IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re White Forest Resources, Inc., *et al.*,[1] Debtors.	Chapter 7 Case No. 25-10195 (TMH) (Jointly Administered) **Hearing Date: November 4, 2025 at 11:00 a.m. (ET)** **Objection Deadline: October 28, 2025 at 4:00 p.m. (ET)**

TRUSTEE'S APPLICATION TO EMPLOY COZEN O'CONNOR
AS GENERAL BANKRUPTCY COUNSEL

Jeoffrey L. Burtch, the chapter 7 trustee (the "Trustee") for the estates (the "Estates") of the above-captioned debtors ("Debtors") hereby applies for authority to employ the law firm of Cozen O'Connor ("Cozen") as general bankruptcy counsel to the Trustee (the "Application") effective as of September 1, 2025, and states in support:

Jurisdiction, Core Nature, Venue, and Statutory Basis

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

2. Venue of these cases and this Application is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief sought in this Application are sections 327(a) and 328(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq*. (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 2014-1 of the Local Rules of the Court (the "Local Rules").

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: White Forest Resources, Inc. (3764); Xinergy Corp. (3865); Xinergy of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors' service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

4. Pursuant to Local Rule 9013-l(f), the Trustee consents to the entry of a final order with respect to this Application if it is determined that the Court lacks adjudicatory authority under Article III of the United States Constitution to enter such final order absent consent of the parties.

Background

5. On February 7, 2025 (the "Petition Date"), the Debtors commenced the above-captioned bankruptcy cases by filing voluntary petitions under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Delaware (the "Court").

6. On August 25, 2025 (the "Conversion Date"), the Court entered an order converting the Debtors' cases to cases under chapter 7 of the Bankruptcy Code. On or about August 29, 2025, the Office of the United States Trustee appointed the Trustee. The Debtors had ceased all operations by the Conversion Date, and the Trustee has not operated the Debtors' business.

7. The meeting of creditors pursuant to section 341 of the Bankruptcy Code is scheduled for October 8, 2025.

Relief Requested

8. By this Application, the Trustee requests entry of an order, substantially in the form attached hereto, authorizing him to employ Cozen as his general bankruptcy counsel in these bankruptcy cases.

9. The Trustee requested that Cozen commence performing services on September 1, 2025, and so is requesting that the Court approve Cozen's employment as of that date.

The Employment and Retention of Cozen

10. The Trustee seeks authorization to employ Cozen as counsel to provide services to the extent necessary and as requested by the Trustee in connection with the matters described herein.

11. Cozen is a nationally recognized, full-service law firm with numerous areas of practice, including without limitation bankruptcy, environmental, corporate, securities, energy, real estate, tax, labor, finance, insurance, commercial litigation, healthcare, and intellectual property. Cozen is well-qualified to represent the Trustee, as Cozen's bankruptcy practice group has considerable experience representing chapter 7 trustees, including in cases similar to this one.

12. The Trustee believes that the employment of Cozen as his general bankruptcy counsel in these cases is in the best interests of the Estates. As Exhibit "A" to this Application, the Trustee is submitting a Verified Statement of Mark E. Felger, Esq. in Support of the Application (the "Felger Statement"). Mr. Felger is a shareholder of Cozen, and the co-chair of Cozen's Bankruptcy, Insolvency & Restructuring group. Based on the Felger Statement, the Trustee believes that Cozen is disinterested as defined in section 101(14) of the Bankruptcy Code, that Cozen does not hold or represent any interest adverse to the Debtors and the Estates, and that Cozen is well-qualified to perform the legal services required by the Trustee on behalf of the Estates.

Scope of Services

13. The Trustee currently seeks to retain Cozen, subject to Court approval, to perform services including without limitation the following:

a) To advise and consult with the Trustee concerning questions arising in the conduct of the administration of the Estates and concerning the Trustee's rights and remedies with regard to the Estates' assets and the claims of secured, priority, and unsecured creditors and other parties in interest;

b) To advise and consult with the Trustee concerning any sale or other disposition of any assets of the Estates;

c) To advise and appear for, prosecute, defend and represent the Estates' interests' in contested matters, adversary proceedings, and other actions arising in or related to these cases;

d) To investigate and pursue claims or causes of action against insiders and/or third parties;

e) To assist in the preparation of such pleadings, agendas, motions, notices, and orders as are required for the orderly administration of the Estates; and

f) To handle such other matters as the Trustee may require during the course of his administration of these cases.

Compensation

14. In accordance with section 330(a) of the Bankruptcy Code, compensation will be payable to Cozen on an hourly basis, plus reimbursement of its actual and necessary expenses incurred in the course of its representation of the Trustee, as set forth in the Felger Statement. Cozen's hourly rates are set at a level designed to compensate it fairly for the work of its attorneys and paraprofessionals, and to cover fixed and routine expenses. Hourly rates vary with the experience and seniority of the individuals assigned and may be adjusted by Cozen from time to time. Cozen's policy is to charge its clients in all areas of practice for all expenses incurred in

connection with a client's matter. Expenses charged to clients include, among other things, photocopying, travel expenses, filing and recording fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges, expenses for "working meals," and telecopy charges. Cozen will charge the Trustee for these expenses in a manner and at rates consistent with charges generally made to its other clients.

15. Cozen intends to apply to the Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

16. Subject to approval by the Court, and in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, the Trustee proposes to pay Cozen its customary hourly rates in effect from time to time, as set forth in the Felger Statement, and submits that such rates are reasonable. Additionally, the Trustee proposes to reimburse Cozen for expenses that it incurs in its representation of the Trustee in these cases.

Notice

17. Notice of this Application has been provided to: (i) Debtors' counsel; (ii) the United States Trustee; and (iii) all parties in interest having requested notice pursuant to Rule 2002. In light of the nature of the relief requested, the Trustee submits that no further notice need be given.

WHEREFORE, the Trustee respectfully requests that the Court enter an order, in substantially the attached form: (i) authorizing him to retain Cozen as his general bankruptcy counsel in the Debtors' bankruptcy cases effective as of September 1, 2025; and (ii) granting any other relief that may be just and proper.

Dated: October 6, 2025

<u>/s/ Jeoffrey L. Burtch</u>
Jeoffrey L. Burtch, Chapter 7 Trustee
919 North Market Street, Suite 460
Wilmington, DE 19801
Telephone: (302) 472-7427

Chapter 7 Trustee for the Debtors' Estates

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re White Forest Resources, Inc., *et al.*,[1] Debtors.	Chapter 7 Case No. 25-10195 (TMH) (Jointly Administered) **Hearing Date: November 4, 2025 at 11:00 a.m. (ET)** **Objection Deadline: October 28, 2025 at 4:00 p.m. (ET)**

VERIFIED STATEMENT OF MARK E. FELGER, ESQ. IN SUPPORT OF TRUSTEE'S APPLICATION TO EMPLOY COZEN O'CONNOR AS GENERAL BANKRUPTCY COUNSEL

Introduction

1. I am a Shareholder of the firm of Cozen O'Connor ("Cozen"), which maintains an office for the practice of law at 1201 North Market Street, Suite 1001, Wilmington, Delaware 19801, and its principal office at 1650 Market Street, Philadelphia, Pennsylvania 19103. Cozen is a nationally recognized, full-service law firm with numerous areas of practice, including without limitation, bankruptcy, environmental, corporate, securities, energy, real estate, tax, labor, finance, insurance, commercial litigation, healthcare, and intellectual property.

2. I am an attorney admitted, practicing, and in good standing in the State of Delaware, the State of New Jersey, the State of New York, and the Commonwealth of Pennsylvania. I am admitted to practice before the United States District Court for the District of Delaware; the United States District Court for the Eastern District of Pennsylvania; the United States District Court for the District of New Jersey; the United States District Courts for the Northern, Eastern, and Southern Districts of New York; and the United States Court of Appeals for the Third Circuit.

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: White Forest Resources, Inc. (3764); Xinergy Corp. (3865); Xinergy of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors' service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

3. I submit this statement (the "Statement") in support of the *Trustee's Application to Employ Cozen O'Connor as General Bankruptcy Counsel*,[2] in which the Trustee seeks an order, among other things, authorizing him to employ Cozen as his general bankruptcy counsel in the above captioned bankruptcy cases (the "Bankruptcy Cases"). Among other things, this Statement provides the disclosures required under Bankruptcy Rules 2014(a) and 2016(b).

4. Unless otherwise stated herein, I have personal knowledge of the facts set forth in this Statement.

5. On or about September 1, 2025, the Trustee requested that Cozen become his general bankruptcy counsel in the Bankruptcy Cases, to assist with matters including without limitation those described in the Application. Cozen began performing services for the Trustee on or about September 1, 2025, subject to Court approval.

6. Cozen has extensive expertise and knowledge in the fields of debtors' and creditors' rights, and business reorganization and liquidation under the Bankruptcy Code. In preparing to represent the Trustee in the Bankruptcy Cases, Cozen has become familiar with the business and financial affairs of the Debtors and the potential legal issues that have arisen or may arise in the context of the Bankruptcy Cases. Cozen is both well qualified and able to represent the Trustee in the Bankruptcy Cases in an efficient and timely manner.

7. Except as set forth in this Statement, and subject to the prompt completion of a detailed conflicts check, I have not, nor has any shareholder, member, associate or counsel of Cozen, insofar as I have been able to ascertain, represented the Debtors, the Debtors' creditors, equity security holders, or any other party in interest in connection with the Bankruptcy Cases.

[2] Capitalized terms not otherwise defined in this Statement shall have the meanings provided in the Application.

The Firm Procedures

8. To prepare this Statement, I obtained the names of the parties enumerated in Bankruptcy Rule 2014(a)(2). Attached hereto as Exhibit A is a chart of all of the names that I caused to be submitted for review in Cozen's conflicts system. Upon a review of the report generated by our conflicts search, I do not represent and, to the best of my knowledge, none of the other attorneys of Cozen represents, any of the entities set forth on Exhibit A, except as may be set forth on the schedule attached hereto as Exhibit B. The various matters set forth on Exhibit B are unrelated to the Debtors or the Bankruptcy Cases.

9. Cozen maintains and systematically updates its conflict check system in the regular course of business of the firm, and it is the regular practice of Cozen to make and maintain these records. Cozen's conflict system is designed to include: (i) every matter on which Cozen now or has been engaged; (ii) the entity engaging Cozen; (iii) the identity of related parties and their relationship to the matter; and (iv) the attorney at Cozen who is responsible for the matter. Cozen's policy is that no new matter shall be accepted or opened within the firm without the completion and submission to the firm's case management staff the information necessary to check such matter for conflicts. Although the conflicts system is regularly updated for every new matter undertaken by Cozen, the accuracy of the conflicts system and the scope of its coverage is a function of the completeness and accuracy of the information submitted by the attorneys opening new matters.

Cozen Connections with Parties In Interest

10. To the best of my knowledge after diligent inquiry, except as set forth on Exhibit B to this Statement, Cozen has no material "connections," as such term is used in Bankruptcy Rule 2014(a), with the Trustee, the Debtors, the Debtors' creditors, any other party in interest,

their respective attorneys and accountants, the United States trustee, and any person employed in the United States trustee's office, all to the extent ascertainable from the information obtained from the Debtors' petitions and initial filings in the Bankruptcy Cases. Cozen will supplement this Statement as additional names of parties enumerated in Bankruptcy Rule 2014(a)(2) become available and are submitted for conflict checks.

11. Cozen is an international law firm with more than 925 attorneys practicing in 32 offices in the United States, Canada, and the United Kingdom. In addition to insolvency law, Cozen provides legal counsel in many practice areas such as environmental, tax, healthcare, insurance, intellectual property, public finance, real estate, securities, and commercial litigation. Cozen's largest practice group is devoted to insurance litigation, primarily coverage litigation, commercial subrogation, and casualty defense.

12. As a large international law firm, Cozen maintains a large and diversified legal practice that encompasses the representation of many financial institutions, private and public commercial entities, and other entities and individuals, some of which are or may consider themselves to be creditors or parties in interest in the Bankruptcy Cases. Cozen will not represent any of such entities or individuals in connection with the Bankruptcy Cases.

13. The Honorable Thomas M. Horan, the Judge presiding over the Bankruptcy Cases, was a member of Cozen for approximately three years before he took the bench in early 2023.

14. I shall supplement or amend this Statement in the event that additional disclosure is required with respect to any of the parties in interest identified in this Statement or any other parties in the categories enumerated in Bankruptcy Rule 2014(a)(2) that become known to Cozen in the course of the Bankruptcy Cases.

Cozen is Disinterested

15. Based on the conflicts search conducted to date and described herein, to the best of my knowledge, neither I, Cozen, nor any member, counsel, or associate thereof, insofar as I have been able to ascertain, has any connection with the Trustee, the Debtors, the Debtors' creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the United States Trustee's office, except as disclosed herein.

16. Cozen is a "disinterested person" as that term is defined in § 101(14) of the Bankruptcy Code, in that Cozen, its members, counsel and associates:

A. are not creditors, equity security holders, or insiders of the Debtors;

B. are not and were not, within two years before the date of commencement of the Bankruptcy Cases a director, officer, or employee of the Debtors; and

C. do not have any interest materially adverse to the interest of the estates or any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

Cozen's Rates and Billing Practices

17. Cozen intends to apply for compensation for professional services rendered in connection with the Bankruptcy Cases, subject to Court approval, in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any applicable orders of the Court. Such applications will seek compensation on an hourly basis,[3] plus reimbursement of actual, necessary expenses and other charges that Cozen incurs during the Bankruptcy Cases. The principal attorneys and paralegal designated to represent the Trustee in

[3] In the event that the Trustee and Cozen agree that the firm should pursue certain claims and causes of action on a contingent fee basis, a separate notice will be filed with the Court setting out the terms of such engagement.

the Bankruptcy Cases, and their standard hourly rates are as follows:

Mark E. Felger, Shareholder	$995 per hour
Simon Fraser, Member	$850 per hour
Shaina E. Carney, Paralegal	$315 per hour

The hourly rates set forth above are subject to periodic adjustment to reflect economic and other conditions. Customarily, such rates are adjusted effective January 1st of each year. Other attorneys and paralegals may from time to time serve the Trustee in connection with the matters described in this Statement.

18. The hourly rates set forth above are Cozen's standard hourly rates for insolvency work of this nature. These rates are set at a level to compensate Cozen fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. It is Cozen's policy to charge its clients in all areas of practice for all expenses incurred in connection with the client's case. These expenses include, among other things, long distance telephone charges, facsimile charges, certain mail charges, express mail charges, special or hand delivery charges, photocopying charges, computerized research, travel expenses, and expenses for "working meals," as well as extra-ordinary overhead expenses such as secretarial overtime. Cozen will charge the Trustee for these expenses in a manner and at rates consistent with the charges made to Cozen's clients, generally.

19. Cozen has not entered into any agreement or writing with third parties respecting the division of fees to be received in these Bankruptcy Cases or other agreement prohibited by 18 U.S.C. § 155.

Conclusion

20. This Statement constitutes the statement of Cozen pursuant to §§ 327, 328(a), 329, and 504 of the Bankruptcy Code, and Fed. R. Bankr. P. 2014(a) and 2016(b).

I declare under penalty of perjury that the foregoing is true and correct.

COZEN O'CONNOR

Dated: October 6, 2025

/s/ Mark E. Felger

Mark E. Felger (No. 3919)
1201 North Market Street, Suite 1001
Wilmington, DE 19801
(302) 295-2000
mfelger@cozen.com

Proposed Counsel to Jeoffrey L. Burtch, Chapter 7 Trustee

EXHIBIT "A"

DEBTORS
White Forest Resources, Inc. Xinergy Corp. Xinergy of West Virginia, Inc. Shenandoah Energy, LLC South Fork Coal Company, LLC Raven Crest Mining, LLC Bull Creek Processing Company, LLC Brier Creek Coal Company, LLC Raven Crest Contracting, LLC Raven Crest Leasing, LLC Raven Crest Minerals, LLC
TRUSTEE
Jeoffrey L. Burtch
SECURED CREDITORS
Spectrum Origination LLC Rudd Equipment Company Utica Leaseco, LLC Aegis Business Credit, LLC Bill Miller Equipment Sales, Inc. Carter Machinery Company, Inc. Caterpillar Financial Services Corp. Highland Mineral Resources, LLC Rish Equipment Company Weyerhaeuser Company
INTERESTED PARTIES
Brian Ryniker Jeffrey A. Schaffer Brian Asby West Virginia Department of Environmental Protection Cantor Fitzgerald Securities Appalachian Power Company and Penn Virginia Operating Company LLC Appalachian Power Company d/b/a American Electric Power Diversified Production, LLC

Professional Highwell Mining Services River Trading Company, Ltd. Sundial Mining, LLC Loadout LLC Penn Virginia Operating Company LLC James Young Kelley Generator Quimica del Nalon SSAB EMEA AB First National Capital, LLC United Rental Company Dominion Energy South Carolina First National Capital, LLC Xcoal Energy & Resources
INSURERS
Crum & Forster First Surety Corporation Houchens Specialty Insurance Company Imperium Insurance Company Lloyds of London RSUI Indemnity Company Starstone Insurance Rockwood Casualty Insurance Company Starr Specialty Insurance Company Lexon Insurance Company
LANDLORDS
Map Ground Lease Owner LLC Professional Park Properties, Inc.
JUDGES
Chief Judge Karen B. Owens Judge John T. Dorsey Judge Craig T. Goldblatt Judge Thomas H. Horan Judge Brendan L. Shannon Judge Laurie Selber Silverstein Judge J. Kate Stickles Judge Mary F. Walrath

EXHIBIT "B"

CLIENT	RELATIONSHIP TO DEBTOR	MATTER
Jeoffrey L. Burtch	Chapter 7 Trustee	Cozen O'Connor represents the Trustee in other chapter 7 cases, including these pending cases (and cases of their affiliates) IntegraMed America, Inc.; Windhaven Top Insurance Holdings, LLC; Dura Automotive Systems, LLC; GigaMedia Access Corporation; Insightra Medical, Inc.; Prodigy Network, LLC; Pyrolyx USA Indiana, Inc.; ProAir HoldCo, LLC; Sears Authorized Hometown Stores, LLC; Canno, Inc.; Notable Labs, Inc.; Kiromic Biopharma, Inc.; Bitwise Industries; Arnold Transportation Services; and Outfox Hospitality LLC. Cozen O'Connor also represents parties who are adverse to Jeoffrey L. Burtch in his capacity as Chapter 7 Trustee to other bankruptcy estates.
West Virginia Department of Environmental Protection	Creditor	Cozen O'Connor represents an entity in a matter unrelated to these proceedings in which West Virginia Department of Environmental Protection is an interested party.
Judge Thomas M. Horan	Judge	Judge Horan is a former member of Cozen O'Connor.

(COZEN O'CONNOR'S CONFLICT RESOLUTION PROCEDURE IS ONGOING, AND COZEN O'CONNOR WILL UNDERTAKE TO SUPPLEMENT THIS DECLARATION AS NECESSARY)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re White Forest Resources, Inc., *et al.*,[1] Debtors.	Chapter 7 Case No. 25-10195 (TMH) (Jointly Administered) **Hearing Date: November 4, 2025 at 11:00 a.m. (ET)** **Objection Deadline: October 28, 2025 at 4:00 p.m. (ET)**

NOTICE OF TRUSTEE'S APPLICATION TO EMPLOY COZEN O'CONNOR AS GENERAL BANKRUPTCY COUNSEL

TO: United States Trustee; Counsel for the Debtors; and All Parties Requesting Notice

PLEASE TAKE NOTICE that Jeoffrey L. Burtch (the "Movant"), Chapter 7 Trustee, has filed an *Application to Employ Cozen O'Connor as General Bankruptcy Counsel* in the above-captioned cases effective as of September 1, 2025 (the "Application").

PLEASE TAKE FURTHER NOTICE that if you wish to respond to the Application, you must do so in writing, and file your response with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware so that it is actually received by **4:00 p.m. on October 28, 2025.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response upon Movant's proposed counsel:

Mark E. Felger, Esquire
Simon, E. Fraser, Esquire
Cozen O'Connor
1201 N. Market Street, Suite 1001
Wilmington, DE 19801-1147

Please take further notice that if objections are filed, a hearing on the Application will be held on November 4, 2025 at 11:00 a.m. (ET) before the Honorable Thomas M. Horan, United States Bankruptcy Judge, United States Bankruptcy Court, 824 N. Market St. 3rd Floor, Courtroom No. 5, Wilmington, DE 19801.

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: White Forest Resources, Inc. (3764); Xinergy Corp. (3865); Xinergy of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors' service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

Please take further notice that if you fail to respond in accordance with this notice, the Bankruptcy Court may grant the relief requested by the Application without further notice or hearing.

COZEN O'CONNOR

Dated: October 6, 2025

<u>/s/ Simon E. Fraser</u>
Mark E. Felger (No. 3919)
Simon E. Fraser (No. 5313)
1201 N. Market Street, Suite 1001
Wilmington, DE 19801-1147
302-295-2000
mfelger@cozen.com
sfraser@cozen.com

Proposed Counsel to Chapter 7 Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re White Forest Resources, Inc., *et al.*,[1] Debtors.	Chapter 7 Case No. 25-10195 (TMH) (Jointly Administered)

ORDER GRANTING TRUSTEE'S APPLICATION TO EMPLOY COZEN O'CONNOR AS GENERAL BANKRUPTCY COUNSEL

Upon consideration of the *Trustee's Application to Employ Cozen O'Connor as General Bankruptcy Counsel* (the "Application");[2] and pursuant to the Verified Statement of Mark E. Felger (the "Felger Statement") in support of the Application; and the Court being satisfied that: (i) Cozen is disinterested as that term is defined in section 101(14) of the Bankruptcy Code and does not hold or represent any entity having an adverse interest in connection with the Debtors' cases, (ii) that retention of Cozen as counsel to the Trustee is necessary and in the best interests of the Estates; (iii) appropriate notice of the Application has been given; and (iv) sufficient cause appearing,

IT IS ORDERED THAT:

1. The Application is GRANTED.

2. Pursuant to section 327 of the Bankruptcy Code, the Trustee is hereby authorized to employ and retain Cozen to serve as counsel to the Trustee effective as of September 1 2025, to provide the services described in the Application on the terms and conditions set forth in the

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: White Forest Resources, Inc. (3764); Xinergy Corp. (3865); Xinergy of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors' service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

[2] Capitalized terms not otherwise defined in this Order shall have the meanings provided in the Application.

Application and in accordance with Cozen's normal hourly rates and reimbursement policies, as set forth in the Felger Statement.

3. Compensation to be paid to Cozen for services rendered to the Trustee, plus reimbursement of Cozen's expenses incurred in connection with the representation of the Trustee, shall be determined by the Court upon appropriate application therefore in accordance with sections 330 and 331 of the Bankruptcy Code, and the applicable Bankruptcy Rules and Local Rules.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re White Forest Resources, Inc., *et al.*,[1] Debtors.	Chapter 7 Case No. 25-10195 (TMH) (Jointly Administered)

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that on Monday, October 6, 2025, the foregoing *Trustee's Application to Employ Cozen O'Connor as General Bankruptcy Counsel* was efiled and served by CM/ECF on all parties registered to receive notification of such filings, and also served by U.S. Mail on the parties listed on the attached Service List.

COZEN O'CONNOR

Dated: October 6, 2025

<u>/s/ Simon E. Fraser</u>
Mark E. Felger (No. 3919)
Simon E. Fraser (No. 5313)
1201 N. Market Street, Suite 1001
Wilmington, DE 19801-1147
302-295-2000
mfelger@cozen.com
sfraser@cozen.com

Proposed Counsel to Chapter 7 Trustee

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: White Forest Resources, Inc. (3764); Xinergy Corp. (3865); Xinergy of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors' service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

SERVICE LIST

West Virginia Department of Environmental Protection c/o Bailey & Glasser, LLP Attn: David A. Felice, Esq. 2961 Centerville Road, Suite 302 Wilmington, DE 19808	SSAB EMEA AB SSAB Europe Oy c/o Sullivan Hazeltine Allinson LLC 919 North Market Street, Suite 420 Wilmington, DE 19801
Professional Highwell Mining Services, LLC c/o Gorman, Sheatsley & Company, LC Attn: James R. Sheatsley, Esq. P.O. Box 5518 343 Prince Street, Suite B Beckley, WV 25801	Professional Park Properties, LLC c/o Gorman,Sheatsley & Company, LC Attn: James R. Sheatsley, Esq. P.O. Box 5518 343 Prince Street, Suite B Beckley, WV 25801
R.T. Rogers Oil Company, Inc. c/o Gorman, Sheatsley & Company, LC Attn: James R. Sheatsley, Esq. P.O. Box 5518 343 Prince Street, Suite B Beckley, WV 25801	MAP Ground Lease Owner LLC c/o Sirlin Lesser & Benson, P.C. Attn: Dana S. Plon, Esq. 123 South Broad Street, Suite 2100 Philadelphia, PA 19109
Caterpillar Financial Services Corporation c/o Buchanan Ingersoll & Rooney PC Attn: Geoffrey G. Grivner, Esq. 500 Delaware Ave., Suite 720 Wilmington, DE 19801	Dominion Energy South Carolina, Inc. c/o Moore & Van Allen PLLC Attn: David B. Wheeler, Esq. 78 Wentworth Street (29401) P.O. Box 22828 Charleston, SC 29413-2828
First Surety Corporation c/o McElroy, Deutsch, Mulvaney & Carpenter, LLP Attn: Gaston P. Loomis, Esq. Attn: Gary D. Bressler, Esq. 300 Delaware Ave., Suite 1014 Wilmington, DE 19801	Kinder Morgan Operating LLC c/o Law Office of Patricia Williams Prewitt Attn: Patricia Williams Prewitt, Esq. 2456 FM 112 Taylor, TX 76574
Carter Machinery Company Inc. c/o Montgomery McCracken Walker & Rhoads LLP Attn: Gregory T. Donilon, Esq. 1105 N. Market Street, Suite 1500 Wilmington, DE 19801	M Resources Trading SA c/o Tucker Arsenberg, P.C. Attn: Michael A. Shiner, Esq. 1500 One PPG Place Pittsburgh, PA 15222

Eagle Horizon Resources, LLC Eagle Specialty Materials, LLC c/o Offit Kurman, P.A. Attn: Joyce A. Kuhns, Esq. Attn: Brian J. McLaughlin, Esq. 222 Delaware Ave., Suite 1105 Wilmington, DE 19801	Spectrum Origination LLC Spectrum Credit Opportunities Fund II, LP c/o Faegre Drinker Biddle & Reath, LLP Attn: Patrick A. Jackson, Esq. 222 Delaware Avenue, Suite 1410 Wilmington, DE 19801
Aegis Business Credit, LLC c/o Gellert Seitz Busenkell & Brown, LLC Attn: Michael Busenkell, Esq. 1201 N. Orange Street, Suite 300 Wilmington, DE 19801	TN Department of Revenue c/o TN Attorney General's Office, Bankruptcy Division Attn: Laura L. McCloud, Esq. P.O. Box 20207 Nashville, TN 37202-0207
Penn Virginia Operation Co., LLC c/o Spilman Thomas & Battle, PLLC Attn: Peter M. Pearl, Esq. 310 First Street, Suite 1100 P.O. Box 90 Roanoke, VA 24002	William E. Chipman, Jr., Esq. Alan M. Root, Esq. Bryan J. Hall, Esq. Alison Maser, Esq. Mariska Suparman, Esq. Chipman Brown Cicero & Cole LLP 1313 N. Market Street, Suite 5400 Wilmington, DE 19801
Joseph F. Cudia, Esq. Office of the United States Trustee J. Caleb Boggs Federal Building 844 N. King Street, Suite 2207 Lockbox 35 Wilmington, DE 19801	