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-21259, LEA COUNTY, NEW MEXICO

Case No. 21690 Order No. R-21259 (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: <u>sshaheen@montand.com</u> jmcintyre@montand.com

OPPONENT

None at this time

STATEMENT OF THE CASE

Case No. 21690. Application of Titus Oil & Gas Production, LLC to Amend Order No.

R-21259, Lea County, New Mexico (Re-Open). Applicant in the above-styled cause seeks to reopen Case No. 21128 for the limited purpose of amending Division Order No. R-21259 to extend by one year, through April 18, 2022, the time to commence drilling the El Campeon South Fed Com 431H well (API #30-025-47828), proposed to be drilled into the Wolfcamp formation underlying the W/2 SW/4 of Section 29, Township 26 South, Range 35 East, and the NW/4 NW/4 and Lot 4 of irregular Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EXHIBITS
Walter Jones, Landman	6-7

PROCEDURAL MATTERS

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

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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Attorneys for Titus Oil & Gas Production, LLC