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

In re:	) Chapter 11
EXTRACTION OIL & GAS, INC. et al.,1	) Case No. 20-11548 (CSS)
Debtors.	(Jointly Administered) Re: Docket No. 547

### CERTIFICATION OF NO OBJECTION TO ROCKY MOUNTAIN MIDSTREAM LLC'S MOTION TO FILE UNDER SEAL ITS OBJECTION TO THE DEBTORS' SECOND OMNIBUS MOTION FOR ENTRY OF AN ORDER AUTHORIZING REJECTION OF LEASES AND EXECUTORY CONTRACTS

The undersigned counsel to Rocky Mountain Midstream LLC ("RMM"), hereby certifies that:

- 1. On August 31, 2020, Rocky Mountain Midstream LLC's Motion to File Under Seal Its Objection to the Debtors' Second Omnibus Motion for Entry of an Order Authorizing Rejection of Leases and Executory Contracts [D.I. 547] (the "Motion") was filed with the Court.
- 2. Objections to the Motion were to be filed by September 14, 2020 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").
- 3. The Objection Deadline has passed and no formal objections or responses were served upon the undersigned counsel or entered on the Court's docket.
  - 4. Accordingly, the Motion may be granted.

The Debtors in these chapter 11 cases, along with the last four digits of each 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) (collectively, the "Debtors"). The location of the Debtors' principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.



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WHEREFORE, RMM respectfully requests the entry of an Order, substantially in the form attached to the motion and hereto as **Exhibit A**, at the earliest convenience of the Court.

Dated: September 17, 2020

By: /s/ Lucian B. Murley

Lucian B. Murley (DE Bar No. 4892)

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ATTORNEYS FOR ROCKY MOUNTAIN MIDSTREAM LL

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## **EXHIBIT A**

**Proposed Order** 

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

In re:	Chapter 11
EXTRACTION OIL & GAS, INC. et al.,1	Case No. 20-11548 (CSS)
Debtors.	(Jointly Administered)  Re: Docket Nos. 547 and

# ORDER GRANTING ROCKY MOUNTAIN MIDSTREAM LLC'S MOTION TO FILE UNDER SEAL ITS OBJECTION TO DEBTORS MOTION TO REJECT

The Court has considered *Rocky Mountain Midstream LLC's Motion to File Under Seal Its Objection to Debtors' Motion to Reject* (the "Seal Motion")<sup>2</sup> pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1. The Court finds that the requested relief is appropriate and that the Seal Motion should be granted. Accordingly, it is

#### **ORDERED THAT:**

- 1. RMM is authorized to file the Objection under seal in accordance with the requirements of Local Rule 9018-1(d).
- 2. RMM is authorized to take all actions necessary to effectuate the terms of this Order.

The Debtors in these chapter 11 cases, along with the last four digits of each 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) (collectively, the "Debtors"). The location of the Debtors' principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined shall have the meaning set forth in the Seal Motion.

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

In re:	Chapter 11
EXTRACTION OIL & GAS, INC. et al.,	) Case No. 20-11548 (CSS)
Debtors.	(Jointly Administered)
	)

#### **CERTIFICATE OF SERVICE**

I, Lucian B. Murley, hereby certify that on September 17, 2020, a copy of the foregoing Certification of No Objection to Rocky Mountain Midstream LLC's Motion to File Under Seal Its Objection to the Debtors' Second Omnibus Motion for Entry of an Order Authorizing Rejection of Leases and Executory Contracts was served through the Court's CM/ECF system upon all registered electronic filers appearing in this case and I caused a copy to be served on the parties via First Class Mail on the parties on the attached service list.

/s/ Lucian B. Murley

Lucian B. Murley (DE Bar No. 4892) SAUL EWING ARNSTEIN & LEHR LLP 1201 N. Market Street, Suite 2300 P.O. Box 1266 Wilmington, DE 19899 (302) 421-6898

Dated: September 17, 2020

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