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Proposed Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
) Chapter 11
)
SABINE OIL & GAS CORPORATION, *et al.*,¹) Case No. 15-11835 (SCC)
)
Debtors.) (Joint Administration Requested)
)

AGENDA FOR FIRST DAY HEARING

Time and Date of Hearing: July 16, 2015 at 11:00 a.m. (Prevailing Eastern Time)

Location of Hearing: The Honorable Judge Shelley C. Chapman
United States Bankruptcy Court for the Southern District of New York
Alexander Hamilton Custom House
One Bowling Green, Courtroom No. 623
New York, New York 10004

Copies of Motions: A copy of each pleading can be viewed on the Court’s website at www.nysb.uscourts.gov and the website of the Debtors’ proposed notice and claims agent, Prime Clerk LLC, at <https://cases.primeclerk.com/sabine>. Further information may be obtained by calling Prime Clerk toll free at 866-692-6696 or internationally at 929-342-0759.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Sabine Oil & Gas Corporation (4900); Giant Gas Gathering LLC (3438); Sabine Bear Paw Basin LLC (2656); Sabine East Texas Basin LLC (8931); Sabine Mid-Continent Gathering LLC (6085); Sabine Mid-Continent LLC (6939); Sabine Oil & Gas Finance Corporation (2567); Sabine South Texas Gathering LLC (1749); Sabine South Texas LLC (5616); and Sabine Williston Basin LLC (4440). The location of Debtor Sabine Oil & Gas Corporation’s corporate headquarters and the Debtors’ service address is: 1415 Louisiana, Suite 1600, Houston, Texas 77002.

I. Introduction

1. ***First Day Declaration.*** Declaration of Michael Magilton (I) in Support of First Day Motions and (II) Pursuant to Local Bankruptcy Rule 1007-2. [Docket No. 3].

II. Matters Requested to be Heard at First Day Hearing

2. ***Joint Administration Motion.*** Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases. [Docket No. 4].
3. ***Cash Collateral Motion.*** Debtors' Motion for the Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Bankruptcy Rule 2002, 4001, and 9014, and Local Bankruptcy Rule 4001-(2) (I) Authorizing Debtors' Limited Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing. [Docket No. 9].
4. ***Cash Management Motion.*** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Using the Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms, (C) Continue Intercompany Transactions, and (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Transactions. [Docket No. 10].
5. ***Wages Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (II) Continue Employee Benefits Programs. [Docket No. 14].
6. ***Royalty and Working Interest Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of (I) Working Interest Disbursements and (II) Royalty Payments in the Ordinary Course of Business. [Docket No. 11].
7. ***Lienholder Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of (I) Operating Expenses, (II) Joint Interest Billings, (III) Shipper and Warehousemen Claims, and (IV) Section 503(b)(9) Claims. [Docket No. 12].
8. ***Taxes and Fees Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Payment of Certain Prepetition Taxes and Fees. [Docket No. 13].
9. ***Equity Trading Motion.*** Debtors' Motion for Entry of Interim and Final Orders Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common

Stock and Preferred Stock. [Docket No. 6].

10. ***Creditor Matrix Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (B) File a Consolidated List of the Debtors' 50 Largest Unsecured Creditors and (II) Approving the Form and Manner of Notifying Creditors of Commencement of These Chapter 11 Cases. [Docket No. 5].
11. ***Schedules Extension Motion.*** Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs. [Docket No. 7].
12. ***Noticing Agent Application.*** Debtors' Application for Entry of an Order Authorizing and Approving Employment and Retention of Prime Clerk LLC as Claims and Noticing Agent for the Debtors and Debtors in Possession. [Docket No. 15].
13. ***Case Management Motion.*** Debtors' Motion for Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures. [Docket No. 8].

III. Introduction to Litigation

14. ***Complaint.*** Complaint, Sabine Oil & Gas Corporation v. Wilmington Trust, N.A. [Adv. Proc. 15-00126 (SCC) Docket No. 2].

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Dated: July 15, 2015
New York, New York

/s/ Ryan Blaine Bennett

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