

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

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| |) | |
| 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) |
| | | Re: Docket Nos. 11, 31 |

**CERTIFICATION OF NO OBJECTION REGARDING DEBTORS’ MOTION
FOR ENTRY OF INTERIM AND FINAL ORDERS ESTABLISHING
ADEQUATE ASSURANCE PROCEDURES WITH RESPECT
TO THE DEBTORS’ UTILITY PROVIDERS**

The undersigned counsel to the above-captioned Debtors (the “Debtors”), hereby certifies the following:

1. On January 9, 2017, the Debtors filed the *Debtors’ Motion for Entry of Interim and Final Orders Establishing Adequate Assurance Procedures with Respect to the Debtors’ Utility Providers* (the “Motion”) [Docket No. 11].

2. On January 10, 2017, the Court entered the *Interim Order Establishing Adequate Assurance Procedures with Respect to the Debtors’ Utility Providers* (the “Interim Order”). [Docket No. 31]

3. The Interim Order set the Motion for final hearing on February 3, 2017 at 11:00 a.m. and set the deadline to file objections for no later than January 27, 2017 at 4:00 p.m. (the “Objection Deadline”)

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.

4. The Debtors did not grant any extensions of the Objection Deadline and have no knowledge of any such extensions.

5. As of January 27, 2017, the undersigned counsel has not received any answer, objection or other responsive pleading to the Motion.

6. Personnel at Gibbons P.C., Counsel to the Debtors, have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

7. Therefore, it is hereby respectfully requested that the Court enter the proposed form of Final Order attached hereto as Exhibit A at its earliest convenience.

Dated: January 30, 2017
Wilmington, Delaware

GIBBONS P.C.

By: /s/ Howard A. Cohen

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PROPOSED ATTORNEYS FOR THE DEBTORS