Docket #0459 Date Filed: 06/14/2021

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
SUPERIOR ENERGY SERVICES, INC., *et al.*,[1]	:	Case No. 20-35812 (DRJ)
Reorganized Debtors.	:	(Jointly Administered)

STIPULATION REGARDING PROOF OF
CLAIM NO. 423 FILED BY APACHE CORPORATION

WHEREAS, on January 7, 2021, Apache Corporation ("**Apache**") filed proof of claim number 423 against debtor Superior Energy Services, Inc. ("**Parent**") asserting a general unsecured claim in an unliquidated amount (the "**Apache Claim**");

WHEREAS, on January 19, 2021, the Court entered an order (the "**Confirmation Order**") [Docket No. 289] confirming the *First Amended Joint Prepackaged Plan of Reorganization for Superior Energy Services, Inc. and its Affiliate Debtors under Chapter 11 of the Bankruptcy Code* (as amended, modified, or supplemented, the "**Plan**");[2]

[1] The Reorganized Debtors in these cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Superior Energy Services, Inc. (9388), SESI, L.L.C. (4124), Superior Energy Services-North America Services, Inc. (5131), Complete Energy Services, Inc. (9295), Warrior Energy Services Corporation (9424), SPN Well Services, Inc. (2682), Pumpco Energy Services, Inc. (7310), 1105 Peters Road, L.L.C. (4198), Connection Technology, L.L.C. (4128), CSI Technologies, LLC (6936), H.B. Rentals, L.C. (7291), International Snubbing Services, L.L.C. (4134), Stabil Drill Specialties, L.L.C. (4138), Superior Energy Services, L.L.C. (4196), Superior Inspection Services, L.L.C. (4991), Wild Well Control, Inc. (3477), and Workstrings International, L.L.C. (0390). The Reorganized Debtors' address is 1001 Louisiana Street, Suite 2900, Houston, Texas 77002.

[2] Capitalized terms used but defined herein have the meanings given to them in the Plan.

2035812210614000000000005

WHEREAS, on February 2, 2021, the Plan was substantially consummated, and the Effective Date occurred; [3]

WHEREAS, Article VIII.A.2 of the Plan authorizes the Reorganized Debtors to settle or compromise any Claim and to administer and adjust the Claims Register to reflect any such settlements or compromises without any further notice to or action, order, or approval of the Bankruptcy Court; and

WHEREAS, Apache and Parent have engaged in discussions and have reached an agreement on resolution of the Apache Claim.

IT IS THEREFORE STIPULATED AND AGREED THAT,

1. The Apache Claim is allowed as a Class 6 General Unsecured Claim against Parent in the amount of $31,000,000 and shall be discharged and treated as a Class 6 General Unsecured Claim under the Plan.

2. Apache and Parent retain all rights under the Plan and Confirmation Order. This stipulation is not an admission of liability, and shall not be treated as a determination of the merits of any claim or defense that was asserted or could be asserted by either party in any other proceeding or matter.

3. Except as provided herein, nothing in this stipulation shall affect Apache's rights with respect to the other Reorganized Debtors. To the extent that Apache has claims against any of the Reorganized Debtors other than Parent, such claims shall be afforded the treatment under Class 8 of the Plan.

---

[3] *See Notice of Effective Date and Entry of Order Approving the Disclosure Statement and Confirming the First Amended Joint Prepackaged Plan of Reorganization for Superior Energy Services, Inc. and its Affiliate Debtors under Chapter 11 of the Bankruptcy Code* [Docket No. 317].

4. No other person or entity not a party to this stipulation shall be deemed a third-party beneficiary of any provision of this stipulation or shall otherwise be entitled to enforce any provision hereof.

STIPULATED AND AGREED TO BY:
June 14, 2021

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II (TX Bar No. 24012503)
Ashley L. Harper (TX Bar No. 24065272)
Philip M. Guffy (TX Bar No. 24113705)
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, Texas 77002
Tel: 713-220-4200
Fax: 713-220-4285
Email: taddavidson@HuntonAK.com
ashleyharper@HuntonAK.com
pguffy@HuntonAK.com

George A. Davis (admitted *pro hac vice*)
Keith A. Simon (admitted *pro hac vice*)
George Klidonas (admitted *pro hac vice*)
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, New York 10020
Tel: 212-906-1200
Fax: 212-751-4864
Email: george.davis@lw.com
keith.simon@lw.com
george.klidonas@lw.com

Counsel for the Reorganized Debtors

-and-

/s/ Sharon M. Beausoleil

Sharon M. Beausoleil
Texas Bar No. 24025245
FOLEY LARDNER LLP
1000 Louisiana Street, Suite 2000
Houston, Texas, 77002
Tel: 713-276-5500
Fax: 713-276-5555
Email: sbeausoleil@foley.com

Counsel for Apache Corporation