

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

**IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF CONSIDERING:**

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

**CASE NO. 24198  
ORDER NO. R-23343**

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

**CASE NO. 24199  
ORDER NO. R-23344**

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

**CASE NO. 24205  
ORDER NO. R-23345**

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

**CASE NO. 24206  
ORDER NO. R-23363**

**APPLICATION FOR HEARING DE NOVO**

COMES NOW, MRC Permian Company (“MRC”), an interest owner adversely impacted by the Division’s orders, and hereby applies for a hearing *de novo* before the full Commission, pursuant to NMSA 1978, Section 70-2-13.

Respectfully submitted,

HOLLAND & HART LLP



By: \_\_\_\_\_

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 November 27, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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

*Attorneys for Franklin Mountain Energy 3, LLC*



---

Paula M. Vance