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Ohio Appellate Court Rejects Arguments that Royalty Interest is Preserved Under “Specific Reference” or “Title Transaction” Exceptions to MTA

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Vorys attorney Casey Valentine authored an article titled "Ohio Appellate Court Rejects Arguments that Royalty Interest is Preserved Under 'Specific Reference' or 'Title Transaction' Exceptions to MTA" for the Institute for Energy Law's December 2024 Oil & Gas E-Report.

The article reflects upon Ohio's Seventh District Court of Appeals findings in *RL Clark, LLC v. Hammond*, which further clarified (i) when a lease constitutes a “title transaction” for MTA purposes, (ii) what constitutes a proper root of title under the MTA and (iii) why the reference language at issue is distinguishable from the language found to constitute a “specific reference” in the Seventh District’s prior decision in *Wolfe v. Bounty Minerals, LLC*.

[Read the entire article here.](#)