

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

CHESAPEAKE ENERGY CORPORATION,¹

Reorganized Debtor.

§

§ Chapter 11

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§ Case No. 20-33233 (DRJ)

§

§ (Jointly Administered)

§ (Emergency Relief Requested)

**REORGANIZED DEBTOR'S EMERGENCY
MOTION TO REOPEN CHAPTER 11 BANKRUPTCY CASE OF
CHESAPEAKE EXPLORATION, LLC AND FOR ENTRY OF A FINAL DECREE
CLOSING THE CHAPTER 11 CASE OF CHESAPEAKE ENERGY CORPORATION**

Emergency relief has been requested. Relief is requested not later than June 28, 2022.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The above-captioned reorganized debtor (together with each of the reorganized debtors in the jointly-administered cases styled *Chesapeake Energy Corporation*, Case No. 20-33233, before the Effective Date² of the Plan, the “Debtors,” and after the Effective Date of the Plan, the “Reorganized Debtors”) states as follows in support of this motion:

Relief Requested

1. To reduce administrative expenses, the Reorganized Debtor seeks entry of (a) a final decree, substantially in the form attached hereto (the “Final Decree”), closing the chapter 11

¹ The location of Reorganized Debtor Chesapeake Energy Corporation’s principal place of business and service address in this chapter 11 case is 6100 North Western Avenue, Oklahoma City, Oklahoma 73118.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the *Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and Its Debtor Affiliates* [Docket No. 2833] (as amended, supplemented, or modified from time to time, the “Plan”).

case of *In re Chesapeake Energy Corporation*, Case No. 20-33233 (the “Lead Case”), on and as of the date of entry of the Final Decree, (b) an order reopening the chapter 11 case of *In re Chesapeake Exploration, L.L.C.*, Case No. 20-33239 (the “New Lead Case”), on and as of the date of entry of the Final Decree, for the purpose of fully and finally administering these chapter 11 cases, and (c) granting related relief.

2. The only material remaining matters in the Lead Case include: (a) the reconciliation of approximately 1,200 claims (the “Remaining Claims”); and (b) pending adversary proceedings (collectively, the “Adversary Proceedings”):

- Adv. Pro. No 20-03451, between Gates Mineral Company, LTD., *et al.*, as plaintiffs, and Chesapeake Energy Corporation, *et al.*, as defendants;
- Adv. Pro. No 21-03009, between Stefanie Lyn Porterfield Delasandro, as plaintiff, and Esquisto Resources II, LLC, *et al.*, as defendants; and
- Adv. Pro. No 20-03425, between Kelly Vesper, as plaintiff, and Chesapeake Energy Corporation, *et al.*, as defendants.

3. The Lead Case is incurring the maximum level of fees payable under 28 U.S.C. § 1930(a)(6)(A) and (B). To minimize such fees, the Reorganized Debtor requests closure of the Lead Case and the reopening of the New Lead Case.

4. The Reorganized Debtor seeks authority to resolve the remaining matters in the sole case that will remain open, the New Lead Case. Additionally, the Reorganized Debtor seeks amendment of the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 91] (the “Joint Administration Order”) to reflect that the New Lead Case is the lead debtor and ordering that all pleadings filed in these chapter 11 cases going forward use the following case caption:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

CHESAPEAKE EXPLORATION, L.L.C.,

Reorganized Debtor.

§

§ Chapter 11

§

§ Case No. 20-33239 (DRJ)

§

§

§ (formerly Jointly Administered under Lead
Case Chesapeake Energy Corporation,
20-33233)

Jurisdiction and Venue

5. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The Reorganized Debtor confirms its consent to the entry of the Final Decree by the Court.

6. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The bases for the relief requested herein are sections 105 and 350(a) and (b) of title 11 of the United States Code (the “Bankruptcy Code”), rules 3022 and 5010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Local Rules”).

Background

8. On the Petition Date, each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors in the chapter 11 cases were:

	Debtor	Case Number
1.	Chesapeake Energy Corporation	Case No. 20-33233
2.	Brazos Valley Longhorn Finance Corp.	Case No. 20-33234
3.	Brazos Valley Longhorn, L.L.C.	Case No. 20-33236

4.	Burleson Sand LLC	Case No. 20-33252
5.	Burleson Water Resources, LLC	Case No. 20-33238
6.	Chesapeake AEZ Exploration, L.L.C.	Case No. 20-33235
7.	Chesapeake Appalachia, L.L.C.	Case No. 20-33247
8.	Chesapeake E&P Holding, L.L.C.	Case No. 20-33237
9.	Chesapeake Energy Louisiana, LLC	Case No. 20-33240
10.	Chesapeake Energy Marketing, L.L.C.	Case No. 20-33244
11.	Chesapeake Exploration, L.L.C.	Case No. 20-33239
12.	Chesapeake Land Development Company, L.L.C.	Case No. 20-33262
13.	Chesapeake Louisiana, L.P.	Case No. 20-33242
14.	Chesapeake Midstream Development, L.L.C.	Case No. 20-33246
15.	Chesapeake NG Ventures Corporation	Case No. 20-33254
16.	Chesapeake Operating, L.L.C.	Case No. 20-33249
17.	Chesapeake Plains, LLC	Case No. 20-33260
18.	Chesapeake Royalty, L.L.C.	Case No. 20-33251
19.	Chesapeake VRT, L.L.C.	Case No. 20-33241
20.	Chesapeake-Clements Acquisition, L.L.C.	Case No. 20-33264
21.	CHK Energy Holdings, Inc.	Case No. 20-33232
22.	CHK NGV Leasing Company, L.L.C.	Case No. 20-33248
23.	CHK Utica, L.L.C.	Case No. 20-33250
24.	Compass Manufacturing, L.L.C.	Case No. 20-33257
25.	EMLP, L.L.C.	Case No. 20-33265
26.	Empress Louisiana Properties, L.P.	Case No. 20-33269
27.	Empress, L.L.C.	Case No. 20-33255
28.	Esquisto Resources II, LLC	Case No. 20-33243
29.	GSF, L.L.C.	Case No. 20-33267
30.	MC Louisiana Minerals, L.L.C.	Case No. 20-33253
31.	MC Mineral Company, L.L.C.	Case No. 20-33256
32.	MidCon Compression, L.L.C.	Case No. 20-33263
33.	Nomac Services, L.L.C.	Case No. 20-33270
34.	Northern Michigan Exploratory Company, L.L.C.	Case No. 20-33271
35.	Petromax E&P Burleson, LLC	Case No. 20-33261
36.	Sparks Drive SWD, Inc.	Case No. 20-33245
37.	WHE AcqCo., LLC	Case No. 20-33268
38.	WHR Eagle Ford LLC	Case No. 20-33258

39.	WildHorse Resources II, LLC	Case No. 20-33259
40.	WildHorse Resources Management Company, LLC	Case No. 20-33266
41.	Winter Moon Energy Corporation	Case No. 20-33272

(collectively, without the Lead Case or the New Lead Case, the “Affiliate Cases” for the “Affiliate Debtors”).

9. On June 29, 2020 the Court entered the Joint Administration Order.

10. On January 16, 2021 the Court entered the Order Confirming the Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and Its Debtor Affiliates [Docket No. 2915] (the “Confirmation Order”) confirming the Plan.

11. On February 9, 2021, the Effective Date of the Plan occurred [Docket No. 3058].

12. On June 23, 2021, the Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* [Docket No. 3812] (the “Initial Final Decree”). The Initial Final Decree closed the Affiliate Cases and the New Lead Case, leaving open the Lead Case for purposes of resolving certain remaining matters related to all Debtors.

13. The Reorganized Debtors continue to work to resolve the Adversary Proceedings and the Remaining Claims and will also file new claim objections, as appropriate.³ The Reorganized Debtors do not anticipate any significant contested matters in the Reorganized Debtors’ chapter 11 cases, other than the Adversary Proceedings, any litigation flowing from claim objections, miscellaneous motions or other matters or proceedings that may arise from time to time, or any matters currently on appeal that may ultimately be remanded to this Court (collectively, with the Remaining Claims, the “Remaining Matters”). However, if any issues arise

³ The Reorganized Debtor reserves all rights to dispute any outstanding claims, and the failure of the Reorganized Debtor to object to any claim filed in these chapter 11 cases shall not cause such claim to be deemed allowed.

related to any of the Reorganized Debtors, any such matters can and should be resolved in the New Lead Case. Chesapeake Exploration, L.L.C. may object to or reconcile claims asserted against or adversary proceedings involving any of the Debtors, including in the Lead Case, on their behalf notwithstanding the Affiliate Cases and the Lead Case being closed.

Basis for Relief

A. Reopening the New Lead Case Is Appropriate Under the Circumstances.

14. Section 350(b) of the Bankruptcy Code provides that a bankruptcy court may reopen a case “to administer assets, to accord relief to the debtor, or for other cause.” 11 U.S.C. § 350(b). Bankruptcy Rule 5010 also provides that “[a] case may be reopened on motion of the debtor or other party in interest pursuant to § 350(b) of the Code.” Here, the Reorganized Debtor seeks to reopen the New Lead Case for the purpose of fully and finally administering the estates of all of the chapter 11 cases, including resolution of the Remaining Matters.

15. The Bankruptcy Code does not define what constitutes “other cause” to reopen a case under section 350(b). However, the Fifth Circuit Court of Appeals has explained that it is “a broad term which gives the bankruptcy court discretion to reopen a closed estate or proceeding when cause for such reopening has been shown.” *Citizens Bank & Trust Co. v. Case (In re Case)*, 937 F.2d 1014, 1018 (5th Cir. 1991). “The bankruptcy court should exercise its discretion, based upon the peculiar facts present and determine if cause exists and how ultimately to dispose of the case.” *In re Odin Demolition & Asset Recovery, LLC*, 544 B.R. 615, 628 (Bankr. S.D. Tex. 2016) (quoting *In re Koch*, 229 B.R. 78, 88 (Bankr. E.D.N.Y. 1999)).

16. Here, “cause” exists to reopen the New Lead Case to fully complete administration of these chapter 11 cases without the expense of the significant U.S. Trustee fees pursuant to section 1930 of the United States Code (“Section 1930 Fees”) currently being assessed in the Lead Case. No parties will suffer any prejudice should the Court grant this motion. Although

Article XII.A. of the Plan provides that all contested matters and adversary proceedings relating to the Reorganized Debtors shall be heard in the Lead Case, the relief requested herein does not materially impact the settlements embodied in the Plan or any terms or provisions therein. Even so, out of an abundance of caution, the Reorganized Debtors discussed this motion with counsel to the Required Plan Sponsors and former counsel to the Royalty Committee, none of which object to the relief sought.

17. The Reorganized Debtor requests that the Court reopen the New Lead Case under section 350(b) of the Bankruptcy Code and Bankruptcy Rule 5010.

B. Entry of a Final Decree Closing the Lead Case Is Appropriate

18. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.”

19. The Bankruptcy Code, the Bankruptcy Rules, and the Local Rules do not define the term “fully administered.” The Advisory Committee Note to Bankruptcy Rule 3022 (the “Advisory Committee Note”), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a. whether the order confirming the plan has become final;
- b. whether deposits required by the plan have been distributed;
- c. whether the property proposed by the plan to be transferred has been transferred;
- d. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;

- e. whether payouts under the plan have commenced; and
- f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991). Courts look “to the advisory committee’s notes on Bankruptcy Rule 3022 in seeking guidance as to the meaning of ‘fully administered.’” *In re JCP Props., Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015).

20. In addition to the factors set forth in the Advisory Committee Note, courts consider whether the plan of reorganization is substantially consummated. *See, e.g., In re JCP Props., Ltd.*, 540 B.R. at 605 (commenting that “substantial consummation is the pivotal question here to determine the propriety of closing the [case]”); *In re gates Cmty. Chapel of Rochester, Inc.*, 212 B.R. 220, 224 (Bankr. W.D.N.Y. 1997) (considering substantial consummation as a factor in determining whether to close a case); *Walnut Assocs. v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994) (same).⁴

21. Bankruptcy courts have adopted the view that “[the Advisory Committee Note] factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, Case No. 02-12608 (WS), 2005 WL 1668396, at *2 (Bankr. D. Del. June 24, 2005); *see also Walnut Assocs. v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994) (“[A]ll of the factors in the Committee Note need not be present before the Court will enter a final decree.”). For example, pending adversary proceedings do not necessarily preclude a court from entering a final decree. *See In re Valence Tech., Inc.*, No. 12-11580-CAG, 2014 WL 5320632, at *4 (Bankr. W.D. Tex. Oct. 17, 2014) (“[I]t is

⁴ Section 1101(2) of the Bankruptcy Code defines substantial consummation as the: “(A) transfer of all or substantially all of the property proposed by the plan to be transferred; (B) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (C) commencement of distribution under the plan.”

well-established that “[t]he continuation of an adversary proceeding . . . is insufficient by itself to keep a case from being considered ‘fully administered.’”) (citation omitted); *In re JMP-Newcor Int’l, Inc.*, 225 B.R. 462, 465 (Bankr. N.D. Ill. 1998) (entering a final decree when an adversary proceeding was pending and the debtors still needed to make certain distributions). Bankruptcy courts in the Fifth Circuit have entered final decrees and closed cases despite certain claims being unpaid.

22. Courts have also noted that entry of a final decree is appropriate to stop the accrual of Section 1930 Fees. *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 539 (Bankr. E.D. Ky. 1997) (concluding that “it seems appropriate to close this case to stop the financial drain on the debtor” due to accrual of Section 1930 Fees).

23. The relevant factors weigh strongly in favor of closing the Lead Case. The Confirmation Order is now a final order, and, on the Effective Date, the Plan was substantially consummated. As of the Effective Date, the Affiliate Cases and the Lead Case were “fully administered.” The Lead Case should be closed effective as of entry of the Final Order.

24. The Reorganized Debtors will continue working to resolve the Remaining Matters through the New Lead Case. But, the limited number of claims and issues remaining that pertain to the Affiliate Cases or Lead Case can be resolved under the New Lead Case without keeping the Lead Case open. Closing the Lead Case will have no impact on the resolution of any Adversary Proceedings, Remaining Claims or distributions, other legal entitlements under the Plan, or the substantive rights of any party in interest.⁵ Finally, closing of the Lead Case and reopening of the

⁵ For the avoidance of doubt, the *Stipulation and Agreed Order Regarding the Final Decree Closing Certain of the Chapter 11 Cases* [Docket No. 3919] entered by the Court on July 26, 2021 shall remain in effect as to the New Lead Case and the Final Decree.

New Lead Case would provide relief from significant Section 1930 Fees, which are at the highest level in the Lead Case. Entry of the Final Decree closing the Lead Case is appropriate.

C. The Court Should Enter an Order Amending the Joint Administration Order.

25. Section 105 of the Bankruptcy Code permits the Court to “issue any order . . . that is necessary or appropriate to carry out the provisions of this title.”

26. Amendment to the Joint Administration Order is appropriate so that the docket can appropriately reflect the New Lead Case and so that the new case caption can be used. This will reduce potential confusion amongst all interested parties involved in the Remaining Matters.

Emergency Consideration

27. Pursuant to Bankruptcy Local Rule 9013-1(i), the Reorganized Debtor requests emergency consideration of this motion. Prompt entry of the Final Decree and order reopening the New Lead Case prior to the end of the fiscal quarter on June 30, 2022 will allow the Reorganized Debtor to save administrative costs that would accrue if the Lead Case were to remain open through resolution of the Remaining Matters.

Notice

28. The Reorganized Debtor will provide notice of this motion to: (a) the U.S. Trustee and (b) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Reorganized Debtor requests that the Court enter the Final Decree, and an order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Houston, Texas
June 24, 2022

/s/ Matthew D. Cavanaugh

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Certificate of Accuracy

I certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh

Certificate of Service

I certify that on June 24, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh

Certificate of Conference

On June 22, 2022, counsel for the Reorganized Debtor provided to Hector Duran with the United States Trustee's office a draft of the order filed with the motion. Counsel corresponded with Mr. Duran who provided comments to the motion that are reflected herein and expressed that he was not opposed to the relief requested.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

CHESAPEAKE ENERGY CORPORATION,

Reorganized Debtor.

§

§ Chapter 11

§

§ Case No. 20-33233 (DRJ)

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**ORDER REOPENING CHAPTER 11 CASE
OF CHESAPEAKE EXPLORATION, L.L.C. AND FINAL DECREE
CLOSING THE CHAPTER 11 CASE OF CHESAPEAKE ENERGY CORPORATION**

Upon the motion (the “Motion”)¹ of the above-captioned reorganized debtor (together with each of the reorganized debtors in the jointly-administered cases styled *Chesapeake Energy Corporation*, Case No. 20-33233, before the Effective Date of the Plan, the “Debtors,” and after the Effective Date of the Plan, the “Reorganized Debtors”) for (a) entry of an order reopening the chapter 11 case of Chesapeake Exploration, L.L.C., and (b) entry of a final decree closing the chapter 11 case of Chesapeake Energy Corporation (this “Order and Final Decree”), all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Reorganized Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Reorganized Debtors’

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

notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Lead Case of Chesapeake Energy Corporation, Case No. 20-33233, is closed as of the date of this Order and Final Decree; provided that the Court shall retain jurisdiction as provided in the Plan and the Confirmation Order.

2. The New Lead Case of Chesapeake Exploration, L.L.C., Case No. 20-33239, is hereby reopened as of the date of this Order and Final Decree pursuant to section 350(b) of the Bankruptcy Code and Rule 5010 of the Bankruptcy Rules, and shall remain open pending entry of a final decree by this Court closing the New Lead Case.

3. The caption of the New Lead Case shall read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Chesapeake Exploration, L.L.C.,

Reorganized Debtor.

§

§ Chapter 11

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§ Case No. 20-33239 (DRJ)

§

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§ (formerly Jointly Administered under Lead
Case Chesapeake Energy Corporation,
20-33233)

4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

5. All Remaining Matters, whether they pertain to the Lead Case or an Affiliate Case, shall be filed, administered, and adjudicated in the New Lead Case without the need to reopen any of the Affiliate Cases.

6. Any objections to any claims against or interests in any Debtors, including the Lead Case (collectively, the “Affiliate Debtors”) may be filed, administered, and adjudicated in the New Lead Case. All of the Remaining Matters and any outstanding motions filed or related to the Lead Case may be administered and adjudicated in the New Lead Case.

7. The Reorganized Debtor, no later than fourteen (14) days after the date of entry of this Final Decree, shall file a post-confirmation report for each of the second and third quarters of 2022, as applicable, through the date of entry of this Final Decree and shall serve a true and correct copy of said reports on the United States Trustee, and shall pay the appropriate sum of quarterly fees due and payable under 28 U.S.C. § 1930(a)(6)(A) and (B) with respect to the Lead Debtor by remitting payment to the United States Trustee Payment Center, P.O. Box 6200-19, Portland, OR, 97228-6200 by (a) fourteen days after the date of entry of this Final Decree or (b) the date on which such quarterly fees are otherwise due, whichever is later. The Reorganized Debtor shall furnish evidence of such payment to the U.S. Trustee, 515 Rusk, Suite 3516, Houston, Texas 77002. The payment shall reflect the account number(s) of the applicable Reorganized Debtor(s) and shall be transmitted with a “Chapter 11 Quarterly Disbursement and Fee Report” available from the U.S. Trustee. The Court shall retain jurisdiction to enforce fees assessed under 28 U.S.C. § 1930(a)(6)(A) and (B).

8. Entry of this Order and Final Decree is without prejudice to (a) the rights of the Debtors, the Reorganized Debtors, or any party in interest to seek to reopen any of the Affiliate Cases and Lead Case for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the

rights of the Debtors, the Reorganized Debtors, or any Entity authorized pursuant to the Plan, as applicable, to dispute, in the Court or any applicable non-bankruptcy forum, any claims filed against the Debtors in the Debtors' chapter 11 cases, as provided in the Plan and the Confirmation Order. Notwithstanding anything to the contrary contained in the Plan, any failure of the Debtors, the Reorganized Debtors, or any Entity authorized pursuant to the Plan, as applicable, to file an objection to a claim in the Debtors' chapter 11 cases shall not constitute allowance of the claim and shall not result in such claim being deemed allowed against any Debtor.

9. Quarterly disbursements for the New Lead Case will be reported and statutory fees will be paid pending the entry of a final decree by the Court closing the New Lead Case.

10. All further reporting concerning the administration of the assets and liabilities of the Affiliate Debtors shall occur only in the New Lead Case. A docket entry shall be made in each of the Affiliate Cases, including the Lead Case, substantially similar to the following:

An order has been entered in this case directing that all further reporting concerning the administration of the assets and liabilities in this case will occur only in the case of Chesapeake Exploration, L.L.C., Case No. 20-33239. The docket in Case No. 20-33239 should be consulted for all matters affecting this case.

11. Notwithstanding anything to the contrary in this Order and Final Decree, the Bankruptcy Rules, or the Bankruptcy Local Rules, all of the terms and conditions of this Order and Final Decree shall be immediately effective and enforceable.

12. The Debtors, the Reorganized Debtors, and any Entity authorized pursuant to the Plan, and their respective agents, are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order and Final Decree in accordance with the Motion.

13. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order and Final Decree.

Dated: _____, 2022
Houston, Texas

DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE