June 4, 2019

Don Wallette, Jr. Executive Vice President and Chief Financial Officer ConocoPhillips 925 N. Eldridge Parkway Houston, TX 77079

Re: ConocoPhillips

Form 10-K for the Fiscal Year Ended December 31, 2018

Filed February 19, 2019 File No. 001-32395

Dear Mr. Wallette:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of

Office of Natural

Corporation Finance

Resources