

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

In re:	)	Chapter 11
CYPRESS ENVIRONMENTAL PARTNERS, L.P., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90039 (MI)
Debtors.	)	(Joint Administration Requested)
	)	(Emergency Hearing Requested)

**AGENDA FOR FIRST DAY HEARING ON  
FIRST DAY MOTIONS SCHEDULED FOR MAY 9, 2022 AT 1:30 P.M.  
(PREVAILING CENTRAL TIME), BEFORE JUDGE MARVIN ISGUR AT THE  
UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002**

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

1. **First Day Declaration.** Declaration of Peter C. Boylan III, Chairman & Chief Executive Officer of the Debtors, in Support of the Chapter 11 Petitions and First Day Pleadings [Docket No. 12].

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

**II. First Day Pleadings.**

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

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

3. **Consolidated Creditor Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to File (A) Consolidated Creditor Matrix, (B) File a Consolidated List of 30

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Cypress Environmental Partners, L.P. (1523); Cypress Municipal Water Services, LLC (5974); Cypress Environmental Partners, LLC (7385); Cypress Brown Integrity, LLC (3455); Cypress Energy Partners - 1804 SWD, LLC (9110); Cypress Energy Partners - Bakken, LLC (9092); Cypress Energy Partners - Grassy Butte SWD, LLC (9047); Cypress Energy Partners - Green River SWD, LLC (1534); Cypress Energy Partners - Manning SWD, LLC (4247); Cypress Energy Partners - Mork SWD, LLC (0761); Cypress Energy Partners - Mountrail SWD, LLC (4977); Cypress Energy Partners - Tioga SWD, LLC (3230); Cypress Energy Partners - Williams SWD, LLC (3840); Cypress Environmental - PUC, LLC (8637); Cypress Environmental Management - TIR, LLC (5803); Cypress Environmental Management, LLC (4753); Cypress Environmental Services, LLC (7770); Tulsa Inspection Resources - PUC, LLC (2514); and Tulsa Inspection Resources, LLC (4632). The Debtors' service address for the purposes of these chapter 11 cases is 5727 South Lewis Avenue, Suite 300, Tulsa, Oklahoma 74105.



Largest Unsecured Creditors, and (C) Redact Certain Personal Information, (II) Waiving the Requirement to File a List of Equity Security Holders, (III) Approving Form and Manner of Notifying Creditors of Commencement of Chapter 11 Cases and Other Information, and (IV) Granting Related Relief [Docket No. 4].

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

4. **Schedules and Statements Motion.** Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Related Relief [Docket No. 5].

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

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

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

6. **KCC Retention Application.** Debtors' Emergency Application for Entry of an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Claims, Noticing and Solicitation Agent Effective as of the Petition Date [Docket No. 7].

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

7. **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. 8].

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

8. **Insurance and Performance Bonds Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Continue Insurance Program and Performance Bond Program and (B) Pay All Obligations with Respect thereto; and (II) Granting Related Relief [Docket No. 9].

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

9. **Utilities Motion.** Debtors' Emergency Motion for Entry of an Order (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utilities From Discontinuing Service, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief [Docket No. 10].

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

10. **Cash Management Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System; (B) Maintain Their Existing Bank Accounts and Business Forms; (C) Pay Related Prepetition

Obligations; and (D) Continue to Perform Intercompany Transactions; and (II) Granting Related Relief [Docket No. 11].

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

11. **DIP Financing Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Postpetition Financing and (B) Utilize Cash Collateral of the RBL Secured Parties, (II) Granting Adequate Protection to the RBL Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling and Final Hearing, and (V) Granting Related Relief [Docket No. 13].

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

A. **Sanjiv Declaration.** Declaration of Sanjiv Shah in Support of the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Postpetition Financing and (B) Utilize Cash Collateral of the RBL Secured Parties, (II) Granting Adequate Protection to the RBL Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling and Final Hearing, and (V) Granting Related Relief [Docket No. 14].

12. **Solicitation Procedures Motion.** Debtors' Emergency Motion for Entry of an Order (I) Scheduling Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Establishing the Plan and Disclosure Statement Objection Deadline and Related Procedures, (III) Approving Prepetition Solicitation Procedures, (IV) Approving the Form and Manner of Notice, (V) Directing that a Meeting of Creditors Note Be Convened and (VI) Granting Related Relief [Docket No. 17].

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

A. **Plan.** Joint Prepackaged Chapter 11 Plan of Reorganization of Cypress Environmental Partners, L.P. and its Debtor Affiliates [Docket No. 15].

B. **Disclosure Statement.** Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization for Cypress Environmental Partners, L.P. and Its Debtor Affiliates [Docket No. 16].

*[Remainder of Page Intentionally Left Blank]*

Dated: May 9, 2022  
Houston, Texas

/s/ James Grogan

**PAUL HASTINGS LLP**

James Grogan (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Justin Rawlins (*pro hac vice* admission pending)  
1999 Avenue of the Stars, 27th Floor  
Century City, California 90067  
Telephone: (310) 620-5700  
Facsimile: (310) 620-5899  
Email: justinrawlins@paulhastings.com

-and-

Matthew Micheli (*pro hac vice* admission pending)  
Matthew Smart (*pro hac vice* admission pending)  
Michael Jones (*pro hac vice* admission pending)  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
Telephone: (312) 499-6000  
Facsimile: (312) 499-6100  
Email: mattmicheli@paulhastings.com  
matthewsmart@paulhastings.com  
michaeljones@paulhastings.com

*Proposed Counsel to the Debtors and Debtors in Possession*

**Certificate of Service**

I certify that on May 9, 2022, 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/ James T. Grogan

James T. Grogan