

**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. 22022  
Order No. R-21443  
(Re-Open)**

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

**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: [sshaheen@montand.com](mailto:sshaheen@montand.com)  
[rgonzales@montand.com](mailto:rgonzales@montand.com)

**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 re-open 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.

Respectfully submitted,

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

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

Ricardo S. Gonzales

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

(505) 986-2678

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

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

*Attorneys for Titus Oil & Gas, LLC*

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 33652

**QUESTIONS**

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 33652
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

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