

**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-21611,  
EDDY COUNTY, NEW MEXICO**

**Case No. 22550  
Order No. R-21611  
(Re-Open)**

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

**Case No. 22551  
Order No. R-21612  
(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.  
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**OTHER PARTY**

COG OPERATING, LLC

**COG’S ATTORNEY:**

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**STATEMENT OF THE CASE**

In **Case No. 22550**, Applicant seeks to re-open Case No. 21615 for the limited purpose of amending Order No. R-21611 to extend by one year, through February 23, 2023, the time to commence drilling the **Chicken Noodle Fed Com 301H** well, proposed to be drilled into the Bone Spring formation (WC-015 G-02 S262503L; Bone Spring [97945]) underlying the W/2 of Section 2 and NW/4 of Section 11, Township 26 South, Range 25 East, NMPM, in Lea County, New Mexico. The well and lands are located approximately 8 miles south of Whites City, New Mexico.

In **Case No. 22551**, Applicant 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.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES

Landman Reed Brunette

EXHIBITS

6-7

**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

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*Attorneys for Titus Oil & Gas, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served by e-mail to the persons identified below.

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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

Action 84124

**QUESTIONS**

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 84124
	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 witnesses	Not answered.
Testimony time (in minutes)	Not answered.