

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

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

CASE NOS. 24198 & 24206

**APPLICATION OF FRANKLIN MOUNTAIN
ENERGY 3, LLC FOR COMPULSORY
POOLING, AND, TO THE EXTENT
NECESSARY, APPROVAL OF AN
OVERLAPPING SPACING UNIT, LEA
COUNTY, NEW MEXICO**

CASE NOS. 24199 & 24205

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

James P. Parrot, Miguel A. Suazo, and Sophia A. Graham of Beatty & Wozniak, P.C., hereby enter their appearances on behalf of Marathon Oil Permian LLC (“Marathon”) in the above-referenced matter. Marathon further provides notices that it objects to presentation of this case by affidavit under Rule 19.15.4.12(A)(1)(b).

Respectfully submitted,

BEATTY & WOZNIAK, P.C.



By: _____

James P. Parrot
Miguel A. Suazo
Sophia A. Graham
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
jparrot@bwenergylaw.com
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com

*Attorneys for Marathon Oil Permian
LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 5th day of March 2024, as follows:

New Mexico Oil Conservation Division Hearings
ocd.hearings@state.nm.us

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.
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
edebrine@modrall.com
deana.bennett@modrall.com
yarithza.pena@modrall.com

Attorneys for Franklin Mountain Energy 3, LLC

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



Grace Go-Hoveland