

**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. 21621

MOTION TO DISMISS

Applicant Titus Oil & Gas Production, LLC (“Titus”) requests that the above-referenced application be dismissed.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen
Ricardo S. Gonzales
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@montand.com
rgonzales@montand.com

Attorneys for Titus Oil & Gas Production, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2022, a true and correct copy of the foregoing was served by electronic mail on the following counsel of record:

Ocean Munds-Dry
Beth Ryan
COG Operating, LLC
1048 Paseo de Peralta
Santa Fe, NM 87501
(505) 780-8000
ocean.munds-dry@conocophillips.com
beth.ryan@conocophillips.com

Attorney for COG Operating, LLC

James Bruce
P.O. Box 1056
Santa Fe, NM 87504
(505) 982-2043
jamesbruc@aol.com

Attorney for Foran Oil Company

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, NM 87504
(505) 988-7577
padillalawnm@outlook.com
padillalaw@qwestoffice.net

Attorney for Colgate Operating, LLC

/s/ Sharon T. Shaheen

Sharon T. Shaheen