

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

**SOUTHCROSS ENERGY
PARTNERS, L.P., *et al.*¹, Debtors.**

Chapter 11

Case No. 19-10702 (MFW)
(Jointly Administered)

Hearing Date: _____ at : __.m. ____
Objections Due: July 11 at 4:00 p.m. (ET)
Relates to Docket No. 327

**LIMITED OBJECTION OF PRUET PRODUCTION CO. TO THE DEBTORS’
NOTICE OF POTENTIAL ASSUMPTION AND ASSIGNMENT OF EXECUTORY
CONTRACTS OR UNEXPIRED LEASES AND CURE AMOUNT**

Comes now Pruet Production Co. (“Pruet”), by and through its undersigned counsel, and hereby files this Limited Objection to the Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount [Doc. 327] (the “Cure Notice”). As grounds for this Limited Objection, Pruet States as follows:

1. Pruet and one or more of the Debtors are parties to various gas purchase agreements identified in the Cure Notice (collectively, the “Agreements”).
2. The Debtors delivered the Cure Notice to Pruet which (i) indicated the potential for the Agreements to be assumed and assigned and (ii) identified a cure amount of zero in connection with the assumption of the Agreements.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Southcross Energy Partners, L.P. (5230); Southcross Energy Partners GP, LLC (5141); Southcross Energy Finance Corp. (2225); Southcross Energy Operating, LLC (9605); Southcross Energy GP LLC (4246); Southcross Energy LP LLC (4304); Southcross Gathering Ltd. (7233); Southcross CCNG Gathering Ltd. (9553); Southcross CCNG Transmission Ltd. (4531); Southcross Marketing Company Ltd. (3313); Southcross NGL Pipeline Ltd. (3214); Southcross Midstream Services, L.P. (5932); Southcross Mississippi Industrial Gas Sales, L.P. (7519); Southcross Mississippi Pipeline, L.P. (7499); Southcross Gulf Coast Transmission Ltd. (0546); Southcross Mississippi Gathering, L.P. (2994); Southcross Delta Pipeline LLC (6804); Southcross Alabama Pipeline LLC (7180); Southcross Nueces Pipelines LLC (7034); Southcross Processing LLC (0672); FL Rich Gas Services GP, LLC (5172); FL Rich Gas Services, LP (0219); FL Rich Gas Utility GP, LLC (3280); FL Rich Gas Utility, LP (3644); Southcross Transmission, LP (6432); T2 EF Cogeneration Holdings LLC (0613); and T2 EF Cogeneration LLC (4976). The debtors' mailing address is 1717 Main Street, Suite 5300, Dallas, TX 75201.



3. The Agreements primarily reflect the parties' agreement with respect to the Debtors' purchase of gas from Pruet for amounts specified in the Agreements.

4. As of the filing of the Cure Notice, the Debtors were current on their payment obligations under the Agreements, though Pruet anticipates amounts coming due under the Agreements prior to any assumption of the Agreements.

5. In addition to their obligation to make payments under the Agreements for gas sold by Pruet, the Debtors also have other obligations under the Agreements.

6. Under the terms of the Agreements, the Debtors may in the future incur obligations under the Agreements that could arguably have accrued and/or arisen prior to the deadline to submit objections to the Cure Notice.

7. Pruet objects to the Cure Notice to the extent the Debtors seek to limit (i) any obligations under the Agreements for the payment of gas purchased or (ii) any obligations under the Agreements that have not yet been discovered, invoices, or otherwise matured or come due.

July 10, 2019

STEVENS & LEE, P.C.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been filed on the Court's CM/ECF system on the 10th day of July, 2019, to all parties receiving electronic notices in this bankruptcy case and via email to the parties below:

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