

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

**APPLICATIONS OF TITUS OIL & GAS PRODUCTION, LLC  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**Case Nos. 22851-22852**

**APPLICANT’S 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

**ATTORNEYS**

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**OTHER PARTIES**

None at this time

**ATTORNEYS**

**STATEMENT OF THE CASE**

In **Case No. 22851**, Applicant seeks an order from the Division pooling all mineral interests in the Bone Spring formation (WC-025 G-08 S263412K; BONE SPRING [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the E/2 E/2 of Section 30 and the E/2 NE/4 of irregular Section 31, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. The HSU is to be dedicated to the **Los Vaqueros Fed Com 214H** well, to be horizontally drilled from an approximate surface hole location 353’ FNL and 1534’

FEL of Section 30, T26S-R35E, to an approximate bottom hole location 10' FSL and 330' FEL of Section 31, T26S-R35E.

In **Case No. 22852**, Applicant seeks an order from the Division pooling all mineral interests in the Wolfcamp formation (JABALINA;WOLFCAMP, SOUTHWEST [96776]) in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the E/2 E/2 of Section 30 and the E/2 NE/4 of irregular Section 31, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. The HSU is to be dedicated to the **Los Vaqueros Fed Com 434H** well, to be horizontally drilled from an approximate surface hole location 353' FNL and 1559' FEL of Section 30, T26S-R35E, to an approximate bottom hole location 10' FSL and 330' FEL of Section 31, T26S-R35E.

The completed intervals and first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 13 miles southwest of Jal City, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES	EST. TIME	EXHIBITS
Landman Reed Brunette	By Affidavit	7-8
Geologist Allen Frierson	By Affidavit	7-8

**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

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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 111064

**QUESTIONS**

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 111064
	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	2
Testimony time (in minutes)	16