

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

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

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

**Case No. 20773**

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

**Case No. 20774**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by BTA Oil Producers, LLC as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Franklin Mountain Energy, LLC

**APPLICANT'S ATTORNEY**

Deanna Bennett

**OPPONENT**

BTA Oil Producers, LLC  
104 South Pecos  
Midland, Texas 79701

**OPPONENT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: Willis Price  
(432) 682-3753

XTO Energy Inc.

Holland & Hart LLP

## STATEMENT OF THE CASE

### APPLICANT

Franklin Mountain Energy, LLC seeks orders pooling of all mineral interests in the Bone Spring formation in the W/2W/2 of Sections 9 and 4, and the Wolfcamp formation in the W/2 of Sections 9 and 4, all in Township 24 South, Range 35 East, NMPM.

### OPPONENT

BTA Oil Producers, LLC is a working interest owner in the Bone Spring formation in the proposed W/2W/2 Bone Spring well unit. It owns no interest in the Wolfcamp formation. It is concerned about the effect of the proposed Wolfcamp wells on its lower Bone Spring rights.

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

### OPPONENT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

Kristeen Ramos  
(landman)

10 min.

Approx. 2

Darren Dolezal  
(geologist)

15 min.

Approx. 6

Britton McQuien  
(engineer)

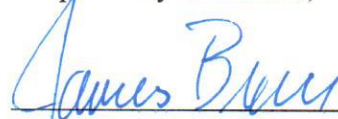
15 Min.

Approx. 4

## PROCEDURAL MATTERS

BTA Oil Producers, LLC may move for a continuance of the cases so it can study the area in more detail.

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for BTA Oil Producers, LLC

**CERTIFICATE OF SERVICE**

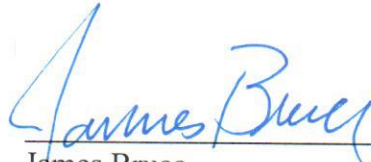
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 29th day of August, 2019 by e-mail:

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James Bruce