

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

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.) (Jointly Administered)
)

**AMENDED AGENDA FOR HEARING TO BE HELD
JANUARY 12, 2016 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

Time and Date of Hearing: January 12, 2016 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.

¹ The debtors in these chapter 11 cases (the “Debtors”), 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. Contested Matters Going Forward

1. ***Complaint filed by Sabine Oil & Gas Corporation against Wilmington Trust, N.A.*** (Adversary Proceeding No. 15-01126) [Adv. Docket No. 1].

Responses Received:

- A. Objection of the Official Committee of Unsecured Creditors to Defendant Wilmington Trust, N.A.'s Motion to Dismiss [Docket No. 19].

Related Documents:

- A. Notice of Motion to Dismiss [Adv. Docket No. 5].
- B. Memorandum of Law in Support of Defendant Wilmington Trust, N.A.'s Motion to Dismiss [Adv. Docket No. 6].
- C. Declaration of Kyle J. Kimpler in Support of Defendant's Motion to Dismiss [Adv. Docket No. 7].
- D. Amended Notice of Motion to Dismiss [Adv. Docket No. 9].
- E. Debtor's Response to Defendant Wilmington Trust, N.A.'s Motion to Dismiss [Adv. Docket No. 12].
- F. Reply Memorandum of Law in Support of Defendant Wilmington Trust, N.A.'s Motion to Dismiss [Adv. Docket No. 14].
- G. Motion of the Official Committee of Unsecured Creditors to Intervene in Second Lien Adversary Proceeding Pursuant to 11 U.S.C. § 1109(b) and Federal Rule of Civil Procedure 24 [Docket No. 16].
- H. Motion of the Forest Notes Trustees to Intervene in Adversary Proceedings Pursuant to 11 U.S.C. §1109(b) and Federal Rule of Civil Procedure 24 [Docket No. 17].
- I. Notice of Filing of Proposed Order Authorizing the Official Committee of Unsecured Creditors and Forest Notes Trustees to Intervene in Second Lien Adversary Proceeding Pursuant to 11 U.S.C. § 1109(b) and Federal Rule of Civil Procedure 24 [Docket No. 18].
- J. Order Authorizing the Official Committee of Unsecured Creditors and Forest Notes Trustees to Intervene in Second Lien Adversary Proceeding [Docket No. 23].**

Status: This matter is going forward.

II. Fee Applications

1. ***Porter Hedges Retention Application.*** Application of the Official Committee of Unsecured Creditors of Sabine Oil & Gas Corporation, *et al.*, for the Entry of an Order Expanding the Scope of the Committee's Employment and Retention of Porter Hedges LLP [Docket No. 625].

Responses Received. None to date.

Related Documents. None.

Status: This matter is going forward.

2. Notice of Hearing on First Interim Fee Applications of Professionals for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses [Docket No. 644].

Responses Received.

- A. Limited Objection of Wells Fargo Bank, N.A., as First Lien Agent, to Fees Incurred by Committee Professionals in Connection with Its Investigation and Related Matters [Docket No. 670].
- B. Preliminary Response to Limited Objection of Wells Fargo Bank, N.A., as First Lien Agent, to Fees Incurred by Committee Professionals in Connection with Its Investigation and Related Matters and Notice of Adjournment of Committee Professionals' Fee Applications [Docket No. 688].**

Related Documents.

- A. First Interim Fee Application of Deloitte & Touche LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Independent Auditor and Accounting Services Provider to the Debtors for the Period from July 15, 2015 Through October 31, 2015 [Docket No. 603].
- B. First Interim Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys for the Debtors and Debtors in Possession, for the Period from July 15, 2015 Through and Including October 31, 2015 [Docket No. 605].
- C. First Interim Fee Application of Lazard Freres and Co. LLC, as Investment Banker to the Debtors' for Allowance of Compensation

and Reimbursement of Expenses for the Period July 15, 2015 Through October 31, 2015 [Docket No. 604].

- D. First Interim Application of PricewaterhouseCoopers LLP, Tax Consultants to the Debtors, for Compensation for Services Rendered and Reimbursement of Expenses Incurred During the Period from July 15, 2015 Through October 31, 2015 [Docket No. 628].
- E. First Interim Fee Application of Prime Clerk LLC, Administrative Agent to the Debtors, for Services Rendered and Reimbursement of Expenses for the Period from July 15, 2015 through October 31, 2015 [Docket No. 607].
- F. First Interim Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses as Financial Advisor to the Official Committee of Unsecured Creditors During the Period from July 28, 2015 Through October 31, 2015 [Docket No. 618].
- G. First Application of Porter Hedges LLP, as Texas and Oil and Gas Counsel for the Official Committee of Unsecured Creditors, for Allowance of Compensation and for the Reimbursement of Expenses for the Period from August 11, 2015 Through October 31, 2015 [Docket No. 624].
- H. First Application of Ropes & Gray LLP, as Counsel for the Official Committee of Unsecured Creditors, for Allowance of Compensation and for the Reimbursement of Expenses for the Period from July 28, 2015 Through October 31, 2015 [Docket No. 606].
- I. **Notice of Adjournment of Matters Scheduled for Hearing on January 12, 2016 [Docket No. 687].**
- J. **Supplemental Application in Support of First Interim Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys for the Debtors for the Period July 15, 2015 Through October 31, 2015 [Docket No. 689].**

Status: These matters are going forward with respect to the Debtors' professionals.

III. Adjourned Matters

1. ***Assumption of Leases Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing Assumption of Certain Non-Residential Real Property

Leases Pursuant to Section 365 of the Bankruptcy Code and Bankruptcy Rule 6006 and (B) Granting Related Relief [Docket No. 659].

Responses Received. None to date.

Related Documents.

- A. Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016 [Docket No. 681].
- B. Notice of Revised Proposed Order Granting Debtors' Motion for Entry of and Order (A) Authorizing Assumption of Certain Non-Residential Real Property Leases Pursuant to Section 365 of the Bankruptcy Code and Bankruptcy Rule 6006 and (B) Granting Related Relief [Docket No. 682].
- C. **Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016 [Docket No. 684].**

Status: This matter is adjourned with respect to the Federal Oil and Gas Leases until February 22, 2016. **This matter is adjourned to January 26, 2016 with respect to the the Oil and Gas Conveyances.**

- 2. ***Contract Rejection Motion.*** Debtors' Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts [Docket No. 371].

Responses Received:

- A. Objection of HPIP Gonzales Holdings, LLC to Debtors' Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts [Docket No. 386].
- B. Objection to Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts filed by Nordheim Eagle Ford Gathering, LLC [Docket No. 387].
- C. Nordheim's Sur-Reply Regarding Rejection of Certain Executory Contracts [Docket No. 676].

Related Documents:

- A. Ex Parte Motion for an Order Authorizing Nordheim Eagle Ford Gathering, LLC to File Under Seal Certain Gas Gathering and Condensate Gathering Agreements in Support of Its Objection to Debtors' Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts [Docket No. 389].

- B. Notice of Adjournment of Matters Scheduled for Hearing on October 15, 2015 [Docket No. 403].
- C. Debtors' Omnibus Reply to Objections to Debtors' Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts [Docket No. 410].
- D. Notice of Adjournment of Matters Scheduled for Hearing on November 10, 2015 [Docket No. 484].
- E. Notice of Adjournment of Matters Scheduled for Hearing on December 16, 2015 [Docket No. 593].
- F. Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016 [Docket No. 680].

Status: This matter is adjourned until January 26, 2016.

- 3. Notice of Hearing on First Interim Fee Applications of Professionals for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses [Docket No. 644].

Responses Received.

- A. Limited Objection of Wells Fargo Bank, N.A., as First Lien Agent, to Fees Incurred by Committee Professionals in Connection with Its Investigation and Related Matters [Docket No. 670].
- B. **Preliminary Response to Limited Objection of Wells Fargo Bank, N.A., as First Lien Agent, to Fees Incurred by Committee Professionals in Connection with Its Investigation and Related Matters and Notice of Adjournment of Committee Professionals' Fee Applications [Docket No. 688].**

Related Documents.

- A. First Interim Fee Application of Deloitte & Touche LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Independent Auditor and Accounting Services Provider to the Debtors for the Period from July 15, 2015 Through October 31, 2015 [Docket No. 603].
- B. First Interim Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys for the Debtors and Debtors in Possession, for the Period from July 15, 2015 Through and Including October 31, 2015 [Docket No. 605].

- C. First Interim Fee Application of Lazard Freres and Co. LLC, as Investment Banker to the Debtors' for Allowance of Compensation and Reimbursement of Expenses for the Period July 15, 2015 Through October 31, 2015 [Docket No. 604].
- D. First Interim Application of PricewaterhouseCoopers LLP, Tax Consultants to the Debtors, for Compensation for Services Rendered and Reimbursement of Expenses Incurred During the Period from July 15, 2015 Through October 31, 2015 [Docket No. 628].
- E. First Interim Fee Application of Prime Clerk LLC, Administrative Agent to the Debtors, for Services Rendered and Reimbursement of Expenses for the Period from July 15, 2015 through October 31, 2015 [Docket No. 607].
- F. First Interim Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses as Financial Advisor to the Official Committee of Unsecured Creditors During the Period from July 28, 2015 Through October 31, 2015 [Docket No. 618].
- G. First Application of Porter Hedges LLP, as Texas and Oil and Gas Counsel for the Official Committee of Unsecured Creditors, for Allowance of Compensation and for the Reimbursement of Expenses for the Period from August 11, 2015 Through October 31, 2015 [Docket No. 624].
- H. First Application of Ropes & Gray LLP, as Counsel for the Official Committee of Unsecured Creditors, for Allowance of Compensation and for the Reimbursement of Expenses for the Period from July 28, 2015 Through October 31, 2015 [Docket No. 606].
- I. **Notice of Adjournment of Matters Scheduled for Hearing on January 12, 2016 [Docket No. 687].**
- J. **Supplemental Application in Support of First Interim Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys for the Debtors for the Period July 15, 2015 Through October 31, 2015 [Docket No. 689].**

Status: These matters have been adjourned until February 22, 2016 with respect to the Official Committee of Unsecured Creditors' professionals.

- 4. ***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].
- C. Order Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (II) Continue Certain Employee Benefits Programs [Docket No. 148].
- D. Order Authorizing the Debtors to Honor Certain Market Compensation Programs and Severance Programs [Docket No. 150].
- E. Order (I) Authorizing the Debtors to Pay and Continue the Combination Payments and (II) Scheduling a Hearing Regarding Certain Legacy Retiree Programs [Docket No. 182].
- F. Notice of Adjournment of Matters Scheduled for Hearing on September 10, 2015 [Docket No. 302].
- G. Second Interim Order Authorizing the Debtors to Pay Certain Pension Trust Contributions and Pension Plan Fees [Docket No. 316].
- H. Notice of Hearing Regarding 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. 483].
- I. Third Interim Order Authorizing the Debtors to Pay Certain Pension Trust Contributions and Pension Plan Fees [Docket No. 504].

Status: This matter has been adjourned to a date to be determined.

Dated: January 11, 2016
New York, New York

/s/ Jonathan S. Henes

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

- and -

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

Counsel to the Debtors and Debtors in Possession