

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

THE HEARTLAND GROUP VENTURES, LLC;
HEARTLAND PRODUCTION AND RECOVERY
LLC; HEARTLAND PRODUCTION AND
RECOVERY FUND LLC; HEARTLAND
PRODUCTION AND RECOVERY FUND II LLC;
THE HEARTLAND GROUP FUND III, LLC;
HEARTLAND DRILLING FUND I, LP; CARSON
OIL FIELD DEVELOPMENT FUND II, LP;
ALTERNATIVE OFFICE SOLUTIONS, LLC;
ARCOIL CORP.; BARRON PETROLEUM
LLC; JAMES IKEY; JOHN MURATORE;
THOMAS BRAD PEARSEY; MANJIT SINGH
(AKA ROGER) SAHOTA; and RUSTIN
BRUNSON,

Defendants,

and

DODSON PRAIRIE OIL & GAS LLC; PANTHER
CITY ENERGY LLC; MURATORE FINANCIAL
SERVICES, INC.; BRIDY IKEY; ENCYIPHER
BASTION, LLC; IGROUP ENTERPRISES LLC;
HARPRIT SAHOTA; MONROSE SAHOTA;
SUNNY SAHOTA; BARRON ENERGY
CORPORATION; DALLAS RESOURCES INC.;
LEADING EDGE ENERGY, LLC; SAHOTA
CAPITAL LLC; and 1178137 B.C. LTD.,

Relief Defendants.

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No. 4-21CV-1310-O-BP

NOTICE OF PROPOSED PUBLIC AUCTION OF CERTAIN OIL AND GAS ASSETS

[HARDEMAN AND WICHITA COUNTIES – LOT 3]

This Notice of Proposed Public Auction of Certain Oil and Gas Assets (the “Notice”) relates to the auction and sale of certain oil and gas assets (the “Receivership Oil and Gas Assets”) of the Receivership Estates by public auction through EnergyNet.com, LLC (“EnergyNet”). If you oppose the auction or sale of a particular Receivership Oil and Gas Asset identified in this Notice, or if you have a claim secured by or otherwise against the Receivership Oil and Gas Assets, you should immediately contact the undersigned counsel for Receiver Deborah D. Williamson (the “Receiver”). If you and the Receiver are unable to resolve your objection, you must file a written objection (or a claim of ownership or interest in the Receivership Oil and Gas Assets, identifying the source of your claim) to the proposed auction or sale by July 5, 2022, which is twelve (12) days of the date this Notice was filed with the Court. Your objection or claim must state why the proposed auction or sale should not be approved by the Court as to specific Receivership Oil and Gas Assets. Any objections must be filed:

**United States District Court for the Northern District of Texas,
Fort Worth Division
Clerk of Court
501 West 10th Street, Room 310
Fort Worth, Texas 76102**

If no party files a timely objection, EnergyNet will be authorized to conduct the public auction and close on the sale of the Receivership Oil and Gas Assets pursuant to the Court-approved procedures in its June 8, 2022 Order [ECF No. 215].

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) in the above-captioned case (the “Case”), hereby files and publishes this Notice of her intention to auction certain oil and gas assets (the “Receivership Oil and Gas Assets”). The leases and the wells are identified on **Exhibit A**. The auction will be held pursuant to the procedures authorized by the Court’s June 8, 2022 Order [ECF No. 215] (the “Order”).¹ **The sale of the Receivership Oil and Gas Assets will be conducted “AS IS – WHERE IS”, and no warranties of any kind will be provided, except that whatever interest is owned by the Receivership Estate shall be transferred to the buyers.**

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Order.

In the event that no objection or claim is filed within twelve (12) days of the date of this Notice, the Receiver has the authority, without further Order of the Court, to hold a public auction of the Receivership Oil and Gas Assets in this Notice through EnergyNet.com, LLC.

The Receiver reserves the right to postpone or terminate the proposed sale of the Receivership Oil and Gas Assets for any reason that she deems to be in the best interests of the receivership estates.

To contact the Receiver's counsel regarding an objection or for additional information related to this Notice, please contact Danielle N. Rushing at (210) 554-5500, or heartlandreceivership@dykema.com.

Dated: June 23, 2022

Respectfully submitted,

By: /s/ Danielle N. Rushing

Danielle N. Rushing

State Bar No. 24086961

drushing@dykema.com

DYKEMA GOSSETT PLLC

112 East Pecan Street, Suite 1800

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and

Rose L. Romero

State Bar No. 17224700

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LAW OFFICES OF ROMERO | KOZUB

235 N.E. Loop 820, Suite 310

Hurst, Texas 76053

Telephone: (682) 267-1351

COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2022, the foregoing document was served via CM/ECF on all parties appearing in this case, including counsel for Plaintiff Securities and Exchange Commission and Defendant Rustin Brunson; served via email on Defendant James Ikey, Relief Defendant Bridy Ikey, Defendant Manjit Singh (aka Roger) Sahota, Relief Defendant Harprit Sahota, and Relief Defendant Sunny Sahota as detailed below; and posted on the Receivership website at www.heartlandreceivership.com/notices.

James Ikey
james.ikeyrcg@gmail.com

Bridy Ikey
bridydikey@gmail.com

Manjit Singh (aka Roger) Sahota
Harprit Sahota
rogersahota207@gmail.com

Sunny Sahota
sunnysanangelo@gmail.com

/s/ Danielle N. Rushing
Danielle N. Rushing

LEASES

| Lease | Lessor | Lessee | Lease Date | Description | Recording Info | County | State |
|------------------|-----------------------------------|---------------|------------|---|-------------------------|----------|-------|
| MCLENNAN-KENNEDY | Alan Cutcher, Lafonda Energy, LLC | ARCOOIL CORP. | 6/1/2018 | 20 Acres out of the W & NW RR Co. Survey, Block H, Section 45, Abstract 506, Hardeman County, Texas: and 20 acres out of the W & NW RR Co. Survey, Block H, Section 46, Abstract 1531, Hardeman County, Texas. Said lands appearing of record in Volume 408, Page 919 of the Deed Records of Hardeman County, Texas | Instrument # D118-63151 | Hardeman | TX |

EXHIBIT A
LEASES

| No. | Lease | Lessor | Lessee | Lease Date | Description | Recording Info | County | State |
|-----|---|---------------------------------|--------------------------------|------------|---|----------------------|---------|-------|
| 6 | WAGGONER "C" LEASE | T.J. Waggoner and J.L. Waggoner | Sims Oil Company | 4/28/1924 | All of Blocks 10 and 11 of the J.L. & T.L. Waggoner's Subd., H. George Survey, A-454, Wichita County, Texas | Volume 220, Page 90 | Wichita | TX |
| | | T.J. Waggoner and J.L. Waggoner | L.T. Burns | 4/23/1924 | All of Block 10, J.L. & T.L. Waggoner's Subd., H. George Survey, A-454, Wichita County, Texas INsofar AND ONLY INsofar AS to the depths drilled and completed by J.F. Hood, subject to FOA | Volume 204, Page 626 | Wichita | TX |
| 7 | T.J. & J.L. WAGGONER "C" LEASE | T.J. Waggoner and J.L. Waggoner | Texhoma Oil & Refining Company | 5/18/1925 | All of Blocks 14,19,20,21,26,27 and the E/2 of Block 8, J.L. & T.L. Waggoner's Subd., H. George Survey, A-454, Wichita County, Texas. | Volume 229, Page 542 | Wichita | TX |
| | | T.J. Waggoner and J.L. Waggoner | L.T. Burns | 4/10/1935 | All of Blocks 14,19,20,21,26,27 and the E/2 of Block 8, J.L. & T.L. Waggoner's Subd., H. George Survey, A-454, Wichita County, Texas. | Volume 334, Page 335 | Wichita | TX |
| | | T.J. Waggoner and J.L. Waggoner | E.B. McFarlin | 12/16/1937 | All of Blocks 14,19,20,21,26,27 and the E/2 of Block 8, J.L. & T.L. Waggoner's Subd., H. George Survey, A-454, Wichita County, Texas. | Volume 348, Page 335 | Wichita | TX |
| 8 | T.J. & J.L. WAGGONER, ET AL LEASE | T.J. Waggoner and J.L. Waggoner | T.J. Waggoner | 3/12/1927 | All of Block 33, J.L. & T.L. Waggoner's Subd., H. George Survey, A-454, Wichita County, Texas. | Volume 280, Page 146 | Wichita | TX |
| 11 | T.J. & J.L. WAGGONER "C" LEASE- TEXO OIL | T.J. Waggoner and J.L. Waggoner | Continental Oil Company | 6/14/1933 | All of Blocks 7, E/2 of Block 8 and Block 13 of GH&H RR Co. Survey , A-454, Wichita County, Texas; the East 20 acres of Block 15 GH&H RR Co. Survey #2, A-772, Wichita County, Texas Texas. | Volume 326, Page 34 | Wichita | TX |

| EXHIBIT "A" | | | | | | |
|--------------|-------------------------|-----------------------------|-------|---------|-------|-----------|
| WELLS | | | | | | |
| API # | Operator | Well Name | Well# | County | State | Well Type |
| 42-485-37946 | ARCOOIL CORP | WAGGONER, T. J. "C" | 12 | Wichita | TX | O |
| 42-485-38644 | ARCOOIL CORP | WAGGONER, T. J. "C" | 15 | Wichita | TX | O |
| 42-485-39299 | ARCOOIL CORP | WAGGONER, T. J. "C" | 16 | Wichita | TX | O |
| 42-485-39611 | ARCOOIL CORP | WAGGONER, T. J. "C" | 17 | Wichita | TX | O |
| 42-485-39696 | ARCOOIL CORP | WAGGONER, T. J. "C" | 18 | Wichita | TX | O |
| 42-485-39781 | ARCOOIL CORP | WAGGONER, T. J. "C" | 19 | Wichita | TX | I |
| 42-485-39783 | ARCOOIL CORP | WAGGONER, T. J. "C" | 20 | Wichita | TX | I |
| 42-485-40117 | ARCOOIL CORP | WAGGONER, T. J. "C" | 22 | Wichita | TX | I |
| 42-485-40242 | ARCOOIL CORP | WAGGONER, T. J. "C" | 23 | Wichita | TX | O |
| 42-485-40420 | ARCOOIL CORP | WAGGONER, T. J. "C" | 24 | Wichita | TX | O |
| 42-485-32483 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 1 | Wichita | TX | O |
| 42-485-32484 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 2 | Wichita | TX | O |
| 42-485-32657 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 3 | Wichita | TX | O |
| 42-485-32656 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 4 | Wichita | TX | O |
| 42-485-32655 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 5 | Wichita | TX | O |
| 42-485-32654 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 6 | Wichita | TX | O |
| 42-485-32653 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 7 | Wichita | TX | O |
| 42-485-32757 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 8 | Wichita | TX | O |
| 42-485-33133 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 11 | Wichita | TX | O |
| 42-485-34628 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 12 | Wichita | TX | I |
| 42-485-41509 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | 13 | Wichita | TX | O |
| 42-485-45646 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | E1 | Wichita | TX | O |
| 42-485-46036 | LEADING EDGE ENERGY LLC | WAGGONER, TJ & JL | S 14 | Wichita | TX | O |
| 42-485-42972 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 1 | Wichita | TX | O |
| 42-485-30640 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 1 | Wichita | TX | O |
| 42-485-43016 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 2 | Wichita | TX | O |
| 42-485-30388 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 3 | Wichita | TX | O |
| 42-485-30813 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 4 | Wichita | TX | O |

| API # | Operator | Well Name | Well# | County | State | Well Type |
|--------------|-------------------------|-----------------------------|-------|---------|-------|-----------|
| 42-485-30812 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 5 | Wichita | TX | O |
| 42-485-31853 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 6 | Wichita | TX | O |
| 42-485-31922 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 7 | Wichita | TX | O |
| 42-485-31941 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 8 | Wichita | TX | O |
| 42-485-32073 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 9 | Wichita | TX | I |
| 42-485-32115 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 10 | Wichita | TX | O |
| 42-485-32155 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 11 | Wichita | TX | O |
| 42-485-32366 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 12 | Wichita | TX | O |
| 42-485-32367 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 13 | Wichita | TX | O |
| 42-485-32370 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 14 | Wichita | TX | O |
| 42-485-32498 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 15 | Wichita | TX | O |
| 42-485-91419 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 16 | Wichita | TX | O |
| 42-485-34627 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 17 | Wichita | TX | O |
| 42-485-34656 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 18 | Wichita | TX | O |
| 42-485-34691 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 19 | Wichita | TX | O |
| 42-485-34897 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 20 | Wichita | TX | O |
| 42-485-34898 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 21 | Wichita | TX | O |
| 42-485-35735 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 24 | Wichita | TX | O |
| 42-485-35747 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 26 | Wichita | TX | I |
| 42-485-36036 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 29 | Wichita | TX | I |
| 42-485-39829 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 34 | Wichita | TX | O |
| 42-485-42262 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 38 | Wichita | TX | O |
| 42-485-30743 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 10A | Wichita | TX | I |
| 42-485-30745 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 11A | Wichita | TX | I |
| 42-485-80770 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 13A | Wichita | TX | O |
| 42-485-31038 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 15A | Wichita | TX | O |
| 42-485-30394 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 1A | Wichita | TX | O |
| 42-485-80772 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 22A | Wichita | TX | O |
| 42-485-80773 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 23A | Wichita | TX | I |
| 42-485-80774 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 24A | Wichita | TX | I |
| 42-485-80775 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 25A | Wichita | TX | O |
| 42-485-30431 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 4A | Wichita | TX | O |
| 42-485-30458 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 5A | Wichita | TX | I |
| 42-485-30554 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 7A | Wichita | TX | I |
| 42-485-30634 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 8A | Wichita | TX | O |

| API # | Operator | Well Name | Well# | County | State | Well Type |
|--------------|-------------------------|-----------------------------|-------|---------|-------|-----------|
| 42-485-30686 | LEADING EDGE ENERGY LLC | WAGGONER, T. J. & J. L. -C- | 9A | Wichita | TX | I |
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