



ENTERED  
12/02/2015

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS**

**IN RE:**

**RAAM GLOBAL ENERGY COMPANY**

**Debtors**

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§  
§  
§  
§

**CHAPTER 11**

**CASE NO. 15-35615  
(Jointly Administered)**

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**ORDER**

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The State of Louisiana (“the State”), through the Office of Mineral Resources, Department of Natural Resources (“Movant”), in accordance with Rules 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), submitted a Motion for Relief from Automatic Stay (“Motion”) in the above-captioned matter on November 3, 2015. This Motion requested this Court for an Order under Section 362(d) of the United States Bankruptcy Code, 11 U.S.C. § 101-1330 (the “Bankruptcy Code”), granting the Movant relief from all stays and injunctions in the above-captioned case, including the automatic stay of Bankruptcy Code § 362(a), so that Movant may exercise all of its regulatory rights to audit RAAM Global Energy Company, Century Exploration New Orleans LLC, Century Exploration Houston LLC, and Century Exploration Resources LLC, (collectively, “Debtors”) for the purposes of determining amounts owed on “[a]ll bonuses, rentals, royalties, shut-in payments, or other sums payable to the state as the lessor under the terms of valid existing mineral leases,” pursuant to La. R.S. 30:136.

For the reasons set forth in the Motion, this Court ORDERS, ADJUDGES, AND DECREES that:

1. The Motion for Relief from Automatic Stay be and is hereby GRANTED solely to permit the Movant to conduct the audit described in the Motion.
2. Nothing contained in the Motion, this Order, or any actions taken by the Debtors, the State, or the Movant pursuant to relief granted in this Order is intended or should be construed as: (a) an admission as to the validity of any particular claim against any Debtor entity; (b) a waiver of the Debtors' rights to dispute any particular claim on any grounds, including, without limitation, any claim that the State or the Movant may assert relating to or resulting from the audit described in the Motion; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in the Motion; (e) a release, waiver, or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law; or (f) a concession by the Debtors that any liens or interests (contractual, common law, statutory, or otherwise) are valid, and the Debtors expressly reserved their rights to contest the extent, validity, or perfection or seek avoidance of any such liens or interests.

###

ORDER WAS PREPARED AND SUBMITTED BY:

Ryan M. Seidemann (La. Bar Roll #28991)  
Assistant Attorney General – State of Louisiana  
Louisiana Department of Justice  
Post Office Box 94005  
Baton Rouge, Louisiana 70804-9005  
TEL: (225) 326-6030

  
Marvin Isgur  
UNITED STATES BANKRUPTCY JUDGE

12-2-15

United States Bankruptcy Court  
Southern District of TexasIn re:  
RAAM Global Energy Company  
Century Exploration New Orleans, LLC  
DebtorsCase No. 15-35615-mi  
Chapter 11**CERTIFICATE OF NOTICE**

District/off: 0541-4

User: mrios  
Form ID: pdf002Page 1 of 2  
Total Noticed: 16

Date Rcvd: Dec 02, 2015

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 04, 2015.

db +Century Exploration Houston, LLC, 10210 Grogans Mill Road, Suite 300,  
The Woodlands, TX 77380-1144

db +Century Exploration Resources, LLC, 10210 Grogans Mill Road, Suite 300,  
The Woodlands, TX 77380-1144

db +RAAM Global Energy Company, 1537 Bull Lea Road, Suite 200, Lexington, KY 40511-1200

cr +Acock Consulting, L.L.C., c/o Law Offices of Elizabeth G. Smith, 6655 First Park Ten, #240,  
San Antonio, TX 78213-4304

cr +BGI Gulf Coast, LLC, c/o Okin & Adams LLP, 1113 Vine St., Ste. 201,  
Houston, TX 77002-1045

cr +Champion Exploration, LLC, c/o Okin & Adams LLP, 1113 Vine St., Ste. 201,  
Houston, TX 77002-1045

intp Department of the Interior, c/o Department of Justice, P. O. Box 875,  
Ben Franklin Station, Washington, DC 20044-0875

cr +Island Operating Company, Inc., Island Operating Company, Inc., 770 S. Post Oak Lane,  
Suite 400, Houston, TX 77056-6666, UNITED STATES OF AMERICA

cr +Lakeside Energy Partners Participation Ltd. & Flin, c/o Gray Reed & McGraw,  
1300 Post Oak Blvd., Ste. 2000, Houston, TX 77056-8000

cr +Oracle America, Inc., Buchalter Nemer, c/o Shawn M. Christianson,  
55 Second St., 17th Floor, San Francisco, Ca 94105-3493

cr +State of Louisiana, Department of Natural Resource, 617 North Third Street,  
Baton Rouge, LA 70802-5432

cr +Superior Natural Gas Corporation, c/o Wells & Cuellar, P.C., 440 Louisiana, Suite 718,  
Attention: D. Brent Wells, Houston, TX 77002-1637

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

db +E-mail/Text: michael.willis@centuryx.com Dec 02 2015 20:36:33  
Century Exploration New Orleans, LLC, Three Lakeway Center,  
3838 North Causeway Blvd., Suite 2800, Metairie, LA 70002-8319

cr E-mail/Text: houston\_bankruptcy@LGBS.com Dec 02 2015 20:37:18 Jasper County,  
c/o John P. Dillman, PO BOX 3064, Houston, TX 77253-3064

cr E-mail/Text: houston\_bankruptcy@LGBS.com Dec 02 2015 20:37:18 Montgomery County,  
c/o John P. Dillman, Post Office Box 3064, Houston, TX 77253-3064

cr E-mail/Text: houston\_bankruptcy@LGBS.com Dec 02 2015 20:37:18 Orange County,  
c/o John P. Dillman, Post Office Box 3064, Houston, TX 77253-3064

TOTAL: 4

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

cr ACE American Insurance Company

intp Ad Hoc Committee of Senior Secured Noteholders

cr Business Property Lending, Inc./Everbank

cr Crown Pine Timber 1, LP by and through its authori

cr Highbridge Principal Strategies, LLC

cr Montco Oilfield Contractors

cr Montoc Offshore, Inc.

intp Power Land, LLC

cr Sheldon Independent School District

cr The Official Committee of Unsecured Creditors

cr Westchester Fire Insurance Company

cr Wilmington Trust, National Association

TOTALS: 12, \* 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Dec 04, 2015

Signature: /s/Joseph Speetjens

District/off: 0541-4

User: mrios  
Form ID: pdf002Page 2 of 2  
Total Noticed: 16

Date Rcvd: Dec 02, 2015

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 2, 2015 at the address(es) listed below:

Annemarie V. Reilly on behalf of Interested Party Ad Hoc Committee of Senior Secured Noteholders annemarie.reilly@lw.com  
 Benjamin W Kadden on behalf of Interested Party Power Land, LLC bkadden@lawla.com, jbridgett@lawla.com;speck@lawla.com;mnguyen@lawla.com  
 Bradley Roland Foxman on behalf of Debtor RAAM Global Energy Company bfoxman@velaw.com, sbarden@velaw.com  
 Bradley Roland Foxman on behalf of Debtor Century Exploration New Orleans, LLC bfoxman@velaw.com, sbarden@velaw.com  
 Bradley Roland Foxman on behalf of Debtor Century Exploration Resources, LLC bfoxman@velaw.com, sbarden@velaw.com  
 Bradley Roland Foxman on behalf of Debtor Century Exploration Houston, LLC bfoxman@velaw.com, sbarden@velaw.com  
 Casey William Doherty, Jr on behalf of Creditor Lakeside Energy Partners Participation Ltd. & Flint Interest II, LLC cdoherty@grayreed.com, aarmstrong@grayreed.com  
 David A Wender on behalf of Creditor Wilmington Trust, National Association david.wender@alston.com  
 Douglas Brent Wells on behalf of Creditor Superior Natural Gas Corporation bwells@wellsccuellar.com  
 Elizabeth Grace Smith on behalf of Creditor Acock Consulting, L.L.C. beth@egsmithlaw.com, maryann@egsmithlaw.com  
 Gina D Shearer on behalf of Creditor Westchester Fire Insurance Company gshearer@l-llp.com, tbarrera@l-llp.com  
 Gina D Shearer on behalf of Creditor ACE American Insurance Company gshearer@l-llp.com, tbarrera@l-llp.com  
 Harry Allen Perrin on behalf of Debtor Century Exploration Houston, LLC hperrin@velaw.com, thawkins@velaw.com;roconnor@velaw.com  
 John P Dillman on behalf of Creditor Jasper County Houston\_bankruptcy@publicans.com  
 John P Dillman on behalf of Creditor Orange County Houston\_bankruptcy@publicans.com  
 John P Dillman on behalf of Creditor Montgomery County Houston\_bankruptcy@publicans.com  
 Joseph G Epstein on behalf of Creditor Crown Pine Timber 1, LP by and through its authorized agent, The Campbell Group, LLC jepstein@winstead.com, pschneller@winstead.com;deierdam@winstead.com  
 Karl J Zimmermann on behalf of Creditor Montco Oilfield Contractors karlz@bhbmlaw.com, troper@bhbmlaw.com;cunningham@bhbmlaw.com  
 Keith A Simon on behalf of Interested Party Ad Hoc Committee of Senior Secured Noteholders keith.simon@lw.com  
 Kyung Shik Lee on behalf of Creditor Island Operating Company, Inc. klee@diamondmccarthy.com, lsimon@diamondmccarthy.com  
 Matthew Scott Okin on behalf of Creditor BGI Gulf Coast, LLC mokin@okinadams.com  
 Matthew Scott Okin on behalf of Creditor Champion Exploration, LLC mokin@okinadams.com  
 Nancy Lynne Holley on behalf of U.S. Trustee US Trustee nancy.holley@usdoj.gov  
 Owen Mark Sonik on behalf of Creditor Sheldon Independent School District osonik@pbfc.com, tpope@pbfc.com;osonik@ecf.inforuptcy.com;houbank@pbfc.com  
 Reese Andrew O'Connor on behalf of Debtor Century Exploration New Orleans, LLC roconnor@velaw.com  
 Reese Andrew O'Connor on behalf of Debtor Century Exploration Houston, LLC roconnor@velaw.com  
 Reese Andrew O'Connor on behalf of Debtor RAAM Global Energy Company roconnor@velaw.com  
 Reese Andrew O'Connor on behalf of Debtor Century Exploration Resources, LLC roconnor@velaw.com  
 Ryan Michael Seidemann on behalf of Creditor State of Louisiana, Department of Natural Resources, Office of Mineral Resources seidemannr@ag.state.la.us  
 Scott Robert Cheatham on behalf of Creditor Business Property Lending, Inc./Everbank scott.cheatham@arlaw.com, laura.vanderpoel@arlaw.com;vicki.owens@arlaw.com  
 Shawn M Christianson on behalf of Creditor Oracle America, Inc. schristianson@buchalter.com, cmcintire@buchalter.com  
 Stewart F Peck on behalf of Interested Party Power Land, LLC speck@lawla.com  
 Theodore Benson Randles on behalf of Interested Party Department of the Interior theodore.b.randles@usdoj.gov  
 US Trustee USTPRegion07.HU.ECF@USDOJ.GOV  
 Vincent P Slusher on behalf of Creditor Committee The Official Committee of Unsecured Creditors vince.slusher@dlapiper.com, sherry.faulkner@dlapiper.com;Daniel.simon@dlapiper.com  
 Vincent P Slusher on behalf of Creditor Montoc Offshore, Inc. vince.slusher@dlapiper.com, sherry.faulkner@dlapiper.com;Daniel.simon@dlapiper.com  
 Vincent P Slusher on behalf of Creditor Montco Oilfield Contractors vince.slusher@dlapiper.com, sherry.faulkner@dlapiper.com;Daniel.simon@dlapiper.com  
 Zack A Clement on behalf of Creditor Highbridge Principal Strategies, LLC zack.clement@icloud.com, steven.serajeddini@kirkland.com;timothy.mohan@kirkland.com;carrie.oppenheim@kirkland.com;benjamin.steadman@kirkland.com;stephen.hessler@kirkland.com;mcclain.thompson@kirkland.com

TOTAL: 38