

From: [Hearings, OCD, EMNRD](#)
To: [Salvidrez, Marlene, EMNRD](#)
Subject: Fw: [EXT] Force Pooling Application of Titus Oil & Gas Production, LLC
Date: Monday, December 28, 2020 1:06:15 PM

From: don@dmfedric.com <don@dmfedric.com>
Sent: Monday, December 28, 2020 10:01 AM
To: Hearings, OCD, EMNRD
Cc: sshaaheen@montand.com
Subject: [EXT] Force Pooling Application of Titus Oil & Gas Production, LLC

The Applicant has applied for Force Pooling in cases 216i7 and 21618. The Applications are set for hearing before a Division Examiner on January 7,2021.

Centennial LLC, Tara N Fedric, Trustee of the Tara N Fedric Living Trust, Ted James and Norton LLC are Working Interest Owners (WIOs) in the property subject to the Applicants Application for Force Pooling. I am Don M Fedric, President of Centennial LLC, and I am speaking for and acting on behalf of said WIOs.

The WIOs object to a January 7,2021 Hearing date and request an extension for the same, upon the following basis:

1. The Applications for Force Pooling appear to have been filed December 8, 2020, however Notice was not received by the undersigned until December 22, 2020. Staff support and witness acquisition during the holidays is most difficult. Time is needed to respond to the application.
2. In the Applicants earlier contact with these WIOs, the Applicant made an unreasonable offer to acquire these parties interests. On behalf of the WIOs I proposed a counter offer, I believed we could negotiate an acceptable result for both sides, however I have received no response whatsoever. It is my opinion that the Applicant seeks to take from the WIOs without the payment of fair and reasonable compensation.
3. The WIOs need additional time to possibly seek opposition witnesses on their behalf.
4. The WIOs need additional time to prepare for the examination of the Applicants witnesses; for information about the Applicants drilling experience background; their acquisition activities with other area parties; AFE basis and scheduling of drilling activities.

These working interest owners, have owned their interests in this property for more than 27 years and have paid their way. They respectfully request cancellation of the January 7,2021 Hearing date and the re-scheduling to another date.

Centennial LLC, Tata N Fedric, Trustee, Ted James & Norton LLC
By Don M Fedric, P O Box 1837, Roswell NM 88202, 575 622 2700, don@dmfedric.com

