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COUNSEL TO THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § Chapter 11
§
COLORADO 2002B LIMITED § Case No. 16-33743-BJH-11
PARTNERSHIP and COLORADO 2002C §
LIMITED PARTNERSHIP, § Jointly Administered
§
Debtors. §

**MOTION TO EXPEDITE HEARING ON EXPEDITED MOTION FOR ORDER
AUTHORIZING PLUGGING OF PARTNERSHIP WELLS**

Colorado 2002B Limited Partnership and Colorado 2002C Limited Partnership, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), for their Motion to Expedite (the “Motion to Expedite”) Hearing on Expedited Motion for Order Authorizing Plugging of Partnership Wells (the “Plugging Motion”), respectfully represent:

1. On the date hereof, Debtors filed their Plugging Motion, seeking entry of an order authorizing the Debtors to plug certain partnership wells subject to nearby horizontal drilling activity (the “Subject Wells”) pursuant to 11 U.S.C. § 363(b).

2. Presently, a hearing is set for May 17, 2017 at 1:15 p.m. to consider confirmation of the Debtors’ joint chapter 11 plan (the “Confirmation Hearing”). The Debtors understand that the proposed commencement of horizontal drilling activity near the Subject Wells is imminent,

potentially prior to the Confirmation Hearing, and, in any event, before the expiration of the regular notice and objection period for motions filed pursuant to section 363 of the Bankruptcy Code.

3. The Debtors seek to expedite the hearing on the Plugging Motion so that, in the event the Court determines that the proposed plugging of the Subject Wells is not in the Debtors' ordinary course of business, the Debtors may obtain approval of the proposed plugging prior to the commencement to the horizontal drilling and in advance of the Confirmation Hearing while the Debtors still own the Subject Wells.¹

4. The Debtors request that a hearing on the Plugging Motion be held on the week of May 8, 2017 or such other time as the Court's calendar permits.

WHEREFORE, the Debtors respectfully requests that the Court (i) expedite the hearing on the Plugging Motion to take place during the week of May 8, 2017 and (ii) grant such other and further relief as may be just and proper.

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¹ As set forth in the Plugging Motion, the Debtors believe that plugging the Subject Wells falls within the ordinary course of the Debtors' business and filed the Plugging Motion out of an abundance of caution.

Respectfully submitted this 1st day of May, 2017.

GRAY REED & McGRAW LLP

By: /s/ Jason S. Brookner

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of May, 2017, she caused a true and correct copy of the foregoing document to be served on the parties appearing on the attached Limited Service List via first class United States mail, postage prepaid and, on those parties who have so-subscribed, via the Court's CM-ECF Notification System.

/s/ Lydia R. Webb

Lydia R. Webb