

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

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

**PDC ENERGY’S LIST OF WITNESSES AND EXHIBITS WHICH IT INTENDS TO
SPONSOR AND PRESENT AT THE HEARING TO BE CONDUCTED
DECEMBER 7, 2021 IN REGARD TO PDC ENERGY’S MOTION FOR ORDER
RESOLVING CONTROVERSIES AND DISPUTES REGARDING INTERPRETATION
AND ENFORCEMENT OF PLAN AND MATTERS RELATED TO THE ASSUMPTION
OR REJECTION OF EXECUTORY CONTRACTS**

PDC Energy, Inc. (“**PDC**”) a counterparty to certain executory contracts with the above captioned Debtor, Extraction Oil & Gas, Inc. (“**Extraction**”) and in support of *PDC’s Motion for Order Resolving Controversies and Disputes Regarding Interpretation and Enforcement of Plan and Matters Related to the Assumption or Rejection of Executory Contracts* [Docket No. 2061 in Case No. 20-11548] (“**Motion**”) hereby submits this list of witnesses and exhibits it intends to sponsor and present at the hearing to be conducted on December 7, 2021 at 2:00 p.m. in regard to the Motion stating at follows:

I. WITNESSES

1. PDC may present the testimony of the following witnesses:

a. Jennifer E. Robinson, Manager, Oil and Gas Marketing for PDC Energy. It

is anticipated that Ms. Robinson’s testimony will be presented through oral testimony, and

¹ 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). The location of the Debtors’ principal place of business is 370 17th Street, Suite 5300, Denver, Colorado 80202.



she will be testifying from her business offices in Denver, Colorado. There will be no one in the room with Ms. Robinson during her testimony and she will be provided with the documents identified as Exhibits herein.

b. Julie Blaser, Vice President and Assistant General Counsel for PDC Energy. It is anticipated that Ms. Blaser's testimony will be presented through oral testimony, and she will be testifying from her business offices in Denver, Colorado. There will be no one in the room with Ms. Blaser during her testimony and she will be provided with the documents identified as Exhibits herein.

II. EXHIBITS

2. PDC anticipates presenting the following documentary evidence:

- a. Amended and Restated Transportation Services Agreement (the "Grand Mesa TSA") dated June 21, 2016, between Grand Mesa Pipeline, LLC ("Grand Mesa") and Bayswater. Bayswater assigned the Grand Mesa TSA to Extraction on July 29, 2016 (a copy of the Grand Mesa TSA is attached to the Motion as Exhibit A);
- b. Crude Oil Sale and Exchange Agreement (the "Exchange Agreement"), dated September 30, 2016, between Extraction and PDC (as successor in interest to Bayswater Exploration & Production, LLC, Bayswater Blenheim Holdings LC and Bayswater Blenheim Holdings II, LLC (collectively, "Bayswater") and Bayswater assigned the Exchange Agreement to PDC on January 5, 2018, effective June 1, 2017 (the Exchange Agreement is attached to the Motion as Exhibit B);

- c. Letter Agreement (the “Line Fill Letter Agreement”), dated May 30, 2018, between Extraction, Bayswater and PDC (the Line Fill Letter Agreement is attached to the Motion as Exhibit C);
- d. Sixth Amended Joint Plan of Reorganization of Extraction Oil & Gas, Inc. and Its Debtor Affiliates Pursuant to the Chapter 11 of the Bankruptcy Code [Docket No. 1505, in Case No. 20-11548];
- e. 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, in Case No. 20-11548];
- f. Email chain between Jennifer E. Robinson of PDC and Landon Jacobsen of Extraction dated November 17, 2020 through November 30, 2020 attached to PDC’s Reply as Exhibit A; and
- g. April 22, 2021 letter from Extraction to PDC attached to PDC’s Reply as Exhibit B.

(Signature page to follow)

Dated: December 1, 2021

GELLERT SCALI BUSENKELL &
BROWN, LLC

/s/ Michael Busenkell

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