

**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)**

**LAKESIDE ENERGY PARTNERS PARTICIPATION, LTD. AND FLINT INTEREST II,
LLC’S APPLICATION FOR ADMINISTRATIVE EXPENSE**

Lakeside Energy Partners Participation Ltd. and Flint Interests II, LLC (“Lakeside”) file this Application for Administrative Expense for post-petition work done on leases and an operating agreement being assumed and assigned in the Sale

Facts and Argument

Lakeside is partners with Debtor Century Exploration Houston, LLC (“Century”) to many JOAs being assumed and assigned in the Sale. One of these is the “Tweety Bird” JOA. (the “JOA” or “Tweety Bird JOA”) (Attached as Exhibit A). Flint Interests II, LLC is a partner of Lakeside Energy Partners Participation, Ltd. on the on the Tweety Bird JOA. (See Exhibit B.)

Under the JOA, Lakeside is a 25% interest holder and is responsible for 25% of expenses. Century is responsible for 75%. The JOA calls for each party to reimburse the other when expenses are paid under the JOA and grant a lien to each party for these expenses.

After this case was filed, Lakeside, encouraged by the Debtors, ensured that expenses under the JOA was paid for and that the projects on the JOA ran smoothly. In so doing, Lakeside incurred \$3,554.05 to benefit Century and the Tweety Bird JOA (Summary and Invoices attached as Exhibit C). This included bonus payments, title work, surveying and geologic work. *Id.*

After the filing of their bankruptcy, the Debtors readily accepted the benefits of Lakeside's effort and expense to keep the Tweety Bird JOA alive. Indeed, the Tweety Bird JOA is now being assumed and assigned as key asset in the Sale.

Lakeside prays that its application be granted.

GRAY REED & MCGRAW, P.C.

By: /s/ Casey W. Doherty
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**ATTORNEYS FOR LAKESIDE ENERGY PARTNERS
PARTICIPATION LTD. & FLINT INTEREST II, LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 13th day of January, 2016, he caused a true and correct copy of the foregoing document to be served via the Court's CM-ECF notification system.

/s/ Casey Doherty
Casey Doherty