

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

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


**CASE NOS. 24314-24319  
and 24327-24334**

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

Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Deana M. Bennett, Earl E. DeBrine, Jr., and Yarithza Peña), hereby enters its appearance on behalf of Franklin Mountain Energy 3, LLC (“Franklin Mountain”) in the above-referenced matters. Franklin Mountain further provides notice that it objects to the above captioned cases proceeding by affidavit.

Respectfully submitted,

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

By: 

Deana M. Bennett  
Earl E. DeBrine, Jr.  
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](mailto:deana.bennett@modrall.com)  
[earl.debrine@modrall.com](mailto:earl.debrine@modrall.com)  
[Yarithza.Pena@modrall.com](mailto:Yarithza.Pena@modrall.com)


*Attorneys for Franklin Mountain Energy 3, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on April 10, 2024:

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
PO Box 2208  
Santa Fe, NM 87504  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

*Attorneys for MRC Permian Company*

By:   
Deana M. Bennett