

Jason S. Brookner
Texas Bar No. 24033684
Lydia R. Webb
Texas Bar No. 24083758
Amber M. Carson
Texas Bar No. 24075610
GRAY REED & McGRAW LLP
1601 Elm Street, Suite 4600
Dallas, TX 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332

PROPOSED COUNSEL TO THE DEBTORS

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

In re:	§	Chapter 11
	§	
ROCKIES REGION 2006 LIMITED PARTNERSHIP,	§	Case No. 18-33513-sgj-11
	§	
Debtor.	§	
<hr/>		
In re:	§	Chapter 11
	§	
ROCKIES REGION 2007 LIMITED PARTNERSHIP,	§	Case No. 18-33514-sgj-11
	§	
Debtor.	§	(Request for Joint Administration Pending)
	§	

**REQUEST FOR EMERGENCY CONSIDERATION OF
CERTAIN FIRST DAY MATTERS**

On October 30, 2018, Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership (together, the “Debtors”), each filed a petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors request emergency consideration of the following initial case matters at the Court’s earliest convenience:

- Motion Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 1015-1 for an Order Directing Joint Administration of Cases [Docket No. 5];

- Motion for Order Pursuant to Sections 102 and 105(a) of the Bankruptcy Code and Bankruptcy Rules 2002(m) and 9007 Establishing Notice Procedures [Docket No. 6];
- Motion for Order Pursuant to Sections 345, 363, 1107 and 1108 of the Bankruptcy Code Authorizing Continued Use of Existing (I) Cash Management System, (II) Bank Accounts and (III) Business Forms [Docket No. 7]; and
- Debtors' Application Pursuant to 28 U.S.C. § 156(c) for Order (i) Authorizing the Employment and Retention of BMC Group, Inc., as Noticing, Solicitation and Tabulation Agent and (ii) Appointing BMC Group, Inc. as Agent of the Bankruptcy Court [Docket No. 8].

Respectfully submitted this 31st day of October, 2018.

GRAY REED & McGRAW LLP

By: /s/ Jason S. Brookner

Jason S. Brookner

Texas Bar No. 24033684

Lydia R. Webb

Texas Bar No. 24083758

Amber M. Carson

Texas Bar No. 24075610

1601 Elm Street, Suite 4600

Dallas, Texas 75201

Telephone: (214) 954-4135

Facsimile: (214) 953-1332

Email: jbrookner@grayreed.com

lwebb@grayreed.com

acarson@grayreed.com

PROPOSED COUNSEL TO THE DEBTORS

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 31st day of October, 2018, she conferred with Stephen McKitt of the Office of the United States Trustee regarding the relief requested herein. Mr. McKitt stated that he did not oppose the relief being sought.

/s/ Lydia R. Webb

Lydia R. Webb