

Exhibit A

Proposed Order

**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.,¹	§	(Chapter 11)
	§	
DEBTORS.	§	(JOINTLY ADMINISTERED)
	§	

**ORDER AUTHORIZING UPSTREAM
EXPLORATION LLC TO FILE SEALED DOCUMENT**

Upon the motion (the “Motion”)² of Upstream Exploration LLC (“Upstream”) for entry of an order (this “Order”), authorizing Upstream to file under seal unredacted versions of the Response and the Declaration, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that notice of the Motion having been adequate and appropriate under the circumstances; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. Upstream is authorized to file under seal unredacted versions of the Response and the Declaration.
3. The unredacted Response and the unredacted Declaration shall remain under seal and shall only be served on WesternGeco.
4. Upstream is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number were RAAM Global Energy Company [2973], Century Exploration New Orleans, LLC [4948], Century Exploration Houston, LLC [9624], and Century Exploration Resources, LLC [7252].

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2016
Houston, Texas

HON. MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE