

**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 *SECOND AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON APRIL 27, 2015 AT 2:00 P.M. (EDT)³**

I. RESOLVED MATTER:

1. Debtors’ Motion for an Order Authorizing and Approving Rejection of Certain Executory Contracts *Nunc Pro Tunc* to the Dates Specified [Docket No. 121; filed March 25, 2015]

Objection/Response Deadline: April 8, 2015 at 4:00 p.m. (EDT); Extended for the Official Committee of Unsecured Creditors (the “Committee”) to April 11, 2015 at 5:00 p.m. (EDT)

Objections/Responses Received:

- A. Limited Objection of Nomac Drilling L.L.C. to Debtors’ Motion for an Order Authorizing and Approving Rejection of Certain Executory Contracts *Nunc Pro Tunc* [Docket No. 162; filed April 8, 2015]

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 **Amended items appear in bold.**

³ 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 April 27, 2015, hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (EDT) on Friday, April 24, 2015, to register his/her telephonic appearance in accordance with the *Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009*.

Related Documents:

- i. Order Authorizing and Approving Rejection of Certain Executory Contracts *Nunc Pro Tunc* to the Dates Specified [Docket No. 213; filed April 15, 2015]

Status: On April 15, 2015, the Court entered an order approving the rejection of the contracts subject to this motion except with respect to the contract with Nomac Drilling L.L.C. (“Nomac Drilling”). The Debtors have resolved the limited objection of Nomac Drilling and intend to file a stipulation reflecting such resolution under certification of counsel.

II. MATTER WITH CERTIFICATION OF COUNSEL:

2. Debtors’ Application for Entry of an Order Pursuant to Bankruptcy Code Sections 327(a) and 328(a) (A) Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date, (B) Waiving Certain Time-Keeping Requirements Pursuant to Local Rule 2016-2(h) and (C) Granting Related Relief [Docket No. 129; filed March 25, 2015]

Objection/Response Deadline: April 8, 2015 at 4:00 p.m. (EDT); Extended for the Committee to April 22, 2015 at 12:00 p.m. (EDT)

Objections/Responses Received:

- A. Informal comments from the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”)
- B. Informal comments from the Committee

Related Documents:

- i. Certification of Counsel Regarding Order Pursuant to Bankruptcy Code Sections 327(a) and 328(a) (A) Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date, (B) Waiving Certain Time-Keeping Requirements Pursuant to Local Rule 2016-2(h) and (C) Granting Related Relief [Docket No. 254; filed April 23, 2015]
- ii. **Order Pursuant to Bankruptcy Code Sections 327(a) and 328(a) (A) Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition**

Date, (B) Waiving Certain Time-Keeping Requirements Pursuant to Local Rule 2016-2(h) and (C) Granting Related Relief [Docket No. 284; entered April 27, 2015]

Status: **On April 27, 2015, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**

III. UNCONTESTED MATTER GOING FORWARD:

3. Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (I) an Unredacted Version of Its Objection to Debtors' Motion for Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC and (II) Exhibits A, B and C to the Objection [Docket No. 230; filed April 20, 2015]

Objection/Response Deadline: April 24, 2015 at 4:00 p.m. (EDT)

Objections/Responses Received: None to date

Related Documents:

- i. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Order Authorizing the Debtors to Enter into an Agreement with Eni Petroleum US LLC (REDACTED) [Docket No. 234; filed April 20, 2015] (*Document located behind tab 6.A.*)
- ii. Order Pursuant to Local Rule 9006-1(e) Shortening the Time for Notice of the Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (I) An Unredacted Version of Its Objection to Debtors' Motion for an Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC and (II) Exhibits A, B and C to the Objection [Docket No. 236; entered April 21, 2015]

Status: The hearing regarding this matter will go forward.

IV. MATTERS GOING FORWARD:

4. Debtors' Motion for (A) Authority to (I) Continue Using Existing Cash Management System, (II) Honor Certain Pre-Petition Obligations Related to the Use of the Cash Management System, and (III) Maintain Existing Bank Accounts and Business Forms; and (B) An Extension of Time to Comply with Bankruptcy Code Section 345(b) and Local Rule 4001-3 [Docket No. 8; filed March 17, 2015]

Objection/Response Deadline: April 8, 2015 at 4:00 p.m. (EDT); Extended for TG Barnett Resources LP ("TG Barnett") to April 17, 2015 at 4:00 p.m.

(EDT); Extended for the Committee to April 20, 2015 at 4:00 p.m. (EDT)

Objections/Responses Received: None to date.

Related Documents:

- i. Declaration of Vanessa Gomez LaGatta in Support of First Day Pleadings [Docket No. 19; filed March 17, 2015]
- ii. Interim Order Granting Debtors' Motion for (A) Authority to (I) Continue Using Existing Cash Management System, (II) Honor Certain Pre-Petition Obligations Related to the Use of the Cash Management System, and (III) Maintain Existing Bank Accounts and Business Forms; and (B) An Extension of Time to Comply with Bankruptcy Code Section 345(b) and Local Rule 4001-3 [Docket No. 91; filed March 19, 2015]
- iii. Notice of (I) Entry of "Interim Order Granting Debtors' Motion for (A) Authority to (I) Continue Using Existing Cash Management System, (II) Honor Certain Pre-Petition Obligations Related to the Use of the Cash Management System, and (III) Maintain Existing Bank Accounts and Business Forms; and (B) An Extension of Time to Comply with Bankruptcy Code Section 345(b) and Local Rule 4001-3" and (II) Scheduling of a Final Hearing Thereon [Docket No. 112; filed March 20, 2015]
- iv. Supplemental Interim Order on Debtors' Motion for (A) Authority to (I) Continue Using Existing Cash Management System, (II) Honor Certain Pre-Petition Obligations Related to the Use of the Cash Management System, and (III) Maintain Existing Bank Accounts and Business Forms; and (B) An Extension of Time to Comply with Bankruptcy Code Section 345(b) and Local Rule 4001-3 [Docket No. 185; entered April 13, 2015]
- v. Declaration of Vanessa Gomez LaGatta in Further Support of (1) Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief and (2) Debtors' Motion for (A) Authority to (I) Continue Using Existing Cash Management System, (II) Honor Certain Pre-Petition Obligations Related to the Use of the Cash Management System, and (III) Maintain Existing Bank Accounts and Business Forms; and (B) An Extension of Time to Comply with Bankruptcy Code Section 345(b) and Local Rule 4001-3 [Docket No. 250; filed April 22, 2015] (*Document located behind tab 5.iv.*)

Status: The hearing regarding this matter will go forward.

5. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 16; filed March 17, 2015]

Objection/Response Deadline: April 8, 2015 at 4:00 p.m. (EDT); Extended for TG Barnett to April 17, 2015 at 4:00 p.m. (EDT); Extended for the Committee until April 20, 2015 at 4:00 p.m. (EDT)

Objections/Responses Received:

- A. Objections of Weatherford Creditors to Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting the Prepetition Secured Lenders Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 161; filed April 8, 2015]
- B. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 234; filed April 20, 2015]
- C. Debtors' Reply in Further Support of Debtors' Cash Collateral Motion and Response to the Official Committee of Unsecured Creditors' Objection Thereto [Docket No. 253; filed April 22, 2015]
- D. Joint Reply of Second Lien Agent and Ad Hoc Group of Second Lienholders to the Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 258; filed April 23, 2015]

Related Documents:

- i. Declaration of Vanessa Gomez LaGatta in Support of First Day Pleadings [Docket No. 19; filed March 17, 2015] (*Document located behind tab 4.i.*)
- ii. Interim 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, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 97; filed March 19, 2015]

- iii. Notice of (I) Entry of “Interim 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, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(b)” and (II) Scheduling of a Final Hearing Thereon [Docket No. 113; filed March 20, 2015]
- iv. Declaration of Vanessa Gomez LaGatta in Further Support of (1) Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief and (2) Debtors’ Motion for (A) Authority to (I) Continue Using Existing Cash Management System, (II) Honor Certain Pre-Petition Obligations Related to the Use of the Cash Management System, and (III) Maintain Existing Bank Accounts and Business Forms; and (B) An Extension of Time to Comply with Bankruptcy Code Section 345(b) and Local Rule 4001-3 [Docket No. 250; filed April 22, 2015]
- v. Declaration of Stan G. Page in Support of Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 251; filed April 22, 2015]
- vi. Declaration of John-Paul Hanson in Support of Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 252; filed April 22, 2015]
- vii. Motion of Second Lien Agent and Ad Hoc Group of Second Lienholders for an Order Granting Leave and Permission to File Joint Reply of Second Lien Agent and Ad Hoc Group of Second Lienholders to the Objection of the Official Committee of Unsecured Creditors to Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 259; filed April 23, 2015]
- viii. The Global Administrative Agent’s Motion for Leave to File and Serve a Late Reply and Joinder in the Debtors’ Reply to the “Objection of the Official Committee of Unsecured Creditors to Debtors Motion for Entry of Interim and Final Order (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling

a Final Hearing and (D) Granting Related Relief” [Docket No. 260; filed April 23, 2015]

- ix. **Order Granting Global Administrative Agent’s Motion for Leave to File and Serve a Late Reply and Joinder in the Debtors’ Reply to the “Objection of the Official Committee of Unsecured Creditors to Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief” [Docket No. 274; entered April 24, 2015]**
- x. **Order Granting Leave and Permission to File Joint Reply of Second Lien Agent and Ad Hoc Group of Second Lienholders to the Objection of the Official Committee of Unsecured Creditors to Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 275; entered April 24, 2015]**
- xi. **Rebuttal Declaration of John-Paul Hanson to Rebut the Lastrapes Declaration (as Defined Below) and in Further Support of Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 280; filed April 26, 2015]**
- xii. **Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal the Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors’ Objections to Debtors’ Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC [Docket No. 281; filed April 27, 2015] (*Document located behind tab 7*)**
- xiii. **Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors’ Objections to Debtors’ Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an**

Agreement with Eni Petroleum US LLC (SEALED) [Docket No. 283; filed April 27, 2015]

Status: The Debtors and the Committee have consented to JPMorgan Chase Bank NA, in its capacity as Global Administrative Agent, Credit Suisse AG, in its capacity as Second Lien Agent and the Ad Hoc Group of Second Lienholders filing a reply to the Committee's objection on or before April 23, 2015 at 5:00 p.m. (EDT). The hearing on this matter will go forward.

6. Debtors' Motion for an Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC [Docket No. 158; filed April 6, 2015]

Objection/Response Deadline: April 20, 2015 at 4:00 p.m. (EDT)

Objections/Responses Received:

- A. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Order Authorizing the Debtors to Enter into an Agreement with Eni Petroleum US LLC (REDACTED) [Docket No. 233; filed April 20, 2015]

Related Documents:

- i. Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (I) an Unredacted Version of Its Objection to Debtors' Motion for an Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC and (II) Exhibits A, B and C to the Objection [Docket No. 230; filed April 20, 2015] (*Document located behind tab 3*)
- ii. Declaration of Stan P. Page in Support of Debtors' Motion for an Order Authorizing the Debtors to Enter into an Agreement with Eni Petroleum US LLC [Docket No. 249; filed April 22, 2015]
- iii. **Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal the Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors' Objections to Debtors' Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC [Docket No. 281; filed April 27, 2015] (*Document located behind tab 7*)**

- iv. **Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors' Objections to Debtors' Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC (SEALED) [Docket No. 283; filed April 27, 2015] (Document located behind tab 5.xiii.)**

Status: The hearing regarding this matter will go forward.

V. MATTER REQUESTED TO GO FORWARD:

- 7. **Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal the Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors' Objections to Debtors' Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC [Docket No. 281; filed April 27, 2015]**

Objection/Response Deadline: (Proposed) April 27, 2015 at 2:00 p.m. (EDT)

Objections/Responses Received: None to date

Related Documents:

- i. **Motion of Official Committee of Unsecured Creditors for Entry of an Order Pursuant to Local Rule 9006-1(e) Shortening the Time for Notice of the Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal the Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors' Objections to Debtors' Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC [Docket No. 282; filed April 27, 2015]**
- ii. **Declaration of Bryan Lastrapes in Support of the Official Committee of Unsecured Creditors' Objections to Debtors' Motions for (1) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Prepetition Secured Parties Adequate**

Protection, (C) Scheduling a Final Hearing, and (D) Granting Related Relief & (2) Order Authorizing the Debtors to Enter Into an Agreement with Eni Petroleum US LLC (SEALED) [Docket No. 283; filed April 27, 2015] (*Document located behind tab 5.xiii.*)

Status: Pending the Court's approval, the hearing regarding this matter will go forward.

Date: April 27, 2015

/s/ Amanda R. Steele

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