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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

In re: III EXPLORATION II LP,

Debtor.

Bankruptcy No. 16-26471 (RKM)

Chapter 11

**NOTICE OF MOTION FOR ORDER APPROVING BID PROCEDURES FOR SALE OF
SUBSTANTIALLY ALL OF DEBTOR'S ASSETS, NOTICE OF EVIDENTIARY
HEARING ON BID PROCEDURES, AND NOTICE OF EVIDENTIARY HEARING ON
APPROVAL OF SALE**

(Deadline to Object to Motion: August 23, 2016 at 9:00 a.m.)

(Hearing on Bid Procedures: August 23, 2016 at 1:00 p.m.)

(Hearing on Approval of Sale: November 30, 2016 at 2:00 p.m.)

PLEASE TAKE NOTICE that III Exploration II LP ("Debtor") has filed its Motion for Order Approving Bid Procedures for Sale of Substantially All of Debtor's Assets [Docket No. 69] (the "Motion"). The Motion (including a proposed order granting the Motion and the proposed bid procedures attached to the proposed order) may be reviewed free of charge on the website of the Debtor's noticing agent, Donlin, Recano & Company, at <https://www.donlinrecano.com/Clients/explor/Dockets>, or copies may be obtained from Debtor's undersigned counsel upon request.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

The Motion requests approval of the proposed bid procedures (the "Bid Procedures") that are described in the Motion and set forth in the exhibit to the Motion. If the Motion is granted, the Bid Procedures would establish the process by which the Debtor intends to market and sell substantially all of its assets. The Bid Procedures, among other things: (1) include a deadline of October 17, 2016 for qualified bidders to

submit specified bid materials to the Debtor (including, but not limited to, a list of specific contracts and leases the bidder would like the Debtor to assume and assign in connection with the bid); (2) set the date of October 24, 2016 for an auction to be conducted if more than one qualified bid is received; (3) set a deadline of November 3, 2016 for the Debtor to file a motion for approval of the proposed sale(s) resulting from implementation of the Bid Procedures and the proposed assumption and assignment of certain contracts and leases, which motion would be considered at the November 30, 2016 sale hearing noted above; and (4) require the Debtor to close the sale(s) on or before December 5, 2016. The Motion itself provides further details regarding the relief the Debtor is seeking.

If you do not want the Court to approve the Motion and grant the relief requested therein, then you or your lawyer must do each of the following:

(1) on or before August 23, 2016 at 9:00 a.m., file with the Court a written objection to the Motion, explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Court for filing you must mail it in time for the Court to **receive** it on or before August 23, 2016 at 9:00 a.m. You also must provide a copy of your objection to Debtor's undersigned counsel by that same deadline.

and

(2) attend the evidentiary hearing on the Motion, which is set for August 23, 2016 at 1:00 p.m. in Courtroom 369, U. S. Bankruptcy Court, 350 South Main Street, Salt Lake City, UT 84101. **Failure to attend the hearing will be deemed a waiver of your objection.**

If you or your attorney do not take both of the above-described steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion, and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may ask the Court to strike the hearing and enter an order approving the Motion without hearing.

Dated: August 11, 2016.

COHNE KINGHORN, P.C.

/s/ Steven C. Strong

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Proposed Attorneys for III Exploration II LP