

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

**APPLICATIONS OF MRC PERMIAN COMPANY
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

CASE NOS. 23885-23888

**ENTRY OF APPEARANCE AND NOTICE OF OBJECTION
TO PROCEEDING BY AFFIDAVIT**

Modrall, Sperling, Roehl, Harris & Sisk, P.A., (Deana M. Bennett, Earl DeBrine, Jr., and Yarithza Peña), hereby enters its appearance on behalf of Franklin Mountain Energy 3, LLC (“Franklin”) in the above-referenced matters. Franklin has submitted an unopposed motion to amend the prehearing order issued for Franklin’s Case Nos. 23833-23840 to consolidate the above captioned MRC Permian Company cases with Franklin’s Case Nos. 23833-23840, which are set for a contested hearing on December 7, 2023. To the extent necessary, Franklin provides notice of objection to these matters proceeding by affidavit.

Respectfully submitted,

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

By: 

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


earl.debrine@modrall.com
yarithza.pena@modrall.com
*Attorneys for Franklin Mountain Energy 3,
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

Attorneys for MRC Permian Company

By: 
Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com