

**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. 21510, 21511, AND 21512  
ORDER NOS. R-21170, R-21171, AND R -21172  
(Re-Open)**

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

Franklin Mountain Energy ("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  
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**OTHER PARTIES**

**Tap Rock Resources, LLC**  
*Only as to case numbers 21510 and 21511*

**ATTORNEY**

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## **STATEMENT OF CASE**

### **APPLICANT:**

In Case No. 21510, Franklin seeks an order from the Division for the limited purposes of 1) conforming Division Order No. R-21170 to the amended order template (“Amended Order Template”) described in the Letter of the Division Director dated April 9, 2020 (Re: Amendments to Compulsory Pooling Order Template); 2) removing the Parade State 603H Well from Order No. R-21170; and 3) amending Order No. R-21170 to allow for an extension of time to commence drilling the Beauty Queen Fed Com 604H well under the Order.

In Case No. 21511, Franklin seeks an order from the Division for the limited purposes of 1) conforming Division Order No. R-21171 to the amended order template (“Amended Order Template”) described in the Letter of the Division Director dated April 9, 2020 (Re: Amendments to Compulsory Pooling Order Template); and 2) amending Order No. R-21171 to allow for an extension of time to commence drilling the Parade State 704H well under the Order.

In Case No. 21512, Franklin seeks an order from the Division for the limited purposes of 1) conforming Division Order No. R-21172 to the amended order template (“Amended Order Template”) described in the Letter of the Division Director dated April 9, 2020 (Re: Amendments to Compulsory Pooling Order Template); and 2) amending Order No. R-21172 to allow for an extension of time to commence drilling the Beauty Queen Fed Com 705H well under the Order.

## **PROPOSED EVIDENCE**

### **APPLICANT:**

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

## **PROCEDURAL ISSUES**

Franklin intends to put these cases on by affidavit and asks that they be consolidated for hearing.

Respectfully submitted,

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

By: Deana M. Bennett

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**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 October 29, 2020:

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