

STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF )  
PERCUSSION PETROLEUM OPERATING, LLC FOR ) DOCKET NO. 20226  
COMPULSORY POOLING, EDDY COUNTY, NEW )  
MEXICO. )

**NOTICE OF BANKRUPTCY FILING**  
**OF VANGUARD NATURAL RESOURCES, INC., ET AL., AND**  
**AUTOMATIC STAY OF PROCEEDINGS**

**PLEASE TAKE NOTICE** that, on March 31, 2019, Vanguard Natural Resources, Inc. (“VNR”) and certain of its affiliates (collectively, the “Debtors”),<sup>1</sup> filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101—1532 (the “Bankruptcy Code”), in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”). The Debtors’ chapter 11 cases are pending before the Honorable Judge David R. Jones, United States Bankruptcy Judge, and are being jointly administered under the lead case *In re Vanguard Natural Resources, Inc.*, Case No. 19-31786 (DRJ) (the “Chapter 11 Cases”). A copy of the voluntary petition of the lead Debtor, VNR, is attached hereto as **Exhibit A**.

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 362(a) of the Bankruptcy Code, the Debtors’ filing of their respective voluntary petitions gives rise to a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtors (i) that was or could have been commenced before the commencement of the Chapter 11 Cases, or (ii) to recover a claim against

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<sup>1</sup> The Debtors in the Chapter 11 Cases (as defined herein), along with the last four digits of each Debtor’s federal tax identification number, are: Vanguard Natural Resources, Inc. (1494); Eagle Rock Acquisition Partnership, L.P. (6706); Eagle Rock Acquisition Partnership II, L.P. (0903); Eagle Rock Energy Acquisition Co., Inc. (4564); Eagle Rock Energy Acquisition Co. II, Inc. (3364); Eagle Rock Upstream Development Company, Inc. (0113); Eagle Rock Upstream Development Company II, Inc. (7453); Escambia Asset Co. LLC (3869); Escambia Operating Co. LLC (2000); Vanguard Natural Gas, LLC (1004); Vanguard Operating, LLC (9331); and VNR Holdings, LLC (6371). The location of the Debtors’ service address is: 5847 San Felipe, Suite 3000, Houston, Texas 77057.

the Debtors that arose before the commencement of the Chapter 11 Cases; (b) the enforcement, against any of the Debtors or against any property of each of the Debtors' bankruptcy estates, of a judgment obtained prior to the commencement of the Chapter 11 Cases; and (c) any act to obtain possession of property of or from any of the Debtors' bankruptcy estates, or to exercise control over property of any of the Debtors' bankruptcy estates.<sup>2</sup> No order has been entered in the Chapter 11 Cases granting relief from the automatic stay.

**PLEASE TAKE FURTHER NOTICE** that pleadings filed in the Chapter 11 Cases may be obtained free of charge by visiting the website <https://cases.primeclerk.com/vnr/> maintained by the Debtors' noticing and claims agent, Prime Clerk LLC. You may also obtain copies of any pleadings by visiting the Court's website at <https://ecf.txsb.uscourts.gov/> (PACER login and password required) in accordance with the procedures and fees set forth therein.

Dated: June 12, 2019

PADILLA LAW FIRM, P.A.

/s/ **ERNEST L. PADILLA**  
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<sup>2</sup> Nothing herein shall constitute a waiver of the Debtors' rights to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims against any party to the above-captioned matter. The Debtors expressly reserve all rights to contest any claims that may be asserted against the Debtors.

### **CERTIFICATE OF SERVICE**

I, ERNEST L. PADILLA, PADILLA LAW FIRM, P.A., do hereby certify that I served a true and correct copy of the foregoing *Notice of Bankruptcy Filing of Vanguard Natural Resources, Inc., Et Al., and Automatic Stay of Proceedings* by email this 12<sup>th</sup> day of June 2019, addressed as follows:

Michael H. Feldewert – [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

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/s/ **ERNEST L. PADILLA**  
ERNEST L. PADILLA

**Exhibit A**

**Voluntary Petition of Vanguard Natural Resources, Inc.  
Under Chapter 11 of the Bankruptcy Code**