

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

**APPLICATIONS OF MRC PERMIAN COMPANY  
FOR APPROVAL OF AN OVERLAPPING HORIZONTAL  
WELL SPACING UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 24367-24370**

**ENTRY OF APPEARANCE AND  
NOTICE OF OBJECTION TO PRESENTATION BY AFFIDAVIT**

Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Deana M. Bennett, Earl E. DeBrine, Jr., and Yarithza Peña), hereby enters its appearance on behalf of Franklin Mountain Energy 3, LLC (“Franklin Mountain”) in the above-referenced matters. Franklin Mountain further provides notice that it objects to the above captioned cases proceeding by affidavit and understands that these cases will be set for a status conference.

Respectfully submitted,

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

By: 


Deana M. Bennett  
Earl E. DeBrine, Jr.  
Yarithza Peña  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
[deana.bennett@modrall.com](mailto:deana.bennett@modrall.com)  
[earl.debrine@modrall.com](mailto:earl.debrine@modrall.com)  
[Yarithza.Pena@modrall.com](mailto:Yarithza.Pena@modrall.com)  
*Attorneys for Franklin Mountain Energy 3, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on April 24, 2024:

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
PO Box 2208  
Santa Fe, NM 87504  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)  
*Attorneys for MRC Permian Company*

James P. Parrot  
Miguel A. Suazo  
Sophia A. Graham  
500 Don Gaspar Ave.  
Santa Fe, NM 87505  
[jparrot@bwenergyllc.com](mailto:jparrot@bwenergyllc.com)  
[mswuazo@bwenergyllc.com](mailto:mswuazo@bwenergyllc.com)  
[sgraham@bwenergyllc.com](mailto:sgraham@bwenergyllc.com)  
*Attorneys for Marathon Oil Permian LLC*

By:   
Deana M. Bennett