

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

|  |   |                               |
|--|---|-------------------------------|
|  | ) |                               |
| In re:   | ) | Chapter 11                    |
|  | ) |                               |
| ARENA ENERGY, LP, <i>et al.</i> , <sup>1</sup> | ) | Case No. 20-34215 (MI)        |
|  | ) |                               |
| Debtors.                                       | ) | (Jointly Administered)        |
|  | ) | (Emergency Hearing Requested) |
|  | ) |                               |

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**NOTICE OF AGENDA FOR FIRST DAY HEARING ON FIRST DAY  
MOTIONS SCHEDULED FOR AUGUST 21, 2020. AT 2:30 P.M. (PREVAILING  
CENTRAL TIME), BEFORE THE HONORABLE JUDGE MARVIN ISGUR AT THE  
UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002**

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**I. Evidentiary Support for First Day Pleadings.**

- A. **Horton First Day Declaration.** Declaration of Anthony R. Horton in Support of the Chapter 11 Petitions of Arena Energy, LP and its Debtor Affiliates [Docket No. 17].
- B. **Flood First Day Declaration.** Declaration of Curtis Flood in Support of the Chapter 11 Petitions of Arena Energy, LP and its Debtor Affiliates [Docket No. 18].
- C. **Vallejo First Day Declaration.** Declaration of J. Michael Vallejo, Chief Financial Officer for Arena Energy, LP, in Support of the Chapter 11 Petitions of Arena Energy, LP and its Debtor Affiliates, the Cash Collateral Motion, and Other First Day Motions [Docket No. 19].

**Status:** The Declarations will be relied upon as evidentiary support for the first day matters listed below.

**II. Financing Motion.**

- 1. **Cash Collateral Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Lenders Under The RBL Credit Facility, (III) Modifying

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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: Arena Energy, LP (1436); Arena Energy 2020 GP, LLC (N/A); Arena Energy GP, LLC (7454); Arena Exploration, LLC (1947); Sagamore Hill Holdings, LP (8266); and Valiant Energy, L.L.C. (7184). The location of the debtors' service address is: 2103 Research Forest Drive, Suite 400, The Woodlands, Texas 77380.



The Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 15].

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

### **III. Combined Scheduling Motion.**

2. ***Combined Scheduling Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Conditionally Approving the Disclosure Statement, (III) Establishing Plan and Disclosure Statement Objection and Reply Deadlines And Related Procedures, (IV) Approving The Solicitation Procedures, (V) Approving the Combined Notice, (VI) Conditionally Waiving the Requirements That the U.S. Trustee Convene a Meeting of Creditors and the Debtors File Schedules and Sofas, and (VII) Granting Related Relief [Docket No. 32].

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

### **IV. First Day Pleadings.**

3. ***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. 22].

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

4. ***Creditor Matrix Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors and a Consolidated List of the 20 Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, And (III) Granting Related Relief [Docket No. 5].

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

5. ***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. 7].

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

6. ***Taxes Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 9].

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

7. ***Utilities Motion.*** Debtors' Emergency Motion for Entry of an Order (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. 10].

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

8. ***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.

9. ***All Trade/Lienholders Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Specified Lienholder and Other Trade Claims, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 8].

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

10. ***Royalty Payments Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing Payment of Mineral Obligations and (II) Granting Related Relief [Docket No. 14].

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

11. ***Wages Motion.*** Debtors' Emergency Motion for Entry of an Order (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. 16].

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

## V. Resolved Matters.

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

- A. Order (I) Directing Joint Administration of the Chapter 11 Cases And (II) Granting Related Relief [Docket No. 25]

**Status:** This matter is resolved.

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

- A. Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 26]

**Status:** This matter is resolved.

14. **Claims and Noticing Agent Application.** Debtors' Emergency Application for Entry of an Order Appointing Kurtzman Carson Consultants LLC as Claims, Noticing, and Solicitation Agent [Docket No. 6].

- A. Order Appointing Kurtzman Carson Consultants LLC as Claims, Noticing, and Solicitation Agent [Docket No. 28]

**Status:** This matter is resolved.

Houston, Texas  
August 21, 2020

Respectfully Submitted,

*/s/ Mathew D. Cavanaugh*

**JACKSON WALKER L.L.P.**

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**Certificate of Service**

I certify that on August 21, 2020, 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/ Matthew D. Cavanaugh*

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Matthew D. Cavanaugh