

2. On April 6, 2020, the Debtors filed the ORRI Motion, requesting among other relief to “honor and pay, in their sole discretion, the Revenue Payable, owed on the Petition Date and to

offset JIB's from any cash call advance liabilities and/or revenue payments. (Doc. 37. ¶ 3).

3. Counsel has reviewed the ORRI Motion and the exhibit attached thereto along with the Debtors' schedules filed on April 17, 2020.

4. As detailed in the Debtors' schedules, the Debtors and Fletcher (or its related entities) are parties to one or more Joint Operating Agreements and Gas Gathering Agreements. (collectively, "**Operating Agreements**").

5. Under the Operating Agreements, the Debtor, Sklar Exploration Company, LLC collects revenues from the sale of oil and gas production from certain wells for the benefit of Fletcher and other working interest owners. Further, the Debtors were to escrow certain production revenues, in the approximate amount of \$800,000, until a dispute regarding who the appropriate royalty landowner was resolved in litigation filed in Alabama state court. Neither the Debtors' Schedules nor the ORRI reflect the escrowed funds.

6. Neither the Debtors' schedules nor the ORRI Motion accurately reflect Fletcher and its related entities' position and it is unclear how the Debtor intends to treat Fletcher's payables under the ORRI Motion.

7. In the ORRI Motion, the Debtors request authorization "to offset JIBs from any cash call advance liabilities and/or revenue payments. (Doc. 27 at ¶13.) To the extent Fletcher and its related entities are affected by the ORRI, Fletcher objects to this request for authorization to offset monthly expenses against production revenue under the Operating Agreements that have not been prepaid and/or future JIBS.

JOINDER

Fletcher further joins in Lucas Petroleum Group, Inc., Anderson Exploration Energy Company, L.C., TCP Cottonwood, L.P.'s Franks Exploration Company, LLC, and Kudzu Oil

Properties, LLC's limited objections to the ORRI Motion, as previously submitted by the aforementioned creditors (Docs. 67, 71, 145, and 152), and any other similar objections to the extent that such objections are not inconsistent with Fletcher's Objection.

RESERVATION OF RIGHTS

Fletcher makes no admission of fact or law and reserves all rights, claims, objections and defenses that may be available to it before this Court and any other court with competent jurisdiction over the parties and the matters at issue. Fletcher further reserves any and all rights to supplement or amend this Objection.

WHEREFORE, Fletcher respectfully request that the Court enter an order denying the Debtor's request to offset monthly JIB expenses against revenues owed to Fletcher and other related entity or other Working Interest owners, and order the SEC to continue its pre-petition practice and industry recognized standard of providing monthly joint interest billing statements to Fletcher and other related entities.

Dated April 23, 2020

BERGER SINGERMAN LLP
Counsel for Fletcher Petroleum Company, LLC
313 North Monroe Street, Suite 301
Tallahassee, FL 32301
Tel. (850) 561-3010
Fax (850) 561-3013

By: /s/ Brian G. Rich
Brian G. Rich
Florida Bar No. 38229
brich@bergersingerman.com
Michael J. Niles
Florida Bar No. 107203
mniles@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of April, 2020, the foregoing ***Fletcher Petroleum Company LLC, Objection and Reservation of Rights to Debtors' Motion to 1) Honor and Pay Overriding Royalty, Royalty, and Working Interest Obligations; and 2) Offset Joint Interest Billing Obligations*** was served by electronic transmission through the Court's CM/ECF System upon all parties on the attached CM/ECF Service List.

s/ Brian G Rich

Brian G Rich

CM/ECF SERVICE LIST

- Victoria N Argeroplos vargeroplos@jw.com
- James B. Bailey jbailey@bradley.com, ashaver@bradley.com
- Joseph Eric Bain jbain@joneswalker.com
- Grant Matthew Beiner gbeiner@munsch.com
- Jordan B. Bird jordan.bird@cookyancey.com
- Duane Brescia dbrescia@clarkhill.com,
kalexander@clarkhill.com;djaenike@clarkhill.com
- Jeffrey S. Brinen jsb@kutnerlaw.com,
receptionist@kutnerlaw.com;vlm@kutnerlaw.com
- John Cornwell jcornwell@munsch.com, hvalentine@munsch.com
- Shay L. Denning sdenning@mbssllp.com
- Michael J. Guyerson mike@kjblawoffice.com,
celina@kjblawoffice.com;teresa@kjblawoffice.com
- Christopher D. Johnson cjohnson@munsch.com, scurry@munsch.com
- Lee M. Kutner lmk@kutnerlaw.com,
vlm@kutnerlaw.com,receptionist@kutnerlaw.com
- Eric Lockridge eric.lockridge@keanmiller.com, Stephanie.gray@keanmiller.com
- Christopher Meredith cmeredith@cctb.com, bankruptcy-
group@cctb.com;2363508420@filings.docketbird.com
- David M. Miller dmiller@spencerfane.com, nschacht@spencerfane.com
- Timothy C. Mohan tmohan@foley.com, tim.mohan4@gmail.com
- Paul Moss Paul.Moss@usdoj.gov
- Kevin S. Neiman kevin@ksnpc.com
- Michael Niles mniles@bergersingerman.com,
efile@bergersingerman.com;efile@ecf.inforuptcy.com
- Matthew J. Ochs mjochs@hollandhart.com
- John Thomas Oldham joldham@okinadams.com, bmoore@okinadams.com
- Robert L Paddock rpaddock@buckkeen.com, myers@buckkeen.com
- Robert Padjen Robert.padjen@coag.gov
- Jeremy L Retherford jretherford@balch.com,
kskelton@balch.com,skynerd@pruet.com
- Brian Rich brich@bergersingerman.com,
efile@bergersingerman.com;efile@ecf.inforuptcy.com
- Keri L. Riley klr@kutnerlaw.com, receptionist@kutnerlaw.com;vlm@kutnerlaw.com
- Timothy Michael Riley timothy@hgslaw.com
- Michael D Rubenstein mdrubenstein@liskow.com
- Craig K. Schuenemann craig.schuenemann@bryancave.com,
alicia.berry@bryancave.com,44Team_DEN@bryancave.com
- Ryan Seidemann seidemannr@ag.louisiana.gov
- Thomas H Shipps tshipps@mbssllp.com
- Barnet B Skelton barnetbjr@msn.com
- Jim F Spencer jspencer@watkinseager.com, mryan@watkinseager.com
- Bryce Suzuki bryce.suzuki@bclplaw.com, tina.daniels@bclplaw.com

- Timothy M. Swanson tim.swanson@moyewhite.com,
audra.duzenack@moyewhite.com;Melissa.dymerski@moyewhite.com
- David R Taggart dtaggart@bradleyfirm.com, kburnley@bradleyfirm.com
- Madison M. Tucker mtucker@joneswalker.com
- US Trustee USTPRegion19.DV.ECF@usdoj.gov
- Amy Vazquez avazquez@joneswalker.com
- Deanna L. Westfall deanna.westfall@coag.gov, bncmail@w-legal.com