

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

**APPLICATIONS OF FRANKLIN MOUNTAIN  
ENERGY 3, LLC FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 23966-23969**

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

MRC Permian Company, through undersigned counsel, hereby appears in the above-referenced cases and further provides notice of objection to these matters proceeding by affidavit.

Respectfully submitted,

**HOLLAND & HART, LLP**



---

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
pmvance@hollandhart.com

**ATTORNEYS FOR MRC PERMIAN COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr.  
Deana Bennett  
Yarithza Peña  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
*earl.debrine@modrall.com*  
*deana.bennett@modrall.com*  
*yarithza.pena@modrall.com*

***Attorneys for Franklin Mountain Energy 3, LLC***

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
505-982-2043  
*jamesbruc@aol.com*

***Attorney for PBEX, LLC and E.G.L. Resources, Inc.***

Matthew M. Beck  
PEIFER, HANSON, MULLINS & BAKER, P.A.  
P.O. Box 25245  
Albuquerque, NM 8172-2545  
(505) 247-4800  
FAX: (505) 243-6458  
*mbeck@peiferlaw.com*

***Attorney for Amtex Energy, Inc. and Chap Exploration, LLC***



---

Michael H. Feldewert