

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

**APPLICATION OF FRANKLIN MOUNTAIN
ENERGY, LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No: 22447

**APPLICATION OF FRANKLIN MOUNTAIN
ENERGY, LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No: 22448

PRE-HEARING STATEMENT

TAP ROCK RESOURCES, LLC (“Tap Rock”) hereby provides this pre-hearing statement as required by the rules of the Division. The parties are conferring in an effort to reach a voluntary agreement. If an agreement is not reached before January 6, 2021, Tap Rock requests that these cases be heard as a status conference at that time.

APPEARANCES

APPLICANT

FRANKLIN MOUNTAIN ENERGY, LLC.

APPLICANT’S ATTORNEYS:

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OPPONENT

TAP ROCK RESOURCES, LLC

TAP ROCK’S ATTORNEYS:

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STATEMENT OF THE CASE

In these cases, Applicant seeks orders pooling all uncommitted mineral interests within the spacing units as described in the applications in the above-referenced cases. Tap Rock owns an interest in the proposed units and wells. However, there has been insufficient time for the parties to negotiate a voluntary agreement. If a voluntary agreement is not reached prior to January 6, 2021, Tap Rock objects to these cases going forward by affidavit and requests that they be set for a status conference to set a date for a contested hearing.

PROCEDURAL MATTERS

If the parties do not reach a voluntary agreement prior to the time of hearing, Tap Rock requests that these matters be heard as a status conference on January 6, 2022.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on December 30, 2021 to the following:

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State of New Mexico
Energy, Minerals and Natural Resources
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QUESTIONS

Action 69761

QUESTIONS

Operator: Franklin Mountain Energy LLC 44 Cook Street Denver, CO 80206	OGRID: 373910
	Action Number: 69761
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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