

# NEWSLETTER

MONTHLY RR&A UPDATES

## WHAT CAN RR&A DO FOR YOU?

We consider ourselves to be a fully functioning, full-scale outside Legal Department that could be picked up and placed in a large corporation without skipping a beat. Why split your legal needs across multiple different firms when you can have your own Legal Department at your fingertips, a single phone call away?

[CLICK HERE TO FIND OUT WHAT RR&A CAN DO FOR YOU](#)



## RELATED ARTICLES

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[THE TRIANGLE MODEL EXPLAINED](#)

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## WHAT'S NEW AT RR&A?

Congratulations to RR&A's Rachel Reese for being elected as the newest Director of Petroleum Club of Houston Board of Directors.

Click [here](#) to congratulate her!



# UPCOMING AT RR&A



**MARCH  
MADNESS  
BRACKET  
CHALLENGE**

**SOCIAL BEER GARDEN**  
3101 SAN JACINTO ST.  
MARCH 13, 2023  
5:30 PM - 7:30 PM

RSVP to [rflamphier@rreeselaw.com](mailto:rflamphier@rreeselaw.com)

RR&A



WORLD OILMAN'S  
**MARC**  
MINERAL & ROYALTY CONFERENCE



**Connect with  
Rachel Reese  
and  
Andrew Clinton  
at MARC**

April 10th-11th  
Post Oak Hotel

RR&A

Don't forget to visit our booth in the foyer during the conference

## CLIENT HIGHLIGHTS

Congratulations to **Tower Rock Oil & Gas** on their recent divestiture!



R. Reese & Associates Advises Tower Rock Oil & Gas in Divestiture of Permian Basin Mineral and Royalty Interests to Elk Range Royalties.

## CASELAW UPDATE

### VAN DYKE V. NAVIGATOR GROUP

Texas Supreme Court Cause No. 21-0146

In 1924, George H. Mulkey and Frances E. Mulkey conveyed their ranch and its underlying mineral estate to G.R. White and G.W. Tom, reserving “1/2 of 1/8” of all minerals and mineral rights. At issue in this case – with the division of over \$44 million in accumulated royalties at stake – is whether the grantors reserved a 1/16 mineral interest or 1/2 of the entire mineral estate. According to the trial court, and as affirmed by the court of appeals, the Mulkeys reserved an undivided 1/16 mineral interest; however, the Supreme Court of Texas disagreed, reversing the lower court decisions by determining the grantors reserved half of the entire mineral estate.

Despite conclusions from the trial court and court of appeals that “1/2 of 1/8” unambiguously reserved only 1/16 of the mineral estate due to simple math, and that the deed contained no conflicting provisions which necessitated interpretation, the supreme court determined that the words of the deed should be interpreted according to the meaning of such words when drafted. At the time of the deed, “1/8” was commonly used to refer to the entire mineral estate. The supreme court also applied the presumed-grant doctrine, pointing out that all parties involved operated as though the grantors and the grantees each owned 1/2 of the mineral estate with no contest, up until this dispute began in 2013.

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