

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:	§	
	§	Chapter 11
	§	
VANGUARD NATURAL RESOURCES, LLC, <i>et al.</i> , <sup>1</sup>	§	Case No. 17-30560
Debtors.	§	(Jointly Administered)
	§	

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**AMENDED NOTICE OF AGENDA FOR HEARING ON MOTIONS SCHEDULED FOR  
APRIL 13, 2017, AT 1:30 P.M. (CT), BEFORE THE HONORABLE MARVIN ISGUR AT  
THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002**

**I. Main Case Matters Going Forward**

1. ***Bidding Procedures Motion***: Debtors' Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Sale of Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 429, filed 3/20/17]

Objection Deadline: March 31, 2017, at 4:00 p.m. (CT)

Responses Received:

- A. Limited Objection of Encana Oil & Gas (USA) Inc. to Debtors' Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Vanguard Natural Resources, LLC (1161); Eagle Rock Acquisition Partnership, L.P. (6706); Eagle Rock Acquisition Partnership II, L.P. (0903); Eagle Rock Energy Acquisition Co., Inc. (4564); Eagle Rock Energy Acquisition Co. II, Inc. (3364); Eagle Rock Upstream Development Company, Inc. (0113); Eagle Rock Upstream Development Company II, Inc. (7453); Encore Clear Fork Pipeline LLC (2032); Escambia Asset Co. LLC (3869); Escambia Operating Co. LLC (2000); Vanguard Natural Gas, LLC (1004); Vanguard Operating, LLC (9331); VNR Finance Corp. (1494); and VNR Holdings, LLC (6371). The location of the Debtors' service address is: 5847 San Felipe, Suite 3000, Houston, Texas 77057.

Executory Contracts and Unexpired Leases, and (E) Granting Related Relief, Etc. [Docket No. 488, filed 3/31/17]

- B. Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Sale of Assets Free and Clear of all Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 489, filed 3/31/2017]
- C. Encana Oil & Gas (USA) Inc.'s Motion to Prohibit or Condition the Sale of Property Pursuant to Section 363(e) of the Bankruptcy Code [Docket No. 546, filed 4/10/17]
- D. Encana Oil & Gas (USA) Inc.'s Corrected Brief in Support of (I) Motion to Prohibit or Condition the Sale of Property Pursuant to Section 363(e) of the Bankruptcy Code, and (II) Objection to Debtors' Motion for Entry of . . . Order (A) Approving Sale of Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 550, filed 4/11/17]
- E. The Debtors received informal comments from various parties in interest.

Related Documents:

- A. Debtors' Omnibus Reply in Further Support of Their Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Sale of Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 502, filed 4/3/17]
- B. Encana Oil & Gas (USA) Inc. Witness and Exhibit List [Docket No. 556, filed 4/11/17]

**Status:** This matter is going forward.

**II. Matters Going Forward in Encana Oil & Gas (USA) Inc. v. Vanguard Operating, LLC [Adversary Proceeding No. 17-03058]**

1. ***Motion to Dismiss.*** Vanguard Operating's Motion Pursuant to Bankruptcy Rule 7012(b)(6) to Dismiss the Fourth Through Seventh Claims for Relief In Encana's Complaint [Adv. Docket No. 9, filed 3/9/17]

Objection Deadline: March 30, 2017, at 4:00 p.m. (CT)

Responses Received:

- A. Encana Oil & Gas (USA) Inc.'s Response to Vanguard Operating, LLC's Motion Pursuant to Bankruptcy Rule 7012(b)(6) to Dismiss the Fourth Through Seventh Claims for Relief in Encana's Complaint [Adv. Docket No. 17, filed 3/30/17]

Related Documents:

- A. Complaint [Adv. Docket No. 1, filed 2/23/17]
- B. First Amended Complaint [Adv. Docket No. 16, filed 3/30/17]

**Status:** This matter is going forward

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Dated: April 11, 2017

Respectfully Submitted,

/s/ James T. Grogan

Chris L. Dickerson, Esq. (admitted *pro hac vice*)

Todd M. Schwartz, Esq. (admitted *pro hac vice*)

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-and-

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*Counsel to Vanguard*

**CERTIFICATE OF SERVICE**

I certify that on April 11, 2017, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Additionally, I have caused Prime Clerk, LLC, the Debtors' Claims and Noticing Agent, to serve the foregoing document on the master service list.

*/s/ James T. Grogan*

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James T. Grogan