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

APPLICATIONS OF FRANKLIN MOUNTAIN ENERGY, LLCTO AMEND ORDERS, LEA COUNTY, NEW MEXICO.

CASE NOS. 23221 -23224

# CONSOLIDATED PRE-HEARING STATEMENT

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

## **APPEARANCES**

<u>APPLICANT</u> <u>ATTORNEY</u>

FRANKLIN MOUNTAIN ENERGY, LLC Deana M. Bennett

Earl E. DeBrine Bryce H. Smith

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(505) 848-1800

OTHER PARTIES ATTORNEY

None

## STATEMENT OF CASES

# **APPLICANT:**

In Case No. 23221, Franklin seeks an order from the Division for the limited purpose of amending Order No. R-21995 to allow for a one-year extension of time to commence drilling the initial well under Order No. R-21995. Order No. R-21995 pooled uncommitted interest owners in

a 640-acre, more or less, Wolfcamp standard horizontal spacing unit comprised of the E/2 of Sections 14 and 23, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico. Said area is located approximately 16 miles northwest of Jal, New Mexico.

In Case No. 23222, Franklin seeks an order from the Division for the limited purpose of amending Order No. R-21996 to allow for a one-year extension of time to commence drilling the initial well under Order No. R-21996. Order No. R-21996 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring standard horizontal spacing unit comprised of the E/2W/2 of Sections 14 and 23, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico. Said area is located approximately 16 miles northwest of Jal, New Mexico.

In Case No. 23223, Franklin seeks an order from the Division for the limited purpose of amending Order No. R-21997 to allow for a one-year extension of time to commence drilling the initial well under Order No. R-21997. Order No. R-21997 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring standard horizontal spacing unit comprised of the W/2E/2 of Sections 14 and 23, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico. Said area is located approximately 16 miles northwest of Jal, New Mexico.

In Case No. 23224, Franklin seeks an order from the Division for the limited purpose of amending Order No. R-21998 to allow for a one-year extension of time to commence drilling the initial well under Order No. R-21998. Order No. R-21998 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring standard horizontal spacing unit comprised of the E/2E/2 of Sections 14 and 23, Township 24 South, Range 35 East, N.M.P.M., Lea County, New Mexico. Said area is located approximately 16 miles northwest of Jal, New Mexico.

#### PROPOSED EVIDENCE

# **APPLICANT**:

WITNESS ESTIMATED TIME EXHIBITS

Landman: Ilona Hoang Approx. 5 minutes Approx. 4

#### PROCEDURAL ISSUES

To date, no party has entered an appearance nor is there any expected opposition to these cases and Franklin intends to present these cases by affidavit.

# Respectfully submitted,

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

By: /s/ Bryce H. Smith

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QUESTIONS

Action 170092

#### **QUESTIONS**

Operator:	OGRID:
Franklin Mountain Energy LLC	373910
44 Cook Street	Action Number:
Denver, CO 80206	170092
	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.