

December 8, 2020

VIA EDGAR

United States Securities and Exchange Commission
Division of Corporation Finance
Office of Energy & Transportation
100 F Street, N.E.
Washington, D.C. 20549-7010
Attention: Irene Barberena-Meissner

**Re: ConocoPhillips
Registration Statement on Form S-4
File No. 333-250183
Request for Acceleration**

Dear Ms. Barberena-Meissner:

Reference is made to the Registration Statement on Form S-4 (File No. 333-250183) initially filed by ConocoPhillips (the "Company") with the U.S. Securities and Exchange Commission on November 18, 2020, as amended by Amendment No. 1 thereto (the "Registration Statement").

The Company hereby requests the Registration Statement be made effective at 4:00 p.m., Eastern Time, on December 10, 2020, or as soon as possible thereafter, in accordance with Rule 461 of the General Rules and Regulations promulgated under the Securities Act of 1933, as amended.

If you have any questions or comments concerning this letter, or if you require any additional information, please feel free to contact Zachary Podolsky of Wachtell, Lipton, Rosen & Katz at (212) 403-1057. We also respectfully request that you notify Mr. Podolsky by telephone when this request for acceleration has been granted.

Very truly yours,

ConocoPhillips

By: /s/ Shannon B. Kinney

Name: Shannon B. Kinney

Title: Deputy General Counsel, Chief Compliance Officer and Corporate Secretary

cc: Andrew Brownstein, *Wachtell, Lipton, Rosen & Katz*
Gregory Ostling, *Wachtell, Lipton, Rosen & Katz*
Zachary Podolsky, *Wachtell, Lipton, Rosen & Katz*
Travis Counts, *Concho Resources Inc.*
Krishna Veeraraghavan, *Sullivan & Cromwell LLP*
