

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

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

**CASE NO. 21806**

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

**CASE NO. 21807**

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

**CASE NO. 21808**

**FRANKLIN MOUNTAIN ENERGY, LLC'S  
CONSOLIDATED PRE-HEARING STATEMENT**

Franklin Mountain Energy, LLC ("Franklin") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

**FRANKLIN MOUNTAIN ENERGY, LLC**

**ATTORNEY**

Deana M. Bennett  
Lance D. Hough  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
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(505) 848-1800

**OTHER PARTIES**

None

**ATTORNEY**

**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 21806, Franklin seeks an order from the Division pooling all uncommitted interests within a Wolfcamp horizontal spacing unit underlying Lots 3 and 4, the S/2NW/4 and the SW/4 of Section 1, and the W/2 of Section 12, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Clincher Fed Com 702H** and **Merit Federal 703H** wells to be horizontally drilled. The completed interval for the Clincher Fed Com 702H well will be within 330' from the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit. The producing area for the Clincher Fed Com 702H and Merit Federal 703H wells will be orthodox. Also to be considered will be the cost of drilling, completing, and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision while drilling and after completion, designation of Franklin Mountain Energy, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells.

In Case No. 21807, Franklin seeks an order from the Division pooling all uncommitted interests within a Wolfcamp horizontal spacing unit underlying Lot 4, the SW/4NW/4 and the W/2SW/4 of Section 1, and the W/2W/2 of Section 12; and Lot 1, the SE/4NE/4 and the E/2SE/4 of Section 2, and the E/2E/2 of Section 11, Township 25 South, Range 35 E, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Clincher Fed Com 701H** well to be horizontally drilled. The completed interval for the Clincher Fed Com 701H well will be within 330' from the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit. The producing area for the Clincher Fed Com 701H well will be orthodox. Also to be considered will be the cost of drilling, completing, and equipping said well, the allocation of these costs as well as the actual operating costs and charges for supervision while drilling and after completion, designation of Franklin Mountain Energy, LLC as operator of the well, and a 200% charge for risk involved in drilling said well.

In Case No. 21808, Franklin seeks an order from the Division pooling all uncommitted interests within a Bone Spring horizontal spacing unit underlying Lot 4, the SW/4NW/4 and the W/2SW/4 of Section 1, and the W/2W/2 of Section 12, Township 25 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Clincher Fed Com 601H** well to be horizontally drilled. The producing area for the Clincher Fed Com 601H well will be orthodox. Also to be considered will be the cost of drilling, completing, and equipping said well, the allocation of these costs as well as the actual operating costs and charges for supervision while drilling and after completion, designation of Franklin Mountain Energy, LLC as operator of the well, and a 200% charge for risk involved in drilling said well.

**PROPOSED EVIDENCE**

**APPLICANT:**

**WITNESS**

**ESTIMATED TIME**

**EXHIBITS**

Landman: Shelly Albrecht

Approx. 30 minutes

Approx. 8

Geologist: Ben Kessel

Approx. 30 minutes

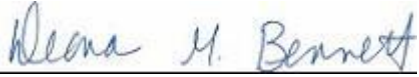
Approx. 6

### PROCEDURAL ISSUES

While Burlington Resources Oil and Gas Company, LP (“Burlington”) entered an appearance briefly, Burlington has withdrawn its appearance and Franklin is not aware of any other entries of appearance. Franklin intends to put these cases on by affidavit.

Respectfully submitted,

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

By: 

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