



**ConocoPhillips**  
925 N. Eldridge Parkway  
Houston, Texas 77079

March 29, 2022

**VIA EDGAR**

Mr. Arthur Tornabene-Zalas  
Division of Corporation Finance  
Office of Energy & Transportation  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549

Re: ConocoPhillips  
Registration Statement on Form S-4; File No. 333-262829  
Withdrawal of Request for Acceleration

Dear Mr. Tornabene-Zalas:

Reference is made to the letter of ConocoPhillips, filed as correspondence via EDGAR on March 28, 2022, in which we requested the acceleration of the effective date of the above-referenced Registration Statement for March 30, 2022, at 4:00 p.m. New York City time, in accordance with Rules 460 and 461 under the Securities Act of 1933, as amended. We are no longer requesting that such Registration Statement be declared effective at this time and we hereby formally withdraw our request for acceleration of the effective date.

*[SIGNATURE PAGE FOLLOWS]*

---

CONOCOPHILLIPS

By: /s/Andrew M. O'Brien

Name: Andrew M. O'Brien

Title: Vice President and Treasurer

cc: Zachary S. Podolsky, Wachtell, Lipton, Rosen & Katz  
Kathryn Gettles-Atwa, Wachtell, Lipton, Rosen & Katz

*[Signature Page to Withdrawal of SEC Acceleration Request]*

---