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FILED
APR 30 2013

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF OKLAHOMA

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

APPLICANT: AMB EXPLORATION COMPANY, LLC

RELIEF SOUGHT: POOLING) CAUSE CD NO. 201302966

LEGAL DESCRIPTION: ALL OF SECTION 19,)
TOWNSHIP 6 SOUTH,)
RANGE 1 WEST, LOVE)
COUNTY, OKLAHOMA)

APPLICATION

COMES NOW Applicant and shows the Honorable Corporation Commission as follows:

1. Parties: Applicant is AMB Exploration Company, LLC, 2103 City West Blvd., Suite 120, Houston Texas 77042, who is the owner of the right to drill a well to the common sources of supply underlying the lands described in the caption hereof by virtue of valid and subsisting oil and gas leases owned by Applicant covering portions of said land. The name and address of each party being made a respondent to this application is as shown on Exhibit "A" attached hereto and made a part hereof. If any named natural person is deceased, then the known or unknown heirs, executors, administrators, trustees, devisees and assigns, immediate and remote, of such decedent are made respondents to this application. If any named respondent is a corporation which does not continue to have legal existence, then the known or unknown successors, trustees or assigns, if any, of such entity are made respondents to this application.

2. Allegation of Facts:

a. The land described in the caption hereof constitutes a "drilling and spacing unit", as defined by Title 52, Section 87.1, O.S., and as heretofore established by the Commission by an Order to be entered in a pending application, for the Deese, Dornick Hills, Caney, Sycamore, Woodford, Hunton, Viola and Bromide common sources of supply; within said "drilling and spacing unit", there are two or more separately owned tracts or there are undivided interests separately owned for which the owners have not agreed to pool their oil and gas interests and to drill and develop the "drilling and spacing unit" and common sources of supply as a unit.

OKLA CORP COM
RECEIPT 1306110063
Date: 04/30/2013 Time: 11:08
Case: 201302966 CD Cashier: CSN
Payor: AMB EXPLORATION \$100.00
OILGAS/TRAN/PUD APP

APPLICATION

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b. Applicant has conducted a diligent and meaningful search of the local county assessor's records, county treasurer's records, county deed records regarding the property involved for return addresses on recorded instruments, county probate records and city and county telephone directories and other sources of such information to locate the whereabouts and mailing address of each respondent, or the identity, whereabouts and mailing address of respondent's heirs, executors, administrators, trustees, successors, devisees or assigns, if any. Applicant has made a bona fide effort to reach an agreement as to the development of the unit with each person located by such search.

c. Applicant has drilled or proposes to drill a well on said "drilling and spacing unit" to test the common sources of supply and the avoiding of the drilling of unnecessary wells, the prevention of waste, and the protection of correlative rights require that the Commission order all owners to pool their interests and to drill and develop the "drilling and spacing unit" and common sources of supply as a unit.

3. Legal Authority: Title 52, Section 87.1, O.S.

4. Relief Sought: Applicant requests that the Commission pool the interests, designate Applicant or some other party as operator, and adjudicate the rights and equities of oil and gas owners in the drilling and spacing unit and common sources of supply listed in paragraph 2a above, all to be upon such terms and conditions as are just and reasonable and which will afford all of such owners the opportunity to recover or receive without unnecessary expense their just and fair share of all hydrocarbon substances produced therefrom, and that the Commission make definite provisions for the payment of all actual costs and expenses, not to exceed reasonable costs and expenses of drilling and development, including a reasonable charge for supervision, with the final Order to be entered in this case to provide for one year from the date of entry within which to commence operations for the drilling of the initial unit well.

APPLICATION

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WHEREFORE, Applicant prays that, after notice and hearing as required by law, all oil and gas interests be pooled and the rights and equities of all oil and gas owners be adjudicated.

Respectfully submitted,

MORICOLI & SCHOVANEC

By 

John C. Moricoli, Jr. - OBA No. 6411

One Leadership Square
211 N. Robinson, Suite 1350
Oklahoma City, Oklahoma 73102
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Facsimile: (405) 232-6515
Email: jmoricoli@moricoli.com

ATTORNEYS FOR APPLICANT

CRI/9378

a-2cla

EXHIBIT "A"
APPLICANT: AMB EXPLORATION COMPANY, LLC
RESPONDENTS

**KNOWN RESPONDENTS WITH
CURRENT ADDRESS**

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| 1. L.E. Jones Production Company
PO Box 1185
Duncan, OK 73534 | 7. Jones-Daube Mineral Company,
an Oklahoma General
Partnership
PO Box 1169
Duncan, OK 73534 |
| 2. David W. Potts Land &
Exploration Co.
PO Box 692
Ardmore, OK 73402-0692 | 8. Raemona Sue Coyle Perry
PO Box 368
Wynnewood, OK 73098 |
| 3. XTO Energy Inc., a Delaware
corporation
810 Houston Street
Fort Worth, TX 76102 | 9. Daube Partnership, Ltd
PO Box 1169
Duncan, OK 73534 |
| 4. Jones-Kalkman Mineral
Company, a partnership
composed of LaWayne Jones
and Joe Kalkman
PO Box 2327
Ardmore, OK 73402 | 10. Sutton-Williams, L.P., an
Oklahoma limited partnership
PO Box 1209
Ardmore, OK 73402-1209 |
| 5. Trustee for the Poland Mineral
Trust
PO Box 121877
Fort Worth, TX 76121 | 11. V.M. Harper
1405 4th Avenue NW #476
Ardmore, OK 73401-2708 |
| 6. Martha Joe Adams Clark
PO Box 722
Vian, OK 74964 | 12. J.M. Newman
PO Box 1465
Ardmore, OK 73402 |
| | 13. Mark A. Newman
PO Box 1058
Ardmore, OK 73402 |
| | 14. The Hefner Company, Inc.
PO Box 2177
Oklahoma City, OK 73101 |

EXHIBIT "A"

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EXHIBIT "A"
APPLICANT: AMB EXPLORATION COMPANY, LLC
RESPONDENTS

- | | |
|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 15. Glebe Royalty, LLC
6305 Waterford Blvd., Suite 300
Oklahoma City, OK 73118 | 23. Harlequin Royalty, LLC
PO Box 54523
Oklahoma City, OK 73154 |
| 16. Derek S. White
c/o Samuel F. White, Sr.
Rt. 1 Box 8
Helena, OK 73741 | 24. Finley Resources, Inc.
1308 Lake Street, Suite 100
Fort Worth, TX 76102 |
| 17. Raemona Sue Coyle Perry
1109 N. Clark
Wynnewood, OK 73098 | 25. R. Brannan & Sons Limited
Partnership
PO Box 1514
Gainesville, TX 76241-1514 |
| 18. KH, L.L.C., an Oklahoma limited
liability company
PO Box 2518
Ardmore, OK 73402 | 26. Milford Corporation
PO Box 721423
Oklahoma City, OK 73172 |
| 19. Craig G. Tirey Family Limited
Partnership
PO Box 20093
Oklahoma City, OK 73156 | 27. Continental Exploration, L.L.C.
275 W. Campbell Road,
Suite 440
Richardson, TX 75080 |
| 20. R.D. Davis & Associates, LLC
5733 NW 132nd Street
Oklahoma City, OK 73142 | |
| 21. Concorde Production Co., L.L.P.
PO Box 691425
San Antonio, TX 78269-1425 | |
| 22. Strata Minerals, Inc.
PO Box 21055
Oklahoma City, OK 73156 | |

UNKNOWN OR UNLOCATED
RESPONDENTS WITH LAST
KNOWN ADDRESS

- | |
|------------------------------------------------|
| 28. Estate of R.D. Poland
ADDRESS UNKNOWN |
| 29. Heirs of Thomas P. Mayo
ADDRESS UNKNOWN |

EXHIBIT "A"

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EXHIBIT "A"
APPLICANT: AMB EXPLORATION COMPANY, LLC
RESPONDENTS

30. Heirs of Alton L. Clement and
their Grantees
ADDRESS UNKNOWN

31. Heirs of Miriam James, now
Burns
ADDRESS UNKNOWN

32. Edna W. Clement, Successor
Trustee of the Alton Kent
Clement Living Trust,
Bentonville, AR
ADDRESS UNKNOWN

33. Michael McDonald
ADDRESS UNKNOWN

34. Elaine June McDonald
ADDRESS UNKNOWN

35. Madelyn Capri Jasmyn Dawn
Kerr
ADDRESS UNKNOWN

36. Kevin B. White
ADDRESS UNKNOWN

RESPONDENTS LISTED FOR
CURATIVE REASONS

None

EXHIBIT "A"