

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

<b>1 Issuer's name</b> Harvest Oil & Gas Corp.		<b>2 Issuer's employer identification number (EIN)</b> 83-0656612	
<b>3 Name of contact for additional information</b> Investor Relations	<b>4 Telephone No. of contact</b> 713.651.1144	<b>5 Email address of contact</b> https://ir.everenergypartners.com/contact-us	
<b>6 Number and street (or P.O. box if mail is not delivered to street address) of contact</b> 1001 Fannin Street, Suite 750		<b>7 City, town, or post office, state, and ZIP code of contact</b> Houston, TX 77002	
<b>8 Date of action</b> October 28, 2019		<b>9 Classification and description</b> Stock - Common	
<b>10 CUSIP number</b> 41755V102	<b>11 Serial number(s)</b>	<b>12 Ticker symbol</b> OTCQX: HRST	<b>13 Account number(s)</b>

**Part II Organizational Action** Attach additional statements if needed. See back of form for additional questions.

**14** Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ The Board of Directors has approved a one-time cash distribution of \$7.00 per share to common stockholders of record on October 18, 2019 to be paid on October 28, 2019.

**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 ▶ The Company expects to have no current or accumulated earnings and profits and the cash distribution should not constitute a taxable dividend for U.S. federal and state income tax purposes. Rather, the cash distribution would constitute non-taxable return of capital, and a reduction in the tax basis of each recipient's ownership interest in the Company (but not below zero).

**16** Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ The Company expects no current or accumulated earnings and profit. Therefore, the cash distribution should be treated as a return of capital.

**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶  
IRC Section 301(c)(2) and IRC Section 316(a)

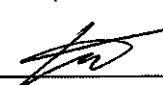
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18 Can any resulting loss be recognized? ▶  
N/A

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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶  
N/A

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**Sign Here**  
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.  
Signature ▶  Date ▶ 11/6/2019  
Print your name ▶ Michael Cheng Title ▶ Principal Tax Officer

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.