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. 21458

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 February 22, 2022, a true and correct copy of the foregoing was served by electronic mail on the following counsel of record:

Michael H. Feldewert
Adam G. Rankin
Julie Broggi
Kaitlyn A. Luck
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Attorneys for EOG Resources, Inc.

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

Attorneys for COG Operating, LLC

/s/ Sharon T. Shaheen Sharon T. Shaheen