

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

MAGNUM HUNTER RESOURCES
CORPORATION, *et al.*,¹

Reorganized Debtors.

SAMSON RESOURCES COMPANY,

Plaintiff,

vs.

BAKKEN HUNTER, LLC

Defendant.

Chapter 11

Case No. 15-12533 (KG)
(Jointly Administered)

Chapter 11

Adversary Case No. 16-50990

**NOTICE OF AGENDA FOR HEARING ON DECEMBER 20, 2016, AT 11:00 A.M.
(PREVAILING EASTERN TIME), BEFORE THE HONORABLE KEVIN GROSS AT
THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF
DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6TH FLOOR,
COURTROOM NO. 3, WILMINGTON, DELAWARE 19801²**

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtors' federal tax identification number, include: Magnum Hunter Resources Corporation (9278); Alpha Hunter Drilling, LLC (7505); Bakken Hunter Canada, Inc. (7777); Bakken Hunter, LLC (3862); Energy Hunter Securities, Inc. (9725); Hunter Aviation, LLC (8600); Hunter Real Estate, LLC (8073); Magnum Hunter Marketing, LLC (2527); Magnum Hunter Production, Inc. (7062); Magnum Hunter Resources GP, LLC (5887); Magnum Hunter Resources, LP (5958); Magnum Hunter Services, LLC (5725); NGAS Gathering, LLC (2054); NGAS Hunter, LLC (3737); PRC Bakken Hunter LLC (1736); Shale Hunter, LLC (1952); Triad Holdings, LLC (8947); Triad Hunter, LLC (5830); Viking International Resources Co., Inc. (0097); and Bakken Hunter Hunter ND, LLC (3798). The location of the Reorganized Debtors' service address is: 909 Lake Carolyn Parkway, Suite 600, Irving, Texas 75039.

² Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946).

CONTINUED MATTERS:

1. Reorganized Debtors' Ninth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Rule 3007-1 [Filed: 7/5/16] (Docket No. 1374).

Response Deadline: August 9, 2016, at 4:00 p.m.

Responses Received:

1. Informal comments of Environmental Standards, Inc.
2. Informal comments of WV Division of Natural Resources.
3. Informal comments of Sierra Liquidity Fund LLC.
4. Informal comments of Eureka Hunter Pipeline, LLC.

Related Documents:

- a. [Proposed] Order Sustaining Reorganized Debtors' Ninth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Rule 3007-1 [Filed: 7/5/16] (Docket No. 1374, Exhibit A).
- b. Notice of Submission of Proofs of Claim in Connection with Reorganized Debtors' Ninth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Rule 3007-1 [Filed: 8/9/16] (Docket No. 1433).
- c. [Signed] Order Sustaining Reorganized Debtors' Ninth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Rule 3007-1 [Filed: 8/16/16] (Docket No. 1436).
- d. [Signed] Order Approving Stipulation By and Between the Reorganized Debtors and Second Lien Agent in Resolution of Claim Nos. 1750 and 2237 [Filed: 8/29/16] (Docket No. 1455).
- e. [Signed] First Supplemental Order Sustaining Reorganized Debtors' Ninth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007,

and Local Rule 3007-1 [Filed: 11/8/16] (Docket No. 1527).

- f. Certification of Counsel Regarding Reorganized Debtors' Ninth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Rule 3007-1 [Filed 11/22/2016] (Docket No. 1541).

Status: The Debtors have filed a certification of counsel resolving the claim of Sierra Liquidity Fund LLC. The remaining claims are continued until January 19, 2017, at 10:00 a.m.

2. Reorganized Debtors' Eleventh Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 8/26/16] (Docket No. 1453).

Response Deadline: September 13, 2016, at 4:00 p.m.

Responses Received:

- a. Response in Opposition of the Commonwealth of Pennsylvania, Department of Revenue to Debtors' Eleventh Omnibus (Substantive) Objection to Claims [Filed: 9/13/16] (Docket No. 1469).
- b. Hazen NG LLC's Response in Opposition to the Reorganized Debtors' Eleventh Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 9/13/16] (Docket No. 1471).
- c. Informal comments of Singer & Levick
- d. Informal comments of Robert & Dale Frizzelle
- e. Informal comments of Snelling
- f. Informal comments of McFall, Breitbeil & Eidman, P.C.
- g. Informal comments of Wanda Clark

Related Documents:

- a. [Proposed] Order Sustaining Reorganized Debtors' Eleventh Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 8/26/16] (Docket No. 1453, Exhibit A).

- b. Notice of Submission of Proofs of Claim in Connection with Reorganized Debtors' Eleventh Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 9/13/16] (Docket No. 1468).
- c. [Signed] Order Sustaining Reorganized Debtors' Eleventh Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 9/23/16] (Docket No. 1480).
- d. Notice of Withdrawal of Reorganized Debtors' Eleventh Omnibus Objection to a No Liability Claim [Docket No. 1453] as it Relates to Proof of Claim No. 2191 Filed By Pennsylvania Department of Revenue [Filed: 10/21/16] (Docket No. 1508).
- e. [Signed] First Supplemental Order Sustaining Reorganized Debtors' Eleventh Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 11/8/16] (Docket No. 1529).

Status: This matter is continued until January 19, 2017, at 10:00 a.m.

- 3. Reorganized Debtors' Fourteenth Omnibus (Non-Substantive) Objection to Insufficient Documentations Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 11/18/16] (Docket No. 1539).

Response Deadline: December 6, 2016, at 4:00 p.m.

Responses Received:

- a. Answer of K.B. Wells Service to Reorganized Debtors' Fourteenth Omnibus (Non-Substantive) Objection to Insufficient Documentations Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 11/30/16] (Docket No. 1557).

Related Documents:

- a. [Proposed] Order Sustaining Reorganized Debtors' Fourteenth Omnibus (Non-Substantive) Objection to Insufficient Documentations Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 11/18/16] (Docket No. 1539, Exhibit A).
- b. Notice of Submission of Proofs of Claim in Connection with Reorganized Debtors' Fourteenth Omnibus (Non-Substantive) Objection to Insufficient

Documentations Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/6/16] (Docket No. 1561).

- c. Notice of Withdrawal of Reorganized Debtors' Fourteenth Omnibus Objection to a Certain Insufficient Documentations Claim [Docket No. 1539] as it Related to Proof of Claim No. 633 Filed By K.B. Well Service, Inc. [[Filed: 12/14/16] (Docket No. 1567).
- d. Certification of Counsel Regarding Reorganized Debtors' Fourteenth Omnibus (Non-Substantive) Objection to Insufficient Documentations Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/15/16] (Docket No. 1570).
- e. [Signed] Order Sustaining Reorganized Debtors' Fourteenth Omnibus (Non-Substantive) Objection to Insufficient Documentations Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/16/16] (Docket No. 1573).

Status: The Court has entered an order on this matter. The remaining claims have been adjourned by agreement to January 19, 2017 at 10:00 a.m. (Eastern Standard Time). Accordingly, no hearing on this matter is necessary.

4. Reorganized Debtors' Fifteenth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 11/18/16] (Docket No. 1540).

Response Deadline: December 6, 2016, at 4:00 p.m.

Responses Received:

- a. Archrock Partners Operating, LLC's Response in Opposition to the Debtors' Fifteenth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/3/16] (Docket No. 1560).
- b. Response of Pioneer Well Services, LLC in Opposition Reorganized Debtors' Fifteenth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/9/16] (Docket No. 1563).

Related Documents:

- a. [Proposed] Order Sustaining Reorganized Debtors' Fifteenth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 11/18/16] (Docket No. 1540, Exhibit A).
- b. Notice of Submission of Proofs of Claim in Connection with Fifteenth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/6/16] (Docket No. 1562).
- c. Certification of Counsel Regarding Reorganized Debtors' Fifteenth Omnibus (Substantive) Objection to Substantive Duplicate, No Liability, Royalty and Working Interest, and Certain Improperly Asserted Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003 and 3007, and Local Rule 3007-1 [Filed: 12/15/16] (Docket No. 1571).

Status: The Reorganized Debtors have filed a revised proposed order under certification of counsel and respectfully request entry of the revised proposed order. The remaining claims have been adjourned by agreement to January 19, 2017 at 10:00 a.m. (Eastern Standard Time). Accordingly, no hearing on this matter is necessary unless requested by the Court.

ORAL ARGUMENT:

5. Samson Resources Company's Motion for Summary Judgment [Filed: 8/11/16] (Adv. Pro. No. 16-50990, Docket No. 10).

Response Deadline: September 6, 2016, at 4:00 p.m.

Responses Received:

- a. Opposition of Bakken Hunter, LLC to Samson Resources Company's Motion for Summary Judgment [Filed: 9/6/16] (Adv. Pro. No. 16-50990, Docket No. 17).

Reply Deadline: September 19, 2016, at 4:00 p.m.

Replies Received:

- a. Samson Resources Company's Reply Brief in Support of Its Motion for Summary Judgment [Filed: 9/19/16] (Adv. Pro. No. 16-50990, Docket No. 20).

Related Documents:

- a. Stipulation Fixing Briefing Schedule on Samson Resources Company's Motion for Summary Judgment [Filed: 8/16/16] (Adv. Pro. No. 16-50990, Docket No. 13).
- b. Declaration of Scott Studdard [Filed: 9/6/16] (Adv. Pro. No. 16-50990, Docket No. 18).
- c. Plaintiff's Request for Oral Argument Regarding Motion for Summary Judgment [Filed: 9/22/16] (Adv. Pro. No. 16-50990, Docket No. 21).
- d. Notice of Completion of Briefing Regarding Samson Resources Company's Motion for Summary Judgment (Oral Argument Has Been Requested) [Filed: 9/22/16] (Adv. Pro. No. 16-50990, Docket No. 22).

Status: This matter has been continued to January 19, 2017 at 10:00 a.m. (Eastern Standard Time).

CONTESTED MATTERS:

6. Motion of Black Land Management, Inc. to Deem Late Proof of Claim as Timely Filed [Filed: 10/11/16] (Docket No. 1499).

Response Deadline: November 22, 2016, at 4:00 p.m. (extended to December 2, 2016 at 4:00 p.m.)

Responses Received:

- a. Creditor Trustee's Objection to Motion of Black Land Management, Inc. to Deem Late Filed Proof of Claim as Timely Filed [Filed: 12/2/16] (Docket No. 1556).

Replies Received:

- a. Black Land Management, Inc.'s Reply to Creditor Trustee's Objection to Motion of Black Land Management, Inc. to Deem Late Filed Proof of Claim as Timely Filed [Filed: 12/15/16] (Docket No. 1568).

Related Documents:

- a. [Proposed] Order Granting the Motion of Black Land Management, Inc. to Deem Late Proof of Claim as Timely Filed [Filed: 10/11/16] (Docket No. 1499).
- b. Amended Notice of Motion and Hearing [Filed 11/18/16] (Docket No. 1536).

Status: This matter will go forward.

Wilmington, Delaware
Dated: December 16, 2016

/s/ Joseph M. Mulvihill

Laura Davis Jones (DE Bar No. 2436)
Colin R. Robinson (DE Bar No. 5524)
Joseph M. Mulvihill (DE Bar No. 6061)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
crobinson@pszjlaw.com
jmulvihill@pszjlaw.com

- and -

Edward O. Sassower P.C. (admitted *pro hac vice*)
Brian E. Schartz (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: edward.sassower@kirkland.com
brian.schartz@kirkland.com

- and -

James H.M. Sprayregen, P.C.
Justin R. Bernbrock (admitted *pro hac vice*)
Alexandra Schwarzman (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: james.sprayregen@kirkland.com
justin.bernbrock@kirkland.com
alexandra.schwarzman@kirkland.com

Co-Counsel to the Reorganized Debtors