## Form **8937** (December 2017) Department of the Treasury Internal Revenue Service

## Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer					
1 Issuer's name		2 Issuer's employer identification number (EIN)			
Diamondback Energy, Inc.		45-4502447			
3 Name of contact for additional in	formation 4 Teleph	hone No. of contact	5 Email address of contact		
Adam Lawlis		432-221-7400	ir@diamondbackenergy.com		
6 Number and street (or P.O. box if mail is not delivered to street address) of contact			7 City, town, or post office, state, and ZIP code of contact		
500 West Texas Ave, Suite 1200  8 Date of action  9 Classification and description			Midland, TX 79701		
bate of action					
03/17/2021	Nonta	exable Corporate Reorganizat	tion - Acquisition of Common Stock		
	ial number(s)	12 Ticker symbol	13 Account number(s)		
*					
25278X109		FANG			
			see back of form for additional questions.		
_	20 (8) 8	the date of the action or the da	ate against which shareholders' ownership is measured for		
the action See Statement 1	1				
15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis > See Statement 1					
16 Describe the calculation of the valuation dates ▶ As a tax-free			ulation, such as the market values of securities and the ation of tax basis in shares of		
Diamondback Common Stock issued in exchange for surrendered shares of QEP Common Stock should generally					
be based upon the exchange ratio of 1 share of QEP Common Stock for 0.050 shares of Diamondback Common					
Stock, and is not dependent on the market value of shares of either QEP Common Stock or Diamondback					
Common Stock on the date of the M	llerger.				
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17 List the a	applicable Internal Revenue Code sec	tion(s) and subsection(s) upon whi	ch the tax treatment is based	► IRC Section 368(a)
18 Can any	resulting loss be recognized? ► For	U.S. federal income tax purpose	es, QEP shareholders will ge	nerally not recognize
	ss as a result of the Merger, except			
	k, any such shareholders should g			
	n having sold such fractional share ween the amount of cash received a			
	ss generally should be long-term ca			
	spect to the QEP Common Stock sh			
exceeds one y				
19 Provide a	any other information necessary to im	olement the adjustment, such as t	he reportable tax year ▶ Not A	Applicable.
	penalties of perjury, I declare that I have e			
	it is true, correct, and complete. Declaratio	n of preparer (other than officer) is bas	ed on all information of which prep	arer has any knowledge.
Sign	Ann WEDW		2)2-	121
Here Signati	ure VVVIQQ		Date ► 3 27	14
Print v	our name ► Teresa L. Dick		Title ► Exec VP.	CAO, and Assistant Secretary
	Print/Type preparer's name	Preparer's signature	Date	Check   if   PTIN
Preparer -				self-employed
	Firm's name >			Firm's EIN ▶
	Firm's address > 7 (including accompanying statement	e) to: Department of the Traceurs	Internal Revenue Service Co	Phone no.