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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

OCT 19 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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<i>In re:</i>	:	Chapter 11
	:	
ENDEAVOUR OPERATING	:	Case No. 14-12308 (KJC)
CORPORATION, et al.,¹	:	
	:	(Jointly Administered)
Debtors.	:	
	:	Re: D.I. 807 & 808
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**NOTICE OF FILING OF REVISED PROPOSED
ORDERS APPROVING (I) THE CREDIT BID AND ADEQUATE
PROTECTION MODIFICATION MOTION AND (II) THE DISMISSAL MOTION**


PLEASE TAKE NOTICE that, on August 3, 2015, Endcavour Operating Corporation and its above-captioned debtor affiliates (collectively, the "**Debtors**") filed the *Motion of the Debtors for Entry of (I) an Interim and Final Order Pursuant to Sections 105(a) and 363(b), (f), (k) and (m) of the Bankruptcy Code and Bankruptcy Rules 2002, 6004, and 9019 Approving the Credit Bid Asset Purchase Agreement Among the Debtors, First Priority Notes Collateral Agent, and the Credit Bid Noteholders, the Settlement Agreement Between and Among the Debtors, First Priority Noteholders, and Ad Hoc Group of EEUK Term Loan Lenders, Release of any Claims Against EEUK Term Loan Lenders, and Modification of Debtors' Services Agreements and (II) an Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9024 Approving Modification of the Adequate Protection Order (D.I. 807) (the "Credit Bid and Adequate Protection Modification Motion")* with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). Attached as **Exhibit A** to the Credit Bid and Adequate Protection Modification Motion was a proposed form of order approving the relief

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Endeavour Operating Corporation (6552); Endeavour International Corporation (8389); Endeavour Colorado Corporation (0067); END Management Company (7578); Endeavour Energy New Ventures Inc. (7563); Endeavour Energy Luxembourg S.à r.l. (2113). The Debtors' principal offices are located at 811 Main Street, Suite 2100, Houston, Texas 77002.

requested with respect to the Credit Bid APA (as defined in the Credit Bid and Adequate Protection Modification Motion) (the “**Original Proposed Credit Bid Order**”). Attached as **Exhibit B** to the Credit Bid and Adequate Protection Modification Motion was a proposed form of order (the “**Original Proposed Adequate Protection Modification Order**”) modifying the *Stipulated Order Granting (I) Adequate Protection to the Prepetition Noteholders and (II) Related Relief Pursuant to Sections 105(a), 361, 362, 363(e), and 507(b) of the Bankruptcy Code* (D.I. 166).

PLEASE TAKE FURTHER NOTICE that the Debtors have received and resolved certain objections and informal responses to the Original Proposed Credit Bid Order and the Original Proposed Adequate Protection Modification Order and have today filed a revised version of the Original Proposed Credit Bid Order (the “**Revised Proposed Credit Bid Order**”) that incorporates certain changes based on the resolutions and a revised version of the Original Proposed Adequate Protection Modification Order (the “**Revised Proposed Adequate Protection Modification Order**”) that incorporates certain changes based on the resolutions. A copy of the Revised Proposed Credit Bid Order, with exhibits, is attached hereto as **Exhibit A**. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Credit Bid Order, without exhibits, against the Original Proposed Credit Bid Order, without exhibits, is attached hereto as **Exhibit B**. A copy of the Revised Proposed Adequate Protection Modification Order is attached hereto as **Exhibit C**. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Adequate Protection Modification Order against the Original Proposed Modification Order is attached hereto as **Exhibit D**.

PLEASE TAKE FURTHER NOTICE that, on August 3, 2015, the Debtors filed the *Motion of the Debtors for Entry of an Order Pursuant to Sections 105(a), 305(a) and*



1112(b) of the Bankruptcy Code and Bankruptcy Rule 1017 Authorizing Dismissal of the Debtors' Cases under Certification of Counsel (D.I. 808) (the "**Dismissal Motion**") with the Court. Attached as **Exhibit A** to the Dismissal Motion was a proposed form of order approving the relief requested (the "**Original Proposed Dismissal Order**").

PLEASE TAKE FURTHER NOTICE that the Debtors have received and resolved certain objections and informal responses to the Original Proposed Dismissal Order and have today filed a revised version of the Original Proposed Dismissal Order (the "**Revised Proposed Dismissal Order**") and collectively with the Revised Proposed Credit Bid Order and the Revised Proposed Adequate Protection Modification Order, the "**Revised Orders**")² that incorporates certain changes based on the resolutions. A copy of the Revised Proposed Dismissal Order, with exhibits, is attached hereto as **Exhibit E**. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Dismissal Order, with certain exhibits, against the Original Proposed Dismissal Order, with certain exhibits, is attached hereto as **Exhibit F**.

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the Revised Orders to the Court at the hearing currently scheduled for **October 16, 2015 at 1:30 p.m. (prevailing Eastern Time)** (the "**Hearing**"). The Debtors reserve the right to make further modifications to the Revised Orders prior to the conclusion of the Hearing.

² The Revised Orders are in substantially final form but are subject to additional comments from parties in interest, including the parties to the transactions contemplated under the Revised Orders, and may be further modified prior to the hearing on October 16, 2015.

PLEASE TAKE FURTHER NOTICE that all filings in these cases may be viewed on the website of the Debtors' court approved claims agent, Kurtzman Carson Consultants ("**KCC**"), at www.kccllc.net/endeavour. All questions concerning the contents of this notice should be directed to KCC at (866) 967-0263 or, for international calls, at (310) 751-2633. Please note that KCC's staff is not permitted to give you legal advice.

Dated: October 13, 2015
Wilmington, Delaware

/s/ Rachel L. Biblo
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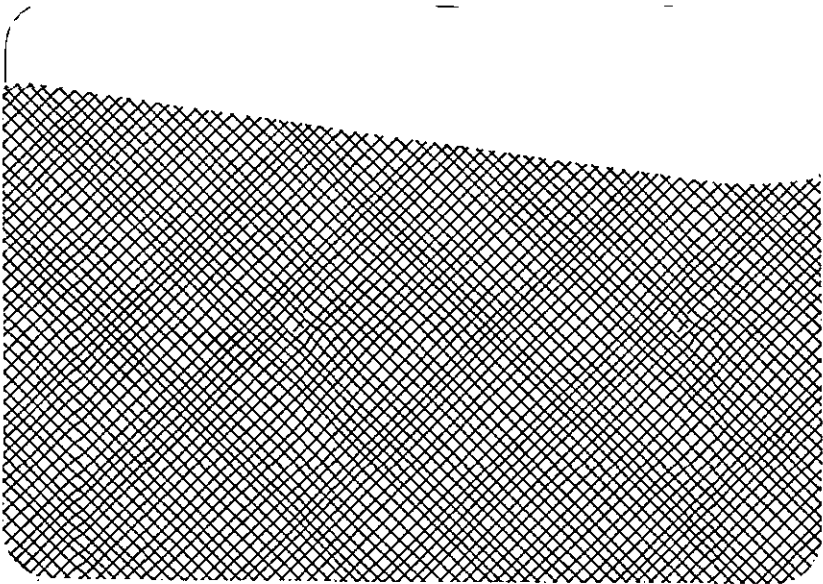
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