

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

**APPLICATION OF MRC PERMIAN  
COMPANY FOR APPROVAL OF AN  
OVERLAPPING HORIZONTAL WELL SPACING  
UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 23621-23623**

**ENTRY OF APPEARANCE AND NOTICE OF OPPOSITION  
TO PRESENTATION BY AFFIDAVIT**

Modrall, Sperling, Roehl, Harris & Sisk, P.A., (Deana M. Bennett and Earl E. DeBrine, Jr.) hereby enters its appearance on behalf of Franklin Mountain Energy, LLC (“Franklin Mountain”) in the above-referenced cases.

Franklin Mountain further provides notice that it objects to presentation of these cases by affidavit under Rule 19.15.4.12(A)(1)(b).

Respectfully submitted,

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

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following  
counsel of record by electronic mail on July 24, 2023:

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