

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

NOTICE OF PROPOSED SETTLEMENT OF THE ANTITRUST CLASS ACTION
AGAINST OCCIDENTAL PETROLEUM CORPORATION, ANADARKO
PETROLEUM CORPORATION, ANADARKO E&P ONSHORE LLC, ANADARKO
LAND CORP., AND ANADARKO OIL & GAS 5 LLC, MOTION FOR ATTORNEYS'
FEES, AND FINAL FAIRNESS HEARING.

A federal court authorized this notice. This is not a solicitation from a lawyer.

If you belong to the Settlement Class and this Settlement is approved, your legal rights will be affected.

Please read this Notice carefully to see what your rights are in connection with this Settlement.

While this Notice summarizes the terms of the Settlement Agreement, you may examine for free the complete Settlement Agreement as well as other relevant documents at occidentalclassaction.com or in the pleadings and other papers maintained by the Clerk of the United States District Court for the District of Wyoming in Cheyenne. Those pleadings and other papers may also be viewed for a fee at Pacer.com. The Lawsuit may be of benefit to you. Your options are explained in this Notice.

I. INTRODUCTION

You have received this Notice because between November 1, 2017, through October 19, 2020, it appears you owned unleased oil and gas minerals located in Eastern Laramie County, Wyoming, within the Niobrara and/or Codell geologic formations under, in, or on lands listed on Appendix A to this Notice. Your legal rights may be affected by the settlement of the antitrust class action lawsuit, *Deselms et al. v. Occidental Petroleum Company et al.*, Case No. 19-CV-0243-KHR filed in the United States District Court for the District of Wyoming (the "Lawsuit"). You may have previously received a class action notice in this case, but that notice was for a class addressing liability only. This notice is different than the previous notice as it concerns the certification of a class action for the settlement of the Lawsuit. Your rights for this settlement are explained in this Notice and are separate from the rights you may have had as a member of the liability only class.

This Notice generally explains the claims being asserted in the Lawsuit. The Defendants have agreed to pay twelve million dollars (\$12,000,000) to settle the Lawsuit ("Class Settlement"). This Notice summarizes the Settlement Agreement and tells you about your rights to remain a Settlement Class Member or to timely and properly submit a Request for Exclusion (commonly referred to as an "opt-out"). An opt-out member is one who is excluded from the Settlement and

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receives no funds paid as part of the Class Settlement. This Notice also provides you information should you wish to object to the Class Settlement. This Notice provides you this information before the Court is asked to finally approve the Class Settlement so you can decide what action you want to take with respect to the Class Settlement. If the Court approves the Class Settlement after it addresses any objections or appeals, the Court will order the Court-appointed Distribution Escrow Agent to send you a Distribution Check. As explained in the Settlement Agreement, your Distribution Check may be adjusted for tax purposes depending upon whether you have provided the Distribution Escrow Agent with necessary tax information. Failure or refusal to provide the requested tax reporting information including a timely complete and executed IRS form W-9 may necessitate backup withholdings. Except as to the requested tax reporting information, issuance of your Distribution Check will occur without any further action on your part. This Notice describes the Lawsuit, the Class Settlement, your legal rights, what benefits are available, who is eligible for those benefits, how to get them, how you may object to the Class Settlement, or how you may request to be excluded from the Settlement Class.

The Lawsuit may be of benefit to you.

Your options are explained in this Notice. Please review it carefully.

II. NATURE AND OVERVIEW OF THE LAWSUIT

In 2019, the Plaintiffs, a group of mineral owners in Eastern Laramie County, filed antitrust claims against Occidental Petroleum Corporation, Anadarko Petroleum Corporation, Anadarko E&P Onshore LLC, Anadarko Land Corp., and Anadarko Oil & Gas 5 LLC (collectively “the Anadarko defendants” or “Anadarko”) on behalf of similarly situated mineral owners. The Lawsuit alleged that Anadarko, the single largest non-governmental owner of minerals in Laramie County, engaged in an anticompetitive practice by leasing its minerals to a related company with a 30% royalty (“Intracompany Lease”), to the disadvantage of neighboring mineral owners. In the Lawsuit, it was alleged Anadarko’s conduct delayed development of minerals belonging to the Plaintiffs and similarly situated mineral owners in order to preserve Anadarko’s advantage in obtaining leases of non-Anadarko minerals at lower lease costs and lower royalty rates negatively impacting the Plaintiffs and similarly situated mineral owners.

As explained in the previous Notice, on April 26, 2022, the Court entered its *Opinion Granting in Part and Denying in Part Plaintiffs’ Motion to Certify Class* (ECF 220). On May 20, 2022, the Court entered its *Order Certifying Class Pursuant to Fed. R. Civ. P. Rule 23(c)(4)* (ECF 227) (“Liability Class Certification Order”). The Anadarko Defendants requested permission to appeal the Liability Class Certification Order to the United States Court of Appeals for the Tenth Circuit pursuant to Fed. R. Civ. P. 23(f) and permission was granted on June 28, 2022 (ECF 236). On June 7, 2023, the United States Court of Appeals for the Tenth Circuit issued its opinion affirming the Liability Class Certification Order in the Tenth Circuit’s *Order Certifying Class Pursuant to Fed. R. Civ. P. Rule 23(c)(4)* (ECF 275-1 and ECF-275-2) and mandating the case back to the District Court (ECF 275). Notice of the class action for liability only was completed. You may have received notice of that liability only class action.

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A trial only on liability was set to commence on August 12, 2024, in the United States District Court in Cheyenne, Wyoming. The parties settled the entire case, including damages, during a mediation that was overseen by the Honorable William F. Downes (retired) on August 5, 2024. Anadarko denies any wrongdoing. The Court has not ruled on the merits of the claims or defenses.

Under Fed. Civ. P. Rule 23(b)(3), United States District Judge Kelly H. Rankin entered an Order certifying a Settlement Class with respect to all claims that arise or could arise out of the facts and allegation of anticompetitive conduct at issue, including all federal and state antitrust claims against Anadarko. The class includes mineral owners in Laramie County, as further defined in Section IV below. Judge Rankin conditionally certified a settlement class for a total of twelve million dollars (\$12,000,000).

III. WHAT IS A SETTLEMENT CLASS ACTION?

In a class action lawsuit, one or more persons called “Class Representatives” sue on behalf of other people (“Class Members”) who have similar claims against the same defendants. In this particular instance, the Class Representatives represented you in reaching the Class Settlement and will serve as the “Settlement Class Representatives”.

IV. CLASS DEFINITION – AM I A SETTLEMENT CLASS MEMBER?

You are a member of the Settlement Class if you owned unleased *Class Minerals* during the *Class Period* in, on, and under the lands listed on Appendix A to this Order.

Class Minerals is defined as:

Oil and gas minerals located in the Niobrara and/or Codell geologic formations that were unleased during the Class Period, as shown by the public records of the Clerk and Recorder of Laramie County, Wyoming. The list of all such lands that include Class Minerals is denominated as Appendix A to this Order. The unleased minerals geographically located by the descriptions in Appendix A have common characteristics of being either:

- a. Within a section that had a 30% royalty Intracompany Lease covering at least 50% of the oil and gas minerals provided the lease or memorandum of the lease was filed in the Laramie County public records disclosing the royalty rate, or
- b. In a section (or a part thereof) immediately bounded to the north, south, or both by a section in which the Anadarko Defendants had a 30% royalty Intracompany Lease as set forth in subparagraph a.

Class Period is defined as the time between November 1, 2017, and continuing through October 19, 2020.

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You are *not* a member of the Settlement Class if you are an owner who is: (1) a Defendant; (2) an officer, director, or employee of a Defendant, (3) an entity in which a Defendant has a controlling interest or is an affiliate, (4) any entity controlled by the buyer of Anadarko's leases or minerals, including Cowboy Land LLC, Sweetwater Trona HoldCo LLC, and any other affiliate of Orion Mine Finance Group, (5) anyone who has given a valid release concerning the Released Claims, (6) was a lessee of Class Minerals during the Class Period, or (7) an affiliate of the Court. The Defendants are Occidental Petroleum Corporation, Anadarko Petroleum Corporation, Anadarko E&P Onshore, LLC, Anadarko Oil & Gas 5 LLC, and Anadarko Land Corp.

If you are still not sure whether you are included in the Settlement Class, you can get free help at occidentalclassaction.com, or by calling or writing the Settlement Class Counsel as explained in Sections IX.

V. SETTLEMENT CLASS CLAIMS AND THE RELIEF OBTAINED, SETTLEMENT DISTRIBUTION FUND, AND ALLOCATION METHODOLOGY

On October 7, 2024, the Court preliminarily approved the Class Settlement as memorialized in the Settlement Agreement executed by the Class Representatives on behalf of themselves and the Settlement Class and the Defendants. The Defendants have agreed to pay twelve million dollars (\$12,000,000) ("Gross Settlement Fund") to settle the Lawsuit ("Class Settlement"). In exchange for this payment, the Settlement Class shall release the Released Claims (as defined in the Settlement Agreement). Each Putative Settlement Class Member is entitled to a share of the Settlement Distribution Fund according to the Allocation Methodology unless you opt-out. The Settlement Distribution Fund will be Gross Settlement Fund less (i) the amount of attorneys' fees the Court awards to Settlement Class Counsel, (ii) the amount of litigation expenses the Court awards to Settlement Class Counsel to reimburse for costs and expenses Settlement Class Counsel incurred in the Lawsuit; (iii) the amount of costs and expenses incurred by Settlement Class Counsel in providing administration, notice, and disbursement of the Gross Settlement Fund to Putative Settlement Class Members who do not opt-out, (iv) the amount of Case Contribution Awards the Court awards to Settlement Class Representatives for the time spent on the Lawsuit as well as the expenses they incurred, and (v) the amount of the Settlement Distribution Fund allocable to the Putative Settlement Class Members who opt out of the Class Settlement that the Court orders returned to the Anadarko Defendants. The Settlement Distribution Fund will be allocated according to the Allocation Methodology:

"Allocation Methodology" means the *pro rata* distribution of the Settlement Distribution Fund on a per net mineral acre basis for the Settlement Class Minerals, based on an individual Settlement Class Member's percentage ownership of the net mineral acreage owned by the entire Settlement Class yielding a "Per Net Mineral Acre Payment Amount." For example, if the total net mineral acres found in the Settlement Class Minerals were 1,000 net mineral acres and an individual Settlement Class Member owned 10 net mineral acres, that individual Settlement class member would be entitled to one percent (1%) (10/1,000) of the Settlement Distribution Fund. Likewise, if the Settlement

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aDistribution Fund were \$1,000, that Settlement Class Member would be entitled to one percent (1%) of the Settlement Distribution Fund or Ten Dollars (\$10.00). The Per Net Mineral Acre Payment Amount would be equal to the amount of the Settlement Distribution Fund divided by the total net mineral acres found in the Settlement Class Minerals or \$1,000/1,000 net mineral acres which equals one dollar per net mineral acre (\$1/net mineral acre).

Each Settlement Class Member will receive the same Per Net Mineral Acre Payment Amount that every other Settlement Class Member will receive.

Settlement Class Counsel intends to seek an award of Settlement Class Counsel's Attorneys' Fees of not more than 40% of the Gross Settlement Fund at the Final Fairness Hearing. Settlement Class Counsel have been litigating this Lawsuit for over five years without any payment. They have advanced well in excess of one million four hundred thousand dollars in expenses including the costs of providing notice for the earlier liability only class and this Settlement Class. At the Final Fairness Hearing, Settlement Class Counsel will also seek reimbursement of those Litigation Expenses up to one million two hundred fifty thousand dollars as well as up to three hundred sixty thousand Dollars for Administration, Notice, and Distribution Costs. The Class Representatives also will seek Case Contribution Awards of ten thousand dollars each for their time, expense, risk and burden as serving as Class Representatives.

The Court must approve the Allocation Methodology. The Net Settlement Fund will be distributed by the Distribution Escrow Agent, Converse County Bank in Douglas, Wyoming, after the Effective Date of the Class Settlement. The Effective Date may take as much as one year or more from the date of entry of the Judgment, depending in large part on whether appeals are taken from the Court's Judgment. The Settlement may be terminated on several grounds, including the Court's decision not to approve the Class Settlement or to materially modify the terms of the Class Settlement. If the Class Settlement terminated, the Lawsuit will proceed as if the Settlement had not been reached, including resetting the trial on liability previously set to commence August 12, 2024.

VI. CLASS SETTLEMENT FAIRNESS HEARING

The Final Fairness Hearing will be held on June 5, 2025 commencing at 10:00 a.m. before the Honorable Kelly H. Rankin, United States District Judge for the District of Wyoming, in Courtroom No. 1 (Room 2132), 2120 Capitol Avenue, Cheyenne, Wyoming 82001. Please note that the date and time of the Final Fairness Hearing is subject to change. You should check with the Class Counsel, the Court or www.occidentalclassaction.com to determine if the date or time has changed. At the Final Fairness Hearing, the Court will consider:

- a. Whether the Court will finally approve the Class Settlement under Fed.R.Civ.P. 23 finding that all requirements therein are satisfied;
- b. Whether the Class Settlement is fair, reasonable, and adequate;
- c. Any timely and properly raised objections to the Class Settlement;

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- d. The Allocation Methodology;
- e. The application for Settlement Class Counsel's Attorneys' Fees and reimbursement of Litigation Expenses;
- f. The application for Administration, Notice, and Disbursement Costs; and
- g. The application for the Case Contribution Awards for the Settlement Class Representative.

IF YOU WISH TO PARTICIPATE IN THE CLASS SETTLEMENT AND DO NOT REQUEST TO BE EXCLUDED FROM CLASS SETTLEMENT, YOU DO NOT NEED TO APPEAR AT THE FINAL FAIRNESS HEARING NOR TAKE ANY OTHER ACTION TO PARTICIPATE IN THE CLASS SETTLEMENT OTHER THAN PROVIDE THE DISTRIBUTION ESCROW AGENT WITH NEEDED RELEVANT INFORMATION.

VII. WHAT ARE MY OPTIONS IF I AM A SETTLEMENT CLASS MEMBER?

A. You May Participate in the Class Settlement by Doing Nothing.

By taking no action, your interests will be represented by Settlement Class Representatives and Class Counsel. As a Settlement Class Member, you will be bound by the outcome of the Settlement if finally approved by the Court. The Class Representatives and Class Counsel believe that the Settlement is in the best interest of the Settlement Class Members, and, therefore, they intend to support the proposed Settlement at the Final Fairness Hearing. As a Settlement Class Member, if you are entitled to a distribution pursuant to the Allocation Methodology, you will receive your portion of the Net Settlement Fund subject to potential withholdings for tax purposes, and you will be bound by the Settlement Agreement and all orders and judgments entered by the Court regarding the Settlement. If the Settlement is approved, unless you exclude yourself from the Settlement Class, neither you nor any other Releasing Party will be able to start a lawsuit or arbitration, continue a lawsuit or arbitration, or be part of any other lawsuit against any of the Released Parties or Defendants' Additional Released Parties based on any of the Released Claims.

B. You May Submit a Request for Exclusion from the Settlement Class or Opt Out of the Settlement Class.

If you do not wish to be a member of the Settlement Class, then you must exclude yourself from the Settlement Class by mailing a Request for Exclusion that must be received by 5:00 p.m. on May 6, 2025, or forty-five (days) before the Final Fairness Hearing. All Requests for Exclusion must include: (i) the Class Member's name, address, telephone number, Settlement Class identification number, and notarized signature; (ii) a statement that the Class Member wishes to be excluded from the Settlement Class in *Deselms, et al. v. Occidental Petroleum Corporation, et al.*, No. 2:19-cv-OO234-KHR and (iii) a description of the Class Member's interest in the Settlement Class Minerals. Your Settlement Class identification number is found in the Supplementary Class Notice

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attached to this Notice. Requests for Exclusion must be mailed by certified mail, return receipt requested, to the Notice Manager, Settlement Class Counsel, and Defendant's counsel as follows:

Notice Manager

Signal Interactive Media, LLC
P.O. Box 1048
Cheyenne, WY 82003

Settlement Class Counsel

Thomas N. Long
Long Reimer Winegar LLP
P.O. Box 87
2120 Carey Ave., Suite 300
Cheyenne, WY 82003

Cody L. Balzer
Balzer Law Firm, P.C.
1302 Cleveland Avenue
Loveland, CO 80537

Defendants' Counsel

Kathy D. Patrick
Barrett H. Reasoner
Ross M. MacDonald
Michael Davis
Mark Doré
Gibbs Bruns, LLP
1100 Louisiana Street, #5300
Houston, Texas 77002

Darin Scheer
Timothy M. Stubson
Crowley Fleck PLLP
111 West 2nd Street, Suite 220
Casper, Wyoming 82601

If you do not follow these procedures – including mailing the Request for Exclusion so that it is received by the deadline set out above – you will not be excluded from the Settlement Class, and you will be bound by all the orders and judgments entered by the Court regarding Settlement, including the release of claims. You must request exclusion even if you already have a pending case against any of the Released Parties based upon any Released Claims during the Claim Period. You cannot exclude yourself on the website, by telephone, facsimile, or by email. If you validly request exclusion as described above, you will not receive any distribution from the Net Settlement Fund, you cannot object to the Settlement, and you will not have released any claim against the Released Parties. You will not be legally bound by anything that happens in the Litigation.

C. You May Remain a Settlement Class Member, but Object to the Class Settlement, the Allocation Methodology, Plan of Allocation, Settlement Class Attorneys' Fees or Litigation Expenses including Administration, Notice Distribution Costs, or the Settlement Class Representatives' Contribution Awards.

Any Class Member who wishes to object to the fairness, reasonableness, or adequacy of

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the Settlement, any term of the Settlement, the Allocation Methodology, the Plan of Allocation, the request for Plaintiffs' Attorneys' Fees and Litigation Expenses and Administration, Notice, and Distribution Costs, or the request for the Case Contribution Award to Class Representative may file an objection. An objector must file with the Court and serve upon Settlement Class Counsel and Defendants' Counsel a written objection containing the following: (i) a heading referring to *Deselms, et al. v Occidental Petroleum Corporation, et al.*, No. 2:19-cv-OO234-KHR, United States District Court for the District of Wyoming; (ii) a statement as to whether the objector intends to appear at the Final Fairness Hearing, either in person or through counsel, and, if through counsel, counsel must be identified by name, address, and telephone number; (iii) a detailed statement of the specific legal and factual basis for each and every objection; (iv) whether the objection applies only to the objector, to a specific subset of the class, or to the entire class and with specificity the grounds for the objection; (v) a list of any witnesses the objector may call at the Final Fairness Hearing, together with a brief summary of each witness's expected testimony (to the extent the objector desires to offer expert testimony and/or any expert report, any such evidence must fully comply with the Federal Rules of Civil Procedure, Federal Rules of Evidence, and the Local Rules of the Court); (vi) a list of and copies of any exhibits the objector may seek to use at the Final Fairness Hearing; (vii) a list of any legal authority the objector may present at the Final Fairness Hearing; (viii) the objector's name, current address, current telephone number, and all owner identification numbers found on the Class Notice; (ix) the objector's signature executed before a Notary Public; (x) identification of the objector's interest in the Class Minerals during the Class Period; (xi) the objectors Settlement Class identification number which can be found in Supplementary Class Notice attached to this Notice; and (xii) if the objector is objecting to any portion of the Plaintiffs' Attorneys' Fees or Litigation Expenses and Administration, Notice, and Distribution Costs, or Case Contribution Award sought by Class Representative or Settlement Class Counsel on the basis that the amounts requested are unreasonably high, the objector must specifically state the portion of such requests he/she/it believes is fair and reasonable and the portion that is not. Such written objections must be filed with the Court and served on Settlement Class Counsel and Defendants' Counsel, *via* certified mail return receipt requested, and received no later than 5:00 pm Mountain Time May 15, 2025 or the deadline of thirty (30) calendar days prior to the Final Fairness Hearing at the addresses set forth herein. Any Class Member that fails to timely file the written objection statement and provide the required information will not be permitted to present any objections at the Final Fairness Hearing. Your written objection must also be timely filed with the Court at the address below:

Clerk of the Court
United States District Court for the District of Wyoming
2120 Capitol Avenue, Room 2131
Cheyenne, Wyoming 82001-3658

UNLESS OTHERWISE ORDERED BY THE COURT, ANY SETTLEMENT CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED HEREIN WILL

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BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL BE FOREVER FORECLOSED FROM MAKING ANY OBJECTION TO THE SETTLEMENT (OR ANY PART THEREOF) AND WILL NOT BE ALLOWED TO PRESENT ANY OBJECTIONS AT THE FINAL FAIRNESS HEARING.

D. You May Retain Your Own Attorney to Represent You in the Final Fairness Hearing.

You have the right to retain your own attorney to represent you at the Final Fairness Hearing. If you retain separate counsel, you will be responsible to pay for his or her fees and expenses out of your own pocket.

VIII. WHO ARE THE CLASS REPRESENTATIVES?

The Court has appointed the following as class representatives: Anita C. Deselms, John C. Eklund, Jr., Justin W. Miller, Brandi J. Miller, Ron Rabou, and Russell I. Williams, Jr. (“Settlement Class Representatives”). The Settlement Class Representatives were appointed class representatives in the class certified for liability purposes only; participated in the mediation of the case with the Honorable William F. Downes (retired); approve of the settlement; and will seek the Court’s approval of the Settlement. The Settlement Class Representatives have sought to adequately and fairly represent the Settlement Class Members and believe they have considered the interests of the Settlement Class Members just as they would consider her or his own interests by requiring distribution of the proceeds according to the Allocation Methodology and the Allocation Plan.

IX. SETTLEMENT CLASS COUNSEL

The Court has appointed Robert P. Schuster of Robert P. Schuster, P.C as the lead counsel for the Settlement Class. Mr. Schuster is the lead Counsel but the full group of Settlement Class Counsel are the following:

Robert P. Schuster
Bradley L. Boone
Robert P. Schuster, P.C.
250 Veronica Lane, Suite 204
P.O. Box 13160
Jackson, Wyoming 83002

Thomas N. Long
Aaron J. Lyttle
Kaylee A. Harmon
Long Reimer Winegar LLP
2120 Carey Ave., Suite 30
Cheyenne, WY 82001 0

Laurence O. Masson
Law Office of Laurence O. Masson
2625 Alcatraz Avenue, # 206
Berkeley, California 94705-2702

J.N. Murdock
Murdock Law Firm, LLC
1551 Three Crowns Drive , Suite 314
Casper, Wyoming 82601

Cody L. Balzer
Balzer Law Firm, P.C.
1302 Cleveland Avenue

Samuel Issacharoff
40 Washington Square South
New York, New York 10012

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Loveland, Colorado 80537

The Settlement Class Counsel will request up to forty percent of the Gross Settlement Fund for their fees.

If you have questions about whether you are in the Class or wish to speak with Settlement Class Counsel about any other issue, please contact Nick Murdock or Cody Balzer at:

Balzer Law Firm, P.C.
1302 Cleveland Avenue
Loveland, Colorado 80537

Murdock Law Firm, LLC
1551 Three Crowns Drive, Suite 314
Casper, Wyoming 82604

or

claims@occidentalclassaction.com

or

(307) 333-5444

Mr. Murdock and Mr. Balzer may have other persons contact you to help with your questions.

You will not be separately charged by these lawyers for their work in the Lawsuit. The Settlement Class Counsel will request from the Court an award for attorneys' fees and expenses as described above.

X. NOTICE MANAGER

Signal Interactive Media, LLC ("Signal") has been selected to act as a Notice Manager, and will provide notice of the settlement class action to Putative Settlement Class Members. The Notice Manager shall receive any Requests for Exclusion and compile a list of the Putative Settlement Class members who filed Requests for Exclusion that shall be provided to the Court. In a declaration submitted to the Court before the Class was certified, Signal indicated how it would seek to provide notice and facilitate participation in the Settlement Class. You may find that declaration and other information concerning the Class at **www.occidentalclassaction.com**. The address, email address, and other contact information for the Notice Manager are:

Signal Interactive Media, LLC
P.O. Box 1048
Cheyenne, WY 82003
Claims@OccidentalClassAction.com

XI. DO YOU NEED TO GET YOUR OWN LAWYER?

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You are not required to hire your own lawyer, though you may do so if you wish. You may hire your own lawyer at your own expense to provide you advice concerning the Class Settlement or to appear on your behalf in Court .

XII. COUNSEL FOR THE ANADARKO DEFENDANTS

The attorneys representing Anadarko are:

Kathy D. Patrick
Barrett H. Reasoner
Ross M. MacDonald
Michael Davis
Mark Doré
Gibbs Bruns, LLP
1100 Louisiana Street, #5300
Houston, Texas 77002

Darin Scheer
Timothy M. Stubson
Crowley Fleck PLLP
111 West 2nd Street, Suite 220
Casper, Wyoming 82601

As members of the Settlement Class are represented by Settlement Class Counsel, Putative Settlement Class Members should not contact Anadarko or Anadarko's attorneys regarding this Notice, the Class, or the Lawsuit.

XIII. FURTHER INFORMATION

If you have any questions about this Notice, the Lawsuit, or your rights, you may contact Settlement Class Counsel at the number and address listed at Section IX.

Court filings and the Court's Orders are available on-line at www.occidentalclassaction.com. For a fee, you may also access those filings and Court Orders on the Court's public access system, known as PACER, at www.pacer.gov.

DO NOT CONTACT THE JUDGE, THE COURT OR THE COURT CLERK OR ANADARKO WITH QUESTIONS ABOUT THIS LAWSUIT OR NOTICE.