

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

-----x Chapter 11
In re: :
: Case No. 08-62733
TRIAD RESOURCES, INC., :
: Judge C. Kathryn Preston
Debtor. :
-----x

In re: : Chapter 11
: Case No. 08-62744
TRIAD ENERGY CORPORATION, :
: Judge C. Kathryn Preston
Debtor. :
-----x

In re: : Chapter 11
: Case No. 08-62747
TRITEX ENERGY, L.L.C., :
: Judge C. Kathryn Preston
Debtor. :
-----x

In re: : Chapter 11
: Case No. 08-62749
TRITEX RESOURCES, L.L.C., :
: Judge C. Kathryn Preston
Debtor. :
-----x

In re: : Chapter 11
: Case No. 08-62757
TRIAD OIL & GAS CO., LTD., :
: Judge C. Kathryn Preston
Debtor. :
-----x

In re: : Chapter 11
: Case No. 08-62759
ALPHA DRILLING, LTD., :
: Judge C. Kathryn Preston
Debtor. :
-----x

MOTION OF DEBTORS AND DEBTORS IN POSSESSION, PURSUANT TO SECTIONS 102 AND 105(A) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002, 4001, 6007, 7016, 9007, 9013 AND 9014, ESTABLISHING: (I) OMNIBUS HEARING DATES; (II) CERTAIN CASE MANAGEMENT PROCEDURES; AND (III) GENERAL BACKGROUND INFORMATION

Triad Resources, Inc. ("TRI"), Triad Energy Corporation ("TEC"), TriTex Energy, L.L.C. ("TEL"), TriTex Resources, L.L.C. ("TRL"), Triad Oil & Gas Co., Ltd. ("TOG") and Alpha Drilling, Ltd. ("ADL") (each a "Debtor" and debtor-in-possession and collectively, the "Debtors"), the debtors and debtors in possession in the above-captioned Chapter 11 cases (the "Cases"), by and through their undersigned proposed counsel, hereby move (the "Motion"), pursuant to sections 102 and 105(a) of title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002, 4001, 6007, 7016, 9007, 9013 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for the entry of an order establishing: (a) omnibus hearing dates; (b) certain case management procedures; and (c) general background information. In support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§157 and 1334. Consideration of the Motion is a core proceeding pursuant to 28 U.S.C. §157(b)(2).
2. Venue is proper in this District pursuant to 28 U.S.C. §§1408 and 1409.
3. The statutory predicates for the relief requested herein are sections 102 and 105(a) of the Bankruptcy Code and Bankruptcy Rules 2002, 4001, 6007, 7016, 9007, 9013 and 9014 and Rules 1007-2 and 9029-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of Ohio (as amended from time to time, the "Local Rules").

BACKGROUND

4. On the date hereof (the "Petition Date"), the Debtors each filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

5. The Debtors are operating their respective businesses as a debtor and debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner or official committee of unsecured creditors has been appointed.

6. Detailed facts about the Debtors, the reasons for the commencement of their Cases, and additional support for this Motion are set forth in the Affidavit of James R. Bryden in Support of Chapter 11 Petition and First Day Motions (the "Bryden Affidavit"), filed contemporaneously herewith.

RELIEF REQUESTED

7. By this Motion, the Debtors seek an order under sections 102(1) and 105(a) of the Bankruptcy Code and Bankruptcy Rules 2002, 4001, 6007, 7016, 9007, 9013 and 9014 establishing: (a) omnibus hearing dates; (b) certain case management procedures; and (c) general background information.

8. The Debtors have approximately 1,600 potential creditors and, because of the nature of their approximately 3,400 oil and gas properties, may have thousands of parties interest. The Debtors anticipate that more than a hundred creditors and other parties in interest may file requests for service in these Cases. The Debtors also expect that numerous motions and applications will be filed in these Cases in pursuit of various forms of relief. By scheduling regular monthly omnibus hearings in advance, parties in interest (an certainly the Debtors) will be better able to plan for and attend hearings. This will reduce the need for emergency hearings and requests for expedited relief, and foster consensual resolution of important matters. Moreover, by directing that notices be mailed only to a shortened mailing list and those creditors

who file with the Court a request that they receive such notices, all parties in interest will be assured of receiving appropriate notice of matters affecting their interests and ample opportunity to prepare for and respond to such matters. Concomitantly, a shortened mailing list will significantly reduce the substantial administrative and financial burden that would otherwise be placed on the Debtors' respective estates and those creditors and parties in interest who file documents in the Cases. Similarly, allowing electronic service of documents according to the requested procedures will further reduce the administrative and financial burden of these Cases on the Debtors' respective estates, as well as on other serving parties, and will in many cases allow for more expedient service of documents.

9. The procedures described herein are set forth more fully in the proposed case management and administrative procedures attached hereto as Exhibit A (as may be modified or amended, the "Case Management Procedures"). The Case Management Procedures will (a) be distributed by the Debtors to all entities who file a request for service pursuant to Bankruptcy Rule 2002; (b) be available from the Debtors undersigned counsel; and (c) be included on the Debtors' public website maintained by BMC Group, Inc. for these cases at <http://www.bmcgroup.com/triad>. Moreover, the Debtors will distribute the Case Management Procedures no less frequently than once per month to the Primary Service List (as defined in the Case Management Procedures), as appropriate.

10. Given the number of parties in interest and the size and complexity of these Cases, the Debtors request that the Court schedule regular, monthly omnibus hearings (the "Omnibus Hearings") in accordance with Section A.4 of the Case Management Procedures. The Debtors intend to consult with this Court's clerk and expect to propose the first several Omnibus Hearings in open court when the Court hears this Motion.

11. Given the administrative costs of mailing notices to all of the Debtors' respective creditors and parties in interest in these Cases, the Debtors request that the mailing matrix for all notices required by the Bankruptcy Code, the Bankruptcy Rules and the Local Rules be limited in accordance with Section B of the Case Management Procedures.

12. The Debtors also request that the Court authorize and allow electronic service of documents where proper and functioning in order to further reduce the administrative and financial burden of providing notice to the Debtors' approximately 1,600 creditors and other parties in interest. Electronic service will be the fastest, most convenient and most economical way to service notice on those who may be entitled to notice. Moreover, Section C of the Case Management Procedures contains provisions that the Debtors believe will ensure that electronic service is efficient and effective.

BASIS FOR RELIEF REQUESTED

13. The Debtors have approximately three thousand creditors and other parties in interest that may be entitled to notice in these Cases. In an effort to facilitate the management of the varied issues that may arise in these Cases and to minimize otherwise burdensome and expensive procedures, the Debtors respectfully request that this Court adopt case management procedures similar to those successfully utilized for the benefit of other Chapter 11 debtors in cases pending throughout Ohio. *See, e.g., In re Techneglas, Inc.*, No. 04-63788 (Bankr. S.D. Ohio Sept. 1, 2004); *In re Excello Engineering Systems, LLC*, No. 08-51424 (Bankr. N.D. Ohio Apr. 25, 2008); *In re Akron Thermal, Limited Partnership*, No. 07-51884 (MSS) (Bankr. N.D. Ohio Aug. 2, 2007); *In re CEP Holdings, LLC*, No. 06-51848 (Bankr. N.D. Ohio Sept. 28, 2006).¹ The proposed Order which is hereby incorporated by reference is attached as Exhibit B.

¹ Because of the voluminous nature of these unreported orders, they are not attached to this Motion. Copies of such orders will be made available to parties upon request from the Debtors' counsel.

MEMORANDUM OF LAW

14. Because this Motion presents no novel issues of law and the authorities relied upon are stated herein, the Debtors respectfully request that this Court waive the requirement contained in Local Bankruptcy Rule 9013-1(a) that the Debtors file a separate memorandum of law in support of this Motion.

NOTICE

15. Notice of the Motion has been given to (a) the Office of the United States Trustee, (b) Capital One National Association, as Administrative Agent for the Secured Lenders, (c) the Debtors' consolidated thirty (30) largest unsecured creditors and (d) WesBanco Bank, Peoples Bank, CNH Capital, Caterpillar Financial, Chrysler Financial and Ford Motor Credit Company. The Debtors submit that, under the circumstances, no other or further notice need be given.

NO PRIOR REQUEST

16. No prior request for the relief sought in this Motion has been made to this or any other Court.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and granting such other and further relief as the Court deems just and proper.

December 31, 2008

Respectfully submitted by:

/s/ Rocco I. Debitetto

Daniel A. DeMarco (0038920)

Nancy A. Valentine (0069503)

Christopher B. Wick (0073126)

Rocco I. Debitetto (0073878)

Hahn Loeser & Parks LLP

200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 621-0150

Facsimile: (216) 241-2824

E-Mail: dademarco@hahnlaw.com

navalentine@hahnlaw.com

cwick@hahnlaw.com

ridebitetto@hahnlaw.com

PROPOSED ATTORNEYS FOR DEBTORS