

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

In re:)	
)	Chapter 11
Quicksilver Resources Inc., <u>et al.</u> , ¹)	Case No. 15-10585 (LSS)
)	
Debtors.)	Jointly Administered
)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MARCH 17, 2016 AT 10:00 A.M. (ET)**²

I. RESOLVED/CONTINUED MATTER:

1. Debtors’ Motion for (I) an Order Establishing Bidding Procedures and Granting Related Relief and (II) an Order or Orders Approving the Sale of the Assets [Docket No. 636; filed September 17, 2015]

<u>Objection/Response Deadline:</u>	Sale Objection Deadline:
	January 15, 2016 at 4:00 p.m. (ET)

Cure Objections Received:

- A. ENI Petroleum’s Limited Objection and Reservation of Rights to Debtors’ Cure Notice [Docket No. 985; filed December 28, 2015]
- B. Objection of TG Barnett Resources, LP to Debtors’ Motion for (I) an Order Establishing Bidding Procedures and Granting Related Relief and (II) an Order or Orders Approving the Sale of the Assets as Such Motion

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Quicksilver Resources Inc. [6163]; Barnett Shale Operating LLC [0257]; Cowtown Drilling, Inc. [8899]; Cowtown Gas Processing L.P. [1404]; Cowtown Pipeline Funding, Inc. [9774]; Cowtown Pipeline L.P. [9769]; Cowtown Pipeline Management, Inc. [9771]; Makarios Resources International Holdings LLC [1765]; Makarios Resources International Inc. [7612]; QPP Holdings LLC [0057]; QPP Parent LLC [8748]; Quicksilver Production Partners GP LLC [2701]; Quicksilver Production Partners LP [9129]; and Silver Stream Pipeline Company LLC [9384]. The Debtors’ address is 801 Cherry Street, Suite 3700, Unit 19, Fort Worth, Texas 76102.

² The hearing will be held before The Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the March 17, 2016, hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (ET) on Wednesday, March 16, 2016, to register his/her telephonic appearance in accordance with the *Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009*.

Relates to the Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 995; filed December 29, 2015]

- C. Supplemental Objection of TG Barnett Resources, LP to Debtors' Motion for (I) an Order Establishing Bidding Procedures and Granting Related Relief and (II) an Order or Orders Approving the Sale of the Assets as Such Motion Relates to the Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 1021; filed January 6, 2016]

Related Documents:

- i. Order Approving the Sale of the Debtors' Oil and Gas Assets [Docket No. 1095; entered January 27, 2016] (the "Sale Order")

Status: On January 27, 2016 the Court entered the Sale Order authorizing the sale of substantially all of the Debtors' assets. All cure and sale-related objections have been addressed at previous hearings, except with respect to the cure objections above. The Debtors and ENI Petroleum are negotiating an agreed form of order that will resolve that cure objection and be submitted under certification of counsel. The cure objection of TG Barnett Resources, LP is continued until the omnibus hearing scheduled for April 20, 2016 at 10:00 a.m. (ET)

II. MATTERS WITH CERTIFICATIONS OF NO OBJECTION OR COUNSEL:

2. Debtors' Second (Non-Substantive) Omnibus Objection to Certain Claims that are (A) Duplicative of a Claim Filed on the Claimant's Behalf, (B) on Account of Equity Interests, (C) Amended and Superseded, and/or (D) Late-Filed [Docket No. 1133; filed February 9, 2016]

Objection/Response Deadline: March 10, 2016 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Second (Non-Substantive) Omnibus Objection to Certain Claims that are (A) Duplicative of a Claim Filed on the Claimant's Behalf, (B) on Account of Equity Interests, (C) Amended and Superseded, and/or (D) Late-Filed [Docket No. 1241; filed March 11, 2016]

Status: On March 11, 2016, the Debtors filed a certification of no objection regarding this matter. Accordingly, a hearing is only necessary to the extent the Court has questions or concerns.

3. Debtors' Motion for Authorization to Sell Certain Real Property Free and Clear of All Liens, Claims, Encumbrances, and Other Interests [Docket No. 1180; filed February 25, 2016]

Objection/Response Deadline: March 10, 2016 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal comments from the Office of the Acting United States Trustee, Region 3
- B. Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Motion for Authorization to Sell Certain Real Property Free and Clear of All Liens, Claims, Encumbrances, and Other Interests [Docket No. 1236; filed March 10, 2016]

Related Documents:

- i. Declaration of Disinterestedness of Ranch Marketing Associates [Docket No. 1239; filed March 11, 2016]
- ii. Certification of Counsel Regarding Order Authorizing the Debtors to Sell Certain Real Property Free and Clear of All Liens, Claims, Encumbrances, and Other Interests [Docket No. 1244; filed March 14, 2016]

Status: On March 14, 2016, the Debtors filed a certification of counsel regarding this matter. Accordingly, a hearing is only necessary to the extent the Court has questions or concerns.

III. MATTERS GOING FORWARD:

4. Debtors' Motion for Entry of an Order Further Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 1116; filed February 1, 2016]

Objection/Response Deadline: February 16, 2016 at 4:00 p.m. (ET); extended to February 19, 2016 at 12:00 p.m. (ET) for the Ad Hoc Group of Second Lienholders

Objections/Responses Received:

- A. Limited Objection of Ad Hoc Group of Second Lienholders and the Second Lien Agent to Debtors' Motion for Entry of an Order Further Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 1165; filed February 19, 2016]

Related Documents: None.

Status: The Debtors are in discussions with the Ad Hoc Group of Second Lienholders regarding its limited objection and hope to resolve this matter in advance of the hearing. The hearing regarding this matter will go forward.

5. Motion of the Official Committee of Unsecured Creditors to Further Amend the “Amended Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Rules 2002, 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral and (II) Granting Adequate Protection to Prepetition Secured Parties” [Docket No. 1178; filed February 25, 2016]

Objection/Response Deadline: March 10, 2016 at 4:00 p.m. (ET); extended to March 11, 2016 at 4:00 p.m. (ET) for the Debtors

Objections/Responses Received:

- A. Objection of the Second Lien Parties to the Motion of the Official Committee of Unsecured Creditors to Further Amend the “Amended Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Rules 2002, 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral and (II) Granting Adequate Protection to Prepetition Secured Parties” [Docket No. 1237; filed March 10, 2016]
- B. Debtors’ Objection to the Motion of the Official Committee of Unsecured Creditors to Further Amend the “Amended Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Rules 2002, 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral and (II) Granting Adequate Protection to Prepetition Secured Parties” [Docket No. 1240; filed March 11, 2016]

Related Documents:

- i. Declaration of James W. Burke in Support of Objection of the Second Lien Parties to the Motion of the Official Committee of Unsecured Creditors to Further Amend the “Amended Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Rules 2002, 4001 and 9014 (I) Authorizing Debtors to Use Cash Collateral and (II) Granting Adequate Protection to Prepetition Secured Parties” [Docket No. 1238; filed March 10, 2016]
- ii. Official Committee of Unsecured Creditors’ Omnibus Reply in Support of Motion of the Official Committee of Unsecured Creditors to Further Amend the “Amended Final Order Under 11 U.S.C. §§ 105, 361, 362, 363 and 507, and Bankruptcy Rules 2002, 4001 and 9014 (I) Authorizing

Debtors to Use Cash Collateral and (II) Granting Adequate Protection to Prepetition Secured Parties” [Docket No. 1246; filed March 14, 2016]

Status: The hearing regarding this matter will go forward.

Dated: March 15, 2016
Wilmington, Delaware

/s/ Amanda R. Steele

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