

**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-21611,
EDDY COUNTY, NEW MEXICO**

**Case No. 22550
Order No. R-21611
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC
TO AMEND ORDER NO. R-21612,
EDDY COUNTY, NEW MEXICO**

**Case No. 22551
Order No. R-21612
(Re-Open)**

PRE-HEARING STATEMENT

Applicant 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

APPLICANT'S ATTORNEY:

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OTHER PARTY

COG OPERATING, LLC

COG'S ATTORNEY:

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STATEMENT OF THE CASE

In **Case No. 22550**, Applicant seeks to re-open Case No. 21615 for the limited purpose of amending Order No. R-21611 to extend by one year, through February 23, 2023, the time to commence drilling the **Chicken Noodle Fed Com 301H** well, proposed to be drilled into the Bone Spring formation (WC-015 G-02 S262503L; Bone Spring [97945]) underlying the W/2 of Section 2 and NW/4 of Section 11, Township 26 South, Range 25 East, NMPM, in Lea County, New Mexico. The well and lands are located approximately 8 miles south of Whites City, New Mexico.

In **Case No. 22551**, Applicant seeks to re-open Case No. 21616 for the limited purpose of amending Order No. R-21612 to extend by one year, through February 23, 2023, the time to commence drilling the **Chicken Noodle Fed Com 401H** well and the **Chicken Noodle Fed Com 402H** well, proposed to be drilled into the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) [98220]) underlying the W/2 of Section 2 and NW/4 of Section 11, Township 26 South, Range 25 East, NMPM, in Eddy County, New Mexico. The well and lands are located approximately 8 miles south of Whites City, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

Landman Reed Brunette

EXHIBITS

6-7

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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Attorneys for Titus Oil & Gas, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by e-mail to the persons identified below.

Ocean Munds-Dry

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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 84128

QUESTIONS

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 84128
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.