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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 FEBRUARY 2, 2016

Time and Date of Pre-Trial Conference February 2, 2016 at 10:00 a.m. (prevailing Eastern Time)

Time and Date of Hearing: February 2, 2016 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 <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. Pre-Trial Conference

1. ***Committee's Standing Motion.*** Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 518].

Responses Received:

- A. Objection of Barclays Bank PLC and Barclays Capital Inc., and Joinder in the Objection of Wells Fargo, N.A., in Its Capacity as First Lien Agent, to the First and Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 716].
- B. Objection of Wells Fargo Bank N.A., in Its Capacity as First Lien Agent, to the First and Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 717].
- C. Omnibus Objection of the Second Lien Agent to the Standing Motions [Docket No. 719].
- D. Objection of Wells Fargo Bank, N.A., as First Lien Agent, to the Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority with Respect to the Alleged Disputed Cash, Lien Scope and Preference Claims [Docket No. 720].
- E. Debtors' Objection to the Motions of the Official Committee of Unsecured Creditors, Forest Notes Indenture Trustees, and Bank of New York Mellon Trust Company N.A. for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Portions Filed Under Seal] [Docket No. 722].
- F. Objections to First and Second Motions of (I) The Official Committee of Unsecured Creditors and (II) The Forest Notes Indenture Trustees for Leave, Standing, and Authority to**

**Commence and Prosecute on behalf of the Debtors' Estates
Fraudulent Transfer and Related Claims [Docket No. 767].**

**G. Omnibus Reply of the Official Committee of Unsecured
Creditors in Support of STN Motions [Docket No. 771].**

Related Documents:

- A. *Ex Parte* Motion for an Order Authorizing the Filing Under Seal of the Unredacted Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 519].
- B. Joinder of The Bank of New York Mellon Trust Company, N.A. to Motion of the Official Committee of Unsecured Creditors for: (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates; and (II) Related Relief [Docket No. 520].
- C. Notice of Pre-Trial Conference [Docket No. 686].
- D. Notice of Hearing [Docket No. 693].
- E. Declaration of Robert Trust [Docket No. 725].
- F. Notice of Filing of Unredacted Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 732].
- G. Notice of Filing of the Debtors' Objection to the Motions of the Official Committee of Unsecured Creditors, Forest Notes Indenture Trustees, and Bank of New York Mellon Trust Company N.A. for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of The Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 758].
- H. ***Ex Parte* Motion for an Order Authorizing the Filing Under Seal of the Unredacted Omnibus Reply of the Official Committee of Unsecured of Unsecured Creditors in Support of STN Motions [Docket No. 770].**
- I. **Joinder of the Bank of New York Mellon Trust Company, N.A. to Creditors in Support of STN Motions [Docket No. 772].**

Status: This matter is going forward.

2. ***Committee's Second Standing Motion.*** Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 609].

Responses Received:

- A. Objection of FRC Founders Corporation, Sabine Investor Holdings LLC, First Reserve Fund XI, L.P., First Reserve GP XI, L.P., First Reserve GP XI, Inc., Michael France, Alex Krueger, Brooks Shughart, and Joshua Weiner to the Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 714].
- B. Limited Objection of Sabine Directors Duane Radtke, David Sambrooks, and John Yearwood to the Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 715].
- C. Objection of Barclays Bank PLC and Barclays Capital Inc., and Joinder in the Objection of Wells Fargo, N.A., in Its Capacity as First Lien Agent, to the First and Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 716].
- D. Objection of Wells Fargo Bank N.A., in Its Capacity as First Lien Agent, to the First and Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 717].
- E. Omnibus Objection of the Second Lien Agent to the Standing Motions [Docket No. 719].
- F. Objection of Wells Fargo Bank, N.A., as First Lien Agent, to the Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and

- (II) Non-Exclusive Settlement Authority with Respect to the Alleged Disputed Cash, Lien Scope and Preference Claims [Docket No. 720].
- G. Omnibus Objection to Motions Seeking Derivative Standing [Docket No. 721].
- H. Debtors' Objection to the Motions of the Official Committee of Unsecured Creditors, Forest Notes Indenture Trustees, and Bank of New York Mellon Trust Company N.A. for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Portions Filed Under Seal] [Docket No. 722].
- I. Objection of FRC Founders Corporation, Sabine Investor Holdings LLC, First Reserve Fund XI, L.P., First Reserve GP XI, L.P., First Reserve GP XI, Inc., Michael France, Alex Krueger, Brooks Shughart, and Joshua Weiner to the Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Redacted] [Docket No. 752].
- J. **Objections to First and Second Motions of (I) The Official Committee of Unsecured Creditors and (II) The Forest Notes Indenture Trustees for Leave, Standing, and Authority to Commence and Prosecute on behalf of the Debtors' Estates Fraudulent Transfer and Related Claims [Docket No. 767].**
- K. **Omnibus Reply of the Official Committee of Unsecured Creditors in Support of STN Motions [Docket No. 771].**

Related Documents:

- A. Notice of Pre-Trial Conference [Docket No. 686].
- B. Notice of Hearing [Docket No. 693].
- C. Joinder of The Bank of New York Mellon Trust Company, N.A. to Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 611].
- D. Joinder of the Forest Notes Trustees to Second Motion of the Official Committee of Unsecured Creditors for (I) Leave,

Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 612].

- E. *Ex Parte* Motion for an Order Authorizing the Filing Under Seal of the Unredacted Objection of FRC Founders Corporation, Sabine Investor Holdings LLC, First Reserve Fund XI, L.P., First Reserve GP XI, L.P., First Reserve GP XI, Inc., Michael France, Alex Krueger, Brooks Shughart, and Joshua Weiner to the Second Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 718].
- F. Declaration of Robert Trust [Docket No. 725].
- G. Notice of Filing of the Debtors' Objection to the Motions of the Official Committee of Unsecured Creditors, Forest Notes Indenture Trustees, and Bank of New York Mellon Trust Company N.A. for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of The Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 758].
- H. ***Ex Parte* Motion for an Order Authorizing the Filing Under Seal of the Unredacted Omnibus Reply of the Official Committee of Unsecured of Unsecured Creditors in Support of STN Motions [Docket No. 770].**
- I. **Joinder of the Bank of New York Mellon Trust Company, N.A. to Creditors in Support of STN Motions [Docket No. 772].**

Status: This matter is going forward.

- 3. ***Forest Notes' Standing Motion.*** Motion of the Forest Notes Indenture Trustees for Entry of an Order Pursuant to § 1109(b) Granting Leave, Standing and Authority to Prosecute and, if Appropriate, Settle Certain Claims on Behalf of the Estate of Sabine Oil & Gas Corporation (F/K/A Forest Oil, Inc.) [Docket No. 521].

Responses Received:

- A. Debtors' Objection to the Motions of the Official Committee of Unsecured Creditors, Forest Notes Indenture Trustees, and Bank of New York Mellon Trust Company N.A. for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Non-

Exclusive Settlement Authority [Portions Filed Under Seal]
[Docket No. 722].

- B. Objections to First and Second Motions of (I) The Official Committee of Unsecured Creditors and (II) The Forest Notes Indenture Trustees for Leave, Standing, and Authority to Commence and Prosecute on behalf of the Debtors' Estates Fraudulent Transfer and Related Claims [Docket No. 767].**

Related Documents:

- A. Notice of Pre-Trial Conference [Docket No. 686].
- B. Notice of Hearing [Docket No. 693].
- C. Forest Notes Indenture Trustees' Motion to File Under Seal Their Motion for Entry of an Order Pursuant to § 1109(b) Granting Leave, Standing and Authority to Prosecute and, if Appropriate, Settle Certain Claims on Behalf of the Estate of Sabine Oil & Gas Corporation (F/K/A Forest Oil, Inc.) [Docket No. 522].
- D. Notice of Amendment of Motion of the Forest Notes Indenture Trustees for Entry of an Order Pursuant to § 1109(b) Granting Leave, Standing and Authority to Prosecute and, If Appropriate, Settle Certain Claims on Behalf of the Estate of Sabine Oil & Gas Corporation (F/K/A Forest Oil Corp.) [Docket No. 712].
- E. Notice of Filing of the Debtors' Objection to the Motions of the Official Committee of Unsecured Creditors, Forest Notes Indenture Trustees, and Bank of New York Mellon Trust Company N.A. for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of The Debtors' Estates and (II) Non-Exclusive Settlement Authority [Docket No. 758].

Status: This matter is going forward.

II. Uncontested Matters Going Forward

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].
- D. Affidavit of Service of Jordan D. Searles Regarding Notice of Adjournment of Hearing Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016, and Notice of Debtors' Motion for Entry of an Order (A) Authorizing Assumption of Certain Non-Residential Real Property Leases and (B) Granting Related Relief [Docket No. 707].
- E. Affidavit of Service of Jordan D. Searles Regarding Notice of Debtors' Motion for Entry of an Order (A) Authorizing Assumption of Certain Non-Residential Real Property Leases and (B) Granting Related Relief and Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016 at 10:00 A.M. [Docket No. 708].
- F. Notice of (I) Cancellation of the Hearing Scheduled for January 26, 2016 and (II) Adjournment of Matters Related Thereto [Docket No. 747].

Status: This matter is going forward with respect to the Oil and Gas Conveyances.

III. Contested Matters Going Forward

- 1. ***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. Debtors' Omnibus Reply to Objections to Debtors' Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts [Docket No. 410].
- D. Nordheim's Sur-Reply Regarding Rejection of Certain Executory Contracts [Docket No. 676].
- E. Debtors' Response to Nordheim's Sur-Reply Regarding Rejection of Certain Executory Contracts [Docket No. 742].

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. Notice of Adjournment of Matters Scheduled for Hearing on November 10, 2015 [Docket No. 484].
- D. Notice of Adjournment of Matters Scheduled for Hearing on December 16, 2015 [Docket No. 593].
- E. Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016 [Docket No. 680].
- F. Letter to Judge Chapman Regarding Nordheim's Sur-Reply Regarding Rejection of Certain Executory Contracts [Docket No. 705].
- G. Memorandum Endorsed Order: Granting Permission to File Response [Docket No. 706].
- H. Notice of (I) Cancellation of the Hearing Scheduled for January 26, 2016 and (II) Adjournment of Matters Related Thereto [Docket No. 747].

Status: This matter is going forward.

IV. 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].
- D. Affidavit of Service of Jordan D. Searles Regarding Notice of Adjournment of Hearing Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016, and Notice of Debtors' Motion for Entry of an Order (A) Authorizing Assumption of Certain Non-Residential Real Property Leases and (B) Granting Related Relief [Docket No. 707].
- E. Affidavit of Service of Jordan D. Searles Regarding Notice of Debtors' Motion for Entry of an Order (A) Authorizing Assumption of Certain Non-Residential Real Property Leases and (B) Granting Related Relief and Notice of Adjournment of Certain Matters Scheduled for Hearing on January 12, 2016 at 10:00 A.M. [Docket No. 708].
- F. Notice of (I) Cancellation of the Hearing Scheduled for January 26, 2016 and (II) Adjournment of Matters Related Thereto [Docket No. 747].

Status: This matter is adjourned with respect to the Federal Oil and Gas Leases until February 22, 2016 at 10:00 a.m.

Dated: February 1, 2016
New York, New York

/s/ Jonathan S. Henes

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