

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

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC  
FOR APPROVAL OF PRODUCTION ALLOCATION,  
LEA COUNTY, NEW MEXICO**

**Case No. 21872**

**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

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### STATEMENT OF THE CASE

In this case, Titus seeks an order from the Division approving the production allocation of minerals in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) underlying a standard 280-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the E/2 E/2 of Section 29 and the NE/4 NE/4 & Lot 1 of irregular Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico, and Lot 1 of irregular Section 25, Block C24, in Loving County, Texas. The HSU will be dedicated to the **El Campeon Fed Com 404H** well, to be horizontally drilled from an approximate surface hole location 558' FSL and 590' FEL of Section 20, T26S-R35E, Lea County, New Mexico, to an approximate bottom hole location 10' FSL and 1912' FEL of Section 25, Block C24, Public School Land Survey, Abstract No. 701, Loving County, Texas. The well will cross the New Mexico/Texas border, continuing to produce in the Wolfcamp formation (Phantom; Wolfcamp [Texas Field No. 71052900]). Production will be allocated to New Mexico and Texas prorated on the basis of surface acreage in the proration unit or in any other manner mutually acceptable to the Division and to the Railroad Commission of Texas.

The completed interval and first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells. Nonetheless, in an abundance of caution, Titus filed an administrative application for approval of a non-standard well location because the last take point will be located in Texas. To the extent necessary, Titus requests that the Division consider whether approval of a non-standard well location is necessary under the circumstances. The well and lands are located approximately 14 miles southwest of Jal, New Mexico.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**

WITNESSES	EST. TIME	EXHIBITS
Landman Walter Jones	Direct Written Testimony	8-10
Geologist Allen Frierson	Direct Written Testimony	7-8
Engineer Marshall Hickey	Direct Written Testimony	1-3

#### **OTHER PARTIES:**

WITNESSES	EST. TIME	EXHIBITS
TBD.		

### **PROCEDURAL MATTERS**

Applicant will submit direct written testimony in accordance with Division rules and recent hearing practice. In addition, the witnesses will be available for additional direct testimony, if needed, and for cross-examination.

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 a true and correct copy of the foregoing was served on the following  
counsel of record by electronic mail on June 10, 2021:

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QUESTIONS  
  
Action 31443

QUESTIONS

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 31443
	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 witness	Not answered.
Testimony time (in minutes)	Not answered.