

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

<hr/> <b>In re:</b>  <b>REMORA PETROLEUM, L.P., et al.,</b>  <b>Debtors.<sup>1</sup></b> <hr/>	<b>§ Chapter 11</b> <b>§</b> <b>§ Case No. 20-34037 (DRJ)</b> <b>§</b> <b>§ (Joint Administration Requested)</b> <b>§</b>
--	--

**DEBTORS' AGENDA OF MATTERS SET FOR FIRST DAY HEARING  
ON AUGUST 13, 2020 AT 9:30 A.M. (PREVAILING CENTRAL TIME)**

---

**I. EVIDENTIARY SUPPORT FOR FIRST DAY PLEADINGS**

1. ***First Day Declaration.*** Declaration of George B. Peyton V in Support of Debtors' Chapter 11 Proceedings and First Day Pleadings [Docket No. 18]

**Status:** This Declaration will be relied upon as evidentiary support for the voluntary chapter 11 petitions and the first day pleadings listed below.

2. ***Voorhies Declaration.*** Declaration of Nellwyn Voorhies in Support of Debtors' Emergency Application for Entry of an Order Authorizing the Debtors to Retain and Employ Donlin, Recano & Company, Inc. as Claims, Noticing, and Solicitation Agent [Docket No. 15]

**Status:** This Declaration will be relied upon as evidentiary support for the voluntary chapter 11 petitions and the first day pleadings listed below.

**II. FIRST DAY PLEADINGS**

3. ***Joint Administration Motion.*** Debtors' Emergency Motion for Entry of an Order Directing Joint Administration of Related Chapter 11 Cases [Docket No. 4]

**Status:** This matter is going forward.

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Remora Petroleum, L.P. (4348); Remora Petroleum GP, LLC (4291); Remora Operating CA, LLC (1853); Remora Operating, LLC (7595); and Remora Operating Louisiana, LLC (0662). The location of the Debtors' main corporate headquarters and the Debtors' service address is: Building II, 807 Las Cimas Pkwy, Suite 275, Austin, TX 78746.

4. ***Notice of Complex Case Designation.*** Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 5]

**Status:** This matter is going forward.

5. ***Consolidated Creditor List Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors and a Consolidated List of the Debtors' Thirty (30) Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, and (III) Approving the Form and Manner of Notifying Creditors of the Commencement of These Chapter 11 Cases and Other Information [Docket No. 6]

**Status:** This matter is going forward.

6. ***Schedules Extension Motion.*** Debtors' Emergency Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs [Docket No. 7]

**Status:** This matter is going forward.

7. ***Cash Collateral Motion.*** Debtors' Emergency Motion for (I) Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Adequate Protection to the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties, (C) Granting Liens and Superpriority Claims, (D) Modifying the Automatic Stay, and (E) Scheduling a Final Hearing; and (II) Entry of a Final Order (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Use of Cash Collateral, (C) Granting Adequate Protection to the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties, (D) Granting Liens and Superpriority Claims, and (E) Modifying the Automatic Stay [Docket No. 16]

**Status:** This matter is going forward with respect to interim use of cash collateral.

8. ***Employee Wages Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (II) Continue Employee Benefit Programs [Docket No. 13]

**Status:** This matter is going forward.

9. ***Cash Management Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue to Operate their Cash Management System, (II) Honor Certain Prepetition Obligations Related Thereto, (III) Maintain Existing Business Forms, and (IV) Perform Intercompany Transactions [Docket No. 10]

**Status:** This matter is going forward.

10. ***Royalty Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to Pay Mineral Payments and Working Interest Disbursements [Docket No. 11]

**Status:** This matter is going forward.

11. ***Joint Interest Billings Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing Payment of Working Interest Costs, Joint Interest Billings, and Marketing Expenses and (II) Confirming Administrative Expense Priority Status of Outstanding Orders [Docket No. 12]

**Status:** This matter is going forward.

12. ***Insurance Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Insurance Coverage, (B) Pay All Insurance Obligations, and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [Docket No. 14]

**Status:** This matter is going forward.

13. ***Utilities Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests [Docket No. 8]

**Status:** This matter is going forward.

14. ***Taxes Motion.*** Debtors' Emergency Motion for Entry of an Order Authorizing the Payment of Certain Prepetition Taxes [Docket No. 9]

**Status:** This matter is going forward.

15. ***Donlin Recano & Company, Inc. Retention Application.*** Debtors' Emergency Application for Entry of an Order Authorizing the Debtors to Retain and Employ Donlin, Recano & Company, Inc. as Claims, Noticing and Solicitation Agent [Docket No. 15]

**Status:** This matter is going forward.

*[Remainder of Page Left Blank Intentionally]*

16. ***Disclosure Statement Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Scheduling Hearings on (A) Adequacy of Disclosure Statement and (B) Confirmation of Plan; (II) Establishing Deadlines to Object to Disclosure Statement and Plan; (III) Approving (A) Disclosure Statement as Containing Adequate Information, (B) Solicitation Procedures, (C) Form and Manner of Notice of Disclosure Statement and Confirmation Hearings, (D) Objection Deadlines, and (E) Notice of Non-Voting Status and Opt-Out Opportunity; (IV) Approving Procedures for Assumption of Contracts and Leases and Form and Manner of Cure Notice; and (V) Granting Related Relief [Docket No. 24]

**Status:** This matter is going forward solely with respect to scheduling matters.

Dated: August 12, 2020

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II (TX Bar No. 24012503)

Joseph P. Rovira (TX Bar No. 24066008)

Catherine A. Diktaban (TX Bar No. 24109810)

600 Travis Street, Suite 4200

Houston, Texas 77002

Tel: (713) 220-4200

Fax: (713) 220-4285

Email: taddavidson@huntonak.com

josephrovira@huntonak.com

cdiktaban@huntonak.com

*Proposed Counsel for the Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I certify that on August 12, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II