

EXHIBIT A

Proposed Order

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

In re:)	Case No. 17-_____ ()
Chieftain Sand and Proppant, LLC,)	Chapter 11
Debtor.)	
In re:)	Case No. 17-_____ ()
Chieftain Sand and Proppant Barron, LLC,)	Chapter 11
Debtor.)	
)	Re: Docket No. _____

**ORDER DIRECTING
JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES**

Upon the Motion¹ filed by the above-referenced debtors and debtors in possession (collectively, the “*Debtors*”) for entry of an order (the “*Order*”) consolidating the administration of these chapter 11 cases for procedural purposes only, all as more fully set forth in the Motion; and the First Day Declaration; and the Court having jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that proper and adequate notice of the Motion and hearing thereon has been given and that no other or further notice is

¹ Capitalized terms used but not otherwise defined herein shall have the meaning set forth in the Motion.

necessary; and the Court having found that good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion, it is **HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** as set forth herein.

2. Any objections to the Motion that have not been withdrawn or otherwise resolved are hereby **OVERRULED**.

3. The above-captioned chapter 11 cases are jointly administered by this Court for procedural purposes only in accordance with Bankruptcy Rule 1015(b) and Local Rule 1015-1 under the case styled *In re Chieftain Sand and Proppant, LLC*, Case No. 17-_____ (the “**Lead Case**”).

4. The procedural consolidation shall be for administrative purposes only and shall not be a substantive consolidation of the Debtors’ estates and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.

5. The Bankruptcy Clerk shall maintain one file and one docket for the cases, which file and docket shall be the file and docket for the chapter 11 case of Debtor, Chieftain Sand and Proppant, LLC, Case No. 17-_____ ().

The joint caption of the cases shall read as set forth immediately below:

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

In re:)	Case No. 17-_____ ()
Chieftain Sand and Proppant, LLC, <i>et al.</i>)	Chapter 11
Debtors. ¹)	(Jointly Administered)

1. The Debtors in these chapter 11 cases, and the last four digits of their respective federal tax identification numbers, are Chieftain Sand and Proppant, LLC (1729) and Chieftain Sand and Proppant Barron, LLC (0418). The Debtors' service address is: 331 27th Street, New Auburn, WI 54757.

6. The foregoing caption shall satisfy the requirements of section 342(c)(1) of the Bankruptcy Code.

7. All original pleadings shall be captioned as indicated in the preceding paragraph, and the Clerk of the Court shall make docket entries in the dockets of each of the chapter 11 cases other than the chapter 11 case of Debtor Chieftain Sand and Proppant, LLC, substantially as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Chieftain Sand and Proppant Barron, LLC and Chieftain Sand and Proppant, LLC. The docket in Chieftain Sand and Proppant, LLC, Case No. 17-_____ should be consulted for all matters affecting the case.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

10. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014, or otherwise, this Order shall be immediately effective and enforceable upon its entry.

11. The Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: January ___, 2017
Wilmington, Delaware

THE HONORABLE
UNITED STATES BANKRUPTCY JUDGE