

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

**APPLICATION OF TITUS OIL &
GAS PRODUCTION, LLC TO
AMEND ORDER NO. R-21612,
EDDY COUNTY, NEW MEXICO**

**Case No. _____
Order No. R-21612
(Re-Open)**

APPLICATION

Titus Oil & Gas Production, LLC, OGRID No. 373986 ("Titus"), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and Troy S. Lawton), hereby files this application with the Oil Conservation Division to amend Order No. R-21612 entered in Case No. 21616 to extend the time for drilling the (1) **Chicken Noodle Fed Com 401H** ("Chicken Noodle 401H Well") and the (2) **Chicken Noodle Fed Com 402H** ("Chicken Noodle 402H Well") (collectively, "Wells") approved in Order No. R-21612. In support of its application, Titus states as follows:

1. Order No. R-21612 pooled uncommitted interest owners in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) [98220]) in a standard 480-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the W/2 of Section 2 and NW/4 of Section 11, Township 26 South, Range 25 East, NMPM, in Eddy County, New Mexico, dedicated to the Chicken Noodle 401H Well and the Chicken Noodle 402H Well.

2. Titus is a working interest owner in the HSU and has the right to drill thereon.

3. Order No. R-21612 designated Titus as the operator of the Chicken Noodle 401H and Chicken Noodle 402H Wells and the HSU.

4. Titus requests that the Division re-open the matter to extend the time to commence drilling the Chicken Noodle 401H and Chicken Noodle 402H Wells to be no later than February

23, 2023, which will be a one-year extension from the time to commence drilling granted in Order No. R-21612.

5. The Division Hearing in Case No. 21616 was held on February 18, 2021.

6. The Division entered Order No. R-21612 in Case No. 21616 on February 23, 2021.

7. Order No. R-21612, ¶ 19, states, “The Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well.” Order No. R-21612, ¶ 20, states, “This Order shall terminate automatically if Operator fails to comply with Paragraph 19 unless Operator obtains an extension by amending this Order for good cause shown.”

8. Under Order No. R-21612, Titus would be required to commence drilling the wells by February 23, 2022.

9. Good cause exists for the Division to grant the extension.

10. Titus requests an extension of time because there have been changes in Titus’s drilling schedule due to current labor shortages and supply chain issues resulting from COVID-19 policies, as well as delays caused by difficulty in securing oil/gas midstream transportation.

WHEREFORE, Titus requests that this application be set for hearing before an Examiner of the Oil Conservation Division on March 3, 2022, and that, after notice and hearing as required by law, the Division enter an order amending Order No. R-21612 to extend the time to commence drilling the Chicken Noodle 401H Well and the Chicken Noodle 402H Well to be no later than February 23, 2023.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

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Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21612, Eddy County, New Mexico (Re-Open). Applicant in the above-styled cause seeks to re-open Case No. 21616 for the limited purpose of amending Order No. R-21612 to extend by one year, through February 23, 2023, the time to commence drilling the **Chicken Noodle Fed Com 401H** well and the **Chicken Noodle Fed Com 402H** well, proposed to be drilled into the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) [98220]) underlying the W/2 of Section 2 and NW/4 of Section 11, Township 26 South, Range 25 East, NMPM, in Eddy County, New Mexico. The well and lands are located approximately 8 miles south of Whites City, New Mexico.