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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	§	Case No. 18-33513-sgj-11
PARTNERSHIP and ROCKIES REGION	§	
2007 LIMITED PARTNERSHIP, ¹	§	(Jointly Administered)
	§	
Debtors.	§	

**MOTION FOR EMERGENCY HEARING ON
DEBTORS' EMERGENCY APPLICATION FOR ORDER
AUTHORIZING THE RETENTION OF GRAVES & CO. CONSULTING
LLC TO PROVIDE ENGINEERING CONSULTING AND
EXPERT TESTIMONY SERVICES, EFFECTIVE AS OF DECEMBER 13, 2018**

Rockies Region 2006 Limited Partnership and Rockies Region 2007 Limited Partnership, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), for their Motion for Emergency Hearing (the “Motion”) on the Debtors’ Emergency Application (the “Application”) for Order Authorizing the Retention of Graves & Co. Consulting LLC (“Graves”)

¹ 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) and Rockies Region 2007 Limited Partnership (8835).

to Provide Engineering Consulting and Expert Testimony Services, Effective as of December 13, 2018, respectfully represent:²

1. Simultaneously herewith, the Debtors have filed the Application. The Debtors respectfully request that the Court set a hearing on the Application for Monday, December 17, 2019 at 1:30 p.m., when the Debtors will already be before the Court for (i) a hearing on the unopposed application to retain Gray Reed & McGraw LLP as counsel to the Debtors and (ii) a status conference.

2. As mentioned in the Application, and as will be discussed at the status conference on December 17, the Debtors, PDC Energy, and the LP Plaintiffs are intending to go to mediation, and expect to do so in either late January or February, 2019. The Debtors previously retained Graves prepetition and now require Graves' services to, among other things, review and comment on the Moritz Report. The Debtors and Graves require sufficient time to review the Moritz Report, respond thereto, and conduct discovery in order to participate meaningfully in the mediation. The Debtors expect that the LP Plaintiffs will depose a Graves representative, and the Debtors plan to depose Mr. Moritz. With the forthcoming holidays and New Year, and mediation to come early in 2019, there is little time for the Debtors and Graves to complete their review of the Moritz Report, engage in discovery and conduct depositions. In order to allow a meaningful opportunity for expert discovery and participation in the mediation process, and to ensure all parties have sufficient time to prepare for all facets of mediation, the Debtors respectfully submit that emergency consideration of the Application is appropriate. It is critical that Graves immediately commence rendering services to the estates, without delay, such that the mediation and associated discovery may remain on track and unfold in an efficient and expeditious manner.

² Capitalized terms used but not defined herein are defined in the Application.

NOTICE

3. The Debtors have provided notice of this Motion to: (a) the Office of the United States Trustee for the Northern District of Texas; (b) counsel to PDC; (c) counsel to the Limited Partner Plaintiff; and (d) those persons have requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

WHEREFORE, the Debtors respectfully request that the Court enter an Order: (i) setting an emergency hearing on the Application for December 17, 2019; and (ii) granting such other relief as is just and proper.

Respectfully submitted this 14th day of December, 2018.

GRAY REED & McGRAW LLP

By: /s/ Jason S. Brookner

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**PROPOSED COUNSEL TO THE
DEBTORS**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on multiple occasions between December 12 and December 14, 2018, he conferred with counsel to the LP Plaintiffs and counsel to PDC. Both sets of counsel consent to emergency consideration of the Application, without waiving any substantive rights with respect thereto.

/s/ Jason S. Brookner
Jason S. Brookner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of December, 2018, he caused a true and correct copy of the foregoing document to be served via the Court's CM/ECF system on all those who have so-subscribed and on the parties appearing on the Limited Service List maintained in these cases via first class United States mail, postage prepaid and, where possible, via electronic mail.

/s/ Jason S. Brookner
Jason S. Brookner

Exhibit A

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

**ORDER GRANTING MOTION FOR EMERGENCY HEARING
ON DEBTORS' EMERGENCY APPLICATION FOR ORDER
AUTHORIZING THE RETENTION OF GRAVES & CO. CONSULTING
LLC TO PROVIDE ENGINEERING CONSULTING AND EXPERT
TESTIMONY SERVICES, EFFECTIVE AS OF DECEMBER 13, 2018**

Upon the Motion for Emergency Hearing (the "Motion") on the Debtors' Emergency Application (the "Application") for Order Authorizing the Retention of Graves & Co. Consulting LLC ("Graves") to Provide Engineering Consulting and Expert Testimony Services, Effective as of December 13, 2018, filed by the above-captioned debtors and debtors in possession (collectively, the "Debtors"),¹ it is hereby

ORDERED that the Motion is **GRANTED** as set forth herein; it is further

¹ All capitalized terms used but otherwise not defined herein shall have the meanings set forth in the Application.

ORDERED that a hearing will be held on the Application on **Monday, December 17, 2019 at 1:30 p.m. (CST)** before the Honorable Stacey G. C. Jernigan, in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Earle Cabell Federal Building, 1100 Commerce Street, 14th Floor, Room 1421 (Courtroom #1), Dallas, TX 75242-1496; and it is further

ORDERED that the Debtors shall promptly provide notice of the hearing in the same manner as notice of the Application and the Motion were provided.

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

END OF ORDER

Submitted by:

GRAY REED & McGRAW LLP

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