

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:)	Chapter 11
)	
VANGUARD NATURAL)	Case No. 19-31786 (DRJ)
RESOURCES, INC., <i>et al.</i> , ¹)	
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF AGENDA FOR HEARING
ON FIRST DAY MOTIONS SCHEDULED
FOR APRIL 1, 2019, AT 3:30 P.M. (PREVAILING
CENTRAL TIME), BEFORE THE HONORABLE DAVID R. JONES AT THE
UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT
OF TEXAS, AT COURTROOM 400, 515 RUSK STREET, HOUSTON, TEXAS 77002**

The above-referenced debtors and debtors in possession (collectively, the “Debtors”) file this agenda for matters set for hearing on April 1, 2019, at 3:30 p.m. (prevailing Central Time).

I. INTRODUCTION

1. ***Voluntary Petitions.***
2. ***First Day Declaration.*** Declaration of R. Scott Sloan, President and Chief Executive Officer of Vanguard Natural Resources, Inc., in Support of Chapter 11 Petitions and First Day Motions [Docket No. 25].

Status: This Declaration will be relied upon as evidentiary support for the voluntary chapter 11 petitions and the first day matters listed below. Mr. Sloan will be present in the courtroom and prepared to testify regarding the subject matter of his declaration.

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, Inc. (1494); 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); Escambia Asset Co. LLC (3869); Escambia Operating Co. LLC (2000); Vanguard Natural Gas, LLC (1004); Vanguard Operating, LLC (9331); and VNR Holdings, LLC (6371). The location of the Debtors’ service address is: 5847 San Felipe, Suite 3000, Houston, Texas 77057.

3. **Joint Administration Motion.** Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [Docket No. 2].

Status: This matter is resolved.

II. MATTERS REQUESTED TO BE HEARD AT FIRST DAY HEARING

4. **Designation as Complex Case.** Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 3].

Status: This matter is going forward.

5. **DIP Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition First Lien Secured the Prepetition Secured Parties Pursuant to Sections 361, 362, 363, and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [Docket No. 26].

Related Documents:

- A. Declaration of Roopesh Shah in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition First Lien Secured the Prepetition Secured Parties Pursuant to Sections 361, 362, 363, and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [Docket No. 26, Exhibit B].
- B. Declaration of Allison Firestone in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition First Lien Secured the Prepetition Secured Parties Pursuant to Sections 361, 362, 363, and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [Docket No.26, Exhibit C].

Status: This matter is going forward.

6. **Cash Management Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts and (B) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 4].

Status: This matter is going forward.

7. **Royalty Payments Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Mineral Obligations and (II) Granting Related Relief [Docket No. 13].

Status: This matter is going forward.

8. **Taxes Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 14].

Status: This matter is going forward.

9. **SOFA Extension Motion.** Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief [Docket No. 10].

Status: This matter is going forward.

10. **Insurance Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, and (II) Granting Related Relief [Docket No. 6].

Status: This matter is going forward.

11. **Utilities Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (IV) Granting Related Relief [Docket No. 7].

Status: This matter is going forward.

12. **Creditor Matrix Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of 50 Largest Unsecured Creditors, (II) Authorizing Redaction of Certain Personal Identification Information, (III) Waiving the Requirement to File Equity Lists and Modifying Equity Holder Notice Requirements, (IV) Approving the Form and Manner of Notifying Creditors of the Commencement of the Chapter 11 Cases and Other Information, and (V) Granting Related Relief [Docket No. 8].

Status: This matter is going forward.

13. **Prime Clerk Retention Application.** Debtors' Emergency Application for Entry of an Order Authorizing the Retention and Appointment of Prime Clerk LLC as Claims, Noticing, and Solicitation Agent *Nunc Pro Tunc* to the Petition Date [Docket No. 9].

Status: This matter is going forward.

14. **NOL Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief [Docket No. 12].

Status: This matter is going forward.

15. **Lienholder Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Specified Trade Claims, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 5].

Status: This matter is going forward.

16. **Wages Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 15].

Status: This matter is going forward.

17. **Surety Bond Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue Their Surety Bond Program and (II) Granting Related Relief [Docket No. 11].

Status: This matter is going forward.

III. MATTERS TO BE HEARD AT A LATER DATE

18. **Hedging Motion.** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Enter Into, and Perform Under, New Postpetition Hedging Arrangements, (B) Grant Superpriority Claims and Liens, and (C) Modify the Automatic Stay, and (II) Granting Related Relief [Docket No. 16].

Houston, Texas
April 1, 2019

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Respectfully Submitted,

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Certificate of Service

I certify that on April 1, 2019, 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.

/s/ Brian E. Schartz

Brian E. Schartz