

Exhibit A

Proposed Form of Order

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

In re:

Case No. 17-10064 (KG)

Chieftain Sand and Proppant, LLC,

Chapter 11

Reorganized Debtor.¹

Re: Docket No. _____

**FINAL DECREE AND ORDER (I) CLOSING CASE OF CHIEFTAIN SAND AND
PROPPANT, LLC AND (II) AUTHORIZING THE PLAN ADMINISTRATOR TO
ABANDON AND DESTROY ANY AND ALL OF THE
DEBTORS' BOOKS AND RECORDS**

This matter is before the Court on the *Reorganized Debtor's Motion for Entry of a Final Decree and Order (I) Closing the Debtor's Remaining Chapter 11 Case, and (II) Authorizing the Plan Administrator to Abandon and Destroy Any and All of the Debtors' Books and Records* (the "*Motion*");² and the Court has considered the Motion, and the matters reflected in the record of any hearing held on the Motion; and the Court having found that this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this Motion is a core proceeding pursuant to 28 U.S.C. § 157; 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 adequate notice of the Motion and opportunity for objection having been given; and it appearing that no other notice need be given; and the Court having determined that

¹ The last four digits of the Debtor's federal tax identification number is 1729. The Debtor's service address is: P.O. Box 37, Birchwood, WI 54817.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

sufficient cause exists for the relief set forth herein; and after due deliberation and sufficient cause therefore, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The Chapter 11 Case of Chieftain Sand and Proppant, LLC, Case No. 16-10064 (KG) is hereby closed effective as of the entry of this Order; provided, however, nothing contained in this Final Decree shall alter or amend the Retention of Jurisdiction provisions of the Plan.
3. Entry of this Final Decree is without prejudice to the rights of the Plan Administrator or any party in interest to seek to reopen the case of Chieftain Sand and Proppant, LLC.
4. The Reorganized Debtor shall, on or before thirty (30) days after entry of this Order (a) file with the Court and provide to the U.S. Trustee all outstanding post-confirmation reports and (b) pay all fees due and payable pursuant to 28 U.S.C. § 1930. Upon payment of the applicable fee and interest, if any, the Reorganized Debtor's obligation to pay quarterly fees or other fees of the U.S. Trustee is hereby discontinued, provided, however, that this paragraph is without prejudice to any obligation to pay quarterly fees in accordance with 28 U.S.C. § 1930(a)(6) in the event the case is reopened.
5. Notwithstanding anything to the contrary in the Plan or Confirmation Order, pursuant to sections 105(a) and 554 of the Bankruptcy Code and Bankruptcy Rule 6007, the Plan Administrator is authorized, but not directed, to abandon and destroy, or caused to be abandoned and destroyed, any and all of the books and records relating to Chieftain Sand and

Proppant, LLC and Chieftain Sand and Proppant Barron, LLC and/or any other records relating to their former businesses.

6. The Reorganized Debtor is authorized and empowered, and may in its discretion and without further delay, take any action and perform any act necessary to implement and effectuate the terms of this Order.

7. The Clerk of the Court shall enter this Order and Final Decree on the docket of Chieftain Sand and Proppant LLC, and therefore such docket shall be marked as "Closed".

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: December ____, 2017

The Honorable Kevin Gross
United States Bankruptcy Judge