

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

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

**AMENDED² NOTICE OF AGENDA FOR HEARING ON MOTIONS SCHEDULED FOR
MAY 30, 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. Matters Going Forward

1. ***Disclosure Statement and Solicitation Procedures Motion:*** Motion for Entry of Order: (I) Approving Debtors' Disclosure Statement for Joint Plan of Reorganization; (II) Establishing Voting Record Date; (III) Approving Solicitation Packages and Distribution Procedures; (IV) Approving Forms of Ballot and Establishing Procedures for Voting on Joint Plan of Reorganization; (V) Approving Forms of Notice to Non-Voting Classes Under Plan; (VI) Establishing Voting Deadline to Accept or Reject Plan; (VII) Approving Procedures for Vote Tabulations; (VIII) Approving Rights Offering Procedures and Related Materials; and (IX) Establishing Confirmation Hearing Date and Notice and Objection Procedures in Respect Thereof [Filed 3/3/17, Docket No. 296]

Objection Deadline:

- A. May 26, 2017, at 4:00 p.m. (CT)

Responses Filed:

- A. Letter from Robert Galeano [Docket No. 244, filed 2/28/17]
- B. Objection of Peter Spuler, Jr. [Docket No. 432, filed 3/20/17]

¹ 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.

² Amended items on this amended agenda are **underlined and in bold**.

- C. Letter from Chris Gallagher [Docket No. 433, filed 3/20/17]
- D. Objections of Robert Heuck II to Debtors' Disclosure Statement [Docket No. 487, filed 3/30/17]
- E. England Resources' Objection to Debtors' Disclosure Statement [Docket No. 566, filed 4/12/17]
- F. The Ad Hoc Equity Committee's (A) Preliminary Objection to the Debtors' Disclosure Statement, and (B) Request for Valuation Hearing [Docket No. 641, filed 4/24/17]
- G. Objection to Disclosure Statement by Iowa Realty Trust and IRT Land & Minerals, LLC [Docket No. 661, filed 5/1/17]
- H. Banc of America Leasing & Capital, LLC's Limited Objection and Reservation of Rights with Respect to Debtor's Disclosure Statement [Docket No. 691, filed 5/10/17]
- I. Letter from Robert D. Lightfoot [Docket No. 713, filed 5/12/17]
- J. Letter from Callie M. Thomas [Docket No. 719, filed 5/11/17]
- K. Objection of the United States Trustee to Debtors' Disclosure Statement [Docket No. 733, filed 5/16/17]
- L. Notice of Filing of Letter from Dennis Robinson [Docket No. 805, filed 5/26/17]
- M. England Resources' Supplemental Objection to Disclosure Statement and Request for Continuance Based on Debtor's Failure to Provide Requested Discovery [Docket No. 806, filed 5/26/17]
- N. Objection of Encana Oil & Gas (USA) Inc. to (I) Disclosure Statement Relating to the Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code and (II) Solicitation Procedures [Docket No. 809, filed 5/26/17]
- O. Ad Hoc Equity Committee's Objection to the Debtors' Motion for Solicitation Procedures Regarding the Debtors' New Disclosure Statement and Amended Proposed Plan [Docket No. 811, filed 5/26/17]
- P. Ad Hoc Equity Committee's Objection to the Disclosure Statement Related to the Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 815, filed 5/26/17]

Other Pro Se Plan-Related Objections:

- A. Letter from Robert Galeano [Docket No. 135, filed 2/7/17]
- B. Letter from Gary Hojell [Docket No. 211, filed 2/16/17]

Related Documents:

- A. Disclosure Statement Relating to the Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 791, filed 5/24/17]
- B. Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 792, filed 5/24/17]
- C. Notice of Filing of Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 793, filed 5/24/17]
- D. Notice of Filing of Disclosure Statement, Exhibits, and Updated Exhibits for Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 794, filed 5/24/17]
- E. Notice of Filing of Revised Proposed Order: (I) Approving Debtors' Disclosure Statement for Joint Plan of Reorganization; (II) Establishing Voting Record Date; (III) Approving Solicitation Packages and Distribution Procedures; (IV) Approving Forms of Ballot and Establishing Procedures for Voting on Joint Plan of Reorganization; (V) Approving Forms of Notice to Non-Voting Classes Under Plan; (VI) Establishing Voting Deadline to Accept or Reject Plan; (VII) Approving Procedures for Vote Tabulations; (VIII) Approving Rights Offering Procedures and Related Materials; and (IX) Establishing Confirmation Hearing Date and Notice and Objection Procedures in Respect Thereof [Docket No. 795, filed 5/24/17]
- F. England Resources Group's Witness and Exhibit List [Docket No. 798, filed 5/25/17]
- G. Debtors' Amended Witness and Exhibit List for May 30, 2017 Hearing [Docket No. 802, filed 5/25/17]
- H. Ad Hoc Equity Committee's Amended Witness and Exhibit List for the May 30, 2017 Hearing [Docket No. 816, filed 5/26/17]
- I. **Disclosure Statement Relating to the Second Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, *et al.*, Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 825, filed 5/29/17]**

- J. Second Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, et al., Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 826, filed 5/29/17]
- K. Notice of Filing of Disclosure Statement, Exhibits, and Updated Exhibits Thereto Relating to Second Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, et al., Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 827, filed 5/30/17]
- L. Notice of Filing of Second Amended Joint Plan of Reorganization of Vanguard Natural Resources, LLC, et al., Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 828, filed 5/30/17]
- M. Notice of Filing of Further Revised Proposed Order: (I) Approving Debtors' Disclosure Statement for Joint Plan of Reorganization; (II) Establishing Voting Record Date; (III) Approving Solicitation Packages and Distribution Procedures; (IV) Approving Forms of Ballot and Establishing Procedures for Voting on Joint Plan of Reorganization; (V) Approving Forms of Notice to Non-Voting Classes Under Plan; (VI) Establishing Voting Deadline to Accept or Reject Plan; (VII) Approving Procedures for Vote Tabulations; (VIII) Approving Rights Offering Procedures and Related Materials; and (IX) Establishing Confirmation Hearing Date and Notice and Objection Procedures in Respect Thereof [Docket No. 829, filed 5/30/17]
- N. Debtors' Omnibus Reply to Objections to Disclosure Statement Motion [Docket No. 830, filed 5/30/17]
- O. Declaration of Christina Pullo of Prime Clerk LLC in Connection with the Debtors' Motion for Entry of Order: (I) Approving Debtors' Disclosure Statement for Joint Plan of Reorganization; (II) Establishing Voting Record Date; (III) Approving Solicitation Packages and Distribution Procedures; (IV) Approving Forms of Ballot and Establishing Procedures for Voting on Joint Plan of Reorganization; (V) Approving Forms of Notice to Non-Voting Classes Under Plan; (VI) Establishing Voting Deadline to Accept or Reject Plan; (VII) Approving Procedures for Vote Tabulations; (VIII) Approving Rights Offering Procedures and Related Materials; and (IX) Establishing Confirmation Hearing Date and Notice and Objection Procedures in Respect Thereof [Docket No. 831, filed 5/30/17]

Status: This matter is going forward.

- 2. **Exclusivity Motion:** Debtors' First Motion Under Bankruptcy Code Section 1121(d) for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 647, filed 4/25/17]

Objection Deadline: May 16, 2017, at 4:00 p.m. (CT)

Responses Filed:

- A. The Ad Hoc Equity Committee's Objection to Debtors' First Motion Under Bankruptcy Code Section 1121(d) for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 734, filed 5/16/17]

Related Documents:

- A. Debtors' Reply in Further Support of Their First Motion Under Bankruptcy Code Section 1121(d) for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 782, filed 5/23/17]
- B. Debtors' Amended Witness and Exhibit List for May 30, 2017 Hearing [Docket No. 802, filed 5/25/17]
- C. Ad Hoc Equity Committee's Amended Witness and Exhibit List for the May 30, 2017 Hearing [Docket No. 816, filed 5/26/17]

Status: This matter is going forward.

- 3. ***Motion to Compel:*** Emergency Motion of the Ad Hoc Equity Committee to Compel Production of Documents by the Debtors Pursuant to Rules 34 and 37 of the Federal Rules of Civil Procedure [Docket No. 810, filed 5/26/17]

Objection Deadline: May 30, 2017, at 1:30 p.m. (CT)

Responses Filed:

- A. **Debtors' Objection to Emergency Motion of the Ad Hoc Equity Committee to Compel Production of Documents by the Debtors Pursuant to Rules 34 and 37 of the Federal Rules of Civil Procedure [Docket No. 810] [Docket No. 823, filed 5/29/17]**

Related Documents:

- A. Debtors' Amended Witness and Exhibit List for May 30, 2017 Hearing [Docket No. 802, filed 5/25/17]
- B. Ad Hoc Equity Committee's Amended Witness and Exhibit List for the May 30, 2017 Hearing [Docket No. 816, filed 5/26/17]

Status: This matter is going forward.

II. Matters to Be Continued

- 4. ***Motion to Intervene:*** Motion of Ad Hoc Committee of Senior Noteholders for Entry of an Order Pursuant to Federal Rule 24 and Bankruptcy Rule 7024 Permitting Intervention in This Adversary Proceeding [AP Docket No. 18, filed 4/11/17]

Objection Deadline: May 15, 2017, at 4:00 P.M. (CT)

Responses Filed:

- A. Encana Oil & Gas (USA) Inc.'s Objection to Motion of Ad Hoc Committee of Senior Noteholders for Entry of an Order Pursuant to Rule 24 and Bankruptcy Rule 7024 Permitting Intervention in this Adversary Proceeding [AP Docket No. 24, filed 5/9/17]

Related Items:

- A. Emergency Motion of Ad Hoc Committee of Senior Noteholders to Continue the May 30, 2017 Hearing on Motion to Intervene in Adversary Proceeding [AP Docket No. 18] [AP Docket No. 26, filed 5/26/17]
- B. Proposed Order Continuing Hearing on Motion of Ad Hoc Committee of Senior Noteholders to Intervene in Adversary Proceeding [Docket No. 18] [AP Docket No. 27, filed 5/26/17]

Status: The Ad Hoc Committee of Senior Noteholders has requested that the hearing on this motion be continued.

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Dated: May 30, 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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Counsel to Vanguard

CERTIFICATE OF SERVICE

I certify that on May 30, 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

James T. Grogan