

# Publications

## U.S. Court of Appeals Holds Assignments of Overriding Royalty Interests Do Not Attach to Utica Shale/Point Pleasant Formation

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Vorys attorney Casey Valentine authored an article titled "U.S. Court of Appeals Holds Assignments of Overriding Royalty Interests Do Not Attach to Utica Shale/Point Pleasant Formation" for the Institute for Energy Law's September 2024 Oil & Gas E-Report.

The article examines a recent decision from the U.S. Court of Appeals in *Sabre Energy Corp. v. Gulfport Energy Corp., et al.*, which analyzed the language in an assignment of overriding royalty interests to determine whether the overriding royalty interests attached to the defendants' horizontal wells drilled into the Utica Shale/Point Pleasant formation.

[Read the entire article here.](#)