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

APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC TO AMEND ORDER NO. R-21204,	Case No. 22552 Order No. R-21204	
LEA COUNTY, NEW MEXICO	(Re-Open)	
APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC TO AMEND ORDER NO. R-21205,	Case No. 22553 Order No. R-21205	
LEA COUNTY, NEW MEXICO	(Re-Open)	
APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC	Case No. 22556	
TO AMEND ORDER NO. R-21206,	Order No. R-21206	
LEA COUNTY, NEW MEXICO	(Re-Open)	

PRE-HEARING STATEMENT

Applicant TITUS OIL & GAS PRODUCTION, LLC ("Titus") provides this Pre-Hearing

Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

TITUS OIL & GAS PRODUCTION, LLC

APPLICANT'S ATTORNEY:

Sharon T. Shaheen, Esq. Troy S. Lawton, Esq. **MONTGOMERY & ANDREWS, P.A.** P.O. Box 2307 Santa Fe, New Mexico 87504-2307 Telephone: (505) 986-2678 Email: <u>sshaheen@montand.com</u> tlawton@montand.com

OTHER PARTY

None at this time.

STATEMENT OF THE CASE

In **Case No. 22552**, Applicant seeks to re-open Case No. 20897 for the limited purpose of amending Order No. R-21204 to extend to April 7, 2023, the time to commence drilling (1) the **Pakse South 24-25-36 Fed Com 111H** well and (2) the **Pakse South 24-25-36 Fed Com 112H** well, proposed to be drilled into the First Bone Spring formation (Salt Lake; First Bone Spring [53560]) underlying the W/2 of Sections 24 and 25 and the NW/4 of Section 36, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

In **Case No. 22553**, Applicant seeks to re-open Case No. 20898 for the limited purpose of amending Order No. R-21205 to extend to April 7, 2023, the time to commence drilling (1) the **Pakse South 24-25 Fed Com 221H** well and (2) the **Pakse South 24-25 Fed Com 222H** well, proposed to be drilled into the Second Bone Spring formation (Salt Lake; Second Bone Spring [53560]) underlying the W/2 of Sections 24 and 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

In **Case No. 22556**, Applicant seeks to re-open Case No. 20899 for the limited purpose of amending Order No. R-21206 to extend to April 7, 2023, the time to commence drilling (1) the **Pakse South 24-25-36 Fed Com 321H** well and (2) the **Pakse South 24-25-36 Fed Com 322H** well, proposed to be drilled into the Third Bone Spring formation (Salt Lake; Third Bone Spring [53560]) underlying the W/2 of Sections 24 and 25 and the NW/4 of Section 36, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

EXHIBITS

Landman Walter Jones

6-7

PROCEDURAL MATTERS

Assuming no opposition by time of hearing, Applicant will present these matters by

affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen Sharon T. Shaheen Troy S. Lawton P.O. Box 2307 Santa Fe, New Mexico 87504-2307 (505) 986-2678 sshaheen@montand.com tlawton@montand.com

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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

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Action 84098

QUESTIONS

Operator:	OGRID:
Titus Oil & Gas Production, LLC	373986
420 Throckmorton St, Ste 1150	Action Number:
Fort Worth, TX 76012	84098
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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