

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

In re:

CASTEX ENERGY PARTNERS, L.P., *ET AL.*¹,
Debtors.

CASE NO. 17-35835 (MI)

Chapter 11

Related to Doc. Nos. 271, 316, 317, 359

(Jointly Administered)

**NOTICE OF AGENDA FOR HEARINGS SCHEDULED FOR FEBRUARY 26, 2018
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**

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1. Confirmation of the Debtors' *Third Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code* [Dkt. No. 428] (the "Confirmation").

Objection Deadline: February 9, 2018

Related Documents:

- Debtors' *Corrected Notice of Executory Contracts and Unexpired Leases to be Assumed by the Debtors Pursuant to the Plan* [Dkt. No. 319] and *Supplemental Notice of Executory Contracts and Unexpired Leases to be Assumed by the Debtors Pursuant to the Plan* [Dkt. No. 332] (collectively, the "Assumption Notices");
- Debtors' *Plan Supplement* [Dkt. No. 333];
- *Limited Objection Of The State Of Louisiana To Notice Of (A) Executory Contracts And Unexpired Leases To Be Assumed By The Debtors Pursuant To The Plan, (B) Cure Amounts, If Any And (C) Related Procedures In Connection Therewith* [Dkt. No. 348] (the "State of Louisiana Objection");
- *WesternGeco, L.L.C.'s Objection to Debtors' Notice of (A) Executory Contracts and Unexpired Leases to be Assumed by the Debtors Pursuant to the Plan, (B) Cure Amounts, If Any, and (C) Related Procedures in Connection Therewith and*

¹ 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.

Debtors' Proposed Assumption of WesternGeco, L.L.C.'s Master License Agreement and Related Supplemental Agreements [Dkt. No. 354] (the "WesternGeco Assumption Objection");

- *Fairfield Industries Incorporated's Objection to Debtors' Notice of (A) Executory Contracts and Unexpired Leases to be Assumed by the Debtors Pursuant to the Plan, (B) Cure Amounts, if any, and (C) Related Procedures In Connection Therewith and Debtors' Proposed Assumption of Fairfield Industries Incorporated's Master License Agreement and Related Supplemental Agreements* [Dkt. No. 355] (Fairfield Contract Objection);
- *Fairfield Industries Incorporated and WesternGeco, L.L.C.'s Objection to Debtors' Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated January 8, 2018* [Dk. No. 357] (the "Western/Geco/Fairfield Plan Objection");
- *Marquis Resources LLC's Limited Objection to Confirmation of Debtors' Second Amended Joint Plan of Reorganization and Objection to Cure Amount* [Dkt. No. 358] (the "Marquis Objection");
- *Geophysical Objection to Debtors' Notice of Assumption and Cure Amount* [Dkt. No. 361] (the "GPI Objection");
- *Limited Objection of the Roman Catholic Church of the Archdiocese of New Orleans and Point Au Fer, LLC to Debtors' Second Amended Joint Plan of Reorganization* [Dkt. No. 363] (the "RCC Objection");
- *Objection of Seneca Resources Corporation to Confirmation of the Debtors' Second Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code Dated January 8, 2018, and Plan Supplement* [Dkt. No. 364] (the "Seneca Objection");
- *Texas Petroleum Investment Company's Cure Objection* [Dkt. No. 365] (the "TPIC Objection");
- *Notice of Withdrawal of Texas Petroleum Investment Company's Cure Objection* [Dkt. No. 413];
- *United States' (Department of Interior) Objection to Confirmation of Debtors' Second Amended Joint Plan of Reorganization* [Dkt. No. 371] (the "United States Objection");
- *OHA Asset Holdings II, LP's Objection to the Debtors' Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated January 8, 2018* [Dkt. No. 393] (the "OHAII Objection");

- *Objection of Apache Corporation to Cure Amounts Pursuant to 11 U.S.C. § 365(B)(1)* [Dkt. No. 395] (the “Apache Objection”);
- *Declaration re: James Daloia of Prime Clerk LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Debtors Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated January 8, 2018* [Dkt. No. 407];
- *Declaration re: Steven Becker (Evercore) in Support of Confirmation of the Second Amended Joint Plan of Reorganization for Castex Energy Partners, L.P. and its Debtor Affiliates under Chapter 11 of the Bankruptcy Code* [Dkt. No. 414];
- *Declaration re: Ryan Omohundro (Alvarez Marsal) in Support of Confirmation of the Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Dkt. No. 415];
- *Declaration re: Aaron Killian, Vice President and Chief Financial Officer of the Debtors, In Support of Confirmation of the Debtors Third Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code* [Dkt. No. 416];
- *Declaration re: Ashley Green, General Counsel of Castex Energy, Inc., in Support of Castex Energy, Inc.'s Joinder to the Debtors' Brief In Support of Confirmation of the Debtors' Third Amended Chapter 11 Plan* [Dkt. No. 417];
- *Stipulation By The Official Committee of Unsecured Creditors and Apache Corporation, the Debtors, and the Prepetition Agent* [Dkt. No. 422];
- *Debtors' Brief in Support of the Plan* [Dkt. No. 423];
- *Debtors' Omnibus Reply to Various Assumption Notice Objections* [Dkt. No. 424];
- *Castex Energy, Inc.'s Joinder to Debtor's (I) Memorandum of Law in Support of the Second Amended Joint Chapter 11 Plan of Reorganization of Castex Energy Partners, L.P. and its Debtor Affiliates and (II) Response to Certain Objections Thereto* [Dkt. No. 425];
- *Marquis Resources LLC's Reply to Debtors' Omnibus Reply to Various Assumption Notice Objections* [Dkt. No. 429];
- *Debtor's Notice of Filing of Third Amended Plan* [Dkt. No. 430];
- *Capital One, National Association, as Administrative Agent's Joinder in Support of Debtors' (i) Memorandum of Law in Support of Second Amended Joint Plan of Reorganization of Castex Energy Partners, L.P. and its Debtor Affiliates and (ii) Response to Certain Objections Thereto* [Dkt. No. 432];

- Debtors' *Reply to the Objection of Apache Corporation to Cure Amounts* [Dkt. No. 433];
- Capital One, National Association, as Administrative Agent's *Joinder to Debtors' Reply to Objection of Apache Corporation to Cure Amounts Pursuant to 11 U.S.C. § 365(b)(1)* [Dkt. No. 434]

Status: **This matter is going forward subject to the following:**

(i) **The Debtors have resolved the State of Louisiana Objection by agreeing that the State of Louisiana (“State”) shall have until March 14, 2018 by which to provide the Debtors with written notice of the specific Cure Claim Contract Objection as may be made by the State (“State Final Cure Claim”), and if the parties cannot agree, the Debtors within 10 business days after receipt of the State Final Cure Claim will notice a hearing on their objection. The Debtors and the State will submit a stipulation to this effect or provide it on the record in open court at hearing.**

(ii) **The Debtors have resolved the GPI Objection and will provide language in the proposed confirmation order to that effect.**

(iii) **The Debtors have resolved the Fairfield Contract Objection and will provide language in the proposed confirmation order to that effect.**

(iv) **The Debtors have resolved the Fairfield component of the WesternGeco/Fairfield Plan Objection and will provide language in the proposed confirmation order to that effect.**

(v) **The Debtors have resolved the component of the United States Objection as regards any cure amounts that may be due the Office of Natural Resource and Revenue, and all parties are working to determine if consensus can be reached with respect to Confirmation Order language.**

(vi) **The TPIC Objection has been resolved and withdrawn (*see* Dkt. No. 413).**

2. Apache Corporation's *Motion to Temporarily Allow Claims for Voting Purposes Only Pursuant to Fed. R. Bankr. P 3018(a)* [Dkt. No. 316] (the “Apache Temporary Allowance Motion”)

Objection Deadline: February 9, 2018

Related Documents:

- Debtors' *Objection to Apache Temporary Allowance Motion* [Dkt. No. 372]

Status: **This matter is going forward and is contested.**

3. Debtors' *First Omnibus Objection to Claims (Unsupported Mineral Claims; No Liability Books and Records Claims; and Satisfied Claims)* [Dkt. No. 317] (the “Omnibus Claim Objection”)

Objection Deadline: n/a

Related Documents:

- JGF3 (Texas), Inc. and James G. Floyd's *Response to Omnibus Claim Objection* [Dkt. No. 419] ("Floyd Objection Response")

Status: **The Omnibus Claim Objection is uncontested and is going forward, with the exception that the Debtors and counsel for the parties to the Floyd Objection Response have agreed to continue this particular hearing to a future date and time (approximately two (2) weeks) .**

4. OHA Asset Holdings II, L.P.'s *Motion to Dismiss Chapter 1 Case of Castex 2005* [Dkt. No. 359] (the "Motion to Dismiss")

Objection Deadline: n/a

Related Documents:

- Debtors' *Objection to Motion to Dismiss* [Dkt. No. 421];
- Capital One, National Association, as Administrative Agent, *Joinder in Support of Debtors' Objection to Expedited Motion to Dismiss Case of Castex 2005, L.P.* [Dkt. No. 431]

Status: **Subject to the Court's ruling on the Debtors' *Objection to Claim* [Dkt. No. 335], this matter is going forward and is contested.**

Dated February 25, 2018

Respectfully submitted,

KELLY HART & PITRE

/s/ Rick Shelby

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Counsel for the Debtors

CERTIFICATE OF SERVICE

I certify that on February 25, 2018, 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.

s/ Rick Shelby