

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

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

Case Nos. 20672-20674

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Titus Oil & Gas, LLC as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Titus Oil & Gas, LLC

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Walt Jones

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Case No. 20712: Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2SE/4 of Section 20, the W/2E/2 of Section 29, and Lot 2 and the NW/4NE/4 (the W/2E/2) of irregular Section 32, Township 26 South, Range 35 East, NMPM. The unit will be dedicated to the El Campeon South 20-29-32 Fed. Well No. 323H, with a first take point in the NW/4SE/4 of Section 20 and a final take point in Lot 2 of Section 32.

Case No. 20713: Applicant seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2SE/4 of Section 20, the

E/2E/2 of Section 29, and Lot 1 and the NE/4NE/4 (the E/2E/2) of irregular Section 32, Township 26 South, Range 35 East, NMPM. The unit will be dedicated to the El Campeon South 20-29-32 Fed. Well No. 324H, with a first take point in the NE/4SE/4 of Section 20 and a final take point in Lot 1 of Section 32.

Case No. 20714: Applicant seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the SE/4 of Section 20, the E/2 of Section 29, and Lots 1, 2 and the N/2NE/4 (the E/2) of irregular Section 32, Township 26 South, Range 35 East, NMPM. The unit will be dedicated to (a) the El Campeon South 20-29-32 Fed. Well No. 403H, (b) the El Campeon South 20-29-32 Fed. Well No. 404H, (c) the El Campeon South 20-29-32 Fed. Well No. 433H, (d) the El Campeon South 20-29-32 Fed. Well No. 434H, (e) the El Campeon South 20-29-32 Fed. Well No. 514H, (f) the El Campeon South 20-29-32 Fed. Well No. 515H and (g) the El Campeon South 20-29-32 Fed. Well No. 516H. The wells have first take points in the N/2SE/4 of Section 20 and final take points in the S/2NE/4 of Section 32

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENTS

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Walt Jones
(landman)

EST. TIME

20 min.

EXHIBIT

Approx. 8

Allen Frierson
(geologist)

15 min.

Approx.8

OPPONENTS

WITNESSES

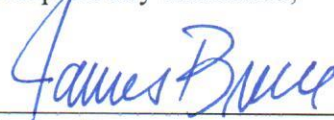
EST. TIME

EXHIBIT

PROCEDURAL MATTERS

1. The cases should be consolidated for hearing.
2. If the cases are unopposed they will be presented by affidavit.

Respectfully submitted,



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Attorney for Titus Oil & Gas, LLC