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

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 NO. 24472

ENTRY OF APPEARANCE AND OBJECTION DUE TO LACK OF NOTICE

The undersigned hereby enters his appearance on behalf of North Fork Land Management, LP and Aguila Operating Company, LLC, in the above captioned case.

North Fork Land Management, LP and Aguila Operating Company, LLC are working interest owners in the proposed spacing unit and have not received a well proposal and notice of the hearing held before the Division on May 16th, 2024.

Wherefore, North Fork Land Management, LP and Aguila Operating Company, LLC, request a stay of future proceedings in this matter until applicant has complied with proposal and notice of hearing requirements.

Respectfully submitted,

PADILLA LAW FIRM, P.A. /s/ Ernest L. Padilla ERNEST L. PADILLA Post Office Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalawnm@outlook.com

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 3rd day of June, 2024, as follows:

Deana M. Bennett Earl E DeBrine, Jr. Yarithza Peña deana.bennett@modrall.com earl.debrine@modrall.com yarithza.pena@modrall.com

> /s/ Ernest L. Padilla ERNEST L. PADILLA