



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

In re: § Chapter 11
§
REMORA PETROLEUM, L.P., *et al.*, § Case No. 20-34037 (DRJ)
§
Debtors.¹ § (Joint Administration Requested)
§

NOTICE OF DISCLOSURE STATEMENT HEARING

TO: ALL HOLDERS OF CLAIMS AGAINST, AND HOLDERS OF EQUITY INTERESTS IN, REMORA PETROLEUM, L.P. AND ITS AFFILIATED DEBTORS AND DEBTORS IN POSSESSION AND ALL OTHER PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER 11 CASES.

PLEASE TAKE NOTICE THAT on August 12, 2020 (the "**Petition Date**"), Remora Petroleum, L.P. and its affiliated debtors, as debtors and debtors in possession (collectively, the "**Debtors**"), each commenced a case under chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**") in the United States Bankruptcy Court for the Southern District of Texas (the "**Bankruptcy Court**").

PLEASE TAKE FURTHER NOTICE THAT on the Petition Date, the Debtors filed their (i) *Plan of Reorganization of Remora Petroleum, L.P. and its Affiliated Debtors* [Docket No. 21] (as may be amended, modified or supplemented from time to time, the "**Plan**"), (ii) *Disclosure Statement for Plan of Reorganization of Remora Petroleum, L.P. and its Affiliated Debtors* [Docket No. 22] (as may be amended, modified or supplemented from time to time, the "**Disclosure Statement**"),² and (iii) *Debtors' Emergency Motion for Entry of an Order (I) Scheduling Hearings on (A) Adequacy of Disclosure Statement and (B) Confirmation of Plan; (II) Establishing Deadlines to Object to Disclosure Statement and Plan; (III) Approving (A) Disclosure Statement as Containing Adequate Information, (B) Solicitation Procedures, (C) Form and Manner of Notice of Disclosure Statement and Confirmation Hearings, (D) Objection Deadlines, and (E) Notice of Non-Voting Status and Opt-Out Opportunity; (IV) Approving Procedures for Assumption of Contracts and Leases and Form and Manner of Cure Notice; and (V) Granting Related Relief* [Docket No. 24] (the "**Disclosure Statement Motion**").

PLEASE TAKE FURTHER NOTICE THAT a hearing (the "**Disclosure Statement Hearing**") is scheduled for September 15, 2020 at 3:00 p.m. (Prevailing Central Time) to approve

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Remora Petroleum, L.P. (4348); Remora Petroleum GP, LLC (4291); Remora Operating CA, LLC (1853); Remora Operating, LLC (7595); and Remora Operating Louisiana, LLC (0662). The location of the Debtors' main corporate headquarters and the Debtors' service address is: Building II, 807 Las Cimas Pkwy, Suite 275, Austin, TX 78746.

² Capitalized terms used but not otherwise defined herein will have the meanings set forth in the Plan.

the adequacy of the Disclosure Statement and certain related relief. The Disclosure Statement Hearing will take place in Courtroom 400, 4th Floor, 515 Rusk Street, Houston, TX 77002 or via videoconference, if necessary.³ The Disclosure Statement Hearing may be continued from time to time by the Bankruptcy Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Bankruptcy Court and served on such parties as the Bankruptcy Court may order. Moreover, the Disclosure Statement may be modified or amended, if necessary, pursuant to section 1127 of the Bankruptcy Code, prior to, during or as a result of the Confirmation Hearing, without further notice to parties in interest.

PLEASE TAKE FURTHER NOTICE THAT if you would like to obtain a copy of the Disclosure Statement, the Plan or related documents, you should contact Donlin Recano & Company, Inc., the voting and claims agent retained by the Debtors in these Chapter 11 Cases, by: (i) calling the Debtors' restructuring hotline at 1-800-236-1551 (Toll Free U.S. or Canada) or 212-771-1128 (international); (ii) visiting the Debtors' restructuring website at: <https://www.donlinrecano.com/remora>; and/or (iii) writing to Remora Claims Processing Center, c/o Donlin, Recano & Company, Inc., P.O. Box 199043, Blythebourne Station, Brooklyn, New York 11219. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://www.txs.uscourts.gov/bankruptcy> or free of charge at www.donlinrecano.com/remora.

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the adequacy of the Disclosure Statement or the relief sought in connection therewith must: (i) be in writing; (ii) conform to the Bankruptcy Rules and the Bankruptcy Local Rules; (iii) state the name and address of the objecting party and the amount and nature of the Claim or Equity Interest held by such Entity; (iv) state with particularity the basis and nature of any objection; and (v) be filed, contemporaneously with a proof of service, with the Bankruptcy Court and served on each of the following parties (the "**Notice Parties**") so that it is actually received by no later than 4:00 p.m. (Prevailing Central Time) on September 11, 2020 (the "**Disclosure Statement Objection Deadline**").

Notice Parties. The Notice Parties include:

- Counsel to the Debtors: Hunton Andrews Kurth LLP, 600 Travis Street, Suite 4200, Houston, TX (Attn: Timothy A. Davidson II, Esq., Joseph P. Rovira, Esq., and Catherine A. Diktaban, Esq.) (taddavidson@huntonak.com, josephrovira@huntonak.com, and cdiktaban@huntonak.com);

³ If the hearing occurs over videoconference the Court will utilize GoToMeeting for the hearing. You should download the free GoToMeeting application on each device that will be used to connect to the hearing. If you choose to connect via a web browser, available literature suggests that Chrome is the preferred browser. Please note that connecting through a browser may limit the availability of some GoToMeeting features. To connect to the hearing, you should enter the meeting code "JudgeJones". You can also connect using the link on Judge Jones' homepage on the Southern District of Texas website. Once connected to GoToMeeting, click the settings icon in the upper right corner and enter your name under the personal information setting. In either event, audio for the Disclosure Statement Hearing will be available by using the Court's regular dial-in number. The dial-in number is +1 (832) 917-1510. You will be responsible for your own long-distance charges. You will be asked to key in the conference room number. Judge Jones' conference room number is 205691.

- Counsel to the DIP Agent: Thompson & Knight LLP, One Arts Plaza, 1722 Routh Street, Suite 1500, Dallas, TX (Attn: Shad E. Sumrow, Esq. and David Bennett, Esq.) (shad.sumrow@tklaw.com and david.bennett@tklaw.com);
- Counsel to any statutory committee appointed in these Chapter 11 Cases; and
- the Office of the United States Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002 (Attn: Stephen Statham, Esq. and Hector Duran, Esq.) (stephen.statham@usdoj.gov and hector.duranjr@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT only those objections made in writing and timely filed and received by the Disclosure Statement Objection Deadline will be considered by the Bankruptcy Court during the Disclosure Statement Hearing. If no objections to the Disclosure Statement Motion are timely and properly filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the relief requested in the Disclosure Statement Motion without further notice.

Dated: August 13, 2020

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II (TX Bar No. 24012503)

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Proposed Counsel for the Debtors and Debtors in Possession

THIS NOTICE IS BEING SENT TO YOU FOR INFORMATIONAL PURPOSES ONLY. IF YOU HAVE QUESTIONS WITH RESPECT TO YOUR RIGHTS UNDER THE PLAN OR ABOUT ANYTHING STATED HEREIN OR IF YOU WOULD LIKE TO OBTAIN ADDITIONAL INFORMATION, PLEASE CONTACT THE VOTING AND CLAIMS AGENT AT THE NUMBER OR ADDRESS SPECIFIED ABOVE. PLEASE NOTE THAT THE VOTING AND CLAIMS AGENT CANNOT PROVIDE LEGAL ADVICE.