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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
§
ROCKIES REGION 2006 LIMITED §
PARTNERSHIP and ROCKIES REGION § Case No. 18-33513-sgj-11
2007 LIMITED PARTNERSHIP, §
§
Debtors. § Jointly Administered

**SUPPLEMENT TO FIRST AND FINAL APPLICATION OF
GRAY REED & McGRAW LLP FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
OCTOBER 30, 2018 THROUGH OCTOBER 21, 2019
[Relates to Docket No. 288]**

Gray Reed & McGraw LLP (“Gray Reed” or “Applicant”), counsel to Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership, the above-captioned debtors and debtors in possession (together, the “Debtors”), pursuant to section 330 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”) and the Guidelines for Compensation and Reimbursement of Professionals in Chapter 11 Cases (Appendix F to the

Local Rules), hereby files its *Supplement* (the “Supplement”) to the *First and Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period October 30, 2018 Through October 21, 2019* [Docket No. 288] (“Application”).¹

1. After filing its Application on November 4, 2019 [Docket No. 288], Gray Reed discovered additional time entries totaling \$2,271.50 in fees incurred during the Application Period. These additional entries were inadvertently excluded from Gray Reed’s invoices and, thus, were not accounted for in the total fees requested by Gray Reed in the Application. The additional time entries are reflected on the invoices attached hereto as Exhibit A.

2. Gray Reed hereby supplements its Application to request approval of, and reimbursement for, the additional fees reflected on Exhibit A.

3. Furthermore, attached hereto as Exhibits B, C and D, respectively, are a revised (i) Application cover sheet, (ii) summary chart of time and fees incurred by matter during the Application Period, and (iii) proposed order granting the Application. The amounts reflected on the revised exhibits are inclusive of the additional time and fees set forth on Exhibit A.

4. As supplemented, Gray Reed seeks final approval of \$1,046,546.50 in fees and \$21,100.15 in expenses incurred during the Application Period.

WHEREFORE Gray Reed respectfully requests that the Court (i) grant the Application, as hereby supplemented, (ii) enter the proposed order attached hereto as Exhibit D, and (iii) grant Gray Reed such other and further relief to which it is justly entitled.

¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Application.

Respectfully submitted this 13th day of November, 2019.

GRAY REED & MCGRAW LLP

By: /s/ Jason S. Brookner

Jason S. Brookner

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lwebb@grayreed.com

acarson@grayreed.com

COUNSEL TO THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 13th day of November, 2019, he caused a true and correct copy of the foregoing document to be served on the Limited Service List in accordance with the Court's Notice Procedures Order, via first class U.S. Mail, postage prepaid, or electronic mail, when available.

/s/ Jason S. Brookner

Jason S. Brookner

EXHIBIT A
INVOICES



GRAY REED

ATTORNEYS & COUNSELORS

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056
Federal Tax Identification Number: 81-4045088

Bill Date: November 13, 2019
Client.Matter: 019587.000008
Attorney: Jason S. Brookner
Invoice: 524075
Page: 1 of 2

Rockies Region 2006 LP et al.
c/o Karen Nicolaou, Harney Management Partners, LLC
knicolaou@harneypartners.com

Attention: Karen Nicolaou, Responsible Party

RE: Case Administration

Bill-at-a-Glance – for services through October 21, 2019

Professional Services	\$118.00
Total this Invoice	\$118.00
Previous Balance	\$30,087.00
Total Now Due	\$30,205.00

Please remit payment to:
Gray Reed & McGraw
ATTN: Accounts Receivable
1300 Post Oak Boulevard
Suite 2000
Houston, TX 77056

Wire Instructions:
Domestic Routing #: 114000093 | Frost Bank
100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725
Beneficiary Name: Gray Reed & McGraw Depository

Credit Card Payment:
Pay your invoice online by using this internet address:
<https://www.grayreed.com/Online-Bill-Pay>

Reference: 019587.000008 **Invoice #** 524075

For questions about this bill please call 1.888.908.8159 or
e-mail us at ar@grayreed.com

Visit us at www.grayreed.com

Dallas
Phone: 214.954.4135
Facsimile: 214.953.1332

Houston
Phone: 713.986.7000
Facsimile: 713.986.7100

||| Gray Reed & McGraw

Rockies Region 2006 LP et al.
 c/o Karen Nicolaou, Harney Management Partners,
 LLC
 knicolaou@harneypartners.com

Bill Date: November 13, 2019
 Client.Matter: 019587.000008
 Invoice: 524075
 Page: 2 of 2

Matter 000008 – Case Administration

Professional Services - Detail

Date	Tkpr	Description of Services	Hours	Amount
10/14/19	CDP	Finalize and file updated limited service list (.3); Email same to BMC to serve (.1).	0.40	\$ 118.00
Total Professional Services			0.40	\$118.00

Professional Services - Timekeeper Summary

Person	Hours	Rate	Amount
CDP Clark D. Patterson	0.40	\$295.00	\$118.00



GRAY REED

ATTORNEYS & COUNSELORS

1300 Post Oak Boulevard, Suite 2000, Houston, Texas 77056
Federal Tax Identification Number: 81-4045088

Bill Date: November 13, 2019
Client.Matter: 019587.000019
Attorney: Jason S. Brookner
Invoice: 524082
Page: 1 of 2

Rockies Region 2006 LP et al.
c/o Karen Nicolaou, Harney Management Partners, LLC
knicolaou@harneypartners.com

Attention: Karen Nicolaou, Responsible Party

RE: Plan and Disclosure Statement

Bill-at-a-Glance – for services through October 21, 2019

Professional Services	\$2,153.50
Total this Invoice	\$2,153.50
Previous Balance	\$165,009.00
Total Now Due	\$167,162.50

Please remit payment to:
Gray Reed & McGraw
ATTN: Accounts Receivable
1300 Post Oak Boulevard
Suite 2000
Houston, TX 77056

Wire Instructions:
Domestic Routing #: 114000093 | Frost Bank
100 W. Houston St., San Antonio, TX 78205

International SWIFT #: FRSTUS44

Beneficiary Account #: 502399725
Beneficiary Name: Gray Reed & McGraw Depository

Credit Card Payment:
Pay your invoice online by using this internet address:
<https://www.grayreed.com/Online-Bill-Pay>

Reference: 019587.000019 **Invoice #** 524082

For questions about this bill please call 1.888.908.8159 or
e-mail us at ar@grayreed.com

Visit us at www.grayreed.com

Dallas
Phone: 214.954.4135
Facsimile: 214.953.1332

Houston
Phone: 713.986.7000
Facsimile: 713.986.7100

||| Gray Reed & McGraw

Rockies Region 2006 LP et al.
 c/o Karen Nicolaou, Harney Management Partners,
 LLC
 knicolaou@harneypartners.com

Bill Date: November 13, 2019
 Client.Matter: 019587.000019
 Invoice: 524082
 Page: 2 of 2

Matter 000019 – Plan and Disclosure Statement

Professional Services - Detail

Date	Tkpr	Description of Services	Hours	Amount
10/01/19	CDP	Assist attorney with preparation for confirmation hearing (3.2); Confer with L. Webb regarding confirmation hearing exhibits (.2); Finalize and file notice of proposed orders (.2); Finalize and file brief in support of confirmation of chapter 11 plan (.2); Finalize and file amended exhibit and witness list (.2); Email to BMC to serve same (.2).	4.20	\$ 1,239.00
10/01/19	CDP	Assist attorney with preparation for confirmation hearing (2.6); Draft letter to Court enclosing notebook containing confirmation hearing exhibits (.3) Coordinate delivery of same (.2).	3.10	\$ 914.50
Total Professional Services			7.30	\$2,153.50

Professional Services - Timekeeper Summary

Person	Hours	Rate	Amount
CDP Clark D. Patterson	7.30	\$295.00	\$2,153.50

EXHIBIT B
REVISED COVER SHEET

Jason S. Brookner
 Texas Bar No. 24033684
 Lydia R. Webb
 Texas Bar No. 24083758
 Amber M. Carson
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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
	§	
ROCKIES REGION 2006 LIMITED	§	
PARTNERSHIP and ROCKIES REGION	§	Case No. 18-33513-sgj-11
2007 LIMITED PARTNERSHIP,	§	
	§	
Debtors.	§	Jointly Administered

**REVISED SUMMARY OF FIRST AND FINAL APPLICATION OF
 GRAY REED & McGRAW LLP FOR ALLOWANCE OF COMPENSATION
 AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
OCTOBER 30, 2018 THROUGH OCTOBER 21, 2019**

1. Applicant:	Gray Reed & McGraw LLP
2. Application Period:	October 30, 2018 through October 21, 2019
3. Date of Order Authorizing Employment:	December 20, 2018 [Docket No. 106]
4. Date Services Were Commenced by Applicant:	October 30, 2018
5. Prior Fee Applications:	N/A
6. Prior Fees Awarded:	N/A
7. Prior Expenses Awarded:	N/A

8. Date of Orders Awarding Prior Fees and Expenses:	N/A
9. Amount of Prepetition Retainer:	\$27,000.72 ¹
10. Total Fees Requested in This Final Application:	\$1,046,546.50 ²
11. Total Expenses Requested in This Final Application:	\$21,100.15
12. Blended Rate for All Professionals:	\$517.14
13. Blended Rate for Attorneys Only:	\$544.72

¹ Gray Reed has a pre-petition retainer (the “Retainer”) with a balance of \$27,000.72. Gray Reed seeks authority to draw down \$17,000 of the retainer to pay a portion of its authorized fees, with the remainder of the retainer staying intact to pay post-Effective Date legal fees.

² As set forth below, this amount includes estimated fees of \$10,000.00 that Gray Reed anticipates it will incur in connection with the preparation and prosecution of this Application, as well as the other final fee applications Gray Reed is filing on behalf of the Debtors’ professionals.

APPLICATION PERIOD

NAME	DATE OF FIRST BAR ADMISSION	POSITION	BILLABLE RATE	HOURS WORKED	VALUE OF SERVICES RENDERED
ATTORNEYS					
William B. Chaney	1977	Partner	\$725.00	3.50	\$2,537.50
Jason S. Brookner	1995	Partner	\$685.00	336.60	\$230,571.00
James J. Ormiston	1987	Partner	\$650.00	322.40	\$209,560.00
Charles W. Sartain	1976	Partner	\$600.00	0.50	\$300.00
Andrew K. York	2005	Partner	\$515.00	0.40	\$206.00
Maura J. Bindler	1991	Partner	\$650.00	10.10	\$6,565.00
Micheal W. Bishop	1988	Senior Counsel	\$575.00	2.40	\$1,380.00
Lydia R. Webb	2012	Associate	\$525.00	101.40	\$53,235.00
			\$485.00	808.60	\$392,171.00
William N. Drabble	2010	Partner	\$425.00	9.90	\$4,207.50
Skyler Y. Stuckey	2011	Partner	\$415.00	38.90	\$16,143.50
			\$0.00	3.30	\$0.00
Amber M. Carson	2012	Associate	\$455.00	4.60	\$2,093.00
			\$395.00	125.00	\$49,375.00
Kelley C. Morris		Associate	\$395.00	35.20	\$13,904.00
Trevor C. Lawhorn	2017	Associate	\$295.00	0.90	\$265.50
SUBTOTAL:				1,803.70	\$982,514.00
PARALEGALS AND OTHER PROFESSIONALS					
Clark D. Patterson	n/a	Paralegal	\$295.00	8.10	\$2,389.50
			\$285.00	147.80	\$42,123.00
Paul Savoy	n/a	Paralegal	\$285.00	16.50	\$4,702.50
Lan G. Lam	n/a	Paralegal	\$225.00	12.80	\$2,880.00
Veronica T. Salazar	n/a	Legal Assistant	\$125.00	15.50	\$1,937.50
SUBTOTAL:				200.70	\$54,032.50
Additional estimated fees for preparation and prosecution of this Application:				N/A	\$10,000.00
TOTAL (billed and estimated):				2,004.40	\$1,046,546.50

EXHIBIT C
REVISED SUMMARY CHART FOR TIME AND FEES
INCURRED DURING APPLICATION PERIOD

CATEGORY	HOURS WORKED	FEES BILLED
Asset Disposition	8.30	\$ 4,498.50
Business Operations	1.70	\$ 824.50
Case Administration	74.00	\$ 30,205.00
Claims Administration and Objections	0.70	\$ 339.50
Employment and Fee Applications	42.10	\$ 19,282.50
Employment and Fee Applications Objections	41.70	\$ 20,109.00
Litigation	1418.60	\$ 748,743.50
Meetings and Communications with Creditors	37.70	\$ 18,346.50
Non-Working Travel	15.80	\$ 10,322.50
Plan and Disclosure Statement	324.90	\$ 167,162.50
Reporting	38.20	\$ 16,373.00
Tax	0.70	\$ 339.50
TOTAL	2,004.40	\$1,036,546.50
Estimated fees for preparation and prosecution of this Application:	N/A	\$10,000.00
TOTAL	2,004.40	\$1,046,546.50

EXHIBIT D
REVISED PROPOSED ORDER

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

In re:	§	Chapter 11
	§	
ROCKIES REGION 2006 LIMITED	§	
PARTNERSHIP and ROCKIES REGION	§	Case No. 18-33513-sgj-11
2007 LIMITED PARTNERSHIP,	§	
	§	
Debtors.	§	Jointly Administered

**ORDER GRANTING FIRST AND FINAL APPLICATION
OF GRAY REED & MCGRAW LLP FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OCTOBER 30, 2018 THROUGH OCTOBER 21, 2019**

Upon the *First and Final Application of Gray Reed & McGraw LLP for Allowance of Compensation and Reimbursement of Expenses for the Period October 30, 2018 through October 21, 2019* [Docket No. 288, as supplemented by Docket No. ___] (the “Application”); and the Court having jurisdiction over the Application pursuant to 28 U.S.C. §§ 157 and 1334; and the Application being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that good

and sufficient notice of the Application has been given and no other or further notice is required; and after due deliberation and good cause appearing therefor,¹ it is

ORDERED that the Application be, and it hereby is, granted as set forth herein; and it is further

ORDERED that final compensation and reimbursement of expenses to Gray Reed is hereby allowed and approved in the aggregate amount of \$1,046,546.50 in fees and \$21,100.15 in expenses for the Application Period; and it is further

ORDERED that Gray Reed is hereby authorized to draw down the Retainer in the amount of \$17,000.00 in partial satisfaction of the fees and expenses approved herein, with the balance to be paid from the Administrative Reserve; and it is further

ORDERED that the Court retains jurisdiction over this Order and the matters addressed herein.

END OF ORDER

¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Application.