

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Case No. 17-10064 (KG)
Chieftain Sand and Proppant, LLC, <i>et al.</i> ,)	Chapter 11
Debtors. ¹)	(Jointly Administered)
)	Hearing Date: February 3, 2017 at 11:00 a.m. (ET)
)	Obj. Deadline: January 27, 2017 at 4:00 p.m. (ET)

NOTICE OF APPLICATION AND HEARING

PLEASE TAKE NOTICE that on January 11, 2017, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed the **Debtors’ Application Pursuant to 11 U.S.C. §§ 327(A), 330 and 331 and, Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 2014-1 for an Order Authorizing the Employment and Retention of Donlin, Recano & Company, Inc., as Administrative Agent for the Debtors** (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Application with respect to the bidding procedures portion of the Motion must be in writing, filed with the Clerk of the Bankruptcy Court and served upon and received by the undersigned proposed counsel for the Debtors at or before **4:00 p.m. (Eastern Time) on January 27, 2017.**

PLEASE TAKE FURTHER NOTICE that if any objections are received, the Application and such objections shall be considered at a hearing before the Honorable Kevin Gross, United States Bankruptcy Judge for the District of Delaware, at the Bankruptcy Court, 824 Market

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.

Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801 on **February 3, 2017 at 11:00 a.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: January 11, 2017
Wilmington, Delaware

GIBBONS P.C.

By: /s/ Howard A. Cohen

Howard A. Cohen (DE 4082)

Natasha M. Songonuga (DE 5391)

300 Delaware Avenue, Suite 1015

Wilmington DE 19801-1761

Telephone: (302) 518-6330

Facsimile: (302) 429-6294

Email: hcohen@gibbonslaw.com

nsongonuga@gibbonslaw.com

PROPOSED ATTORNEYS FOR THE DEBTORS