

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATIONS OF FRANKLIN MOUNTAIN
ENERGY 3, LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 23968 & 23969

CONSOLIDATED PRE-HEARING STATEMENT

Franklin Mountain Energy 3, LLC ("Franklin") submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

FRANKLIN MOUNTAIN ENERGY, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine
Yarithza Peña
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OTHER PARTIES

PBEX, LLC and E.G.L. Resources

ATTORNEY

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Couzzourt Trusts

Leslie Weaver
Amarillo National Bank Trustee
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STATEMENT OF CASES

APPLICANT:

In Case No. 23968, Franklin seeks an order from the Division pooling all uncommitted mineral interests within a standard 320-acre, more or less, Wolfcamp horizontal spacing unit comprising the W/2E/2 of Sections 27 and 34, Township 18 South, Range 34 East, N.M.P.M., Lea County, New Mexico. This spacing unit will be dedicated to the **Link Fed Com 703H well**, to be horizontally drilled. The producing area for the well is expected to be orthodox. Also to be considered will be the cost of drilling and completing said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Franklin Mountain Energy 3, LLC as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 24 miles west of Hobbs, New Mexico.

In Case No. 23969, Franklin seeks an order from the Division pooling all uncommitted mineral interests within a standard 320-acre, more or less, Wolfcamp horizontal spacing unit comprising the E/2E/2 of Sections 27 and 34, Township 18 South, Range 34 East, N.M.P.M., Lea County, New Mexico. This spacing unit will be dedicated to the **Link Fed Com 704H well**, to be horizontally drilled. The producing area for the well is expected to be orthodox. Also to be considered will be the cost of drilling and completing said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Franklin Mountain Energy 3, LLC as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 24 miles west of Hobbs, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Don Johnson	Approx. 10 minutes	Approx. 10
Geologist: Ben Kessel	Approx. 10 minutes	Approx. 10

PROCEDURAL ISSUES

As noted above, PBEX, LLC and E.G.L. Resources, as well as Couzzourt Trust, have filed objections to these cases proceeding by affidavit. Franklin is in discussions with those parties. If

those discussions are fruitful, and if there is no other opposition to these cases, Franklin intends to move forward with the December 7 hearing in these matters and to present these cases by affidavit.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: Deana M. Bennett

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel by electronic mail on November 30, 2023:


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Couzzourt Trusts

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 290030

QUESTIONS

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID: 331595
	Action Number: 290030
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.