

Paul M. Basta, P.C.  
Jonathan S. Henes, P.C.  
Christopher Marcus, P.C.  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900

James H.M. Sprayregen, P.C.  
Ryan Blaine Bennett (admitted *pro hac vice*)  
Brad Weiland (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
300 North LaSalle Street  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

*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, <i>et al.</i> , <sup>1</sup> | ) | Case No. 15-11835 (SCC) |
|  | ) |                         |
| Debtors.   | ) | (Jointly Administered)  |
|  | ) |                         |

**AMENDED AGENDA FOR HEARING TO BE HELD AUGUST 10, 2015  
AT 10:00 A.M. (PREVAILING EASTERN TIME)**

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Time and Date of Hearing: August 10, 2015 at 10:00 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 <http://www.nysb.uscourts.gov> and the website of Prime Clerk LLC, the notice and claims agent in these chapter 11 cases, 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.

<sup>1</sup> 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. Uncontested Matters Going Forward**

**A. Final or Additional Interim Relief on Certain First Day Motions**

1. ***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].

Responses Received: None

Related Documents:

- A. Interim Order Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (II) Continue Employee Benefits Programs [Docket No. 56].
- B. Supplement to 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. 117].

**Status:** This matter is going forward for the purpose of presenting *revised* proposed final orders with respect to the relief requested in the motion *except* as such relief relates to the Combination Payments, Forest Oil Retiree Health Benefits, Retiree Health Benefit Fees, and Legacy Forest Retirement Benefits. This matter is *adjourned* to a hearing currently scheduled for August 17, 2015 with respect to the Combination Payments, Forest Oil Retiree Health Benefits, Retiree Health Benefit Fees, and Legacy Forest Retirement Benefits.

2. ***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].

Responses Received: None

Related Documents:

- A. Interim Order Authorizing Payment of (I) Operating Expenses, (II) Joint Interest Billings, (III) Shipper and Warehousemen Claims, and (IV) Section 503(b)(9) Claims [Docket No. 54].

**Status:** This matter is going forward for the purpose of presenting a *revised* proposed second interim order. A final hearing on this matter is currently scheduled for August 17, 2015.

3. ***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].

Responses Received: None

Related Documents:

- A. Interim Order Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 55].

**Status:** This matter is going forward for the purpose of presenting a proposed final order.

4. ***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].

Responses Received: None

Related Documents:

- A. Interim Order Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock [Docket No. 58].

**Status:** This matter is going forward for the purpose of presenting a proposed final order.

**B. Additional Matters**

5. ***Utilities Motion.*** Debtors' Motion for Entry of an Order Determining Adequate Assurance of Payment for Future Utility Services [Docket No. 16].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a proposed order.

6. ***Insurance Motion.*** Debtors' Motion for Entry of an Order Authorizing the Debtors to (I) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligation Related Thereto and (II) Renew, Supplement, or Purchase Insurance Policies [Docket No. 17].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a proposed order.

7. ***Surety Bond Motion.*** Debtors' Motion for Entry of an Order Approving Continuation of Surety Bond Program [Docket No. 18].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a *revised* proposed order.

8. ***Assumption and Rejection Procedures.*** Debtors' Motion for Entry of an Order Authorizing and Approving Expedited Procedures to Reject or Assume Executory Contracts and Unexpired Leases. [Docket No. 20]

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a *revised* proposed order.

**C. Matters Related to Professional Retention**

9. ***Ordinary Course Professionals.*** Debtors' Motion for Entry of an Order Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business [Docket No. 21].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a *revised* proposed order.

10. ***Interim Compensation Motion.*** Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 87].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a proposed order.

11. ***Zolfo Cooper Retention Application.*** Debtors' Motion for Entry of an Order Authorizing the Debtors to (I) Retain Zolfo Cooper Management, LLC to Provide the Debtors with a Chief Restructuring Officer and Certain Additional Personnel and (II) Designate Jonathan A. Mitchell as Chief Restructuring Officer for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 22].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a proposed order.

12. ***Prime Clerk Administrative Advisor Retention Application.*** Debtors' Application for Entry of an Order Authorizing and Approving Employment and Retention of Prime Clerk LLC as Administrative Advisor for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition [Docket No. 23].

Responses Received: None

Related Documents: None

**Status:** This matter is going forward for the purpose of presenting a proposed order.

## **II. Contested Matter Going Forward**

13. ***Contract Rejection Motion.*** Debtors' Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts Effective as of the Petition Date [Docket No. 19].

Responses Received:

- A. Limited Objection of Nabors Industries, Inc. and Nabors Drilling USA, LP to Debtors Motion for Entry of an Order Authorizing

Rejection of Certain Executory Contracts Effective as of the  
Petition Date [Docket No. 108].

Related Documents:

- A. **Debtors' Reply to Limited Objection of Nabors Industries, Inc. and Nabors Drilling USA, LP to Debtors' Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts Effective as of the Petition Date [Docket No. 134].**
- B. **Declaration of Michael Magilton in Support of Debtors' Reply to Limited Objection of Nabors Industries, Inc. and Nabors Drilling USA, LP to Debtors' Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts Effective as of the Petition Date [Docket No. 135].**

Status: This matter is going forward.

**III. Adjourned Matters**

- 14. ***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].

Responses Received:

- A. Limited Objection of Alerion Gas AXA, LLC to 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. 105].
- B. **Limited Objection of The Ad Hoc Committee of Forest Noteholders to Debtors' Motion for the Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 507, Bankruptcy Rules 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. 137].**

Related Documents:

- A. Interim Order 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. 60].

**Status:** This matter is *adjourned* to a hearing currently scheduled for August 17, 2015.

15. ***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].

Responses Received: None

Related Documents:

- A. Interim Order (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 Payments [Docket No. 52].

**Status:** This matter is *adjourned* to a hearing currently scheduled for August 17, 2015.

16. ***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].

Responses Received:

- A. Limited Objection of Alerion Gas AXA, LLC to 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. 106].

Related Documents:

- A. Interim Order Authorizing Payment of (I) Working Interest Disbursements and (II) Royalty Payments in the Ordinary Course of Business [Docket No. 53].

**Status:** This matter is *adjourned* to a hearing currently scheduled for August 17, 2015.

17. ***Lazard Retention Application.*** Debtors' Application for Entry of an Order Authorizing and Approving the Employment and Retention of Lazard Frères & Co. LLC, as Investment Banker *Nunc Pro Tunc* to the Petition Date [Docket No. 88].

**Responses Received:** None

**Related Documents:** None

**Status:** This matter is *adjourned* to a hearing currently scheduled for August 17, 2015.



Dated: August 7, 2015  
New York, New York

*/s/ Ryan Blaine Bennett*

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Paul M. Basta, P.C.  
Jonathan S. Henes, P.C.  
Christopher Marcus, P.C.  
KIRKLAND & ELLIS LLP  
KIRKLAND & ELLIS INTERNATIONAL LLP  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
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- and -

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