

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA**

<b>IN RE:</b>	§	<b>CASE NO. 14-51099</b>
	§	
<b>MATAGORDA ISLAND GAS OPERATIONS, LLC</b>	§	<b>CHAPTER 11</b>
	§	
<b>DEBTOR.</b>	§	

**SUPPLEMENT TO MEMORANDUM IN SUPPORT OF THE UNITED STATES  
TRUSTEE’S MOTION TO CONVERT CASE TO CHAPTER 7**  
**[Relates to Docket Nos. 33, 53]**

COMES NOW, Stallion Offshore Quarters, Inc. (“Stallion”), and Wood Group PSN, Inc. f/k/a Wood Group Production Services, Inc. (“Wood Group”), lien creditors and parties in interest, through undersigned counsel, and files this *Supplement to Memorandum in Support of the United States Trustee’s Motion to Convert Case to Chapter 7*, which supplements Stallion’s memorandum in support on conversion (the “Memorandum”) [Docket No. 53], and would respectfully represent to the Court the following:

Matagorda Island Gas Operations, LLC (the “Debtor”) owns an offshore oil drilling platform located in the Gulf of Mexico known as Matagorda Island 632 (commonly known as the “MI 632”). Both Stallion and Wood Group hold liens against this property. As noted in the Memorandum, this platform is deserted, non-producing, unmanned, and upon information and belief, still completely uninsured. Wood Group’s personnel flew out to an adjacent platform this morning, and passed near the MI 632 to take photographs of the property, and would now offer them to the Court in support of the Memorandum for demonstrative purposes.

**The following seven (7) images depict the MI 632 from different aerial angles. These photos were taken this morning (February 23, 2015). Stallion’s stranded crew quarters are highlighted:**









WHEREFORE, Stallion and Wood Group pray that this supplement be considered, and that the case of Matagorda Island Gas Operations, LLC be converted to one under Chapter 7 of the United States Bankruptcy Code, or alternatively, dismissed.

Respectfully Submitted,

**DORÉ LAW GROUP, P.C.**

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Stallion Offshore Quarters, Inc., &  
Wood Group Production Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2015, a true and correct copy of the foregoing was served by the Court's Electronic Case Filing System to all parties registered or otherwise entitled to receive electronic notices.

By: /s/ Carl Doré  
Carl Doré, Jr.