

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

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

**Case No. 21208**

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

**Case No. 21209**

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

**Case No. 21210**

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

**Case No. 21211**

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

**Case No. 21212**

**PRE-HEARING STATEMENT**

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.  
John F. McIntyre, Esq.  
**MONTGOMERY & ANDREWS, P.A.**  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
Telephone: (505) 986-2678  
Email: [sshaheen@montand.com](mailto:sshaheen@montand.com)  
[jmcintyre@montand.com](mailto:jmcintyre@montand.com)

## **OPPOSING PARTY**

CHEVRON U.S.A., INC

OPPOSING PARTY'S ATTORNEY:

Candace Callahan  
Beatty & Wozniak, P.C.  
500 Don Gaspar Avenue  
Santa Fe, NM 87505  
(505) 983-8545  
[ccallahan@bwenenergy.com](mailto:ccallahan@bwenenergy.com)

## **STATEMENT OF THE CASE**

**Case No. 21208:** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Bone Spring (Oil) formation (WC-025 G-08 S263412K; Bone Spring [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the E/2 SW/4 of Section 17 and the E/2 W/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: Cattlemen Fed Com 322H well, to be horizontally drilled from an approximate surface hole location 2084' FNL and 1994' FWL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FSL and 1651' FWL of Section 20, T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 13 miles southwest of Jal, New Mexico.

**Case No. 21209:** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, horizontal spacing and proration unit

(“HSU”) comprised of the E/2 SW/4 of Section 17 and the E/2 W/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Cattlemen Fed Com 432H well, to be horizontally drilled from an approximate surface hole location 2084’ FNL and 2054’ FWL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FSL and 2310’ FWL of Section 20, T26S-R35E, and (2) Cattlemen Fed Com 512H well, to be horizontally drilled from an approximate surface hole location 2084’ FNL and 2024’ FWL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1850’ FWL of Section 20, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 13 miles southwest of Jal, New Mexico.

**Case No. 21210:** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Bone Spring (Oil) formation (WC-025 G-08 S263412K; Bone Spring [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the W/2 SE/4 of Section 17 and the W/2 E/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: Cattlemen Fed Com 323H well, to be horizontally drilled from an approximate surface hole location 2077’ FNL and 1912’ FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1650’ FEL of Section 20, T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation

of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 13 miles southwest of Jal, New Mexico.

**Case No. 21211:** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the W/2 SE/4 of Section 17 and the W/2 E/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Cattlemen Fed Com 403H well, to be horizontally drilled from an approximate surface hole location 2077’ FNL and 1972’ FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FSL and 2310’ FEL of Section 20, T26S-R35E, and (2) Cattlemen Fed Com 513H well, to be horizontally drilled from an approximate surface hole location 2077’ FNL and 1942’ FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1870’ FEL of Section 20, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 13 miles southwest of Jal, New Mexico.

**Case No. 21212:** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the E/2 SE/4 of Section 17 and the E/2 E/2 of Section 20, Township 26

South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Cattlemen Fed Com 404H well, to be horizontally drilled from an approximate surface hole location 1948' FNL and 892' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FSL and 330' FEL of Section 20, T26S-R35E, (2) Cattlemen Fed Com 434H well, to be horizontally drilled from an approximate surface hole location 1948' FNL and 952' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FSL and 989' FEL of Section 20, T26S-R35E, and (3) Cattlemen Fed Com 514H well, to be horizontally drilled from an approximate surface hole location 1948' FNL and 922' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FSL and 530' FEL of Section 20, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 13 miles southwest of Jal, New Mexico.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**

WITNESSES	EST. TIME	EXHIBITS
Walter Jones (Landman)	15-20 minutes	8-10
Allan Frierson (Geologist)	15-20 minutes	10-12

#### **OPPOSING PARTY:**

WITNESSES	EST. TIME	EXHIBITS
TBD		

## **PROCEDURAL MATTERS**

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

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

Telephone: (505) 982-2678

Email: [sshaheen@montand.com](mailto:sshaheen@montand.com)

[jmcintyre@montand.com](mailto:jmcintyre@montand.com)

*Attorneys for Titus Oil & Gas Production, LLC*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on June 18, 2020:

Candace Callahan

Beatty & Wozniak, P.C.

500 Don Gaspar Avenue

Santa Fe, NM 87505

(505) 983-8545

[ccallahan@bwenergylaw.com](mailto:ccallahan@bwenergylaw.com)

*Attorneys for Chevron U.S.A., Inc.*

/s/ Sharon T. Shaheen

Sharon T. Shaheen