

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

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LCC
TO AMEND ORDER NO. R-21204,
LEA COUNTY, NEW MEXICO**

**Case No. 21687
Order No. R-21204
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LCC
TO AMEND ORDER NO. R-21205,
LEA COUNTY, NEW MEXICO**

**Case No. 21688
Order No. R-21205
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LCC
TO AMEND ORDER NO. R-21206,
LEA COUNTY, NEW MEXICO**

**Case No. 21689
Order No. R-21206
(Re-Open)**

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
jmcintyre@montand.com

OPPONENT

None at this time

STATEMENT OF THE CASE

Case No. 21687. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21204, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 20897 for the limited purpose of amending Order No. R-21204 to extend by one year, through April 7, 2022, 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 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.

Case No. 21688. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21205, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 20898 for the limited purpose of amending Order No. R-21205 to extend by one year, through April 7, 2022, 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 underlying the W/2 of Sections 24 and 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico.

Case No. 21689. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21206, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 20899 for the limited purpose of amending Order No. R-21206 to extend by one year, through April 7, 2022, 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 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.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

Walter Jones, Landman

EXHIBITS

6-7

PROCEDURAL MATTERS

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

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

Post Office Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

sshaheen@montand.com

jmcintyre@montand.com

Attorneys for Titus Oil & Gas Production, LLC