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Attorney for Hogg Ranch, LLC and DDC Ranch Consulting, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:	§	Chapter 11
	§	
Vista Proppants and Logistics, LLC, et al. ¹	§	Case No. 20-42002-elm11
	§	
	§	Jointly Administered
Debtors.	§	
	§	
	§	

**HOGG RANCH, LLC'S AND DDC RANCH CONSULTING, LLC'S OBJECTION TO NOTICE
OF CURE PROCEDURES**

TO THE HONORABLE EDWARD LEE MORRIS, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW HOGG RANG, LLC and DDC RANCH CONSULTING, LLC, a creditor and party-in-interest in the Lonestar Prospects, Ltd. d/b/a Vista Sand, Ltd. Chapter 11 bankruptcy case², and files this *Objection to Notice of Cure Procedures*. In support of this objection, Hogg Ranch, LLC and DDC Ranch Consulting, LLC respectfully states as follows:

1. On June 9, 2020 (the "Petition Date"), Lonestar Prospects, Ltd. d/b/a Vista Sand, Ltd. ("Lonestar Prospects") filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Vista Proppants and Logistics, LLC (7817) ("Vista OnCo"); VPROP Operating, LLC (0269) ("VPROP"); Lonestar Prospects Management, L.L.C. (8451) ("Lonestar M LLC (2001) ("Bulk"); Denetz Logistics, LLC (8177) ("Denetz"); Lonestar Pro MAALT, LP (5198) ("MAALT"). The location of the Debtors' service address is 44 2042002200825000000000003 76119-4219.



2. Hogg Ranch, LLC is the Lessor and Lonestar Prospects, Ltd is the Lessee under that certain Lease Agreement, First Amendment to Lease Agreement and Second Amendment to Lease Agreement related to Debtor's West Texas Facility.

3. On August 19, 2020, Debtors filed a Notice of Cure and reflected a cure amount owed to Hogg Ranch, LLC of \$691,180.00. Hogg Ranch, LLC objects to such alleged cure amount.

4. The Lease Agreement between the parties requires an Annual Minimum Payment to be paid quarterly along with monthly minimum payments. The proposed cure amount owed to Hogg Ranch, LLC does not include all such payments. Debtors have not paid the Annual Minimum Payment due for July 2020, for the correct amount of tonnage owed for March 2020, and the monthly minimum payments owed for April, May, June and July 2020. Hogg Ranch, LLC objects to the proposed cure amount and asks the Court to enter an Order reflecting the true and correct amount owed to Hogg Ranch, LLC.

5. DDC Ranch Consulting, LLC objects to Debtors claimed \$0.00 cure amount owed to it. Hogg Ranch, LLC has been working with Debtors to correctly calculate the cure amount and has requested additional documentation regarding the total cure amount owed. The exact cure amount is not known at this time but Hogg Ranch, LLC believes it will come to an agreement with Debtors on such cure amount. This Objection is being filed to protect the rights of Hogg Ranch, LLC is the parties are unable to reach an agreement.

6. DDC Ranch Consulting, LLC receives a \$10,000.00 a month consulting fee to be paid under the terms of the Lease Agreement between Hogg Ranch, LLC and Debtors. Debtors last paid the consulting fee in April 2020. Debtors must bring the consulting fee payments current in order to cure the defaults under the Lease Agreement.

PRAYER

WHEREFORE, Hogg Ranch, LLC and DDC Ranch Consulting, LLC respectfully requests entry of an order granting the relief requested herein and granting such other and further relief as is just and proper.

Dated: August 25, 2020.

Respectfully submitted,

/s/ Chad Smith

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