

Robin Russell  
Texas Bar. No. 17424001  
Joseph P. Rovira  
Texas Bar No. 24066008  
Michele R. Blythe  
Texas Bar No. 24043557  
Edward A. Clarkson, III  
Texas Bar No. 24059118  
**HUNTON ANDREWS KURTH LLP**  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4200  
Facsimile: (713) 220-4285

**COUNSEL TO PDC ENERGY, INC.**

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

In re: § Chapter 11  
§  
ROCKIES REGION 2006 LIMITED § Case No. 18-33513-sgj-11  
PARTNERSHIP and ROCKIES REGION §  
2007 LIMITED PARTNERSHIP,<sup>1</sup> § (Jointly Administered)  
§  
Debtors. §

**PDC ENERGY, INC.’S FINAL WITNESS AND EXHIBIT LIST FOR JUNE 20, 2019  
HEARING ON APPLICATION TO RETAIN HARNEY MANAGEMENT PARTNERS  
AND DESIGNATE RESPONSIBLE PARTY AND MOTION TO DISMISS  
[Relates to Motion at Docket Nos. 12, 85, and 140]**

PDC Energy, Inc. (“PDC”) submits this Final Witness and Exhibit List for the hearing to be held on **June 20, 2019, at 9:30 a.m. (prevailing Central Time)** (the “Hearing”) on the Debtors’ Application for Order (I) Authorizing the Retention of Harney Management Partners to Provide Responsible Party and Additional Personnel, (II) Designating Karen Nicolaou as Responsible Party Effective as of the Petition Date, and (III) Granting Related Relief [Docket No. 12] and the Plaintiffs’ Motion and Amended Motion for Dismissal of Chapter 11 Case

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Rockies Region 2006 Limited Partnership (9573) (“RR2006”) and Rockies Region 2007 Limited Partnership (8835) (“RR2007”).

[Docket Nos. 85 and 140]. PDC submits this Final Witness and Exhibit List in accordance with the Agreed Scheduling Order entered by the Court [Docket No. 135 at 3].

**I. PDC’S WITNESSES**

PDC may call the following witnesses at the Hearing:

1. Karen Nicolaou;
2. Darwin Stump;
3. Any witness listed by any other party; and
4. Rebuttal witnesses as necessary.

**II. PDC’S EXHIBITS**

PDC submits this Exhibit List in connection with the Hearing:

| <b>EX. NO.</b> | <b>DESCRIPTION</b>   | <b>OFFERED</b> | <b>OBJECTED</b> | <b>ADMITTED/<br/>NOT<br/>ADMITTED</b> | <b>DISPOSITION<br/>AFTER HEARING</b> |
|----------------|--|----------------|-----------------|---------------------------------------|--------------------------------------|
| 201            | Confidential Private Placement Offering Memorandum for Rockies Region 2006 Limited Partnership<br>[PDCRR6RR700002562 to PDCRR6RR700002764] |                |                 |                                       |                                      |
| 202            | Confidential Private Placement Offering Memorandum Rockies Region 2007 Limited Partnership<br>[PDCRR6RR700002359 to PDCRR6RR700002561]     |                |                 |                                       |                                      |
| 203            | Form of Limited Partnership Agreement of Rockies Region 2006 Limited Partnership<br>[PDCRR6RR700002779 to PDCRR6RR700002825]               |                |                 |                                       |                                      |

| EX. NO. | DESCRIPTION   | OFFERED | OBJECTED | ADMITTED/<br>NOT<br>ADMITTED | DISPOSITION<br>AFTER HEARING |
|---------|---|---------|----------|------------------------------|------------------------------|
| 204     | Form of Limited Partnership Agreement of Rockies Region 2007 Limited Partnership<br>[PDCRR6RR700002296 to PDCRR6RR700002344]                  |         |          |                              |                              |
| 205     | Form of Drilling and Operating Agreement for Rockies Region 2006 Limited Partnership<br>[PDCRR6RR700002765 to PDCRR6RR700002778]              |         |          |                              |                              |
| 206     | Form of Drilling and Operating Agreement for Rockies Region 2007 Limited Partnership<br>[PDCRR6RR700002345 to PDCRR6RR700002358]              |         |          |                              |                              |
| 207     | Assignments of Working Interest Wellbore Only from PDC to Rockies Region 2006 Limited Partnership<br>[PDCRR6RR700000656 to PDCRR6RR700000672] |         |          |                              |                              |
| 208     | Assignments of Working Interest Wellbore Only from PDC to Rockies Region 2007 Limited Partnership<br>[PDCRR6RR700000673 to PDCRR6RR700000682] |         |          |                              |                              |

| EX. NO. | DESCRIPTION  | OFFERED | OBJECTED | ADMITTED/<br>NOT<br>ADMITTED | DISPOSITION<br>AFTER HEARING |
|---------|--|---------|----------|------------------------------|------------------------------|
| 209     | Retention Agreement between Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership and Bridgepoint Consulting LLC<br>[Docket No. 12 at 15-21] |         |          |                              |                              |
| 210     | Rockies Region 2006 Limited Partnership Form 10-Q for the quarterly period ended Sept. 30, 2015  |         |          |                              |                              |
| 211     | Rockies Region 2007 Limited Partnership Form 10-K for the quarterly period ended Dec. 31, 2016   |         |          |                              |                              |
| 212     | Rockies Region 2006 Limited Partnership Form 8-K dated May 11, 2018  |         |          |                              |                              |
| 213     | Rockies Region 2007 Limited Partnership Form 8-K dated May 11, 2018  |         |          |                              |                              |
| 214     | Any exhibit introduced by any other party  |         |          |                              |                              |
| 215     | Rebuttal exhibits as necessary   |         |          |                              |                              |

### III. SCHEIG

Debtors have filed their Expedited Motion to Exclude Expert Reports and Testimony of Gregory E. Scheig [Docket No. 192] ("Scheig Motion"). PDC will be filing a joinder to the Scheig Motion. To the extent that the Court allows Mr. Scheig to testify at the Hearing, PDC intends to cross-examine Mr. Scheig.

On May 13, 2019, each Plaintiff served his written responses to PDC's First Set of Requests for Production of Documents. During the meet and confer on May 24, 2019, counsel for Plaintiffs indicated that documents would be produced on May 28, 2019, in advance of the Status Conference on May 29, 2019. This production was to include documents responsive to the 48 Requests for Production where Plaintiffs each individually indicated responsive documents would be produced. Plaintiffs have still failed to produce documents responsive to requests that seek information related to Mr. Scheig including Request for Production No. 98, 99, 100, and 101. PDC reserves the right to supplement this Exhibit List following any additional document production by Plaintiffs.

**IV. RESERVATION OF RIGHTS**

PDC reserve its right to amend or supplement this Witness and Exhibit List as necessary in advance of the Hearing.

Respectfully submitted,

**HUNTON ANDREWS KURTH LLP**

By:           /s/ Michele R. Blythe            
Robin Russell (TX Bar #17424001)  
Joseph P. Rovira (TX Bar #24066008)  
Michele R. Blythe (TX Bar #24043557)  
Edward A. Clarkson, III (TX Bar #24059118)  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4200  
Facsimile: (713) 220-4285  
russell@HuntonAK.com  
josephrovira@HuntonAK.com  
micheleblythe@HuntonAK.com  
edwardclarkson@HuntonAK.com

**COUNSEL TO PDC ENERGY, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the forgoing document was served on June 10, 2019 via the Bankruptcy Court's Electronic Case Filing notification system on those parties registered to receive such notices.

Thomas G. Foley, Jr.  
tfoley@foleybezek.com  
Aaron L. Arndt  
aarndt@foleybezek.com  
FOLEY BEZEK BEHLE & CURTIC, LLP  
15 West Carrillo St.  
Santa Barbara, CA 93101

Mark A. Weisbart  
mark@weisbartlaw.net  
James S. Brouner  
jbrouner@weisbartlaw.net  
THE LAW OFFICE OF MARK A. WEISBART  
12770 Coit Rd., Suite 541  
Dallas, TX 75251

Jason S. Brookner  
jbrookner@grayreed.com  
Lydia R. Webb  
lwebb@grayreed.com  
Amber M. Carson  
acarson@grayreed.com  
GRAY REED & MCGRAW LLP  
1601 Elm Street, Suite 4600  
Dallas, TX 75201

*/s/ Michele R. Blythe*  
\_\_\_\_\_  
Michele R. Blythe