

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

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

**CASE NOS. 22560-22565**

**CONSOLIDATED PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

**FRANKLIN MOUNTAIN ENERGY, LLC**

**ATTORNEY**

Deana M. Bennett  
Earl E. DeBrine  
Bryce H. Smith  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
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2168  
(505) 848-1800

**OTHER PARTIES**

**NONE**

**ATTORNEY**

**STATEMENT OF CASES**

**APPLICANT:**

In Case No. 22560, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the W/2W/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the Western Fed Com 601H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy,

LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22561, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the E/2W/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the Bidder 49 Fed Com 602H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22562, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the W/2 E/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the KC7 Fed Com 603H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22563, Franklin seeks an order from the Division pooling all overriding royalty interests within a Bone Spring horizontal spacing unit underlying the E/2E/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the El Paso Fed Com 604H well to be horizontally drilled. The producing area for the well will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the well. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22564, Franklin seeks an order from the Division pooling all overriding royalty interests within a Wolfcamp horizontal spacing unit underlying the E/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the KC7 Fed Com 704H, the El Paso Fed Com 705H, and the El Paso Fed Com 706H wells to be horizontally drilled. The completed interval for the El Paso Fed Com 705H well will be less than 330' from the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit. The producing area for the wells will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the wells. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

In Case No. 22565, Franklin seeks an order from the Division pooling all overriding royalty interests within a Wolfcamp horizontal spacing unit underlying the W/2 of Sections 25 and 36, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the Western Fed Com 702H and Bidder 49 Fed Com 703H wells to be horizontally drilled. The completed interval for the Western Fed Com 702H well will be less than 330' from

the adjoining tracts to allow inclusion of proximity tracts within the proposed standard horizontal spacing unit. The producing area for the wells will be orthodox. Also to be considered will be designation of Franklin Mountain Energy, LLC as operator of the wells. Said area is located approximately 11 miles Northwest of Jal, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

<b>WITNESS</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Landman: Lee Zink	Approx. 30 minutes	Approx. 8
Geologist: Ben Kessel	Approx. 30 minutes	Approx. 6

**PROCEDURAL ISSUES**

Franklin requests that these cases be consolidated for hearing purposes only and Franklin intends to put these cases on by affidavit.

Respectfully submitted,

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

By: Deana M. Bennett

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS  
 Action 83287

**QUESTIONS**

Operator: Franklin Mountain Energy LLC 44 Cook Street Denver, CO 80206	OGRID: 373910
	Action Number: 83287
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.