

**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. 21458

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

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INTERESTED PARTIES

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STATEMENT OF THE CASE

In Case No. 21458, Titus seeks an order from the Division pooling all uncommitted interests in the Bone Spring formation (Salt Lake; Bone Spring [53560]) in a standard 480-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the E/2 of Section 24, Township 20 South, Range 32 East, and the NE/4 of Section 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Pakse South 24-25 Fed 113H, to be horizontally drilled from an approximate surface hole location 275' FNL and 1400' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2640' FSL and 1540' FEL of Section 25, T20S-R32E; (2) Pakse South 24-25 Fed 223H, to be horizontally drilled from an approximate surface hole location 250' FNL and 1400' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2640' FSL and 1540' FEL of Section 25, T20S-R32E; (3) Pakse South 24-25 Fed 323H, to be horizontally drilled from an approximate surface hole location 225' FNL and 1400' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2640' FSL and 1540' FEL of Section 25, T20S-R32E; (4) Pakse South 24-25 Fed 114H, to be horizontally drilled from an approximate surface hole location 275' FNL and 330' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2640' FSL and 330' FEL of Section 25, T20S-R32E; (5) Pakse South 24-25 Fed 224H, to be horizontally drilled from an approximate surface hole location 250' FNL and 330' FEL of Section 24, T20S-R32E, to an

approximate bottom hole location 2640' FSL and 330' FEL of Section 25, T20S-R32E; and (6) Pakse South 24-25 Fed 324H, to be horizontally drilled from an approximate surface hole location 225' FNL and 330' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2640' FSL and 330' FEL of Section 25, T20S-R32E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal oil wells. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

PROPOSED EVIDENCE

APPLICANT TITUS

WITNESSES	TIME	EXHIBITS
Landman TBD	Dependent on cross-examination	10-12
Geologist TBD	Dependent on cross-examination	10-12
Engineer TBD	Dependent on cross-examination	10-12

OTHER INTERESTED PARTIES

WITNESSES	TIME	EXHIBITS
TBD		

PROCEDURAL MATTERS

The case will be heard as a status conference on December 16, 2021, to set a date for a contested hearing. Titus will be filing new applications for the same wells, requesting the pooling of smaller spacing units. Titus anticipates filing the new applications no later than February 1,

2022. Titus would thus be prepared to go to a contested hearing by March 3, 2022, or on the next available docket.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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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 December 9, 2021:

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 66124

QUESTIONS

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 66124
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>