

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attachment.

Multiple horizontal lines for listing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶ See attachment.

Multiple horizontal lines for providing information regarding resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attachment.

Multiple horizontal lines for providing other necessary information for the adjustment.

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.

Sign Here

Signature ▶ [Handwritten Signature] Date ▶ 5/07/2024

Print your name ▶ Jon W. Sauer Title ▶ Vice President

Paid Preparer Use Only	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.

APA Corporation
EIN: 86-1430562
Attachment to IRS Form 8937 – Part II
Report of Organizational Actions Affecting Basis of Securities

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations related to the effects of the Merger (as defined below) on the tax basis of shares of common stock of APA Corporation (“APA”) received in exchange for shares of common stock of Callon Petroleum Company (“Callon”). The information contained herein does not constitute tax advice and does not purport to be complete or describe the tax consequences that may apply to particular categories of shareholders. Neither APA nor Callon provides tax advice to its shareholders. Shareholders are encouraged to consult their own tax advisors regarding the particular consequences of the Merger to them (including the applicability and effect of all U.S. federal, state and local tax laws and non-U.S. tax laws) and should carefully read the joint proxy statement/prospectus, which is part of a Registration Statement on Form S-4 that APA filed on February 1, 2024 (and amended Form S-4/A that APA filed on February 13, 2024) with the Securities and Exchange Commission, noting especially the discussion under the heading “Material U.S. Federal Income Tax Consequences of the Merger.” The information provided herein is subject to such discussion in all respects. The Registration Statement may be accessed at www.sec.gov.

Line 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.

On April 1, 2024, pursuant to the terms and conditions of the Agreement and Plan of Merger (the “Merger Agreement”), dated as of January 3, 2024, by and among APA, a Delaware corporation, Callon, a Delaware corporation, and Astro Comet Merger Sub Corp., a Delaware corporation and a wholly owned subsidiary of APA (“Merger Sub”), Merger Sub merged with and into Callon (the “Merger”), with Callon continuing as the surviving corporation and a wholly owned subsidiary of APA.

In the Merger, each share of common stock, par value \$0.01 per share, of Callon (“Callon Common Stock”) that was issued and outstanding immediately prior to the effective time of the Merger (the “Effective Time”) (other than any shares that were excluded pursuant to the terms of the Merger Agreement) was converted at the Effective Time into the right to receive 1.0425 shares of common stock of APA (“APA Common Stock”). No fractional shares of APA Common Stock were issued in the Merger. Instead, Callon shareholders received cash in lieu of fractional shares of APA Common Stock. The Merger is intended to qualify as a reorganization within the

meaning of Section 368(a) of the Code. The following descriptions and calculations assume that the Merger so qualifies.

Line 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.

Provided the Merger qualifies as a “reorganization” within the meaning of Section 368(a) of the Code, a Callon shareholder who exchanges its shares of Callon Common Stock for shares of APA Common Stock in the Merger generally will not recognize any gain or loss for U.S. federal income tax purposes, except with respect to cash, if any, received in lieu of fractional shares of APA Common Stock. Each such Callon shareholder’s aggregate tax basis in the shares of APA Common Stock received pursuant to the Merger (including any fractional share of APA Common Stock for which cash was received) will equal such Callon shareholder’s aggregate adjusted tax basis in the shares of Callon Common Stock surrendered in the Merger. Each such Callon shareholder that receives cash in lieu of a fractional share of APA Common Stock generally will recognize capital gain or loss equal to the difference between the amount of cash received and the tax basis in such fractional share, determined as described above.

Line 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 aggregate tax basis of the APA Common Stock received in the Merger (including any fractional share interests in APA Common Stock deemed received) will equal the aggregate adjusted tax basis in the shares of Callon Common Stock exchanged.

Line 17 – List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 354, 358, 368, 1001 and 1223 of the Code.

Line 18 – Can any resulting loss be recognized?

Callon shareholders generally may not recognize any loss for U.S. federal income tax purposes as a result of the Merger, except with respect to cash, if any, received in lieu of fractional shares of APA Common Stock.

Line 19 – Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Merger was effective on April 1, 2024. For a Callon stockholder whose taxable year is the calendar year, the reportable tax year is 2024.