UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO

In re:	:	Case No: 08-62733
	:	Chapter 11 – Jointly Administered
	:	
TRIAD RESOURCES, INC., *et al*	:	Judge C. Kathryn Preston
	:	
	:	**Objection Deadline: July 16, 2010**
Debtors.	:	**Hearing Date, if necessary: July 21, 2010 @ 9:30 a.m.**

MOTION OF JAMES ROSE, TRUSTEE TO EXTEND DATE BY WHICH OBJECTIONS TO CLAIMS MUST BE FILED

NOW COMES, James Rose ("Trustee") the duly appointed Trustee of the Triad Liquidation Trust ("Trust"), and does hereby petition the Court to extend the date by which objections to claims must be filed to and including October 18, 2010. In support of this Motion, the Trustee states as follows:

1. On January 28, 2010, the Court entered that certain Order Confirming Joint Plan of Reorganization of Triad Resources, Inc. et al. Dated October, 30, 2009, as Modified January 25, 2010 [Dkt. 613].

2. On February 19, 2010, the Court entered that certain Notice of (A) Occurrence of Effective Date of Joint Plan of Reorganization of Triad Resources, Inc., Et Al. Dated October 30, 2009, as Modified January 25, 2010; And (B) Important Bar Dates [Dkt 644].

3. Section 9.1 of the Plan provides that: "Unless otherwise ordered by the Bankruptcy Court, the Reorganized Debtors and/or the Liquidation Trustee shall file and serve all objections to Claims as soon as practicable, but, in each instance, not later than 120 days following the Effective Date or such later date as may be approved by the Bankruptcy Court."

4. The Trustee, by and through its counsel, among other activities has undertaken the review of claims filed in these proceedings, including the review of claimants holding mechanics' liens. Such review has included the review of documents and records provided by

Debtors and with respect to mechanics' liens has included the review of such liens, legal descriptions, descriptions of the work performed and applicable state law to determine if such liens have been filed correctly.

5. The Trustee has consulted with the former employees of Debtors who have provided valuable insight regarding claims where there is a discrepancy between the scheduled claim amount and the amount noted in filed proofs of claim. While such assistance has been provided willingly and been invaluable, the Trustee notes that the individuals providing assistance are now employees of Triad Hunter, the entity that acquired Debtors' assets pursuant to the Plan.

6. Despite diligent efforts to date, the Trustee has yet to complete the review of all claims in order to determine which claims are worthy of objection. Accordingly, no distributions have been made and all assets of the Trust have been preserved.

7. The Trustee requests, pursuant to Section 9.1 of the Plan, that the time frame for filing objections to claims to October 18, 2010. The extension will allow sufficient time for the Trustee to complete the review of claims and to determine which claims should be made the subject of objections. In fact, the Trustee anticipates that initial omnibus objections to claims will be filed shortly.

8. The extension of the claims bar date is appropriate as the Plan contemplated the extension of such deadline and because creditors will not be prejudiced by such extension. In fact, such extension will insure that creditors holding valid claims will receive distributions that accurately reflect their interest in the funds available for distribution to creditors.

For the foregoing reasons, Trustee requests that the deadline to object to claims be extended to October 18, 2010 without prejudice to such further extensions as the Trustee may request and that the Court deems appropriate.

Dated: June 28, 2010

Respectfully submitted,

/s/Reginald W. Jackson

Reginald W. Jackson (OH #0022885)
Jesse Cook-Dubin (OH #0081949)
Vorys, Sater, Seymour, and Pease LLP
52 East Gay Street, P.O. Box 1008
Columbus, Ohio 43216-1008
Phone: (614) 464-5621
Fax: (614) 719-4778
E-mail: rwjackson@vorys.com

Counsel to James Rose, Trustee

CERTIFICATE OF SERVICE

On this the 28th day of June, 2010 the above Motion of James Rose, Trustee to Extend Date by Which Objections to Claims Must be Filed, was served by first class mail, postage prepaid upon the attached service list.

/s/Reginald W. Jackson
Reginald W. Jackson

CORE AND 2002 LIST

Triad Resources, Inc.
Attn: James R. Bryden
P.O. Box 427
27724 State Route 7
Marietta, OH 45773

Theisen Brock
James S Huggins, Esq.
424 Second Street
Marietta, OH 45750

Reimer Lorber & Arnovitz Co. LPA
Fay D. English
Edward A. Bailey
P.O. Box 968
2450 Edison Blvd.
Twinsburg, OH 44087

Frost Brown Todd LLC
Ronald E Gold
2200 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Bailey Cavalieri LLC
Nick V. Cavaliere
Matthew Schaefer
10 West Broad Street, Suite 2100
Columbus, OH 43215

Hahn Loeser & Parks LLP
Christopher W. Wick
Daniel A. DeMarco
Rocco I Debitetto
200 Public Square, Suite 2800
Cleveland, OH 44114

Reimer, Lorber & Arnovitz Co., LPA
Cynthia A Jeffrey
2450 Edison Boulevard
Twinsburg, OH 44087

Vinson & Elkins LLP
William L. Wallander , Esq.
Trammell Crow Center
2001 Ross Ave, Ste 3700
Dallas, TX 75201

U.S. Trustee's Office – Region 9
Mary Anne Wilsbacher
Larry Hackett
170 North High, Suite 200
Columbus, OH 43215

Phillips Gardill Kaiser & Altmeyer, PLLC
Denise Knouse-Snyder
61 Fourteenth Street
Wheeling, WV 26003

CNH Capital America LLC
100 Brubaker Avenue
New Holland, PA 17557

Chrysler Financial
27777 Inkster Road
Farmington Hills, MI 48334

Triad Resources, Inc.
P.O. Box 430
Reno, Ohio 45773

Triad Energy Corporation
P.O. Box 430
Reno, Ohio 45773

Triad Oil & Gas Co., Ltd.
P.O. Box 430
Reno, Ohio 45773

Alpha Drilling, Ltd.
P.O. Box 430
Reno, Ohio 4577**3**

TriTex Resources, L.L.C.
15455 Dallas Parkway
Ste 600
Addison, TX 75001

Bowles Rice McDavid Graff & Love, LLP
Robert L. Bays
501 Avery Street, Fifth Floor
P.O. Box 49
Parkersburg, West Virginia 26102-0049

Porter Wright Morris & Arthur LLP
James P. Botti
41 South High Street, 31st Floor
Columbus, Ohio 43215

Vinson & Elkins LLP
Clayton T. Hufft
Trammell Crow Center
2001 Ross Avenue, Suite 3700
Dallas, TX 75201

Dinsmore & Shohl LLP
John B. Persiani
1900 Chemed Center
255 East 5th Street
Cincinnati, OH 45202

Vinson & Elkins LLP
P. Beth Lloyd
Trammell Crow Center
2001 Ross Avenue, Suite 3700
Dallas, TX 75201

Vinson & Elkins LLP
L Prentiss Cutshaw
Trammell Crow Center
2001 Ross Avenue, Suite 3700
Dallas, TX 75201

Mapother & Mapother, P.S.C.
Dennis M. Ostrowski
801 West Jefferson Street
Louisville, KY 40202

BakerCorp
Amy M. Paul
Vice President, General Counsel
3020 Old Ranch Pkwy, Ste 220
Seal Beach, CA 90740

Robert R. Tuke & Paul Ambrosius
Trauger & Tuke
The South Turf Building
222 Fourth Avenue North
Nashville, Tennessee 37219

Carl Dore, Jr.
Dore' & Associates, Attorneys, P.C.
17171 Park Row, Suite 350
Houston, TX 77084

Michelle T. Sutter
Principal Asst. Attorney General
Environmental Enforcement Section
30 E Broad St., 25th Fl.
Columbus, OH 43215

Kenneth C. Johnson, Esq.
Gordon F. Litt, Esq.
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215

Larry A. Levick, esq.
Michelle E. Shriro, Esq.
Singer & Levick, P.C.
16200 Addison Road, Suite 140
Addison, Texas 75001

Phil Snow
Snow Fogel & Spence LLP
America Tower Suite 4100
2929 Allen Parkway
Houston, Texas 77019

David Husk
5821 Shamrock Road
Durham, NC 27713

Elizabeth Weller
Linebarger Goggan Blair & Sampson
2323 Bryan Street, Suite 1600
Dallas, TX 75021

Larry J. McClatchey, Esq.
Kegler, Brown, Hill & Ritter
65 East State Street, Suite 1800
Columbus, OH 43215

ADDITIONAL SERVICE PARTIES

Arvilla Oilfield Services
P.O. Box 432
St. Marys, WV 26170

Baker Hughes Oilfield Operations, Inc.
Attn: Phil Snow
Snow Fogel Spence LLP
2929 Allen Pkwy, Suite 4100
Houston, TX 77019

Cecil I. Walker Machinery Co.
C/O Julia A. Chincheck Esq.
P.O. Box 1386
Charleston, WV 25325

Houchin Construction, LLC
RT 3, Box 527
Arnoldsburg, WV 25234

Key Energy Services, Inc.
Mark Rotberg
6 Desta Drive, Suite 4400
Midland, TX 79705

Keybank
P.O. Box 94831
Cleveland, OH 44101

Mack Finance Services A. Div. of VFS US LLC
Attn: Shelley Mickey
P.O. Box 26131
Greensboro, NC 27402

United Rentals NA, Inc.
5 Greenwich Office Park
Greenwich, CT 06831

Salta Pipe Co Inc.
Mark S Zachary
McMahon Surovik Suttle PC
P.O. Box 3679
Abilene, TX 79604

IRS SERVICE LIST

Internal Revenue Service
600 Arch Street, Room 7310
Philadelphia, PA 19106

Internal Revenue Service
Centralized Insolvency Operation
11601 Roosevelt Blvd.
Mail Drop Point N781
Philadelphia PA 19154

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 21126
Philadelphia PA 19114

Internal Revenue Service
District Director
Insolvency Section
550 Main Street
Cincinnati, OH 45202

U.S. Attorney General
Main Justice Building Room 5111
10th and Constitution Ave. N.W.
Washington, DC 20530

U.S. Attorney – Columbus
303 Marconi Blvd., Suite 200
Columbus, OH 43215

Internal Revenue Service
Department of the Treasury
P.O. Box 21126
Philadelphia PA 19114

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

- Asst US Trustee (Col) ustpregion09.cb.ecf@usdoj.gov

- Robert L Bays rbays@bowlesrice.com, bmartin@bowlesrice.com;bnichols@bowlesrice.com;jchincheck@bowlesrice.com
- James P Botti jbotti@porterwright.com
- Brenda K Bowers bkbowers@vorys.com
- George H Calloway ghcalloway@columbus.gov
- Jeremy M Campana jeremy.campana@thompsonhine.com
- Nick V Cavalieri nick.cavalieri@baileycavalieri.com, BR-ECF@BaileyCavalieri.com
- Jesse Cook-Dubin jcookdubin@vorys.com, cdfricke@vorys.com
- Daniel A DeMarco dademarco@hahnlaw.com, hlpcr@hahnlaw.com
- Rocco I Debitetto ridebitetto@hahnlaw.com
- Carl Dore' carldore@doreassociates.com
- Ronald E Gold rgold@fbtlaw.com, ahammerle@fbtlaw.com
- Lawrence Hackett larry.hackett@usdoj.gov
- Clayton T Hufft chufft@velaw.com
- James S Huggins huggins@theisenbrock.com
- Cynthia A Jeffrey ecfsdoh@reimerlaw.com, RACJ.ecfsdoh@yahoo.com
- Kenneth C Johnson kjohnson@bricker.com, rdelsignore@bricker.com
- Larry A Levick levick@singerlevick.com
- Beth Lloyd blloyd@velaw.com
- Larry J. McClatchey lmcclatchey@keglerbrown.com
- Dennis M Ostrowski loubknotices@mapother-atty.com
- Geoffrey J Peters colecfsdo@weltman.com
- Gregory S Pope Bankruptcy@Pope-Law-Offices.com
- Matthew T Schaeffer matthew.schaeffer@baileycavalieri.com, br-ecf@baileycavalieri.com
- Michelle T Sutter msutter@ag.state.oh.us
- Bill Wallander bwallander@velaw.com
- Christopher B Wick cwick@hahnlaw.com, hlpcr@hahnlaw.com
- Mary Anne Wilsbacher MaryAnne.Wilsbacher@usdoj.gov