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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF FRANKLIN MOUNTAIN ENERGY 3, LLC FOR COMPULSORY POOLING, AND, TO THE EXTENT NECESSARY, APPROVAL OF AN OVERLAPPING SPACING UNIT, LEA COUNTY, NEW MEXICO.

CASE NO. 24472 ORDER NO. R-23808

APPLICATION FOR HEARING DE NOVO

COMES NOW, Coterra Energy ("Coterra") as successor in interest to Franklin Mountain Energy 3, LLC, and the operator adversely impacted by Division Order No. R-23808, and hereby applies for a hearing *de novo* before the full Commission, pursuant to NMSA 1978, Section 70-2-13, at the next available Commission Hearing.

Respectfully submitted,

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

By: Wella M. Bennett

Earl E. DeBrine, Jr

Deana M. Bennett

Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

deana.bennett@modrall.com

yarithza.pena@modrall.com

Attorneys for Coterra Energy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 5, 2025.

Ernest L. Padilla
PADILLA LAW FIRM, P.A.
Post Office Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalawnm@outlook.com
Attorney for North Fork Land Management, LP
and Aguila Operating Company, LLC

Deana M. Bennett