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

APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC, FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO Case No. 22022 Order No. R-21443 (Re-Open)

Case No. 22023 Order No. R-21444 (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. Ricardo S. Gonzales, 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> <u>rgonzales@montand.com</u>

OTHER PARTY

None at this time.

STATEMENT OF THE CASE

Case No. 22022. Application of Titus Oil & Gas Production, LLC to Amend Order No.

R-21443, Lea County, New Mexico (Re-Open). Applicant in the above-styled cause seeks to re-

open Case No. 21252 for the limited purpose of amending Order No. R-21443 to extend by one year, through September 3, 2022, the time to commence drilling the **El Campeon Fed Com 322H** well (API# 30-025-48136), proposed to be drilled into the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) underlying the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of irregular Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. The well and lands are located approximately 14 miles southwest of Jal, New Mexico.

Case No. 22023. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21444, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to reopen Case No. 21253 for the limited purpose of amending Order No. R-21444 to extend by one year, through September 3, 2022, the time to commence drilling the (1) El Campeon Fed Com 432H well (API #30-025-47394) and (2) El Campeon Fed Com 512H well (API #30-025-48138), proposed to be drilled into the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) underlying the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of irregular Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. The well and lands are located approximately 14 miles southwest of Jal, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

Landman Walter Jones

EXHIBITS

4-5

PROCEDURAL MATTERS

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

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Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

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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

Operator:	OGRID:	
Titus Oil & Gas Production, LLC	373986	
,	Action Number:	
Fort Worth, TX 76012	33650	
	Action Type:	
	[HEAR] Prehearing Statement (PREHEARING)	
QUESTIONS		
Testimony		

Please assist us by provide the following information about your testimony.	
Number of witness	0
Testimony time (in minutes)	0

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