UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

IN RE:

SOUTHCROSS ENERGY PARTNERS, L. P., ET AL., : CASE NO. 19-10702 (MFW)

: Jointly Administered

Hearing Date: 9/18/2019 @ 10:30 a.m.

Obj. Deadline 7/11/2019 Related To: Docket # 307

RESERVATION OF RIGHTS OF CEC CORROSION SERVICES LLC REGARDING CURE AMOUNT REFLECTED IN THE NOTICE OF POTENTIAL ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS OR UNEXPIRED LEASES AND CURE AMOUNT

By and through its undersigned counsel, CEC Corrosion Services LLC reserves its right to object to the stated Cure Cost on the Potential Assumed Contracts Schedule with respect to the contract or contracts to which it is the counter-party. As of the date of the commencement of the case, CEC Corrosion Services LLC was owed \$19,277.23 rather than the "\$0.00" reflected on the Schedule. Subsequent to the commencement of the case, and pursuant to court authorization, CEC Corrosion Services LLC was paid. CEC Corrosion is advised that the Cure Cost reflected on the Schedule takes such post-petition payments into consideration and is only filing this reservation of rights in an abundance of caution.

Dated: July 10, 2019 MONZACK MERSKY McLAUGHLIN AND BROWDER, P.A.

/s/ Rachel B. Mersky

Rachel B. Mersky, Esquire (DE #2049)

1201 N. Orange Street, Suite 400 Wilmington, DE 19801-1155

Telephone: (302) 656-8162 Facsimile: (302) 656-2769

Email: rmersky@monlaw.com

ATTORNEYS FOR CEC CORROSION SERVICES, LLC



{00206838-1}

CERTIFICATE OF SERVICE

I, Rachel B. Mersky, hereby certify that on July 10, 2019 I caused a copy of the foregoing

Reservation of Rights to be served upon the following parties in the manner indicated:

/s/ Rachel B. Mersky

Rachel B. Mersky, Esquire (DE #2049)

VIA FIRST CLASS MAIL

Robert J. Dehney
Andrew R. Remming
Joseph C. Barsalona I
Eric W. Moats
Morris, Nichols, Arsht & Tunnell, LLP
1201 N. Market Street, 16th Floor, PO Box 1347
Wilmington, Delaware 19899-1347

VIA FIRST CLASS MAIL

William Wallander Bradley Foxman Matthew Pyeatt Vinson & Elkins LLP Trammell Crow Center 2001 Ross Avenue, Suite 3900 Dallas, TX 75201-2975

VIA FIRST CLASS MAIL

Seth J. Kleinman Arnold & Porter Kaye Scholer LLP 70 West Madison Street, Suite 4200 Chicago, Illinois 60602-4231

VIA FIRST CLASS MAIL

Joseph G. Minias
Paul V. Shalhoub
Debra C. McElligott
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, New York 10019-6099

VIA FIRST CLASS MAIL

Marshall S. Huebner
Darren S. Klein
Steven Z. Szanzer
Benjamin M. Schak
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017

VIA FIRST CLASS MAIL

Alan Glantz Arnold & Porter Kaye Scholer LLP 250 West 55th Street New York New York 10019-9710

VIA FIRST CLASS MAIL

Christopher M. Winter
Duane Morris LLP
222 Delaware Avenue, Suite 1600
Wilmington, Delaware 19801-1659

VIA FIRST CLASS MAIL

Edmon L. Morton Matthew B. Lunn Young Conaway Stargatt & Taylor LLP Rodney Square 100 North King Street Wilmington, Delaware 19801

VIA FIRST CLASS MAIL
M. Natasha Labovitz Jasmine Ball Daniel E. Stroik Debevoise & Plimpton LLP 919 Third Avenue New York, New York 10022

VIA FIRST CLASS MAIL

Office of the U. S. Trustee 844 King Street, Suite 2207 Lockbox 35 Wilmington, Delaware 19801