

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

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

Case No. 20897

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

Case No. 20898

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

Case No. 20899

AMENDED PREHEARING STATEMENT

This Amended Pre-hearing Statement is submitted by EOG Resources, Inc. by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:	Titus Oil & Gas Production, LLC
ATTORNEY:	Montgomery & Andrews Law Firm Sharon T. Shaheen John F. McIntyre PO Box 2307 Santa Fe, NM 87501 505-982-3873 sshaheen@montand.com jmcintyre@montand.com
OPPOSITION OR OTHER PARTY:	EOG Resources, Inc.
ATTORNEY:	Ernest L. Padilla Padilla Law Firm, P.A. P.O. Box 2523 Santa Fe, NM 87504 (505) 988-7577 padillalaw@qwestoffice.net

APPLICANT:

OPPOSITION OR OTHER PARTY:

STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

Titus Oil & Gas Production, LLC has filed a plan of development for the proposed wells with the Bureau of Land Management (BLM). EOG Resources, Inc. has opposed the plan of development before the BLM. Because the lands and leases committed to the proposed plan of development are federal lands, the BLM has primary jurisdiction over the plan of development. Accordingly, the applications are premature and the Division should defer consideration of these applications until the BLM approves or disapproves the proposed plan of development.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

EOG will not present any witnesses or evidence, but stands on its motion below.

PROCEDURAL MATTERS

OPPOSITION:

EOG Resources, Inc., moves to dismiss the applications of Titus Oil & Gas Production, LLC on the basis that the applications are premature and should not be considered by the Division until the Bureau of Land Management approves or disapproves the plan of development submitted by Titus Oil & Gas Production, LLC. In the alternative, the Division should continue the hearing of these applications until the BLM approves or disapproves the plant of development.

Respectfully submitted:

PADILLA LAW FIRM, P.A.

By: /s/ Ernest L. Padilla
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing pleading to be sent via e-mail on this 11th day of February, 2020 to:

Sharon T. Shaheen
John F. McIntyre

sshaheen@montand.com
jmcintyre@montand.com

/s/ Ernest L. Padilla
Ernest L. Padilla