

**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. 21203

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

Case No. 21204

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

Case No. 21205

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

Case No. 21206

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

Case No. 21207

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

APPLICANT’S ATTORNEY:

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OPPOSING PARTY

CHEVRON U.S.A., INC

OPPOSING PARTY'S ATTORNEY:

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STATEMENT OF THE CASE

Case No.21203: Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Bone Spring (Oil) formation (WC-025 G-08 S263412K; Bone Spring [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the E/2 NW/4 of Section 17 and the E/2 W/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: Lonesome Dove Fed Com 322H well, to be horizontally drilled from an approximate surface hole location 1592’ FSL and 1990’ FWL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FNL and 1653’ FWL of Section 8, T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal 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 well and lands are located approximately 13 miles southwest of Jal, New Mexico.

Case No. 21204: Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, horizontal spacing and proration unit

("HSU") comprised of the E/2 NW/4 of Section 17 and the E/2 W/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Lonesome Dove Fed Com 432H well, to be horizontally drilled from an approximate surface hole location 1592' FSL and 2050' FWL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FNL and 2310' FWL of Section 8, T26S-R35E, and (2) Lonesome Dove Fed Com 512H well, to be horizontally drilled from an approximate surface hole location 1592' FSL and 2020' FWL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FNL and 1850' FWL of Section 8, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal 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 13 miles southwest of Jal, New Mexico.

Case No. 21205: Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Bone Spring (Oil) formation (WC-025 G-08 S263412K; Bone Spring [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the W/2 NE/4 of Section 17 and the W/2 E/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: Lonesome Dove Fed Com 323H well, to be horizontally drilled from an approximate surface hole location 2304' FSL and 1912' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FNL and 1650' FEL of Section 8, T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal 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 well and lands are located approximately 13 miles southwest of Jal, New Mexico

Case No. 21206: Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the W/2 NE/4 of Section 17 and the W/2 E/2 of Section 8, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Lonesome Dove Fed Com 403H well, to be horizontally drilled from an approximate surface hole location 2304’ FSL and 1972’ FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FNL and 2307’ FEL of Section 8, T26S-R35E, and (2) Lonesome Dove Fed Com 513H well, to be horizontally drilled from an approximate surface hole location 2304’ FSL and 1942’ FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10’ FNL and 1870’ FEL of Section 8, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal 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 13 miles southwest of Jal, New Mexico.

Case No. 21207: Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the E/2 NE/4 of Section 17 and the E/2 E/2 of Section 8, Township 26

South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) Lonesome Dove Fed Com 404H well, to be horizontally drilled from an approximate surface hole location 2289' FSL and 1079' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FNL and 330' FEL of Section 8, T26S-R35E, (2) Lonesome Dove Fed Com 434H well, to be horizontally drilled from an approximate surface hole location 2289' FSL and 1139' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FNL and 988' FEL of Section 8, T26S-R35E, and (3) Lonesome Dove Fed Com 514H well, to be horizontally drilled from an approximate surface hole location 2289' FSL and 1109' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FNL and 530' FEL of Section 8, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal 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 13 miles southwest of Jal, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Walter Jones (Landman)	15-20 minutes	8-10
Allan Frierson (Geologist)	15-20 minutes	10-12

OPPOSING PARTY:

WITNESSES	EST. TIME	EXHIBITS
TBD		

PROCEDURAL MATTERS

Assuming no opposition by time of hearing, Applicant will present these matters together by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

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Attorneys for Titus Oil & Gas Production, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on June 18, 2020:

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/s/ Sharon T. Shaheen
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