

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

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

CASE NOS. 22560-22565

CONSOLIDATED PRE-HEARING STATEMENT

Franklin Mountain Energy, 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
Bryce H. Smith
MODRALL, SPERLING, ROEHL,
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OTHER PARTIES

NONE

ATTORNEY

STATEMENT OF CASES

APPLICANT:

In Case No. 22560, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the W/2W/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the Western Fed Com 601H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy,

LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22561, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the E/2W/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the Bidder 49 Fed Com 602H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22562, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the W/2 E/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the KC7 Fed Com 603H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22563, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the E/2E/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the El Paso Fed Com 604H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22564, Franklin seeks an order from the Division pooling all overriding royalty interests within a Wolfcamp horizontal spacing unit underlying the E/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the KC7 Fed Com 704H, the El Paso Fed Com 705H, and the El Paso Fed Com 706H wells to be horizontally drilled. The completed interval for the El Paso Fed Com 705H well will be less than 330' from the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit. The producing area for the wells will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the wells. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22565, Franklin seeks an order from the Division pooling all overriding royalty interests within a Wolfcamp horizontal spacing unit underlying the W/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the Western Fed Com 702H and Bidder 49 Fed Com 703H wells to be horizontally drilled. The completed interval for the Western Fed Com 702H well will be less than 330' from

the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit. The producing area for the wells will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the wells. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Lee Zink	Approx. 30 minutes	Approx. 8
Geologist: Ben Kessel	Approx. 30 minutes	Approx. 6

PROCEDURAL ISSUES

Franklin requests that these cases be consolidated for hearing purposes only and Franklin intends to put these cases on by affidavit.

Respectfully submitted,

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

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 83287

QUESTIONS

Operator: Franklin Mountain Energy LLC 44 Cook Street Denver, CO 80206	OGRID: 373910
	Action Number: 83287
	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.