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 NO. 23647

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 case.

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.

By: /s/ Deana M. Bennett

Deana M. Bennett Earl E. DeBrine, Jr. Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 edebrine@modrall.com dbennett@modrall.com

Attorneys for Franklin Mountain Energy

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:

Michael H. Feldewert Adam G. Rankin Julia Broggi Paula M. Vance HOLLAND & HART, LLP Post Office Box 2208 Santa Fe, NM 87504-2208 <u>mfeldewert@hollandhart.com</u> <u>agrankin@hollandhart.com</u> <u>jbroggi@hollandhart.com</u> <u>pmvance@hollandhart.com</u> *Attorneys for MRC Permian Company*

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

By: <u>/s/ Deana M. Bennett</u> Deana M. Bennett