

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

**IN RE:** §  
§ **CHAPTER 11**  
**SUPERIOR ENERGY SERVICES, INC.** §  
*et al.*<sup>1</sup> § **CASE NO. 20-35812 (DRJ)**  
**DEBTORS.** § **(Jointly Administered)**

**APACHE CORPORATION’S JOINDER TO CHEVRON U.S.A. INC., UNION OIL  
COMPANY OF CALIFORNIA AND CHEVRON MIDCONTINENT, L.P.’S  
OBJECTIONS TO DEBTORS’ JOINT PLAN OF REORGANIZATION  
CHAPTER 11 OF THE BANKRUPTCY CODE AND FINAL  
APPROVAL OF DEBTORS’ DISCLOSURE STATEMENT**

Related To Docket Nos. 11, 12, and 227

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Apache Corporation (“Apache”), by and through its undersigned counsel, hereby files this *Joinder to Chevron U.S.A. Inc., Union Oil Company of California and Chevron Midcontinent, L.P.’S Objections to Debtors’ Joint Plan of Reorganization Chapter 11 of the Bankruptcy Code and Final Approval of Debtors’ Disclosure Statement* [Dkt. No. 227] and in support thereof, respectfully submits as follows:

**I.  
JURISDICTION**

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://www.kcellc.net/superior>. The Debtors’ address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002



**II.**  
**BACKGROUND**

3. On or around February 13, 2004, Apache and SPN Resources, LLC (“SPN Resources”) entered into a Purchase and Sale Agreement (“PSA”). Pursuant to the PSA, Apache sold its rights, title, and interests in Gulf of Mexico Block Eugene Island 100 (“EI 100”) to SPN Resources. SPN Resources assumed all liabilities to the plugging and abandonment of any wells related to EI 100, and decommissioning of any facilities, including, but not limited to, clearing of any sites and restoration of any seabeds, related to EI 100 (“P&A/Decommissioning Obligations”).

4. Superior Energy Services, Inc. (“Superior Energy”) executed a parent guaranty dated February 13, 2004 (“Parent Guaranty”) in favor of Apache. Under the Parent Guaranty, Superior Energy agreed to guarantee all obligations of SPN Resources under the PSA, including, but not limited to, the P&A/Decommissioning Obligations.

5. Apache filed a claim based on the Parent Guaranty, and was assigned Claim No. 423. Apache also opted out of all third party releases.

**III.**  
**JOINDER AND RESERVATION OF RIGHTS**

6. Apache joins in the objection filed by *Chevron U.S.A. Inc., Union Oil Company of California and Chevron Midcontinent, L.P.’S Objections to Debtors’ Joint Plan of Reorganization Chapter 11 of the Bankruptcy Code and Final Approval of Debtors’ Disclosure Statement* [Dkt. No. 227] to the final approval of the Disclosure Statement and confirmation of the proposed Plan and adopts the legal arguments and authorities cited therein.

7. Apache reserves all rights, including the right to raise such other and further objections at the hearing on confirmation of the proposed Plan.

WHEREFORE, Apache respectfully requests that this Court: (i) deny approval of the Disclosure Statement; (ii) deny confirmation of the Plan; and (iii) grant Apache such other and further relief that this Court deems just and proper

Dated: January 12, 2021  
Houston, Texas

Respectfully submitted,

**FOLEY & LARDNER LLP**

*/s/ John P. Melko*

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**COUNSEL FOR APACHE CORPORATION**

**CERTIFICATE OF SERVICE**

I do hereby certify that on January 12, 2021, a true and correct copy of the foregoing pleading was served via CM/ECF to all parties authorized to receive electronic notice in this case.

/s/ John P. Melko  
John P. Melko