

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

**APPLICATION OF FRANKLIN MOUNTAIN ENERGY 3, LLC  
TO AMEND ORDER NO. R-22812 FOR THE LIMITED  
PURPOSE OF ADDING ADDITIONAL POOLED PARTIES,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 25160**

**APPLICATION OF FRANKLIN MOUNTAIN ENERGY 3, LLC  
TO AMEND ORDER NO. R-22816 FOR THE LIMITED  
PURPOSE OF ADDING ADDITIONAL POOLED PARTIES,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 25161**

**FRANKLIN MOUNTAIN ENERGY 3 LLC'S PRE-HEARING STATEMENT**

Franklin Mountain Energy 3 LLC's ("Franklin Mountain") submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Franklin Mountain 3, LLC

**ATTORNEY**

Deana M. Bennett  
Earl E. DeBrine, Jr.  
Yarithza Peña  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800

**OTHER PARTIES**

None

**ATTORNEY**

**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 25160, Franklin Mountain seeks an order from the Division for the limited purpose of amending Order No. R-22812 to pool additional parties under Order No. R-22812. Order R-22812 was issued in Case No. 23611 and pooled uncommitted interest owners in a standard 320-acre, more or less, Wolfcamp horizontal spacing unit comprised of the E/2 W/2 of Sections 27 and 34, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico. Said area is located approximately 18 miles west of Hobbs, New Mexico.

In Case No. 25161, Franklin Mountain seeks an order from the Division for the limited purpose of amending Order No. R-22816 to pool additional parties under Order No. R-22816. Order R-22816 was issued in Case No. 23613 and pooled uncommitted interest owners in a standard 320-acre, more or less, Bone Spring horizontal spacing unit comprised of the E/2 W/2 of Sections 27 and 34, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico. Said area is located approximately 18 miles west of Hobbs, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

**WITNESS**

**ESTIMATED TIME**

**EXHIBITS**

Landman: Don Johnson

Approx. 10 minutes

Approx. 5

**PROCEDURAL ISSUES**

If there are no objections to this case proceeding by affidavit, Franklin Mountain intends to present this case by affidavit on February 13, 2025.

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 428778

**QUESTIONS**

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID: 331595
	Action Number: 428778
	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	1
Testimony time (in minutes)	10