

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

**APPLICATIONS OF FRANKLIN MOUNTAIN
ENERGY, LLC TO AMEND ORDERS,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 23342, 23343

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

APPLICANT

FRANKLIN MOUNTAIN ENERGY, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-
2168
(505) 848-1800

OTHER PARTIES

None

ATTORNEY

STATEMENT OF CASES

APPLICANT:

In Case No. 23342, Franklin seeks an order from the Division for the limited purpose of amending Order No. R-22090 to allow for a one-year extension of time to commence drilling the initial well under Order No. R-22090. Order No. R-22090 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring standard horizontal spacing unit comprised of the W/2 W/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. 23343, Franklin seeks an order from the Division for the limited purpose of amending Order No. R-22092 to allow for a one-year extension of time to commence drilling the initial well under Order No. R-22092. Order No. R-22092 pooled uncommitted interest owners in a 640-acre, more or less, Wolfcamp standard horizontal spacing unit comprised of the W/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/ Deana M. Bennett

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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 189836

QUESTIONS

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|---|--|
| Operator: Franklin Mountain Energy LLC 44 Cook Street Denver, CO 80206 | OGRID: 373910 |
| | Action Number: 189836 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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