

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF OKLAHOMA

APPLICANT: AVALON OIL AND GAS III, LLC

RELIEF SOUGHT: POOLING

LEGAL DESCRIPTION: SE/4 NE/4 SECTION 18,
TOWNSHIP 4 SOUTH, RANGE 1 WEST, CARTER
COUNTY, OKLAHOMA

CAUSE CD NO.

201502077-T

4
REPLACEMENT FOR FAX FILED
APR 30 2015
FILED / RECEIVED
MAY 05 2015
COURT CLERK'S OFFICE - TULSA
CORPORATION COMMISSION
OF OKLAHOMA

APPLICATION

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

1. Parties: Applicant is Avalon Oil and Gas III, LLC, 15 West 6th Street, Suite 2300, Tulsa, Oklahoma, 74119, who is the owner of the right to drill a well to the common sources of supply named below 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 of each party being made a respondent to this Application is as shown on Exhibit "A", attached hereto and made a part hereof.

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 **Order No. 68474** for each common source of supply also named below; 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.

b. Applicant has conducted a diligent and meaningful search of the local county assessor's records, county treasurer's records, and 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 each respondent and has made a bona fide effort to reach an agreement as to the development of the unit with each respondent located by such search.

c. Applicant has drilled or proposes to drill a well on said "drilling and spacing unit" to test each common source of supply named below and the avoiding of the drilling of unnecessary well, the prevention of waste, and the protection of correlating 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.

OKLA CORP COM
RECEIPT 1507460037
Date: 05/06/2015 Time: 11:45
Case: 201502077 CD Cashier: GPT
Payor: AVALON OIL AND GAS III, LLC
Check: 20150506 \$100.00
OIL&GAS/TRAN/PUD APP

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

4. Relief Sought: Applicant requests that the Commission pool the interests and adjudicate the rights and equities of oil and gas owners in the **Deese Sand** common source of supply for the 40-acre drilling and spacing unit underlying the SE/4 NE/4 Section 18, Township 4 South, Range 1 West, Carter County, Oklahoma 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; 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 and designate Applicant or some other party as operator of the initial unit well and any other subsequent well or wells drilled in the unit; and that the Applicant be given one year to commence operations for the drilling or other operations with respect to the unit covered hereby.

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,

CRUTCHMER & BARNES, P.L.L.C.
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918/382-8686
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By: 

Ron M. Barnes OBA #534

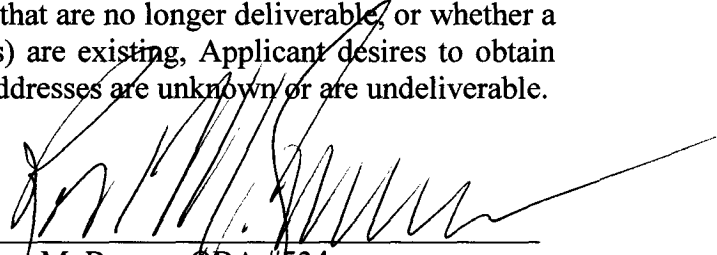
Grayson Barnes, OBA #31475

Attorneys for Avalon Oil and Gas III, LLC

CERTIFICATE OF MAILING/CERTIFICATE OF SERVICE

The undersigned, of lawful age, being first duly sworn upon oath, states: I am the Attorney for the above-named Applicant. I certify that on or before the 5 day of May, 2015 I mailed by Certified United States mail, proper postage prepaid thereon, a copy of the Notice of Hearing on file in this Cause and this Application to the respondents named on the Exhibit "A" attached to this Application, at their respective mailing addresses.

That Applicant has, with due diligence and after inquiry of every possible source for information, attempted to locate the names and addresses of all respondents that should be receiving notice of this hearing before the Corporation Commission. For respondents that Applicant does not know and cannot ascertain whether an individual respondent(s) are living or deceased, or respondent(s) with a last known address that are no longer deliverable, or whether a corporation(s) or other business entities respondent(s) are existing, Applicant desires to obtain service by publication upon said respondents whose addresses are unknown or are undeliverable.



Ron M. Barnes, OBA #534
Grayson Barnes, OBA #31475

EXHIBIT "A"

ADDRESS KNOWN

None

ADDRESS UNKNOWN

None

CURATIVE

1. Southwest Petroleum Company
P.O. Box 702377
Dallas, TX 75370
2. S & C Properties
P.O. Box 601295
Dallas, TX 75360
3. Marilyn G. Galt, Deceased
any known or unknown heirs, executors,
administrators, devisees, trustees and
assigns, immediate or remote
654 Mulberry Point Road
Guilford, CT 06437
4. John Travis Galt, Personal
Representative of Freeman P. Galt, Jr.,
Estate
10564 Somerton Drive
Dallas, TX 75229-5323
5. The Magma Trust
P.O. Box 1622
Abilene, Texas 79604

CURATIVE ADDRESS UNKNOWN

None

If Any Named 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

**FOR ADMINISTRATIVE PURPOSES
ONLY**

6. Kandi Almendares
Avalon Oil and Gas III, L.L.C.
15 West 6th Street, Suite 2300
Tulsa, OK 74119