

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

<b>In re:</b>	§	
	§	<b>Case No. 21-30710</b>
<b>CASTEX ENERGY 2005 HOLDCO,</b>	§	
<b>LLC, <i>et al.</i>,</b>	§	<b>Chapter 11</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>

**NOTICE OF BAR DATES FOR FILING  
PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT  
UNDER 11 U.S.C. §§ 503(b)(1) AND 503(b)(9) OF THE BANKRUPTCY CODE**

**TO: ALL PERSONS AND ENTITIES WHO HAVE CLAIMS AGAINST ANY OF THE  
FOLLOWING DEBTOR ENTITIES:**

<b>Debtor</b>	<b>Case No.</b>
Castex Energy 2005 Holdco, LLC	<b>21-30710</b>
Castex Energy 2005, LLC	<b>21-30711</b>
Castex Energy Partners, LLC	<b>21-30712</b>
Castex Offshore, Inc.	<b>21-30713</b>

**PLEASE TAKE NOTICE THAT:**

On February 26, 2021 (the “Petition Date”), Castex Energy 2005 Holdco, LLC and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11, title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (as amended and modified, the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”).

On March 2, 2021, the Court entered an order at Docket No. 39 (the “Bar Date Order”)<sup>2</sup> establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim, including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code (“Proofs of Claim”). For your convenience, enclosed with this Bar Date Notice is a Proof of Claim Form.

As used in this Bar Date Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, governmental units,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Castex Energy 2005 Holdco, LLC (6832); Castex Energy 2005, LLC (6832); Castex Energy Partners, LLC (6832); and Castex Offshore, Inc. (8432). The Debtors’ mailing address is One Memorial City Plaza, 800 Gessner Rd., Suite 925, Houston, Texas 77024.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

and the Office of the United States Trustee for the Southern District of Texas. In addition, the terms “persons” and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Bar Date Notice, the term “claim” means, as to or against the Debtors in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

## **I. THE BAR DATES**

The Bar Date Order established the following bar dates for filing Proofs of Claim in these Chapter 11 Cases (collectively, the “Bar Dates”):

- (a) **Claims Bar Date.** Pursuant to the Bar date Order, except as described below, all entities (except governmental units) holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these Chapter 11 Cases on the Petition Date, **including requests for payment under section 503(b)(9) of the Bankruptcy Code, and requests for payment of any P&A Claim (as defined in section IV(b) below) under section 503(b)(1) of the Bankruptcy Code**, are required to file Proofs of Claim by the Claims Bar Date established as **April 21, 2021 at 5:00 p.m. (prevailing Central Time)**. Excepts as expressly set forth in this Bar Date Notice and the Bar Date Order, the Claims Bar Date applies to all types of claims against the Debtors that arose before the Petition Date, including secured claims, unsecured priority claims, and unsecured non-priority claims.
- (b) **Governmental Bar Date.** Pursuant to the Bar Date Order, all governmental units holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these Chapter 11 Cases on the Petition Date are required to file Proofs of Claim by the Governmental Bar Date established as **August 25, 2021 at 5:00 p.m. (prevailing Central Time)**. The Governmental Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to the Petition Date, including governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods, or prepetition transactions to which the Debtors were a party.
- (c) **Rejection Damages Bar Date.** Pursuant to the Bar Date Order, all entities holding claims arising from the Debtors’ rejection of executory contracts and unexpired leases are required to file Proofs of Claim by the Rejection Damages Bar Date – *i.e.*, by the date that is **the later of (i) the Claims Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m., prevailing Central**

**Time, on the date that is thirty (30) days following entry of the order approving the rejection of the applicable executory contract or unexpired lease of the Debtors.**

- (d) **Amended Schedules Bar Date.** Pursuant to the Bar Date Order, all entities holding claims affected by an amendment to the Debtors' Schedules and Statements are required to file Proofs of Claim by the Amended Schedules Bar Date – *i.e.*, by the date that is **the later of (i) the Claims Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m., prevailing Central Time, on the date that is thirty (30) days from the date on which the Debtors serve notice of the amendment to the Schedules and Statements.**

## **II. WHO MUST FILE A PROOF OF CLAIM**

Except as otherwise set forth herein, the following entities holding claims against the Debtors that arose (or that are deemed to have arisen) prior to the Petition Date **must** file Proofs of Claim on or before the Claims Bar Date, Governmental Bar Date, or any other Bar Date set forth in the Bar Date Order, as applicable:

- (a) any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules and Statements or is listed as contingent, unliquidated, or disputed if such entity desires to participate in any of these Chapter 11 Cases or share in any distribution in these Chapter 11 Cases;
- (b) any entity who believes that its claim is improperly classified in the Schedules and Statements or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount other than that identified in the Schedules and Statements;
- (c) any former full-time, part-time, salaried, or hourly employees must submit Proofs of Claim relating to any grievance prior to the Claims Bar Date to the extent grounds for such grievances arose on or prior to the Petition Date;
- (d) any entity that believes that its prepetition claim as listed in the Schedules and Statements is not an obligation of the specific Debtor against which the claim is listed and that desires to have its claim allowed against a Debtor other than that identified in the Schedules and Statements;
- (e) any entity asserting a P&A Claim against a Debtor that is or may be an administrative expense pursuant to section 503(b)(1) of the Bankruptcy Code; and
- (f) any entity who believes that its claim against a Debtor is or may be an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code.

### **III. PARTIES WHO DO NOT NEED TO FILE PROOFS OF CLAIM**

Certain parties are not required to file Proofs of Claim. The Court may, however, enter one or more separate orders at a later time requiring creditors to file Proofs of Claim for some kinds of the following claims and setting related deadlines. If the Court does enter such an order, you will receive notice of it. The following entities holding claims that would otherwise be subject to the Bar Dates, in the capacities described below, do **not** need to file Proofs of Claim:

- (a) any entity whose claim is listed on the Schedules and Statements if: (i) the claim is **not** scheduled by the Debtors as any of disputed, contingent, or unliquidated; (ii) such entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules and Statements; and (iii) such entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules and Statements;
- (b) any entity whose claim has previously been allowed by a final order of the Court in these Chapter 11 Cases;
- (c) any Debtor having a claim against another Debtor;
- (d) any entity whose claim is solely against any non-Debtor affiliates;
- (e) any entity whose claim has been paid in full by a Debtor pursuant to a Court order;
- (f) any entity holding a claim for which a separate deadline is fixed by this Court;
- (g) any entity holding a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration incurred in the ordinary course on and after the Petition Date, including fees and costs of professional advisors (e.g. attorneys, financial advisors, and accountants) retained by the Debtors or any statutory committee appointed in the Chapter 11 Cases; *provided* that any entity asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must assert such claims by filing a Proof of Claim on or before the Claims Bar Date and filing a request for payment of the same;
- (h) any entity holding any equity interest in any Debtor;
- (i) any holder of a claim arising under or in connection with any of the Debtors' secured debt facilities; and

- (j) any holder of a claim for any fees, expenses, or other obligations arising under any interim or final order approving the Debtors' use of cash collateral or access to post-petition financing.

#### **IV. INSTRUCTIONS FOR FILING PROOFS OF CLAIM**

Pursuant to the Bar Date Order, the following requirements apply with respect to preparing and filing each Proof of Claim:

- (a) **Contents.** Each Proof of Claim must: (i) be written in legible English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant on behalf of the claimant, whether such signature is an electronic signature or is ink.
- (b) **P&A Claims.** Any claimant filing a Proof of Claim arising from or related to P&A Obligations<sup>3</sup> ("P&A Claims") who asserts that such claim is entitled to priority under section 503(b)(1) of the Bankruptcy Code must also file, on or before the Claims Bar Date, a separate pleading in the Chapter 11 Cases, which pleading shall: (i) identify the factual and legal basis for priority treatment; (ii) identify the particular OCS leases, wells, pipelines, and platforms applicable to the claim; (iii) state whether the claim is liquidated or unliquidated, contingent or non-contingent; and (iv) attach any documentation identifying the particular invoices paid on account of the Debtors' P&A Obligations.
- (c) **Section 503(b)(9) Claims.** Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must also: (i) include the value of the goods delivered to and received by the Debtors in the 20 days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code, if applicable.
- (d) **Electronic Signatures Permitted.** Only original Proofs of Claim signed electronically by the claimant or an authorized agent or legal representative of the claimant may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim, or Proofs of Claim sent by facsimile or electronic mail will not be accepted. Unless otherwise ordered by the Court, any original document containing the original signature of any party other than the party that files the Proof of Claim shall be retained by the filing party for a period of not less than five (5)

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<sup>3</sup> "P&A Obligations" shall mean any plugging and abandonment, decommissioning, and similar health, safety, or environmental obligations and liabilities of the Debtors arising from or related to the various wells, oil and gas platforms, pipelines, other facilities, and interests owned by the Debtors.

years after the Debtors' Chapter 11 Cases are closed, and upon request, such original document must be provided to the Court or other parties for review, pursuant to the Administrative Procedures for the Filing, Signing, and Verifying of Documents by Electronic Means in Texas Bankruptcy Courts.

- (e) **Identification of the Debtor Entity.** Each Proof of Claim must clearly identify the Debtor against which a claim is asserted, including the individual Debtor's case number. A Proof of Claim filed under the joint administration case number (Case No. 21-30710) will be deemed as filed only against Castex Energy 2005 Holdco, LLC. A Proof of Claim filed without identifying a specific Debtor will be deemed as filed only against Castex Energy 2005 Holdco, LLC.
- (f) **Claim Against Multiple Debtor Entities.** Each Proof of Claim must state a claim against only one Debtor and clearly indicate that Debtor against which the claim is asserted. To the extent more than one Debtor is listed on the Proof of Claim, such claim may be treated as if filed only against Castex Energy 2005 Holdco, LLC. Notwithstanding anything to the contrary set forth in the Bar Date Order, the filing of a Proof of Claim by an administrative agent or indenture trustee in the Chapter 11 Case of Castex Energy 2005 Holdco, LLC will also be deemed to constitute the filing of a Proof of Claim in the Chapter 11 Cases of all other Debtors against whom a claim may be asserted under any applicable loan documents or other operative documents.
- (g) **Supporting Documentation.** Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rule 3001(c) and 3001(d). If, however, such documentation is voluminous, upon prior written consent of the Debtors' counsel, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available; *provided* that any creditor that received such written consent shall be required to transmit such writings to Debtors' counsel upon request no later than ten (10) business days from the date of such request.
- (h) **Timely Service.** Each Proof of Claim Must be filed, including supporting documentation, by either (i) electronic submission through PACER (Public Access to Court Electronic Records at <http://ecf.txsb.uscourts.gov>), (ii) electronic submission using the interface available on the Claims and Noticing Agents website at <http://donlinrecano.com/castex>, or (iii) if submitted through non-electronic means, by U.S. mail or other hand delivery system, so as to be **actually received** by the Claims and Noticing Agent on or before the Claims Bar Date or the Governmental Bar Date, or other applicable Bar Date, at the following address:

By U.S. Mail, send to:

Donlin, Recano & Company, Inc.  
Re: Castex Energy 2005 Holdco, LLC, *et al.*  
P.O. Box 199043  
Blythebourne Station  
Brooklyn, NY 11219

By Overnight Mail, Courier, or Hand Delivery, send to:

Donlin, Recano & Company, Inc.  
Re: Castex Energy 2005 Holdco, LLC, *et al.*  
6201 15th Avenue  
Brooklyn, NY 11219

By Electronic Submission at:

<https://www.donlinrecano.com/Clients/cxe/FileClaim>

- (i) **Receipt of Service.** Claimants submitting a Proof of Claim through non-electronic means wishing to receive acknowledgement that their Proofs of Claim were received by the Claims and Noticing Agent must submit (i) a copy of the Proof of Claim (in addition to the original Proof of Claim sent to the Claims and Noticing Agent) and (ii) a self-addressed stamped envelope.

**V. CONSEQUENCES OF FAILING TO TIMELY FILE YOUR PROOF OF CLAIM**

Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), if you or any person or entity who is required, but fails, to file a Proof of Claim in accordance with the Bar Date Order on or before the applicable Bar Date, please be advised that:

- (a) YOU WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS (OR FILING A PROOF OF CLAIM WITH RESPECT THERETO);
- (b) THE DEBTORS AND THEIR PROPERTY SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO OR ARISING FROM SUCH CLAIM;
- (c) YOU WILL NOT RECEIVE ANY DISTRIBUTION IN THESE CHAPTER 11 CASES ON ACCOUNT OF THAT CLAIM; AND
- (d) YOU WILL NOT BE PERMITTED TO VOTE ON ANY PLAN OF REORGANIZATION FOR THE DEBTORS ON ACCOUNT OF THESE

BARRED CLAIMS OR RECEIVE FURTHER NOTICES REGARDING SUCH CLAIM.

## **VI. RESERVATION OF RIGHTS**

Nothing contained in this Bar Date Notice is intended to or should be construed as a waiver of the Debtors' rights to: (a) dispute, or assert offsets or defenses against, any filed claim or any claim listed or reflected in the Schedules and Statements as to the nature, amount, liability, or classification thereof; (b) subsequently designate any scheduled claim as disputed, contingent, or unliquidated; and (c) otherwise amend or supplement the Schedules and Statements.

## **VII. THE DEBTORS' SCHEDULES AND STATEMENTS**

You may be listed as a holder of a claim against, or interest in, one or more of the Debtor entities in the Debtors' Schedules and Statements. If you rely on the Debtors' Schedules and Statements, it is your responsibility to determine that the claim is accurately listed in the Schedules and Statements. However, if you agree with the nature, amount, and status of your claim as listed in the Debtors' Schedules and Statements, and if you do not dispute that your claim is only against the Debtor entity specified by the Debtors, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need **not** file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the Bar Date Order and the procedures set forth in this Bar Date Notice.

## **VIII. ADDITIONAL INFORMATION**

Copies of the Debtors' Schedules and Statements, the Bar Date Order, and other information regarding these Chapter 11 Cases are available for inspection free of charge on the Debtors' website at <https://www.donlinrecano.com/castex>. The Schedules and Statements and other filings in these Chapter 11 Cases are also available for a fee at the Court's website at <http://www.txs.uscourts.gov/bankruptcy>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Copies of the Schedules and Statements and other documents filed in these Chapter 11 Cases may also be examined between the hours of 8:00 a.m. and 5:00 p.m., prevailing Central Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of Texas, United States Courthouse, 515 Rusk Street, Houston, Texas 77002.

<p><b>A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS BAR DATE NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF CLAIM.</b></p>
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Dated: March 3, 2021.

**OKIN ADAMS LLP**

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**PROPOSED ATTORNEYS FOR THE  
DEBTORS**