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

IN RE:	§	
	§	CASE NO. 15-35615
RAAM GLOBAL ENERGY COMPANY,	§	
et al.	§	(Chapter 11)
	§	•
	§	JOINTLY ADMINISTERED
DEBTORS.	§	

NOTICE OF ADDITIONAL INFORMATION REGARDING CERTAIN OIL AND GAS PROPERTIES IN CALIFORNIA

PLEASE TAKE NOTICE:

- The Debtors made certain disclosures in sections 3.02 and 3.05(N) of the Second Amended Disclosure Statement for the Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 265] (the "Disclosure Statement")¹ and at the hearing thereon related to properties that are not proposed to be purchased by the Stalking Horse Bidder where Ace has not issued bonds. In addition to these wells discussed in sections 3.02 and 3.05(N) of the Disclosure Statement, there are four wells that are onshore that are also not proposed to be purchased by the Stalking Horse Bidder where Ace has not issued bonds.² In Schedule 2.2(d) in the *Notice of Filing of Exhibit to Disclosure Statement* [Docket No. 266] ("Exhibit Notice"), the Debtors previously disclosed that these additional four wells would be excluded from the properties to be purchased by the Stalking Horse Bidder.
- Pursuant to the Order Setting Administrative and Priority Claims Bar Date [Docket No. 272] (the "Administrative and Priority Claim Bar Date Order"), any request for payment of an Administrative Expense Claim³ incurred during the period between the Petition Date and January 13, 2016 that is not related to the assets proposed to be acquired by the Stalking Horse Bidder must be filed on the docket of the Cases on or before January 13, 2016 or

superior priority than that of a general unsecured creditor pursuant to Bankruptcy Code § 503(b) or otherwise. For the avoidance of doubt, except to the extent provided otherwise in the Administrative and Priority Claims Bar Date Order, the Administrative Expense Claims and Priority Claims subject to the Administrative and Priority Claims Bar Date include (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, and (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.

¹ Capitalized terms used but not defined herein shall have the meaning given in the Disclosure Statement or the Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code (the "Plan"), as applicable.

² Gump Trust No. 1, Gump Trust No. 2, Gump Trust No. 3, and BMWD No. 1.

³ Administrative Expense Claims and Priority Claims include any asserted expense or claim seeking a higher or

will forever be barred from doing so. The Court has set January 14, 2016 at 2:00 p.m. (Central Time) as the date and time for hearing on confirmation of the Plan and to consider any objections to the Plan. The confirmation hearing will be held at the United States Bankruptcy Court, Southern District of Texas, Houston Division, Courtroom 404, 515 Rusk Street, Houston, Texas. The hearing may be adjourned from time to time without further notice other than an announcement of the adjourned date(s) at the hearing, and, thereafter, at any adjourned hearing(s). In addition, the Plan may be modified without further notice prior to or as a result of the confirmation hearing, and, thereafter, as otherwise provided in the Bankruptcy Code.

3. Any objection to confirmation of the Plan must be filed on the docket of the Cases on or before January 12, 2016. To the extent that you hold an impaired claim and have the opportunity to vote on the Plan, the Court has fixed January 12, 2016 as the deadline for the receipt of Ballots evidencing the votes accepting or rejecting the Plan.

Dated: January 4, 2016

Respectfully submitted,

VINSON & ELKINS LLP

By: <u>/s/ Bradley R. Foxman</u>

Harry A. Perrin, SBT # 1579800 John E. West, SBT # 21202500 Reese A. O'Connor, SBT # 24092910 First City Tower 1001 Fannin Street, Suite 2500 Houston, TX 77002-6760

Tel: 713.758.2222 Fax: 713.758.2346

hperrin@velaw.com; jwest@velaw.com

roconnor@velaw.com

and

William L. Wallander, SBT # 20780750 Bradley R. Foxman, SBT # 24065243 Trammell Crow Center 2001 Ross Avenue, Suite 3700 Dallas, Texas 75201

Tel: 214.220.7700 Fax: 214.999.7787

bwallander@velaw.com; bfoxman@velaw.com

ATTORNEYS FOR THE DEBTORS