

**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-21381,  
LEA COUNTY, NEW MEXICO**

**Case No. 21861  
Order No. R-21381  
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC  
TO AMEND ORDER NO. R-21382,  
LEA COUNTY, NEW MEXICO**

**Case No. 21862  
Order No. R-21382  
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC  
TO AMEND ORDER NO. R-21395,  
LEA COUNTY, NEW MEXICO**

**Case No. 21863  
Order No. R-21395  
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LCC  
TO AMEND ORDER NO. R-21369,  
LEA COUNTY, NEW MEXICO**

**Case No. 21864  
Order No. R-21369  
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC  
TO AMEND ORDER NO. R-21370,  
LEA COUNTY, NEW MEXICO**

**Case No. 21865  
Order No. R-21370  
(Re-Open)**

**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

**ATTORNEY:**

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**OTHER PARTY**

ALLAR COMPANY  
(In Case Nos. 21863, 21864, and 21865 only)

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**STATEMENT OF THE CASE**

**Case No. 21861. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21381, Lea County, New Mexico (Re-Open).*** Applicant in the above-styled cause seeks to re-open Case No. 21203 for the limited purpose of amending Order No. R-21381 to extend by one year, through July 6, 2022, the time to commence drilling the **Lonesome Dove Fed Com 322H** well (API #30-025-48153), proposed to be drilled into the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) underlying the E/2 NW/4 of Section 17 and the E/2 W/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

**Case No. 21862. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21382, Lea County, New Mexico (Re-Open).*** Applicant in the above-styled cause seeks to re-open Case No. 21204 for the limited purpose of amending Order No. R-21382 to extend by one year, through July 6, 2022, the time to commence drilling (1) the **Lonesome Dove Fed Com 432H** well (API # 30-025-48156) and (2) the **Lonesome Dove Fed Com 512H** well (API # 30-025-PENDING), proposed to be drilled into the Wolfcamp formation (WC-025 G-09 S263619C;

Wolfcamp [98234]) underlying the E/2 NW/4 of Section 17 and the E/2 W/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

**Case No. 21863. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21395, Lea County, New Mexico (Re-Open).*** Applicant in the above-styled cause seeks to re-open Case No. 21205 for the limited purpose of amending Order No. R-21395 to extend by one year, through July 22, 2022, the time to commence drilling the **Lonesome Dove Fed Com 323H** well (API #30-025-48154), proposed to be drilled into the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) underlying the W/2 NE/4 of Section 17 and the W/2 E/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

**Case No. 21864. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21369, Lea County, New Mexico (Re-Open).*** Applicant in the above-styled cause seeks to re-open Case No. 21206 for the limited purpose of amending Order No. R-21369 to extend by one year, through July 22, 2022, the time to commence drilling (1) the **Lonesome Dove Fed Com 403H** well (API # 30-025-PENDING) and (2) the **Lonesome Dove Fed Com 513H** well (API # 30-025-PENDING), proposed to be drilled into the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) underlying the W/2 NE/4 of Section 17 and the W/2 E/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

**Case No. 21865. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21370, Lea County, New Mexico (Re-Open).*** Applicant in the above-styled cause seeks to re-open Case No. 21207 for the limited purpose of amending Order No. R-21370 to extend by one year, through July 22, 2022, the time to commence drilling (1) the **Lonesome Dove Fed Com 404H** well (API # 30-025-48155), (2) the **Lonesome Dove Fed Com 434H** well (API # 30-025-PENDING), and (3) the **Lonesome Dove Fed Com 514H** well (API # 30-025-PENDING),

proposed to be drilled into the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) underlying the E/2 NE/4 of Section 17 and the E/2 E/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES

Landman Walter Jones

EXHIBITS

12-14

**OTHER PARTY:**

TBD

**PROCEDURAL MATTERS**

Assuming no opposition by time of hearing, Applicant will present these matters together by affidavit. If Allar opposes presentation of Case Nos. 21863, 21864, and 21865 by affidavit, Titus may present Case Nos. 21861 and 21862 by affidavit.

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By: /s/Sharon T. Shaheen

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*Attorneys for Titus Oil & Gas Production, LLC*

## CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2021, a true and correct copy of the foregoing pleading was emailed to counsel of record, as follows:

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