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-21204, LEA COUNTY, NEW MEXICO

Case No. 22552 Order No. R-21204

(Re-Open)

APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC TO AMEND ORDER NO. R-21205, LEA COUNTY, NEW MEXICO

Case No. 22553 Order No. R-21205

(Re-Open)

APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC TO AMEND ORDER NO. R-21206, LEA COUNTY, NEW MEXICO

Case No. 22556 Order No. R-21206

(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. Troy S. Lawton, Esq.

MONTGOMERY & ANDREWS, P.A.

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

Telephone: (505) 986-2678 Email: sshaheen@montand.com

tlawton@montand.com

OTHER PARTY

None at this time.

STATEMENT OF THE CASE

In Case No. 22552, Applicant seeks to re-open Case No. 20897 for the limited purpose of amending Order No. R-21204 to extend to April 7, 2023, the time to commence drilling (1) the Pakse South 24-25-36 Fed Com 111H well and (2) the Pakse South 24-25-36 Fed Com 112H well, proposed to be drilled into the First Bone Spring formation (Salt Lake; First Bone Spring [53560]) underlying the W/2 of Sections 24 and 25 and the NW/4 of Section 36, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

In Case No. 22553, Applicant seeks to re-open Case No. 20898 for the limited purpose of amending Order No. R-21205 to extend to April 7, 2023, the time to commence drilling (1) the Pakse South 24-25 Fed Com 221H well and (2) the Pakse South 24-25 Fed Com 222H well, proposed to be drilled into the Second Bone Spring formation (Salt Lake; Second Bone Spring [53560]) underlying the W/2 of Sections 24 and 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

In Case No. 22556, Applicant seeks to re-open Case No. 20899 for the limited purpose of amending Order No. R-21206 to extend to April 7, 2023, the time to commence drilling (1) the Pakse South 24-25-36 Fed Com 321H well and (2) the Pakse South 24-25-36 Fed Com 322H well, proposed to be drilled into the Third Bone Spring formation (Salt Lake; Third Bone Spring [53560]) underlying the W/2 of Sections 24 and 25 and the NW/4 of Section 36, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES EXHIBITS

Landman Walter Jones 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
Troy S. Lawton
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
(505) 986-2678
sshaheen@montand.com
tlawton@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

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 84094

QUESTIONS

Operator:	OGRID:
Titus Oil & Gas Production, LLC	373986
420 Throckmorton St, Ste 1150	Action Number:
Fort Worth, TX 76012	84094
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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