

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
ENDURO RESOURCE PARTNERS LLC, <i>et al.</i> ,)	
)	Case No. 18-11174 (KG)
Debtors. ¹)	
)	(Jointly Administered)
)	
)	Hearing Date: June 11, 2018 at 10:00 a.m. (ET)
)	Obj. Deadline: June 4, 2018 at 4:00 p.m. (ET)
)	
)	Ref. Docket Nos. 4, 5, 6, 7, 8, 9, 10, 20, 29, 30, 31,
)	32, 34, 41, 59, 60, 61, 63, 64, 66, & 69

**OMNIBUS NOTICE OF PLEADINGS
AND HEARING THEREON**

PLEASE TAKE NOTICE that on May 15, 2018, Enduro Resource Partners LLC and its affiliated debtors and debtors in possession in the above-captioned cases (collectively, the “*Debtors*”) filed the following pleadings with this Court (collectively, the “*First Day Pleadings*”):

- Motion of Debtors for Interim and Final Orders (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, and (D) Authorizing Payment Authorizing Payment of Prepetition Claims Owing to Workforce Program Administrators or Providers [Docket No. 4]²
- Motion of Debtors for Interim and Final Orders (A) Prohibiting Utility Companies from Altering or Discontinuing Service on Account of Prepetition Invoices, (B) Approving Deposit as Adequate Assurance of Payment, and (C) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment [Docket No. 5]
- Motion of Debtors for Interim and Final Orders Authorizing Payment of Prepetition Taxes and Fees [Docket No. 6]

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor’s United States federal tax identification number, if applicable, or other applicable identification number, are: Enduro Resource Partners LLC (6288); Enduro Resource Holdings LLC (5571); Enduro Operating LLC (7513); Enduro Management Company LLC (5932); Washakie Midstream Services LLC (7562); and Washakie Pipeline Company LLC (7798). The debtors’ mailing address is 777 Main Street, Suite 800, Fort Worth, Texas 76102.

² This motion includes a request for approval to implement the Sale Incentive Program and to honor all Incentive Compensation Obligations, both terms as defined therein.



- Motion of Debtors for Interim and Final Orders Authorizing Payment of (A) Royalty Payments, (B) Working Interest Disbursements, and (C) Other Obligations in the Ordinary Course of Business [Docket No. 7]
- Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Payment of Prepetition Operating Expenses, Joint Interest Billings, Marketing Expenses, Lien Claims, and 503(b)(9) Claims and (B) Confirming Administrative Expense Priority of Outstanding Orders [Docket No. 8]
- Motion of Debtors for Interim and Final Orders (A) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (B) Authorizing Continuation of Existing Deposit Practices, (C) Waiving Certain U.S. Trustee Guidelines, (D) Authorizing Continuation of Intercompany Transactions, and (D) Granting Priority Status to Postpetition Intercompany Claims [Docket No. 9]
- Motion of Debtors for Orders (A) Authorizing the Debtors to Use Cash Collateral, (B) Granting Adequate Protection to the Prepetition Secured Parties, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 10]

PLEASE TAKE FURTHER NOTICE that on May 16, 2018, the Debtors filed the following pleadings (collectively, the “*Second Day Pleadings*,” and together with the First Day Pleadings, the “*Pleadings*”):

- Debtors’ Motion for Entry of (A) Order (I) Approving Bidding Procedures in Connection with Sale of Assets of the Debtors and Related Bid Protections, (II) Approving Form and Manner of Notice, (III) Scheduling Auction and Sale Hearing, (IV) Authorizing Procedures Governing Assumption and Assignment of Certain Contracts and Unexpired Leases, and (V) Granting Related Relief; and (B) Order (I) Approving Purchase Agreements, and (II) Authorizing Sale Free and Clear of All Liens, Claims, Encumbrances, and Other Interests [Docket No. 20]³
- Motion of Debtors for Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals [Docket No. 29]
- Motion of Debtors for Entry of an Order Establishing Bar Dates and Related Procedures for Filing Proofs of Claim, Including 503(b)(9) Claims, and Approving the Form and Manner of Notice Thereof [Docket No. 30]
- [Sealed] Motion of Debtors for Entry of an Order Authorizing Payments under Debtors’ Key Employee Incentive Plan [Docket No. 31]
- [Redacted] Motion of Debtors for Entry of an Order Authorizing Payments under Debtors’ Key Employee Incentive Plan [Docket No. 32]

³ The Debtors are only seeking approval of the bid procedures at the Second Day Hearing (as defined below).

- Debtors' Motion for an Order Authorizing Debtors to Redact Sensitive Information in Motion of Debtors for Entry of an Order Authorizing Payments under Debtors' Key Employee Incentive Plan [Docket No. 34]
- Motion of Debtors for Order Authorizing (A) Payment of Prepetition Insurance Obligations and Prepetition Bonding Obligations, and (B) Maintenance of Postpetition Insurance Coverage and Bonding Program [Docket No. 41]

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings was held on May 17, 2018, at which time the Court approved the First Day Pleadings on an interim basis [Docket Nos. 59, 60, 61, 63, 64, 66, and 69].

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Pleadings must be in writing, filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **June 4, 2018 at 4:00 p.m. (ET)** (the "***Objection Deadline***"). At the same time, you must serve a copy of your response upon the proposed undersigned counsel so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE SECOND DAY PLEADINGS AND FINAL APPROVAL OF THE FIRST DAY PLEADINGS IS SCHEDULED FOR JUNE 11, 2018 AT 10:00 A.M. (ET) (THE "*SECOND DAY HEARING***") AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801 BEFORE THE HONORABLE KEVIN GROSS, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE.**

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO ANY OF THE PLEADINGS ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

[Signature Page Follows]

Dated: May 18, 2018
Wilmington, Delaware

/s/ Kara Hammond Coyle

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