IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re) Chapter 11
SAMSON RESOURCES CORPORATION,) Case No. 15-11934 (BLS)
Reorganized Debtor.)) Objection Deadline: July 25, 2018 at 4:00 p.m. Eastern)

SETTLEMENT TRUST'S THIRD NOTICE OF CLAIMS SATISFIED IN FULL

The Settlement Trust files this notice (the "Notice") identifying certain Claims filed in the Chapter 11 cases, which have been satisfied by payments made (the "Satisfied Claims"). Each of the Satisfied Claims is listed in **Exhibit A.** In further support of this Notice, the Settlement Trust respectfully states as follows:

Background

- 1. On September 16, 2015 (the "Petition Date"), each of the Debtors filed a voluntary petition with the Court under the Bankruptcy Code. The Court has entered a final order for joint administration of these chapter 11 cases [D.I. 70]. The Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") formed an official committee of unsecured creditors of Samson Resources Corporation on September 30, 2015 [D.I. 129]. Further information regarding the Debtor's business operations and capital structure is set forth in the declaration of Philip Cook in support of the Debtors' first day motions [D.I. 2].
- 2. On October 15, 2015, the Debtors filed their schedules of assets and liabilities (the "Schedules") and statements of financial affairs ("Statements" and together, with the Schedules, the "Schedules and Statements") [D.I. 201–218]. On June 29, 2016, the Debtors filed certain amended Schedules and Statements [D.I. 1108–1118].

- 3. On October 16, 2015, the Court entered an order (the "<u>Bar Date Order</u>") establishing November 20, 2015, at 5:00 p.m. (prevailing Eastern Time) (the "<u>Bar Date</u>") as the final date and time for non-government claimants holding or asserting a claim against the Debtors arising on or before the Petition Date to file proofs of claim in these chapter 11 cases and approving the form and manner of notice of the Claims Bar Date [D.I. 224].¹
- 4. Written notice of the Bar Date was mailed to, among others, all known creditors and other known holders of claims against the Debtors as of the date of entry of the Bar Date Order, including all entities listed in the Schedules as holding claims against the Debtors, and to all parties who had filed requests for notices under Bankruptcy Rule 2002 as of the date of the Bar Date Order. In addition to mailing such actual notice, the Debtors also published notice of the Bar Date in the national edition of *The New York Times* [D.I. 467].
- 5. On February 13, 2017, the Court entered an order confirming the Debtors' plan of reorganization (the "Plan") [D.I. 2019]. Thereafter, on March 1, 2017, the Plan became effective [D.I. 2020] and the Settlement Trust was established.

Claims Satisfied

- 6. In connection with its duties and obligations, the Settlement Trust has identified certain Claims set forth in **Exhibit A** that have been satisfied after the Petition Date through payments.
- 7. Accordingly, the Settlement Trust intends to designate the Satisfied Claims on the Claims Register as having been satisfied as described in **Exhibit A**.

2

The Bar Date Order also established March 14, 2016, at 5:00 p.m. as the final date and time for all governmental units (as defined in section 101(27) of the Bankruptcy Code) holding or asserting a claim against the Debtors, including claims for unpaid taxes, arising on or before the Petition Date to file proofs of claim in these chapter 11 cases (the "Governmental Bar Date"), which deadline was subsequently extended as to certain governmental

Responses to the Notice

8. By this Notice, the Settlement Trust requests that any holder of a Satisfied Claim who disputes the Reorganized Debtors' determination that its Claim has been satisfied file a written response (the "Response") with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware (the "Clerk"), 824 North Market Street, Wilmington, Delaware 19801. In addition, such claimant must serve its Response upon the following entity, so that the Response is actually received no later than July 25, 2018 at 4:00 p.m. (Prevailing Eastern Time) (the "Response Deadline")

Settlement Trust

FARNAN LLP Attn: Michael J. Farnan 919 North Market Street, 12th Floor Wilmington, DE 19801 (302) 777-0300 (302) 777-0301 mfarnan@farnanlaw.com

WHITE & CASE LLP Attn: Thomas E Lauria 200 South Biscayne Blvd. Miami, FL 33131-2352 (305) 371-2700 tlauria@whitecase.com

WHITE & CASE LLP Attn: Michele J. Meises 1221 Avenue of the Americas New York, NY 10020-1095 (212) 819-8200 michele.meises@whitecase.com

- 9. Every response to this Notice must contain at a minimum the following information:
 - a) A caption setting forth the name of the claimant, his or her Claim number, and a description of the basis for the amount and validity of the Claim;

- b) The specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection;
- c) Any supporting documentation, to the extent it was not included with the proof of Claim previously filed, upon which the party will rely to support the basis for and amounts asserted in the proof of claim; and
- d) The name, address, telephone number, and email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Settlement Trust should communicate with respect to the Claim or the objection and who possesses authority to reconcile, settle, or otherwise resolve this Objection to the disputed Claim on behalf of the claimant.
- 10. Upon the Settlement Trust's receipt of a Response, the Settlement Trust will then make a good faith effort to review the relevant Satisfied Claim in light of such Response, to determine whether there is a basis upon which to sustain the claimant's assertion that its Claim in fact is not a Satisfied Claim. In the event the parties are unable to reach a resolution, the Settlement Trust will schedule a hearing on the Satisfied Claim. The Settlement Trust reserves the right to contest any new assertions of liability against the Settlement Trust made by the holders of Satisfied Claims with respect to their Claims.
- 11. If a claimant fails to file and serve a timely response by the Response Deadline, claimant is deemed to have consented to the Notice and the Settlement Trust's determinations with respect to its Satisfied Claim, as set forth herein.

[Remainder of page intentionally left blank]

Dated: July 11, 2018

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

Joseph J. Farnan, Jr. (Bar No. 100245) Joseph J. Farnan, III (Bar No. 3945) Michael J. Farnan (Bar No. 5165) 919 North Market Street, 12th Floor Wilmington, DE 19801 (302) 777-0300 (302) 777-0301 bfarnan@farnanlaw.com mfarnan@farnanlaw.com

Thomas E Lauria
WHITE & CASE LLP
200 South Biscayne Blvd.
Miami, FL 33131-2352
(305) 371-2700
tlauria@whitecase.com

Glenn M. Kurtz
J. Christopher Shore
Michele J. Meises
Thomas MacWright
John J. Ramirez
WHITE & CASE LLP
1221 Avenue of the Americas
New York, NY 10020-1095
(212) 819-8200
gkurtz@whitecase.com
cshore@whitecase.com
michele.meises@whitecase.com
tmacwright@whitecase.com
john.ramirez@whitecase.com

Attorneys for the Settlement Trust

EXHIBIT A

Creditor Name	Claim Number	Filed Date	Filed Amount
AMERICAN MILLENNIUM CORPORATION INC	S2019268036	10/15/2015	\$12,042.89
CANYON OILFIELD SERVICES LLC	S2019294974	10/15/2015	\$63,572.45
DENTONS DIRT WORXS	S2019295033	10/15/2015	\$60,490.00
GEONIX LP	S2019268090	10/15/2015	\$46,735.31
INSTRUMENT AND EQUIPMENT TECHNICIANS LLC	S2019295123	10/15/2015	\$101,959.48
JOHNSON COUNTY TREASURER	S2019294304	10/15/2015	\$828,701.65
JOLLEY, CASTILLO, DRENNON LTD	S2019295146	10/15/2015	\$11,311.63
JONES ENERGY LTD	S2019295147	10/15/2015	\$66,313.22
J-W POWER COMPANY	S2019243709	10/15/2015	\$13,320.15
KEYSTONE OILFIELD SERVICES INC	S2019295157	10/15/2015	\$41,328.66
LUFKIN INDUSTRIES INC	S2019295190	10/15/2015	\$89,133.57
NORTH DAKOTA STATE TAX COMMISSIONER	S2019294299	10/15/2015	\$74,998.44
OILFIELD SOFTWARE SOLUTIONS LTD	2589	12/07/15	\$39,888.00
RAMON & BENNETT ROUSTABOUT SVC	\$2019295300	10/15/2015	\$11,448.75
RE/SPEC INC DBA RESPEC	S2019295301	10/15/2015	\$63,959.43
RE/SPEC INC DBA RESPEC	1268	11/17/15	\$41,926.81
ROCKY MOUNTAIN POWER	S2019295314	10/15/2015	\$10,588.35
SCHRILL TECHNOLOGIES INC	S2019295329	10/15/2015	\$35,520.00
STATE OF OKLAHOMA OKLAHOMA TAX COMMISSION	S2019294300	10/15/2015	\$80,658.90
SWEETWATER COUNTY TREASURER	S2019294305	10/15/2015	\$7,424,458.54
VERIZON WIRELESS	S2019295423	10/15/2015	\$25,779.41
WARD PETROLEUM CORPORATION	1555	11/19/15	\$16,248.32
WEATHERFORD US HOLDINGS LLC	S2019295435	10/15/2015	\$83,019.60
WOLD ENERGY PARTNERS, LLC	1692	11/19/15	\$199,412.43