

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

---

In re:	)	
	)	Chapter 11
SAMSON RESOURCES CORPORATION, <i>et al.</i> , <sup>1</sup>	)	Case No. 15-11934 (CSS)
	)	
Debtors.	)	Jointly Administered
	)	
	)	<b>Related to DI No. 1574</b>

---

**AMENDED NOTICE OF AGENDA FOR MATTERS  
SCHEDULED FOR HEARING ON OCTOBER 26, 2016 AT  
1:00 P.M. (ET)<sup>2</sup> CONTINUED FROM OCTOBER 17, 2016 HEARING**

---

**CONTESTED MATTERS:**

1. Debtors’ Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1322; Filed 9/6/2016]

Related Documents:

- A. Supplement to Debtors’ Motion or Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1349; Filed 9/13/2016]
- B. Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1425; Entered 9/30/2016]
- C. Notice of Auction [Docket No. 1454; Filed 10/6/2016]

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Geodyne Resources, Inc. (2703); Samson Contour Energy Co. (7267); Samson Contour Energy E&P, LLC (2502); Samson Holdings, Inc. (8587); Samson-International, Ltd. (4039); Samson Investment Company (1091); Samson Lone Star, LLC (9455); Samson Resources Company (8007); and Samson Resources Corporation (1227). The location of parent Debtor Samson Resources Corporation’s corporate headquarters and the Debtors’ service address is: Two West Second Street, Tulsa, Oklahoma 74103.

<sup>2</sup> Parties who are unable to attend the hearing in person may participate by telephone by contacting CourtCall an independent conference call company, at 866-582-6878. Please refer to the Court’s website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov) (in the “General Information under the Judges’ Info” section) for complete information and instructions. A copy of each pleading can be viewed on the Court’s website at <https://ecf.deb.uscourts.gov> and on the website of the Debtors’ proposed notice and claims agent, Garden City Group, LLC at <http://www.gardencitygroup.com/cases/SamsonRestructuring>. Further information may be obtained by calling (888) 547-8096 or emailing to [SMNInfo@gardencitygroup.com](mailto:SMNInfo@gardencitygroup.com)

- D. Notice of Successful Bidders [Docket No. 1480; Filed 10/7/2016]
- E. Notice of Designated Contracts List [Docket No. 1484; Filed 10/10/2016]
- F. Notice of Successful Bidder and Backup Bidder [Docket No. 1499; Filed 10/11/2016]
- G. Notice of Proposed Form of Sale Orders [Docket No. 1507; Filed 10/12/2016]
- H. Omnibus Reply in Support of Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1509; Filed 10/13/2016]
- I. Declaration of Craig E. Johnson In Support of the Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1516; Filed 10/13/2016]
- J. Declaration of Michael O'Hara In Support of the Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1517; Filed 10/13/2016]
- K. Declaration of John Stuart in Support of the Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1525; Filed 10/14/2016]
- L. Debtors' Reply to Bakken Hunter LLC's Preliminary Objection and Reservation of Rights to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1526; Filed 10/14/2016]
- M. Declaration of Andrew Schmid in Support of the Sale for the Permian Minerals Asset Package to Stone Hill Minerals Holdings, LLC [Docket No. 1533; Filed 10/16/2016]

- N. Notice of Proposed Form of Sale Orders [Docket No. 1534; Filed 10/17/2016]
- O. Order (I) Authorizing the Sale of the Permian Minerals Asset Package Free and Clear of All Liens, Claims, Encumbrances and Interests, (B) the Debtors' Entry Into and Performance of Their Obligations Under the Asset Purchase Agreement and Ancillary Agreements, and (C) the Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (II) Granting Related Relief [Docket No. 1557; Filed 10/19/2016]

Response Deadline: September 20, 2016 at 4:00 p.m.; extended until September 21, 2016 at 4:00 p.m. for the U.S. Trustee and the creditors committee and until October 13, 2016 at 4:00 p.m. for Bakken Hunter LLC.

Responses Received:

- A. Acting United States Trustee's Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1392; Filed 9/22/2016]
- B. Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests Docket No. 1397; Filed 9/23/2016]
- C. Limited Objection and Reservation of Rights to Debtors' Motion for Entry of an Order Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1459; Filed 10/7/2016]
- D. Limited Objection of Chesapeake Operating, LLC to the Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims Encumbrances, and Interests [Docket No. 1485; Filed 10/10/2016]
- E. Limited Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests (Dkt. No. 1322) and Supplement Thereto (Dkt. No. 1349) [Docket No. 1486; Filed 10/10/2016]

- F. Limited Objection of SAP America, Inc. to the Debtors' Sale Motion and Potential Transfer Certain Intellectual Property or Use of Certain Intellectual Property for the Benefit of the Purchasers [Docket No. 1488; Filed 10/10/2016]
- G. Limited Objection and Reservation of Rights of Seitel Data, Ltd. and Affiliates to Debtors' Motion for Entry of an Order Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1489; Filed 10/10/2016]
- H. Limited Objection of J-W Power Company to the Debtors' Motion for Entry of an Order (I) Establishing Bid Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1490; Filed 10/10/2016]
- I. Objection of Cabot Oil & Gas Company to Debtors' Motion for Entry of an Order Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests (Central Anadarko Asset Sale) [Docket No. 1491; Filed 10/10/2016]
- J. Amended Objection of Cabot Oil & Gas Company to Debtors' Motion for Entry of an Order Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests (Central Anadarko Asset Sale) [Docket No. 1500; Filed 10/11/2016]
- K. Limited Objection and Reservation of Rights of the United States to Debtors' Proposed Sale Transactions [Docket No. 1501; Filed 10/12/2016]
- L. Bakken Hunter, LLC's Preliminary Objection and Reservation of Rights to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1512; Filed 10/13/2016]
- M. Objection of Chesapeake Operating, Inc. to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale of Certain of the Debtors' Assets and the Proposed Cure Costs [Docket No. 1513; Filed 10/13/2016]
- N. Limited Objection and Reservation of Rights Regarding Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain

Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. 1524; Filed 10/14/2016]

- O. Objection of Mr. and Mrs. Lloyd Odell and Mary Patricia Ness to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures and Granting Related Relief and (II) Approving the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Interests [Docket No. TBD; Received 10/14/2016]
- P. Objection of Oneok Rockies Midstream, L.L.C. to Cure Amount Associated with Assumption and Assignment of Gas Purchase Agreement. [Docket No. 1531; Filed 10/14/2016]
- Q. First Lien Agent's Reservation of Rights with Respect to the United States' Limited Objection to Debtors Proposed Sale Transactions [Docket No. 1532; Filed 10/14/2016]
- R. Limited Objection of the Official Committee of Unsecured Creditors to Debtors' Notice of Proposed Form of Sale Orders [Docket No. 1536; Filed 10/17/2017;
- S. Objection to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale of Certain of the Debtors' Assets and the Proposed Cure Amounts [Docket No. 1540; Filed 10/17/2016]
- T. Amended Objection to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale of Certain of the Debtors' Assets and the Proposed Cure Amounts [Docket No. 1541; Filed 10/17/2016]
- U. **Objection of Enbridge G&P (Oklahoma) L.P. and Enbridge Pipelines (Texas Gathering) L.P. to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale of Certain of the Debtors' Assets and the Proposed Cure Amounts (Relating to the Central Anadarko Designated Contracts List) [Docket No. 1581; Filed 10/24/2016]**

Status: This motion was granted at the October 17, 2016 hearing in these cases except as to certain issues raised in the government's objection and the committee's and first lien agent's reservations of rights. The aforementioned issues were continued to this hearing and will be going forward.

Dated: October 25, 2016  
Wilmington, Delaware

*/s/ Domenic E. Pacitti*

---

Domenic E. Pacitti, Esq. (DE Bar No. 3989)  
Michael W. Yurkewicz, Esq. (DE Bar No. 4165)  
**KLEHR HARRISON HARVEY  
BRANZBURG LLP**  
919 N. Market Street, Suite 1000  
Wilmington, Delaware 19801  
Telephone: (302) 426-1189  
Facsimile: (302) 426-9193

-and-

Morton Branzburg (admitted *pro hac vice*)  
**KLEHR HARRISON HARVEY  
BRANZBURG LLP**  
1835 Market Street, Suite 1400  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 569-2700  
Facsimile: (215) 568-6603

-and-

Paul M. Basta, P.C. (admitted *pro hac vice*)  
Edward O. Sassower, P.C. (admitted *pro hac vice*)  
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900

-and-

James H.M. Sprayregen, P.C.  
Ross M. Kwasteniet (admitted *pro hac vice*)  
Brad Weiland (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

*Co-Counsel for the Debtors and Debtors in  
Possession*