and Order Confirming the Sixth Joint Plan of Reorganization of Extraction Oil & Gas, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code, and (B) Occurrence of Effective Date* [Docket No. 1652].

WHEREAS, the Reorganized Debtors and Claimant have conferred and have determined that the Scheduled Claim is not due and owing to Claimant.

NOW, THEREFORE, in consideration of the foregoing, plus other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties hereby stipulate and agree as follows:

1. The Scheduled Claim is not due and owing to Claimant and no prepetition amounts are due and owing to Claimant.
2. Kurtzman Carson Consulting, LLC, the claims agent appointed in these Chapter 11 Cases, is authorized to reflect the Scheduled Claim is not due and owing to Claimant on the official claims register maintained in the Chapter 11 Cases.

3. Claimant further waives any and all rights Claimant may otherwise have to file any prepetition claims against the Debtors in these Chapter 11 Cases.

4. This Stipulation constitutes the entire agreement between the Parties and may not be amended or modified in any manner except by writing signed by each of the parties or their counsel and approved by the Court.

5. Each Party and signatory to this Stipulation represents and warrants to each other Party thereto that such Party or signatory has full power, authority and legal right and has obtained all approvals and consents necessary to execute, deliver and perform all actions required under this Stipulation.

6. This Stipulation may be executed in identical counterparts, each of which when so executed and delivered will constitute an original, but all of which taken together will constitute one and the same instrument. The exchange of copies of this Stipulation and of signature pages by facsimile transmission or by other electronic transmission of a manual signature (by portable data format (PDF) or other method that enables the recipient to reproduce a copy of the manual signature) shall constitute effective execution and delivery of this Stipulation as to the Parties and may be used in lieu of the original Stipulation for all purposes. Signatures of the Parties transmitted by facsimile or other electronic transmission will be deemed to constitute their original signatures for all purposes.

[Signature Pages Follow. Remainder of the Page Intentionally Left Blank]

Dated: September 1, 2021



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