IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
8 North, LLC,[1]	Case No. 20-11550 (TMH)
Reorganized Debtor.	(Formerly Jointly Administered under Lead Case: Extraction Oil & Gas, Inc. Case No. 20-11548 (CSS))
	Hearing Date: June 22, 2026 at 11:00 a.m. (ET) **Response Deadline: June 10, 2026 at 4:00 p.m. (ET)**

ELEVENTH MOTION FOR ORDER
EXTENDING CLAIMS OBJECTION BAR DATE

The reorganized debtors (the "Reorganized Debtors"), by and through undersigned counsel, hereby move this Court (the "Motion") for entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), extending the time to file objections to claims and interests by approximately 180 days pursuant to section 105 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the "Bankruptcy Code"), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules")[2] thereby extending the deadline by which the Reorganized Debtors must file and serve objections to claims or interests through and including

[1] The Reorganized Debtors in the chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, were: 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. On October 25, 2021, the Court entered an order [Docket No. 2070] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 20-11550 (CSS).

[2] Pursuant to Rule 9006-2 of the Bankruptcy Local Rules (hereinafter defined), the filing of this Motion prior to the expiration of the current deadline to object to claims automatically extends such deadline until such time as the Court rules on this Motion.

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December 30, 2026. In support of this Motion, the Reorganized Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider the Motion under 28 U.S.C. §§ 157 and 1334, the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012, Article XI of the Plan, and paragraph 154 of the Confirmation Order.

2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A). Pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Local Rules"), the Reorganized Debtors consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory predicate for the relief sought herein is section 105 of the Bankruptcy Code. The relief is also appropriate under Bankruptcy Rule 9006, and the applicable Bankruptcy Local Rules.

BACKGROUND

A. Bankruptcy Cases

5. On June 14, 2020 (the "Petition Date"), Extraction Oil & Gas, Inc. and its affiliated debtors (the "Debtors") filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code (the "Chapter 11 Cases").

6. On December 23, 2020, the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), entered an order [Docket No. 1509] (the "Confirmation Order") approving and 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. 1505] (as may be amended, supplemented, or modified from time to time, and including all exhibits and supplements thereto, the "Plan").[3]

7. On January 21, 2021, the Reorganized Debtors filed the *Notice of (A) Entry of 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, and (B) Occurrence Of Effective Date* [Docket No. 1652], pursuant to which, among other things, the Reorganized Debtors declared that the Effective Date of the Plan occurred on January 20, 2021.

8. Since the Effective Date, the Reorganized Debtors were acquired by Civitas Resources, Inc. ("Civitas") and Civitas was acquired by SM Energy Company ("SM Energy").

9. On October 25, 2021, the Court entered the *Final Decree (A) Closing Certain of the Chapter 11 Cases, (B) Transferring Claims Against and Interests Asserted in the Debtors to the Remaining Case, (C) Amending the Caption of the Remaining Case, and (D) Granting Related Relief* [Docket No. 2070] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 20-11550 (TMH).

[3] Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Plan and/or Confirmation Order.

B. The Claims Objection Bar Date

10. Under the terms of the Plan, the deadline for objecting to Claims is defined as follows:

> "Claims Objection Bar Date" means the deadline for objecting to a Claim, which shall be on the date that is the later of (a) 180 days after the Effective Date and (b) such other period of limitation as may be specifically fixed by the Debtors or the Reorganized Debtors, as applicable, or by an order of the Bankruptcy Court for objecting to Claims."

See Plan, Article I, ¶ A. 48.[4]

11. On May 20, 2021, January 13, 2022, August 1, 2022, January 24, 2023, July 18, 2023, January 17, 2024, July 26, 2024, January 2, 2025, July 9, 2025 and December 17, 2025, the Court entered orders (the "Extension Orders") extending the Claims Objection Bar Date, and the Claims Objection Bar Date is presently extended through and including June 29, 2026.

12. Since the Effective Date of the Plan and the Court's entry of the Extension Orders, the Reorganized Debtors and their professionals have been diligently attending to their duties under the Plan including, without limitation, reviewing, reconciling, and resolving the filed claims against the Debtors. The Reorganized Debtors have filed numerous omnibus claim objections, claim stipulations and numerous individual claim objections, objecting to certain claims including, without limitation, claims asserted by royalty owners or contract counterparties pursuant to oil, natural gas, or mineral agreements with the Reorganized Debtors. Through the omnibus claim objections, claim stipulations, individual claim objections and settlement

[4] As set forth in Article II.A of the Plan, "[o]bjections to [requests for Administrative Claims], if any, must be Filed and served on the Reorganized Debtors and the requesting party by the Claims Objection Bar date."

negotiations, the Reorganized Debtors have resolved a majority of the disputed claims filed against the Debtors.

13. Significantly, a majority claims that were filed by claimants asserting Royalty and Working Interests (as defined under the Plan) have been addressed by the filing and service of a notice [Docket No. 185] advising claimants who have asserted Royalty and Working Interests them that, among other things, Royalty and Working Interests were preserved under the Plan and remain in full force and effect in accordance with the terms of the granting instruments or other governing documents applicable to such Royalty and Working Interests and, therefore, KCC (the Debtors' claims agent) was designating on the Claims Register that such proofs of claim are expunged because they assert Royalty and Working Interests.

14. The Reorganized Debtors believe there are only a few remaining claims for SM Energy, on behalf of the Reorganized Debtors, to review, reconcile, and try to resolve, including without limitation, primarily claims filed by Viola Production, Inc., Union Pacific Railroad Company and Ranchero 78 North LLC.

15. SM Energy, on behalf of the Reorganized Debtors, continues to explore whether the remaining claims can be resolved on a business level. However, there may a need to file additional objections to claims to resolve certain of the remaining claims.

16. Moreover, because a resolution of certain remaining claims will not likely require action by the Court, SM Energy and its advisors are discussing whether they can close the remaining case of 8 North, LLC with the right to reopen the case if there are any issues requiring the Court's attention in the future related to such claims.

17. Undersigned counsel remains hopeful that a motion to close the remaining case of 8 North, LLC can be filed soon.

RELIEF REQUESTED

18. By this Motion, the Reorganized Debtors respectfully request the entry of an order, pursuant to section 105 of the Bankruptcy Code and Bankruptcy Rule 9006, extending the Claims Objection Bar Date for approximately 180 days, through and including December 30, 2026. The Reorganized Debtors further request that the Order approving this Motion be without prejudice to the right of the Reorganized Debtors to seek further extensions of the Claims Objection Bar Date.

BASIS FOR RELIEF

19. As noted above, the Claims Objection Bar Date under the Plan for the Reorganized Debtors, as extended by the Extension Orders, is currently June 29, 2026. Bankruptcy Rule 9006(b) provides that the Court may extend a time period provided under the Bankruptcy Rules or order of the Court, except for certain time periods which are not applicable here. *See* Fed. R. Bankr. P. 9006(b).

20. Moreover, section 105 of the Bankruptcy Code provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions" of the Bankruptcy Code 11 U.S.C. § 105(a). Further, "[s]ection 105(a) authorizes the bankruptcy court, or the district court sitting in bankruptcy, to fashion such orders as are required to further the substantive provisions of the Code." *See In re Morristown & E.R. Co.*, 885 F.2d 98, 100 (3d Cir. 1989) (*citing Collier on Bankruptcy*, ¶ 105.04 at 105-15 & n.5 (15th rev. ed. 1989)).

21. In addition, the Plan, as approved and confirmed by the Confirmation Order, specifically contemplates the extension of the Claims Objection Bar Date by order of this Court. The definition of Claim Objection Bar Date states that the deadline can be "such other period of limitation as may be specifically fixed by the Debtors or the Reorganized Debtors, as applicable, or by an order of the Bankruptcy Court for objecting to Claims." *See* Plan, Article I, ¶ A.48 (emphasis added).

22. In the present case, sufficient cause exists to further extend the Claims Objection Bar Date as requested herein.

23. The requested extension will afford the Reorganized Debtors the opportunity to continue their attempted resolutions of the few remaining claims, settle or object to those remaining claims, if necessary, and ensure that all claims, to the extent practicable, have been addressed. Moreover, the requested extension will allow time for the remaining case of 8 North, LLC to potentially be closed.

24. The requested extension of the Claims Objection Bar Date is in the best interests of the Reorganized Debtors and is appropriate under the circumstances as it will provide the additional time needed to reconcile the remaining claims. The requested extension will not prejudice any creditor or other party in interest because there are only a few unresolved claims. Without an extension, the Reorganized Debtors may forfeit valuable potential objections to the remaining claims.

25. As such, an extension will allow time for the remaining claims to be resolved and for the remaining open case of 8 North, LLC to potentially be closed.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit A, granting the relief requested in this Motion and for such other and further relief as is just and proper.

Dated: May 27, 2025
Wilmington, Delaware

/s/ Richard W. Riley

Richard W. Riley
Pashman Stein Walder Hayden, P.C.
824 North Market Street, Suite 800, Wilmington, DE 19801
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Co-Counsel to the Reorganized Debtors

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
8 North, LLC,[1]	)	Case No. 20-11550 (TMH)
Reorganized Debtor.	)	(Formerly Jointly Administered under Lead Case: Extraction Oil & Gas, Inc. Case No. 20-11548 (CSS))
	)	**Regarding D.I.**

ORDER GRANTING ELEVENTH MOTION FOR
ORDER EXTENDING CLAIMS OBJECTION BAR DATE

Upon consideration of the *Eleventh Motion for an Order Extending Claims Objection Bar Date* (the "Motion");[2] and the Court having reviewed the Motion; and it appearing that proper and adequate notice has been given and that no other or further notice is required; and the Court having determined that the legal and factual bases in the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and sufficient cause therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth herein.

2. The Claims Objection Bar Date is hereby extended through and including December 30, 2026.

[1] The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, were: 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. On October 25, 2021, the Court entered an order [Docket No. 2070] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 20-11550 (CSS).

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. This Order shall be without prejudice to the right of the Reorganized Debtors to seek further extensions of the Claims Objection Bar Date.

4. This Court shall retain jurisdiction with respect to all matters relating to or arising from the Motion or the interpretation or implementation of this Order.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
8 North, LLC,[1]	)	Case No. 20-11550 (TMH)
Reorganized Debtor.	)	(Formerly Jointly Administered under Lead Case: Extraction Oil & Gas, Inc. Case No. 20-11548 (CSS))
	)	**Hearing Date: June 22, 2026 at 11:00 a.m. (ET)** **Response Deadline: June 10, 2026 at 4:00 p.m. (ET)**

NOTICE OF ELEVENTH MOTION FOR ORDER EXTENDING CLAIMS OBJECTION BAR DATE

PLEASE TAKE NOTICE that on May 27, 2026, the reorganized debtors (the "Reorganized Debtors") filed the *Eleventh Motion for Order Extending Claims Objection Bar Date* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the "Court").

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing and filed with the Clerk of the Bankruptcy Court, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the undersigned, so as to be received on or before **June 10, 2026 at 4:00 p.m. (*prevailing* Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon undersigned counsel for the Reorganized Debtors.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

[1] The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, were: 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. On October 25, 2021, the Court entered an order [Docket No. 2070] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 20-11550 (CSS).

PLEASE TAKE FURTHER NOTICE THAT IF AN OBJECTION IS PROPERLY FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, A HEARING WILL BE HELD BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801 ON JUNE 22, 2026 AT 11:00 A.M. (ET). ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

Dated: May 27, 2026
Wilmington, Delaware

/s/ Richard W. Riley

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Co-Counsel to the Reorganized Debtors

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CERTIFICATE OF SERVICE

I, Richard W. Riley, hereby certify that on May 27, 2026, I caused a true and correct copy of the *Eleventh Motion for Order Extending Claims Objection Bar Date* to be electronically filed and served through the Court's CM/ECF system which will send notification that such filing is available for viewing and downloading to all registered participants, and additionally served such motion on the parties listed below in the manner indicated.

VIA EMAIL
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Email: bpprodcorp@yahoo.com

VIA EMAIL
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/s/ Richard W. Riley
Richard W. Riley

[1] The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, were: 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. On October 25, 2021, the Court entered an order [Docket No. 2070] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 20-11550 (CSS).