

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

In re: CHESAPEAKE ENERGY CORPORATION, <i>et al.</i> , ¹ <div style="text-align: right;">Reorganized Debtors.</div>	§ § § § § § §	Chapter 11 Case No. 20-33233 (DRJ) (Jointly Administered)
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**STIPULATION AND AGREED ORDER
REGARDING JAMESTOWN RESOURCES, LLC’S PROOFS OF
CLAIM NOS. 12594, 12602, 12607, 12542, 12551, 12555, 12635, & 12637**

The above-captioned reorganized debtors (before the Effective Date² of the Plan, the “Debtors,” and after the Effective Date of the Plan, the “Reorganized Debtors”) and Jamestown Resources, LLC (“Jamestown” or “Claimant,” and together with the Debtors or Reorganized Debtors, as applicable, the “Parties”) hereby enter into this stipulation and agreed order (this “Stipulation and Agreed Order”) as follows:

WHEREAS, the Debtors and Jamestown had an oil and gas contractual and operational relationship between each other where Debtors operated numerous wells in which Jamestown held working interests and from which certain disputes arose wherein Jamestown asserted claims for, *inter alia*, non-payment of well revenue, reversing revenue payments, overcharging for well insurance and improperly billed monthly recurring charges (“Disputes”);

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://dm.epiq11.com/chesapeake>. The location of Reorganized Debtor Chesapeake Energy Corporation’s principal place of business and the Reorganized Debtors’ service address in these chapter 11 cases is 6100 North Western Avenue, Oklahoma City, Oklahoma 73118.

² All terms used but not otherwise defined herein have the meanings ascribed to them in the *Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and Its Debtor Affiliates* [Docket No. 2915, Ex. A] (the “Plan”).

WHEREAS, on June 28, 2020, the Debtors filed voluntary petitions for relief under title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”);

WHEREAS, on August 13, 2020, the Bankruptcy Court entered the *Order (I) Setting Bar Dates For Filing Proofs of Claim, Including Requests For Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner For Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Dates, and (V) Granting Related Relief* [Docket No. 787];

WHEREAS, on or before November 30, 2020, and as a result of these Disputes, Jamestown timely filed the following proofs of claim (collectively, the “Jamestown Claims”):

(1) Jamestown Claim Nos. 12594, 12602, 12607 against Chesapeake Energy Corporation, Chesapeake Exploration, L.L.C., and Chesapeake Louisiana, L.P., respectively, each for the unsecured amount of \$36,380 for non-payment of well revenue;

(2) Jamestown Claim Nos. 12542, 12551, 12555, against Chesapeake Exploration, L.L.C., Chesapeake Energy Corporation, and Chesapeake Louisiana, L.P., respectively, each for the unsecured amount of \$158,522 for reversed well revenue payments;

(3) Jamestown Claim No. 12637 against Chesapeake Energy Corporation for the unsecured amount of \$102,717.00 for well insurance overcharges;

(4) Jamestown Claim No. 12635 against Chesapeake Energy Corporation for the unsecured amount of \$313,807.00 as a result of improperly billed monthly recurring charges described in JIB reports as ownership charges;

WHEREAS Jamestown agrees that the following Jamestown Claims are duplicative and are entitled to be disallowed, as set forth herein: Jamestown Claim Nos. 12602, 12607, 12551, and 12555;

WHEREAS Jamestown has been provided sufficient information such that it has agreed to withdraw Jamestown Claim No. 12637 in the amount of \$102,717.00 for well insurance overcharges, as set forth herein;

WHEREAS Jamestown asserts that Jamestown Claim Nos. 12594 and 12542 are good and valid claims but has agreed with Reorganized Debtors that such claims should be reduced and Allowed in the amount of \$24,466.00 and \$110,965.40, respectively, as set forth herein;

WHEREAS Jamestown asserts that Claim No. 12635 is a good and valid claim but has agreed with Reorganized Debtors that such claim should be reduced and Allowed in the amount of \$219,664.90, as set forth herein;

WHEREAS, on January 16, 2021, the Bankruptcy Court entered the *Order Confirming Fifth Amended Joint Chapter 11 Plan of Reorganization of Chesapeake Energy Corporation and Its Debtor Affiliates* [Docket No. 2915] (the “Confirmation Order”) confirming the Plan; and

WHEREAS, the Claimant and the Debtors have consensually agreed, after good faith, arm’s-length negotiations, to resolve the Disputes as well as the Jamestown Claims set forth above on the terms set forth in this Stipulation and Agreed Order.

NOW, THEREFORE, IT IS STIPULATED AND AGREED as follows:

1. The following Jamestown Claims are duplicative and shall be disallowed in full: Jamestown Claim Nos. 12602, 12607, 12551, and 12555.
2. Jamestown Claim No. 12637 in the amount of \$102,717.00 for well insurance overcharges is hereby withdrawn.

3. In full and final satisfaction of Jamestown Claim Nos. 12594 and 12542, the Reorganized Debtors shall reduce and Allow each such Jamestown Claim as an Allowed General Unsecured Claim, as such term is defined in the Plan, in the amount of \$25,466.00 and \$110,965.40, respectively, and such Allowed General Unsecured Claims shall be treated in accordance with the terms of the Plan.

4. In full and final satisfaction of the Jamestown Claims related to improperly billed monthly recurring charges described in JIB reports as ownership charges, the Reorganized Debtors shall reduce and Allow Jamestown Claim No. 12635 as an Allowed General Unsecured Claim, as such term is defined in the Plan, in the aggregate amount of \$219,664.90, and such Allowed General Unsecured Claim shall be treated in accordance with the terms of the Plan.

5. Epiq Corporate Restructuring, LLC is hereby authorized and directed to update the Jamestown Claims on the Official Claims Register to reflect the terms of this Stipulation and Agreed Order.

6. Nothing in this Stipulation and Agreed Order shall be interpreted to impair in any way the rights, claims or defenses reserved under the Plan with regard to or on behalf of the Reorganized Debtors, except to the extent inconsistent with the terms of the Stipulation and Agreed Order.

IT IS SO ORDERED.

Signed: _____, 2021
Houston, Texas

DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO THIS 28TH DAY OF JULY, 2021:

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