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Ohio's Seventh Appellate District "Breaks the Seal" and Issues First Decision Determining Whether a Grant or Reservation Created a Fixed or Floating Royalty Interest

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AUTHORED ARTICLE | 4.2024

Vorys attorney Casey Valentine authored an article titled "Ohio's Seventh Appellate District 'Breaks the Seal' and Issues First Decision Determining Whether a Grant or Reservation Created a Fixed or Floating Royalty Interest" for the Institute for Energy Law's April 2024 Oil & Gas E-Report.

The article summarized the Ohio's Seventh District Court of Appeals decision in *Miller v. Rice Drilling D, LLC*, which analyzed (i) what constitutes a proper root of title when the chain of title includes multiple oil and gas severances and (ii) who may file a claim to preserve severed mineral interests under Ohio Revised Code § 5301.52.

[Read the entire article here.](#)