

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

CASTEX ENERGY PARTNERS, L.P., ET AL.<sup>1</sup>,  
Debtors.

CASE NO. 17-35835 (MI)

Chapter 11

Related to Doc. Nos: 6, 8, 10, 11, 13, 14

(Jointly Administered)

**AMENDED NOTICE OF AGENDA FOR HEARING ON MOTIONS SCHEDULED FOR  
NOVEMBER 14, 2017, AT 2:00 PM (CST), BEFORE THE HON. MARVIN ISGUR AT  
THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002**

**Uncontested Matters:**

1. Debtors' *Emergency Application for Retention and Employment of Kelly Hart & Hallman, LLP as Counsel for the Debtors, Nunc Pro Tunc to the Petition Date (ECF Doc. No. 8)* (the "Application to Employ KHH")

Objection Deadline: November 10, 2017, 12:00 Noon, prevailing Central Standard Time

Related Documents:

- Notice of Filing of Amended Proposed Orders for Certain of the Debtors' First Day Filings Set For Hearing on November 14, 2017 (**ECF Doc. No. 82**)
- Debtors' Exhibit and Witness Listed for November 14, 2017 Hearings (**ECF Doc. No. 101**)
- Notice Of Filing of Amended Declarations of Aaron Killian And Avinash D'Souza (**ECF Doc. No. 102**)
- Debtors' Amended Exhibit and Witness List for November 14, 2017 (**ECF Doc. No. 114**)

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<sup>1</sup> The Debtors are the following five entities (the last four digits of their respective taxpayer identification numbers (if required) follow in parentheses): Castex Energy Partners, L.P. (5230); Castex Energy 2005, L.P. (7632); Castex Energy II, LLC (N/A), Castex Energy IV, LLC (N/A) and Castex Offshore, Inc. (8432). The address of the Debtors is Three Allen Center, 333 Clay Street, Suite 2900, Houston, Texas 77002.

Status: This matter is resolved. The Debtors and Office of the United States Trustee have exchanged multiple comments and edits on a form of order approving the Application to Employ KHH. The Debtors submit that all open issues with respect to the Application to Employ KHH have been resolved and all comments and edits are incorporated in the Amended Proposed Order. Counsel will have a form of order to present to the Court at hearing.

2. Debtors' *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Royalties, Severance Taxes, Delay Rentals and Related Lease Obligations and (II) Granting Related Relief* (**ECF Doc. No. 10**) (the "Royalties Motion")

Objection Deadline: November 10, 2017, 12:00 Noon, prevailing Central Standard Time

Related Documents:

- Interim Order (I) Authorizing the Debtors to Pay Royalties, Severance Taxes, Delay Rentals and Related Lease Obligations and (II) Granting Related Relief (**ECF Doc. No. 37**)
- Notice of Filing of Amended Proposed Orders for Certain of the Debtors' First Day Filings Set For Hearing on November 14, 2017 (**ECF Doc. No. 82**)
- Debtors' Exhibit and Witness Listed for November 14, 2017 Hearings (**ECF Doc. No. 101**)
- Notice Of Filing of Amended Declarations of Aaron Killian And Avinash D'Souza (**ECF Doc. No. 102**)
- Debtors' Amended Exhibit and Witness List for November 14, 2017 (**ECF Doc. No. 114**)

Status: This matter is resolved. The Committee previously submitted a proposed form of order as ECF Doc. No. 98-4. The Debtors have submitted a final redline form of order showing the changes from ECF Doc. No. 98-4 which reflects the agreed form of order. Final order to be presented at hearing.

3. Debtors' *Emergency Motion for Entry of Interim and Final Orders Authorizing Debtors to Continue Surety Bond Program* (**ECF Doc. No. 13**) (the "Surety Bond Motion")

Objection Deadline: November 10, 2017, 12:00 Noon, prevailing Central Standard Time

Related Documents:

- Notice of Filing of Amended Proposed Orders for Certain of the Debtors' First Day Filings Set For Hearing on November 14, 2017 (**ECF Doc. No. 82**)

- The Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights to Certain First Day Matters (**ECF Doc. No. 98**)
- Exhibit and Witness Listed for November 14, 2017 Hearings (**ECF Doc. No. 101**)
- Notice Of Filing of Amended Declarations of Aaron Killian And Avinash D'Souza (**ECF Doc. No. 102**)
- Debtor's Response to Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights (**ECF Doc. No. 110**)

Status: The Debtors propose to continue the hearing on the Surety Bond Motion until December 4, 2017.

4. Debtors' *Emergency Motion Under 11 U.S.C. §§ 363 and 105(a) for Entry of Interim and Final Orders Authorizing Continued Performance of Obligations Under Shared Services Agreement* (**ECF Doc. No. 14**) (the "Shared Services Motion")

Objection Deadline: November 10, 2017, 12:00 Noon, prevailing Central Standard Time

Related Documents:

- Interim Order Authorizing the Debtors' Continued Performance of Obligations Under Shared Services Agreement with Castex Energy, Inc. (**ECF Doc. No. 38**)
- Notice of Filing of Amended Proposed Orders for Certain of the Debtors' First Day Filings Set For Hearing on November 14, 2017 (**ECF Doc. No. 82**)
- The Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights to Certain First Day Matters (**ECF Doc. No. 98**)
- Debtors' Exhibit and Witness Listed for November 14, 2017 Hearings (**ECF Doc. No. 101**)
- Notice Of Filing of Amended Declarations of Aaron Killian And Avinash D'Souza (**ECF Doc. No. 102**)
- Debtor's Response to Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights (**ECF Doc. No. 110**)
- Debtors' Amended Exhibit and Witness List for November 14, 2017 (**ECF Doc. No. 114**)

Status: This matter has been resolved. An agreed form of order will be submitted at hearing.

**Contested Matters:**

5. Debtors' *Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Superpriority Financing; (II) Authorizing the Debtors' Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c); (III) Granting Adequate Protection Pursuant to 11 U.S.C. § 361; and (IV) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(c)* (**ECF Doc. No. 6**) (the "DIP Motion")

Objection Deadline: November 10, 2017, 12:00 Noon, prevailing Central Standard Time

Related Documents:

- Interim Order Pursuant to 11 U.S.C. §§ 105, 361,362, 363, 364, and 507, Bankruptcy Rules 2002, 2001, and 9014, and Local Bankruptcy Rules 2002-1, 4001-1(b), 4002-1(i), and 9013-1 (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Superpriority Financing; (II) Authorizing the Debtors' Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c); (III) Granting Adequate Protection Pursuant to 11 U.S.C. § 361; and (IV) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(c) (**ECF Doc. No. 35**)
- Notice of Filing of Amended Proposed Orders for Certain of the Debtors' First Day Filings Set For Hearing on November 14, 2017 (**ECF Doc. No. 82**)
- Objection of Cypress-Fairbanks Independent School District, Harris County, and Shelby County to the DIP Motion (**ECF Doc. No. 87**) (withdrawn **ECF Doc. No. 106**).
- Limited Objection of OHA Asset Holdings II, LP to the DIP Motion (**ECF Doc. No. 96**)
- The Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights to Certain First Day Matters (**ECF Doc. No. 98**)
- Debtors' Exhibit and Witness Listed for November 14, 2017 Hearings (**ECF Doc. No. 101**)
- Notice Of Filing of Amended Declarations of Aaron Killian And Avinash D'Souza (**ECF Doc. No. 102**)
- United States' Limited Objection and Reservation of Rights with Respect to the DIP Motion (**ECF Doc. No. 107**)
- Debtors' Reply to OHA Asset Holdings II, LP Limited Objection (**ECF Doc. No. 108**)
- Debtor's Response to Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights (**ECF Doc. No. 110**)

- Reply of Capital One, National Association, as DIP Agent and Prepetition Agent to Limited Objection of OHA Asset Holdings II, LP (**ECF Doc. No. 112**).
- Debtors' Amended Exhibit and Witness List for November 14, 2017 (**ECF Doc. No. 114**)

**Status:** This matter is resolved as among the Debtors the DIP Agent and the Committee. An agreed form of order reflecting this consent will be submitted at hearing along with a redline showing changes. Currently this matter is going forward with respect to the objection of OHA Asset Holdings II, LP to the DIP Motion (**ECF Doc. No. 96**).

6. Debtors' *Emergency Motion For Entry of Interim and Final Orders (I) Authorizing the Payment in the Ordinary Course of (A) Lease Operating Expenses and Costs, (B) Joint Interest Billings, and (C) Insurance Payments and (II) Granting Related Relief* (**ECF Doc. No. 11**) (the "JIB Motion")

**Objection Deadline:** November 10, 2017, 12:00 Noon, prevailing Central Standard Time

**Related Documents:**

- Interim Order (I) Authorizing the Payment in the Ordinary Course of (A) Lease Operating Expenses and Costs, (B) Joint Interest Billings, and (C) Insurance Payments and (II) Granting Related Relief (**ECF Doc. No. 36**)
- Notice of Filing of Amended Proposed Orders for Certain of the Debtors' First Day Filings Set For Hearing on November 14, 2017 (**ECF Doc. No. 82**)
- The Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights to Certain First Day Matters (**ECF Doc. No. 98**)
- Debtors' Exhibit and Witness Listed for November 14, 2017 Hearings (**ECF Doc. No. 101**)
- Notice Of Filing of Amended Declarations of Aaron Killian And Avinash D'Souza (**ECF Doc. No. 102**)
- Objection of Apache Corporation to the JIB Motion (**ECF Doc. No. 109**) (late filed)
- Debtor's Response to Official Committee of Unsecured Creditors' Limited Omnibus Objection and Reservation of Rights (**ECF Doc. No. 110**)
- Debtor's Reply to Objection of Apache Corporation (**ECF Doc. No. 111**)
- Debtors' Amended Exhibit and Witness List for November 14, 2017 (**ECF Doc. No. 114**)

Status: The Debtors and the Committee have resolved all issues and have agreed to an agreed form of order, to be submitted at hearing. Currently Debtors have not heard that the Apache objection is resolved. Debtors propose that the objection of Apache Corporation should be denied.

Dated November 14, 2017

Respectfully submitted,

**KELLY HART & PITRE**

*/s/ Rick Shelby*

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***Proposed Counsel for the Debtors***

**CERTIFICATE OF SERVICE**

I certify that on November 14, 2017, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Additionally, I have caused Prime Clerk, LLC, the Debtors' Claims and Noticing Agent, to serve the foregoing document on the master service list.

*s/ Rick Shelby*