

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

**APPLICATIONS OF TITUS OIL & GAS PRODUCTION, LLC  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**Case Nos. 22774-22777**

**APPLICANT’S 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 **Case No. 22774**, Applicant seeks an order from the Division pooling all mineral interests in the Bone Spring formation (Salt Lake; Bone Spring [53560]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the W/2 E/2 of Section 24, Township 20 South, Range 32 East, and the W/2 NE/4 of Section 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The HSU is to be dedicated to the following two (2) 1.5-mile wells: (1) **Pakse South Fed Com 113H** well, to be horizontally drilled from an approximate surface hole location 293’ FNL and 2070’ FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2628’ FNL and 2310’ FEL of Section 25, T20SR32E; (2) **Pakse South Fed Com 223H** well, to be horizontally drilled from an approximate surface hole location 261’ FNL and 1309’ FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2629’ FNL and 1650’ FEL of Section 25, T20SR32E.

In **Case No. 22775**, Applicant seeks an order from the Division pooling all mineral interests in the Bone Spring formation (Salt Lake; Bone Spring [53560]) in a standard 240-acre, more or less, HSU comprised of the E/2 E/2 of Section 24, Township 20 South, Range 32 East, and the E/2 NE/4 of Section 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The HSU is to be dedicated to the following two (2) 1.5-mile wells: (1) **Pakse South Fed Com 114H** well, to be horizontally drilled from an approximate surface hole location 298’ FNL and 733’ FEL of Section 24, T20SR32E, to an approximate bottom hole location 2630’ FNL and 990’ FEL of Section 25, T20SR32E; and (2) **Pakse South Fed Com 224H** well, to be horizontally drilled from an approximate surface hole location 261’ FNL and 1279’ FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2631’ FNL and 330’ FEL of Section 25, T20S-R32E.

In **Case No. 22776**, Applicant seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (Salt Lake; Wolfcamp [53570]) in a standard 240-acre, more or less, HSU comprised of the W/2 E/2 of Section 24, Township 20 South, Range 32 East, and the W/2 NE/4 of Section 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The HSU is to be dedicated to the **Pakse South Fed Com 433H** well, to be horizontally drilled from an approximate surface hole location 263' FNL and 2070' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2629' FNL and 1657' FEL of Section 25, T20S-R32E.

In **Case No. 22777**, Applicant seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (Salt Lake; Wolfcamp [53570]) in a standard 240-acre, more or less, HSU comprised of the E/2 E/2 of Section 24, Township 20 South, Range 32 East, and the E/2 NE/4 of Section 25, Township 20 South, Range 32 East, NMPM, in Lea County, New Mexico. The HSU is to be dedicated to the **Pakse South Fed Com 434H** well, to be horizontally drilled from an approximate surface hole location 268' FNL and 732' FEL of Section 24, T20S-R32E, to an approximate bottom hole location 2632' FNL and 330' FEL of Section 25, T20S-R32E.

The completed intervals and first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The wells and lands are located approximately 33 miles east of Carlsbad, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES	EST. TIME	EXHIBITS
Landman John McBroom	By Affidavit	7-9
Geologist Allen Frierson	By Affidavit	20-22

**PROCEDURAL MATTERS**

The parties have agreed to continue this case to May 19, 2022, and will be filing motions for continuance accordingly. 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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## CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by email upon the following:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS

Action 102587

**QUESTIONS**

Operator: Titus Oil & Gas Production, LLC 420 Throckmorton St, Ste 1150 Fort Worth, TX 76012	OGRID: 373986
	Action Number: 102587
	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 witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>