

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	§	Chapter 11
	§	
PARALLEL ENERGY LP, <i>et al.</i> ¹	§	Case No. 15-12263 (KG)
	§	(Joint Administration Requested)
Debtors.	§	
	§	

**NOTICE OF FILING OF BANKRUPTCY PETITIONS AND
RELATED PLEADINGS; NOTICE OF HEARING ON FIRST DAY
MOTIONS SCHEDULED FOR NOVEMBER 10, 2015 AT 2:00 P.M.**

PLEASE TAKE NOTICE that on November 9, 2015, Parallel Energy LP and its related debtor affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

PLEASE TAKE FURTHER NOTICE that in addition to the filing of their voluntary petitions, the Debtors have filed the following first day motions and related pleadings (the “**First Day Motions**”):

1. **Joint Administration**. Motion For Entry of An Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only [D.I. 2, filed 11/9/2015];
2. **Creditor Matrix**. Motion to (A) Permit Filing of Consolidated Creditor Matrix, and (B) Implement Certain Notice Procedures [D.I. 3, filed 11/9/2015];
3. **DIP/Cash Collateral**. Motion for (A) Interim and Final Orders (I) Authorizing the Debtors to Obtain Post-Petition Secured Financing Pursuant to 11 U.S.C. § 364, (II) Authorizing the Debtors’ Limited Use of Cash Collateral Pursuant to 11 U.S.C. § 363, (III) Granting Adequate Protection to Prepetition Senior Lender Pursuant to 11 U.S.C. §§ 361, 362, 363 And 364, and (B) Scheduling A Final Hearing Pursuant To Bankruptcy Rule 4001 [D.I. 4, filed 11/9/2015];

¹ The Debtors are Parallel Energy LP and Parallel Energy GP LLC.

4. **Cash Management.** Motion for Interim and Final Orders to Approve (A) Maintenance of Pre-Petition Bank Accounts and Cash Management System; and (B) Continued Use of Existing Checks and Business Forms [D.I. 5, filed 11/9/2015];
5. **Critical Vendors.** Motion For Entry of Interim and Final Orders (a) Authorizing the Payment of Pre-Petition (i) Operating Expenses, (ii) Joint Interest Billings, (iii) Transportation and Warehousing Claims, and (iv) 503(b)(9) Claims, and (b) Confirming Administrative Expenses Priority of Outstanding Orders [D.I. 6, filed 11/9/2015];
6. **Royalty Payments.** Motion for Interim and Final Orders to (A) Honor Certain Pre-Petition Obligations to Working Interest Owners and Royalty Interest Owners; and (B) Continue Such Payments Post-Petition in the Ordinary Course of Business [D.I. 7, filed 11/9/2015];
7. **Wages and Benefits.** Motion for Interim and Final Orders Authorizing (A) Payment of Pre-petition Accrued Employee Wages, Salaries and Payroll Taxes, (B) Reimbursement of Employees for Pre-petition Business Expenses, and (C) Honoring of Existing Employee Benefit Plans and Policies at Its Discretion in The Ordinary Course of Business [D.I. 8, filed 11/9/2015];
8. **Utilities.** Motion for Interim and Final Orders (A) Authorizing Adequate Assurance of Payments to Utilities; (B) Prohibiting Utilities from Altering, Refusing, or Discontinuing Services; and (C) Establishing Procedures for Resolving Requests for Additional Assurance of Payment [D.I. 9, filed 11/9/2015];
9. **Taxes.** Motion to Authorize the Payment of Pre-Petition Taxes and Related Obligations; and Continue Such Payments Post-Petition in the Ordinary Course of Business [D.I. 10, filed 11/9/2015];
10. **Insurance Coverage.** Motion for Interim and Final Orders Authorizing (A) Continued Workers' Compensation, Liability, Property, and Other Insurance Programs, (B) Payment of All Obligations in Respect Thereof, and (C) The Ability to Enter into Premium Financing Agreements in the Ordinary Course of Business [D.I. 11, filed 11/9/2015];
11. **156(c) Retention.** Application to Employ Prime Clerk LLC as Claims and Noticing Agent for the Debtors Nunc Pro Tunc to the Petition Date Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 105(a), and Local Rule 2002-1(f) [D.I. 13, filed 11/9/2015];
12. **First Day Declaration.** Declaration of Richard N. Miller in Support of Voluntary Petitions and First Day Motions [D.I. 15, filed 11/9/2015];

PLEASE TAKE FURTHER NOTICE that in addition to the filing of the First Day Motions, the Debtors have filed the following motions (the “**Second Day Motions**”) and related pleadings that they seek to have considered for scheduling purposes only:

13. **Bid Procedures**. Motion Pursuant to 11 U.S.C. §§ 105, 363, 365, 503 And 507 and Bankruptcy Rules 2002, 6004 and 6006 for (I) Entry of an Order (A) Establishing Bid and Auction Procedures Related to the Sale of Substantially All of the Debtors’ Property; (B) Approving Related Bid Protections; (C) Scheduling an Auction and Sale Hearing; (D) Establishing Certain Notice Procedures for Determining Cure Amounts for Executory Contracts and Unexpired Leases to be Assumed and Assigned; and (E) Granting Related Relief; and (II) Entry of an Order (A) Approving the Sale of Substantially All of the Debtors’ Property Free and Clear of All Liens, Claims, Encumbrances and Interests; and (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [D.I. 12, 11/9/2015]
14. **Bar Dates**. Debtors’ Motion for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Notice of Bar Dates [D.I. 14, filed 11/9/2015];

PLEASE TAKE FURTHER NOTICE that a hearing (the “**First Day Hearing**”) with respect to the First Day Motions and the Second Day Motions (for scheduling purposes only) is scheduled for November 10, 2015 at 2:00 p.m. at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801, before the Honorable Kevin Gross, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that copies of all motions and pleadings referenced above are available on the Court’s website at <https://ecf.deb.uscourts.gov> and on the website of the Debtors’ proposed notice and claims agent, Prime Clerk LLC at <https://cases.primeclerk.com/Parallel>. Further information may be obtained by calling

(866)727-8489 (US) or (929)342-0753 (international) or emailing to parallelinfo@primeclerk.com or upon request from the undersigned proposed counsel to the Debtors.

PLEASE TAKE FURTHER NOTICE that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: November 9, 2015
Wilmington, DE

BAYARD, P.A.

/s/ Evan T. Miller

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