

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

**APPLICATION OF TITUS OIL & GAS PRODUCTION,
LLC, FOR COMPULSORY POOLING, LEA COUNTY
NEW MEXICO.**

Case No. 20897

**APPLICATION OF TITUS OIL & GAS PRODUCTION,
LLC, FOR COMPULSORY POOLING, LEA COUNTY
NEW MEXICO.**

Case No. 20898

**APPLICATION OF TITUS OIL & GAS PRODUCTION,
LLC, FOR COMPULSORY POOLING, LEA COUNTY
NEW MEXICO.**

Case No. 20899

PREHEARING STATEMENT

This Pre-hearing Statement is submitted by EOG Resources, Inc. by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:	Titus Oil & Gas Production, LLC
ATTORNEY:	Montgomery & Andrews Law Firm Sharon T. Shaheen John F. McIntyre PO Box 2307 Santa Fe, NM 87501 505-982-3873 sshaheen@montand.com jmcintyre@montand.com
OPPOSITION OR OTHER PARTY:	EOG Resources, Inc.
ATTORNEY:	Ernest L. Padilla Padilla Law Firm, P.A. P.O. Box 2523 Santa Fe, NM 87504 (505) 988-7577 padillalaw@qwestoffice.net

APPLICANT:

OPPOSITION OR OTHER PARTY:

STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

EOG Resources opposes these cases because Titus Oil & Gas Production, LLC has filed a plan of development for the proposed wells with the Bureau of Land Management (BLM). EOG Resources, Inc. has opposed the plan of development before the BLM. Because the lands and leases committed to the proposed plan of development are federal lands, the BLM has primary jurisdiction over the plan of development. Accordingly, the applications are premature and the Division should defer consideration of these applications until the BLM approves or disapproves the proposed plan of development.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

Charles Moran, Landman

15 min.

Approx. 5

Jenna Hessert, Geologist

20 min.

Approx. 5

(EOG may also call an engineering expert)

PROCEDURAL MATTERS

OPPOSITION

EOG Resources, Inc., may file a motion to dismiss prior to the hearing, or ask for a continuance should Titus Oil & Gas Production, LLC, refuse to continue the case until a ruling is made by BLM on the plan of development.

Respectfully submitted:

PADILLA LAW FIRM, P.A.

By: /s/ Ernest L. Padilla
Ernest L. Padilla
P.O. Box 2523
Santa Fe, NM 87504-2523
(505) 988-7577
padillalaw@qwestoffice.net

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing pleading to be sent via e-mail on this 7th day of November, 2019 to:

Sharon T. Shaheen
John F. McIntyre

sshaheen@montand.com
jmcintyre@montand.com

/s/ Ernest L. Padilla
Ernest L. Padilla