

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Canadian Overseas Petroleum Limited, *et al.*,¹

Debtors in a foreign proceeding.

Chapter 15

Case No. 24-10376 (JTD)

(Jointly Administered)

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON JUNE 5, 2024 AT 3:00 P.M. (ET)**

**AS THERE ARE NO MATTERS GOING FORWARD, THE HEARING HAS
BEEN CANCELED AT THE DIRECTION OF THE COURT.**

ADJOURNED MATTER:

1. Motion of the Foreign Representative for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Order, (II) Approving the Sale of Substantially All of the Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, (III) Conditionally Approving Dismissal Procedures for Debtor Southwestern Production Corporation; and (IV) Granting Related Relief [[Docket No. 44](#) - filed April 30, 2024]

Response/Objection Deadline: May 14, 2024 at 4:00 p.m. (ET); extended to May 24, 2024 at 4:00 p.m. (ET) for the United States Trustee for the District of Delaware (the "U.S. Trustee"); extended to June 4, 2024 at 12:00 p.m. (ET) for the United States Department of Justice.

Responses/Objections/Replies Received:

- A. Informal comments from the U.S. Trustee.

¹ The Debtors in these chapter 15 proceedings, together with the last four digits of their business identification numbers are: Canadian Overseas Petroleum Limited (8749); COPL Technical Services Limited (1656); Canadian Overseas Petroleum (Ontario) Limited (8319); Canadian Overseas Petroleum (UK) Limited (7063); Canadian Overseas Petroleum (Bermuda Holdings) Limited (N/A); Canadian Overseas Petroleum (Bermuda) Limited (N/A); COPL America Holding Inc. (1334); COPL America Inc. (9018); Atomic Oil and Gas LLC (8233); Southwestern Production Corporation (8694); and Pipeco LLC (0925). The location of the Debtors' headquarters and the Debtors' duly appointed foreign representative is 715 5 Avenue SW, Suite 3200, Calgary, Alberta T2P 2X6, Canada.

² **Amended items appear in bold.**

- B. Informal comments from United States Department of Justice.
- C. BP Energy Company's Objection to the Motion of the Foreign Representative for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Order, (II) Approving the Sale of Substantially all of the Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, (III) Conditionally Approving Dismissal Procedures for Debtor Southwestern Production Corporation; and (IV) Granting Related Relief [[Docket No. 51](#) – filed May 14, 2024]
- D. Foreign Representative's Reply to BP Energy Company's Objection to the Motion of the Foreign Representative for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Order, (II) Approving the Sale of Substantially all of the Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, (III) Conditionally Approving Dismissal Procedures for Debtor Southwestern Production Corporation; and (IV) Granting Related Relief [[Docket No. 61](#) – filed May 31, 2024]
- E. Joinder to Foreign Representative's Reply to BP Energy Company's Objection to the Motion of the Foreign Representative for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Order, (II) Approving the Sale of Substantially All of the Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, (III) Conditionally Approving Dismissal Procedures for Debtor Southwestern Production Corporation; and (IV) Granting Related Relief [[Docket No. 62](#) – filed May 31, 2024]

Related Documents:

- i. Declaration of Peter Kravitz in Support of the Motion of the Foreign Representative for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Order, (II) Approving the Sale of Substantially All of the Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, (III) Conditionally Approving Dismissal Procedures for Debtor Southwestern Production Corporation; and (IV) Granting Related Relief [[Docket No. 45](#) – filed April 30, 2024]
- ii. Notice of Rescheduled Hearing [[Docket No. 57](#) - filed May 22, 2024]
- iii. BP Energy Company's Witness and Exhibit List for June 5, 2024 Hearing [[Docket No. 63](#) – filed June 3, 2024]
- iv. Declaration of Kenneth Joaquin Anderson in Support of BP Energy Company's Objection to the Motion of the Foreign Representative for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Order, (II) Approving the Sale of Substantially All of the Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, (III) Conditionally Approving Dismissal Procedures for Debtor Southwestern Production Corporation; and (IV) Granting Related Relief [[Docket No. 64](#) – filed June 3, 2024]

- v. **BP Energy Company's Amended Witness and Exhibit List for June 5, 2024, Hearing [[Docket No. 66](#) – filed June 3, 2024]**

Witness Information:

- i. The Foreign Representative may offer testimony by declaration and/or live testimony of Peter Kravitz the chief restructuring officer of the Foreign Representative and the Debtors. Mr. Kravitz may have copies of the documents that are relevant to this motion before him as well as his prior declarations, for which the Foreign Representative intends to file an exhibit list prior to the hearing. The Foreign Representative expects that counsel for BP Energy Company (Haynes and Boone, LLP & Morris Nichols Arsht & Tunnell LLP) may seek to cross-examine the witness. The parties are coordinating to streamline any evidentiary issues and will update the Court based on any agreements reached.

Status: The hearing on this matter is adjourned to June 12, 2024 at 11:00 a.m.

Dated: June 3, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ L. Katherine Good

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L. Katherine Good (No. 5101)

Gregory J. Flasser (No. 6154)

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