

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

**In re:** § CHAPTER 11  
§  
**SOUTHCROSS ENERGY PARTNERS,** § CASE No. 19-10702 (MFW)  
**L.P, et al.,** §  
§  
**Debtors.**

**TENNESSEE GAS PIPELINE COMPANY L.L.C.’S  
LIMITED OBJECTION TO DEBTOR’S PROPOSED ASSUMPTION OF  
CONTRACT ABSENT PAYMENT OF THE CORRECT CURE AMOUNTS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Tennessee Gas Pipeline Company L.L.C. (referred to herein as “TGP”) files this limited objection to Debtors’ Notice of Potential Assumption, Assumption and Assignment, or Rejection, docket entry 726-1, filed December 2, 2019 (the “Notice”) and in support of its objection, TGP states as follows:

1. TGP and Debtors Southcross Alabama Pipeline, LLC, Southcross Alabama Pipeline, L.P., Southcross Alabama Gathering System, L.P. and Southcross Mississippi (“Debtors”) are parties to transportation and related agreements with TGP as set forth in the Notice. (the “Agreements”).
2. Debtors have defaulted under the Agreements by failing to pay invoice number 0071411019000 in the amount of \$5,744.64 which was due November 22, 2019.



3. In addition, Invoice 007411119000 and Invoice 00623241119001 were billed to Debtors in the amounts of \$2,077.55 and \$4,031.29, respectively, on December 11, 2019 and remain outstanding.
4. The Notice provides that Debtors intends to assume the Agreements but does not list the cure amount. The current cure amount must be paid prior to the Debtors assuming the Agreements.

WHEREFORE, PREMISES CONSIDERED, TGP respectfully requests that as a condition precedent to assumption of the contract that Debtors be required to cure the default under the Agreement by making payment to TGP in the amounts set forth herein and for such other and further relief as may be just under the premises.

Respectfully submitted,

/s/Patricia Williams Prewitt  
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Counsel for **TENNESSEE GAS PIPELINE  
COMPANY L.L.C.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Objection was served by electronic mail on the 12th day of December 2019.