

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

FILED

2021 MAR -1 PM 11:00

CHAPTER 11
FOR
CASE NUMBER 20-11548 (CSS)

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

A RESPONSE BY WALT STODDARD TO OPPOSE THE RELIEF REQUESTED IN
DOCUMENT NUMBER 1725, REORGANIZED DEBTORS' FIFTH OMNIBUS
(SUBSTANTIVE) OBJECTION TO CERTAIN NO LIABILITY CLAIMS PURSUANT
TO SECTION 502(b) OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 3003
AND 3007, AND BANKRUPTCY LOCAL RULE 3007-1

To:
Clerk of the Bankruptcy Court for the District of Delaware
824 Market Street, 3rd Floor
Wilmington, Delaware 19801

Cc:
Reorganized Debtors
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Attention: Christopher Marcus P.C. (Christopher.marcus@kirkland.com)
Allyson Smith Weinhouse (allyson.smith@kirkland.com)

Whiteford Taylor Preston LLC
The Renaissance Center
Suite 500
405 North King Street
Wilmington, Delaware 19802
Attention: Marc A. Abrams (mabrams@wtplaw.com)
Richard W. Riley (rriley@wtplaw.com)
Stephan B. Gerald (sgerald@wtplaw.com)

Re:
DOCUMENT NUMBER 1725, REORGANIZED DEBTORS' FIFTH OMNIBUS
(SUBSTANTIVE) OBJECTION TO CERTAIN NO LIABILITY CLAIMS PURSUANT
TO SECTION 502(b) OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 3003
AND 3007, AND BANKRUPTCY LOCAL RULE 3007-1, Exhibit 1, Claim Number
1713.

I, Walt Stoddard (aka Walter D. Stoddard) Pursuant to U.S.C. 1746, declare:



20115482103010000000000002

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

CHAPTER 11
FOR
CASE NUMBER 20-11548 (CSS)

1. I am the owner of all oil, gas, coal, and all other minerals in, on, and under a plot of land in Greeley Colorado described as Lot 7, Block 12, Pumpkin Ridge Subdivision, County of Weld, State of Colorado, also known by street and number as 727 61st Avenue, Greeley, CO 80634. Reference the attached EXHIBIT A, Warranty Deed, which a signed copy is recorded and on file at the Clerk & Records office for Weld County in Greeley, Colorado.
2. That Debtors, Extraction Oil & Gas Inc, prior to their entrance into bankruptcy duly researched and determined mineral rights ownership of property located above, and affected by, their drilling and oil and gas extraction activities and contacted those mineral rights owners, including Walt Stoddard, for the sole purpose of paying royalties to those mineral rights owners for the oil & gas that would be, and was, extracted below said property. Reference Exhibit B, Revised Division Order addressed to Walter D. Stoddard, Owner number 45993. This EXHIBIT B Revised Division Order proves that Extraction Oil and Gas researched and determined that Walter D. Stoddard was the rightful owner of the oil & gas interests below the item 1 above said property and is rightfully due royalties paid for oil & gas extracted below said property.
3. That debtors, Oil & Gas Inc, prior to their entrance into bankruptcy had in fact been paying royalties to Walter D, Stoddard for his fractional ownership and the extraction of oil & gas below the item 1 said property. Reference EXHIBIT's C.1, C.2, and C.3 for details of Walt Stoddard's fractional ownership and to prove that Debtors, Extraction Oil and Gas Inc, have made oil and gas royalty payments made to Walter D. Stoddard in the past and therefore, should continue to make oil and gas royalty payments in the future.
4. That Walt Stoddard does not have any legal representation and is filing this letter on his own behalf with the United States Bankruptcy Court for the District of Delaware and that the Reorganized Debtors should serve any reply to the above to:
Walter D. Stoddard, 3808 Amy Place, Loveland, CO 80538 (wstoddard@aol.com)

Signed: _____

Dated: _____

Walt Stoddard
2/22/21

Exhibit A

WARRANTY DEED

THIS DEED, made this 31st day of July, 2018, between Walter D. Stoddard of the County of Weld and State of Colorado, grantor(s), and Salah Eddine Mahdaoui and Danielle J. Mahdaoui

whose legal address is **950 52nd Avenue Court #A3, Greeley, CO 80634** of the County of Weld and State of Colorado, grantees:

WITNESS, that the grantor(s), for and in consideration of the sum of **SEVENTY SEVEN THOUSAND ONE HUNDRED FIFTY AND 00/100 DOLLARS (\$77,150.00)**, the receipt and sufficiency of which is hereby acknowledged, has granted, bargained, sold and conveyed, and by these presents does grant, bargain, sell, convey and confirm unto the grantees, their heirs and assigns forever, **JOINT TENANTS**, all the real property, together with improvements, if any, situate, lying and being in the County of Weld and State of Colorado, described as follows:

Lot 7, Block 12, Pumpkin Ridge Subdivision, County of Weld, State of Colorado

EXCEPTING FROM THIS CONVEYANCE AND RESERVING TO THE GRANTOR ALL OIL, GAS, COAL AND ALL OTHER MINERALS IN, ON AND UNDER THE SAID PROPERTY.

also known by street and number as: **727 61st Avenue, Greeley, CO 80634**

TOGETHER with all and singular the hereditaments and appurtenances thereunto belonging, or in anywise appertaining, and the reversion and reversions, remainder and remainders, rents, issues and profits thereof, and all the estate, right, title, interest, claim and demand whatsoever of the grantor(s), either in law or equity, of, in and to the above bargained premises, with the hereditaments and appurtenances;

TO HAVE AND TO HOLD the said premises above bargained and described, with the appurtenances, unto the grantees, their heirs and assigns forever. The grantor(s), for himself, his heirs, and personal representatives, does covenant, grant, bargain and agree to and with the grantees, their heirs and assigns, that at the time of the enrolling and delivery of these presents, he is well seized of the premises above conveyed, has good, sure, perfect, absolute and indefeasible estate of inheritance, in law, in fee simple, and has good right, full power and lawful authority to grant, bargain, sell and convey the same in manner and form as aforesaid, and that the same are free and clear from all former and other grants, bargains, sales, liens, taxes, assessments, encumbrances and restrictions of whatever kind or nature soever, except **general taxes for the current year and subsequent years, and except easements, covenants, conditions, restrictions, reservations, and rights of way of record, if any.**

The grantor(s) shall and will **WARRANT AND FOREVER DEFEND** the above-bargained premises in the quiet and peaceable possession of the grantees, their heirs and assigns, against all and every person or persons lawfully claiming the whole or any part thereof.

The singular number shall include the plural, the plural the singular, and the use of any gender shall be applicable to all genders.

IN WITNESS WHEREOF, the grantor has executed this deed on the date set forth above.

Walter D. Stoddard
State of Colorado

}
}
} ss.
}

County Of **WELD**

The foregoing instrument was acknowledged before me this **July 31, 2018**, by **Walter D. Stoddard**

My Commission expires:

Witness my hand and official seal.

Notary Public

Doc Fee: \$7.71

Buyers Forwarding Address for Recorded documents is:
Borrower Address

NOTE
Walter
Stoddard
Still owns
the oil +
gas
interests
under
Lot 7,
Block 12



Exhibit B

COPY (4)

NADOA Model Form Division Order (Adopted 9/95)

REVISED DIVISION ORDER

To: Extraction Oil and Gas, Inc.
370 17th Street, Suite 5300
Denver, CO 80202

Date: November, 2018

Analyst: R. VandenBroeck

Well/Property Name: See Exhibit on Reverse Side
Well API Number: 0512343748 & 0512343742
Well/Property Number: See Exhibit on Reverse Side
Well/Property Spacing: 5N 66W, SEC 4: S/2S/2, SEC 3: S/2S/2, SEC 2: S/2SW/4,
SEC 9: N/2N/2, SEC 10: N/2N/2, SEC 11: N/2NW/4
County and State: Weld, Colorado
Spacing Unit Gross Acres: 851.3700

Production Type: ☒ Oil ☒ Gas ☒ Other

Owner Number	Owner Name	Tax Identification	Interest Type	Interest Decimal
45993	WALTER D STODDARD 3808 AMY PL LOVELAND, CO 80538	XXX-XX-9537	See Reverse Side	See Reverse Side

The undersigned certifies the ownership of their decimal interest in production or proceeds as described above payable by Extraction Oil and Gas, Inc. ("Payor").

Payor shall be notified, in writing, of any change in ownership, decimal interest, or payment address. All such changes shall be effective within 60 days of notification from Payee.

Payor is authorized to withhold payment pending resolution of a title dispute or adverse claim asserted regarding the interest in production claimed herein by the undersigned. The undersigned agrees to indemnify and reimburse Payor any amount attributable to an interest to which the undersigned is not entitled.

Payor may accrue proceeds until the total amount equals \$100.00, or pay annually, whichever occurs first, or as required by applicable state statute.

This Division Order does not amend any lease or operating agreement between the undersigned and the Lessee or operator or any other contracts for the purchase of oil or gas.

In addition to the terms and conditions of this Division Order, the undersigned and Payor may have certain statutory rights under the Laws of the state in which the property is located.

A facsimile or scanned copy of a signed copy of this Division Order shall be deemed an original.

Federal Law requires you to furnish your Social Security or Taxpayer Identification Number.

Owner(s) Signature:

Owner(s) Tax ID. (SSN or EIN):

Change of Address Request:

Printed Name: _____

Old Mailing Address:

Printed Name: _____

Phone Number (optional): _____

New Mailing Address:

Printed Name: _____

Email Address (optional): _____

File ID: 1771
Owner ID: 45993

SENT 12/15/18
Signed copy NOT
1/16/19

DA1100

EXTRACTION OIL & GAS, INC
720-481-2380
370 17TH STREET
SUITE 5300
DENVER, CO 80202

EXTRACTION
Oil & Gas

Page 1 of 6

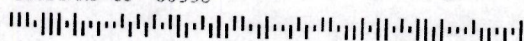
25,269

(5)

004517 R3N4TTC
WALTER D STODDARD
3808 AMY PL
LOVELAND CO 80538



Owner ID: 45993
Check Date: 04/28/2020
Check No.: 209963
Check Amount: 104.94



Please login to ENERGYLINK.COM to access the details for your payment.

Well#	Well Name	State	County	Owner	Net Share
Sale	Type				
Date	PC Int Price	Quantity	Value	Deductions	Net
1771	TC-MOISER HILL 02-09-11	CO	WELD		
12/31/18 O RI	0.00	0.00	0.00	0.00	0.00
12/31/18 G RI	0.00	0.00	0.00	0.00	0.00
12/31/18 L RI	0.00	0.00	0.00	0.00	0.00
06/30/19 G RI	1.37	31,303.00	42,729.23	5,180.81	37,548.42
				59.89 CON	
				4,693.63 ADV	
				427.29 SEV	
06/30/19 L RI	7.15	3,260.76	23,308.01	2,825.92	20,482.09
				32.54 CON	
				2,560.30 ADV	
				233.08 SEV	
07/31/19 O RI	49.26	8,223.49	405,059.69	49,052.74	356,006.95
				44,556.57 ADV	
				4,050.60 SEV	
				445.57 CON	
07/31/19 G RI	1.26	30,896.35	39,080.89	4,738.76	34,342.13
				55.12 CON	
				4,292.83 ADV	
				390.81 SEV	
07/31/19 L RI	6.49	3,056.09	19,827.17	2,404.13	17,423.04
				27.95 CON	
				2,177.91 ADV	
				198.27 SEV	
08/31/19 O RI	46.64	7,815.89	364,565.20	44,148.84	320,416.36
				40,102.17 ADV	
				3,645.65 SEV	
				401.02 CON	
08/31/19 G RI	1.36	29,917.60	40,752.92	4,940.77	35,812.15
				56.65 CON	
				4,476.59 ADV	

PLEASE DETACH BEFORE DEPOSITING CHECK

11/30/19 O RI	49.75	6,759.56	336,288.01	40,724.48	295,563.53	RI	0.001982	6.67	-0.07 SEV	5.86
				-363.97 CON					-0.01 CON	
				36,991.68 ADV					0.81	
				3,362.88 SEV					0.73 ADV	
				369.92 CON					0.07 SEV	
11/30/19 G RI	2.08	30,169.09	62,815.83	18,525.82	44,290.01	RI	0.001982	1.01	0.01 CON	0.89
				69.10 CON					0.12	
				5,551.68 ADV					0.00 CON	
				628.16 SEV					0.11 ADV	
11/30/19 L RI	15.74	3,189.51	50,198.09	15,232.95	34,965.14	RI	0.001982	0.79	0.01 SEV	0.69
				55.22 CON					0.00 CON	
				4,383.58 ADV					0.09 ADV	
				501.98 SEV					0.01 SEV	
12/31/19 O RI	52.49	6,743.04	353,974.50	42,866.32	311,108.18	RI	0.001982	7.02	0.85	6.17
				38,937.20 ADV					0.77 ADV	
				3,539.75 SEV					0.07 SEV	
				389.37 CON					0.01 CON	
12/31/19 G RI	2.31	29,641.55	68,543.08	22,054.06	46,489.02	RI	0.001982	1.05	0.13	0.92
				75.40 CON					0.00 CON	
				5,830.55 ADV					0.12 ADV	
				685.43 SEV					0.01 SEV	
12/31/19 L RI	15.14	2,988.64	45,258.18	13,813.36	31,444.82	RI	0.001982	0.71	0.09	0.62
				49.78 CON					0.00 CON	

Exhibit 8.2

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EXTRACTION OIL & GAS, INC.
370 17TH STREET
SUITE 5300
DENVER, CO 80202

2018 1099 Misc Income
Substitute Form 1099 - MISC

Phone number : 720-481-2380

Federal ID: 46-1473923

OMB No. 1545-0115

WALTER D STODDARD
3808 AMY PL
LOVELAND, CO 80538

Tax ID: 476-72-9537
Account No: 45993

St	Type Pymt	Gross	Taxes	Expenses	Fed Backup Withholding	Net
CO	RI2	416.43	36.86	1.48		378.09

***	416.43		1.48		378.09
***		36.86			

=====
Box 2: Royalties 416.43

Copy B For Recipient

This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.

(Keep for your records)

Walter D Stoddard

Exhibit C.3

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Colorado DR21W - Substitute Form

DR21-W (10/02) - Substitute

COLORADO DEPARTMENT OF REVENUE
DENVER, CO 80261-0007

OIL AND GAS WITHHOLDING STATEMENT
FOR CALENDAR YEAR 2018

Colorado Severance Tax Withheld from Oil Shale and Oil/Gas Payments

1. Well Name
2. Lease
3. Field

4. County

5. API Number

		CASH BASIS	ACCRUAL BASIS
6. GROSS PAYMENTS.....	\$	416.43	\$ 380.64
7. GROSS PAYMENTS ATTRIBUTABLE TO STRIPPER WELL PRODUCTION.....	\$		\$
8. AD VALOREM TAX ON OIL AND GAS PRODUCTION.....	\$		\$
9. AD VALOREM TAX ATTRIBUTABLE TO STRIPPER WELL PRODUCTION.....	\$		\$
10. SEVERANCE TAX WITHHELD.....	\$		4.13

If filing on a fiscal period, this information is not correct.
Consult your distribution statements or payor for correct amounts.

11. Name, Address and Social Security
or Colorado Account No. of Payee:

WALTER D STODDARD
3808 AMY PL
LOVELAND, CO 80538

12. Name, Address and Colorado Account No.
or Federal I.D. No. of Payor:

EXTRACTION OIL & GAS, INC.
370 17TH STREET
SUITE 5300
DENVER, CO 80202

476-72-9537
NOTE TO PAYEE: Attach a copy to Form DR21.
Retain a copy for your records.

46-1473923
NOTE TO PAYOR: Attach original copy to
DR 456. Retain a copy for your records.
Submit 2 copies to payee.

WALTER D STODDARD