

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. **21252**

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

Case No. **21253**



***El Campeon Fed Com Wells***

322H, 432H, 512H

August 20, 2020

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Tab 1

# COMPULSORY POOLING APPLICATION CHECKLIST

ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS

Case: 21252	APPLICANT'S RESPONSE
Date	August 20, 2020
Applicant	Titus Oil & Gas Production, LLC
Designated Operator & OGRID (affiliation if applicable)	373986
Applicant's Counsel:	Montgomery & Andrews, P.A. (Sharon Shaheen & John McIntyre)
Case Title:	Application of Titus Oil & Gas Production, LLC for Compulsory Pooling, Lea County, New Mexico
Entries of Appearance/Intervenors:	None
Well Family	El Campeon Wells
<b>Formation/Pool</b>	
Formation Name(s) or Vertical Extent:	Bone Spring Formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Bone Spring Formation
Pool Name and Pool Code:	WC-025 G-08 S263412K; Bone Spring [96672]
Well Location Setback Rules:	Statewide rules
Spacing Unit Size:	240 acres, more or less
<b>Spacing Unit</b>	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	240 acres, more or less
Building Blocks:	Quarter-quarter section (40 ac)
Orientation:	North-South
Description: TRS/County	E2W2 of Section 29 and E2NW4 of irregular Section 32, 26S-35E, Lea County, NM
Standard Horizontal Well Spacing Unit (Y/N), If No, describe	Yes
<b>Other Situations</b>	
Depth Severance: Y/N. If yes, description	No
Proximity Tracts: If yes, description	No
Proximity Defining Well: if yes, description	No
Applicant's Ownership in Each Tract	Tract 1, part a (100%); Tract 1, part b (100%); Tract 2 (25%); Tract 3 (100%); see Ex. A-2
<b>Well(s)</b>	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	



Well #1	<p>El Campeon Fed Com 322H, API No. 30-025-Pending</p> <p>SHL: 579' FSL and 2077' FWL, Section 20-T26S-R35E, NMPPM BHL: 10' FSL and 1650' FWL, Section 32-T26S-R35E, NMPPM</p> <p>Completion Target: Third Bone Spring at approx. 12,500 Feet TVD Well Orientation: North to South Completion location expected to be standard</p>
Horizontal Well First and Last Take Points	FTP (~100' FNL and 1650' FWL of Section 29-T26S-R35E); LTP (~100' FSL and 1650' FWL of Section 32-T26S-R35E)
Completion Target (Formation, TVD and MD)	Third Bone Spring - TVD (~12,500'), MD (~20,420')
<b>AFE Capex and Operating Costs</b>	
Drilling Supervision/Month \$	\$8000; see Exhibit A, ¶ 19
Production Supervision/Month \$	\$800; see Exhibit A, ¶ 19
Justification for Supervision Costs	Please see AFE at Exhibit A-7
Requested Risk Charge	200%; see Exhibit A, ¶ 20
<b>Notice of Hearing</b>	
Proposed Notice of Hearing	Submitted with online filing of Application
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit C; see Exhibit A-8
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit C
<b>Ownership Determination</b>	
Land Ownership Schematic of the Spacing Unit	See Exhibits A-2, A-3, & A-4
Tract List (including lease numbers and owners)	Exhibits A-2, A-3, & A-4
Pooled Parties (including ownership type)	Exhibit A-4
Unlocatable Parties to be Pooled	none
Ownership Depth Severance (including percentage above & below)	none
<b>Joinder</b>	
Sample Copy of Proposal Letter	Exhibit A-7
List of Interest Owners (ie Exhibit A of JOA)	Exhibit A-4
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	n/a
Cost Estimate to Drill and Complete	See AFE at Exhibit A-7
Cost Estimate to Equip Well	See AFE at Exhibit A-7
Cost Estimate for Production Facilities	See AFE at Exhibit A-7
<b>Geology</b>	
Summary (including special considerations)	Exhibit B-1
Spacing Unit Schematic	Exhibit B-3
Gunbarrel/Lateral Trajectory Schematic	Exhibit B-7
Well Orientation (with rationale)	Exhibit B-1
Target Formation	Exhibits B-5 & B-6

HSU Cross Section	Exhibit B-6
Depth Severance Discussion	n/a; see Exhibit A, ¶ 12
<b>Forms, Figures and Tables</b>	
C-102	Exhibit A-6
Tracts	Exhibit A-2
Summary of Interests, Unit Recapitulation (Tracts)	Exhibits A-2, A-3, & A-4
General Location Map (including basin)	Exhibit A-1
Well Bore Location Map	Exhibit B-3
Structure Contour Map - Subsea Depth	Exhibit B-4
Cross Section Location Map (including wells)	Exhibit B-2
Cross Section (including Landing Zone)	Exhibit B-6
<b>Additional Information</b>	
<b>CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.</b>	
<b>Printed Name</b> (Attorney or Party Representative):	Sharon T. Shaheen
<b>Signed Name</b> (Attorney or Party Representative):	<i>Sharon T. Shaheen</i>
<b>Date:</b>	8/18/2020

# COMPULSORY POOLING APPLICATION CHECKLIST

ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS

<b>Case: 21253</b>	<b>APPLICANT'S RESPONSE</b>
<b>Date</b>	<b>August 20, 2020</b>
Applicant	Titus Oil & Gas Production, LLC
Designated Operator & OGRID (affiliation if applicable)	373986
Applicant's Counsel:	Montgomery & Andrews, P.A. (Sharon Shaheen & John McIntyre)
Case Title:	Application of Titus Oil & Gas Production, LLC for Compulsory Pooling, Lea County, New Mexico
Entries of Appearance/Intervenors:	None
Well Family	El Campeon Wells
<b>Formation/Pool</b>	
Formation Name(s) or Vertical Extent:	Wolfcamp Formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Wolfcamp Formation
Pool Name and Pool Code:	WC-025 G-09 S263619C; Wolfcamp [98234]
Well Location Setback Rules:	Statewide rules
Spacing Unit Size:	240 acres, more or less
<b>Spacing Unit</b>	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	240 acres, more or less
Building Blocks:	Quarter-quarter section (40 ac)
Orientation:	<b>North-South</b>
Description: TRS/County	E2W2 of Section 29 and E2NW4 of irregular Section 32, 26S-35E, Lea County, NM
Standard Horizontal Well Spacing Unit (Y/N), If No, describe	Yes
<b>Other Situations</b>	
Depth Severance: Y/N. If yes, description	No
Proximity Tracts: If yes, description	No
Proximity Defining Well: if yes, description	No
Applicant's Ownership in Each Tract	Tract 1, part a (100%); Tract 1, part b (100%); Tract 2 (25%); Tract 3 (100%); see Ex. A-2
<b>Well(s)</b>	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	

Well #1	<p>El Campeon Fed Com 432H, API No. 30-025-Pending</p> <p>SHL: 579' FSL and 2137' FWL, Section 20-T26S-R35E, NMPPM BHL: 10' FSL and 2308' FWL, Section 32-T26S-R35E, NMPPM</p> <p>Completion Target: Wolfcamp A at approx 12,760 Feet TVD Well Orientation: North to South Completion location expected to be standard</p>
Well #2	<p>El Campeon Fed Com 512H, API No. 30-025-Pending</p> <p>SHL: 579' FSL and 2107' FWL, Section 20-T26S-R35E, NMPPM BHL: 10' FSL and 1850' FWL, Section 32-T26S-R35E, NMPPM</p> <p>Completion Target: Wolfcamp B at approx. 13,050 Feet TVD Well Orientation: North to South Completion location expected to be standard</p>
Horizontal Well First and Last Take Points	
Well #1	432H: FTP (~100' FNL and 2310' FWL of Section 29-T26S-R35E); LTP (~100' FSL and 2308' FWL of Section 32-T26S-R35E)
Well #2	512H: FTP (~100' FNL and 1850' FWL of Section 29-T26S-R35E); LTP (~100' FSL and 1850' FWL of Section 32-T26S-R35E)
Completion Target (Formation, TVD and MD)	
Well #1	432H: Wolfcamp A - TVD (~12,760'), MD (~20,680')
Well #2	512H: Wolfcamp B - TVD (~13,050'), MD (~20,970')
<b>AFE Capex and Operating Costs</b>	
Drilling Supervision/Month \$	\$8000; see Exhibit A, ¶ 19
Production Supervision/Month \$	\$800; see Exhibit A, ¶ 19
Justification for Supervision Costs	Please see AFE at Exhibit A-7
Requested Risk Charge	200%; see Exhibit A, ¶ 20
<b>Notice of Hearing</b>	
Proposed Notice of Hearing	Submitted with online filing of Application
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit C; see Exhibit A-8
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit C
<b>Ownership Determination</b>	
Land Ownership Schematic of the Spacing Unit	See Exhibits A-2, A-3, & A-4
Tract List (including lease numbers and owners)	Exhibits A-2, A-3, & A-4
Pooled Parties (including ownership type)	Exhibit A-4
Unlocatable Parties to be Pooled	none
Ownership Depth Severance (including percentage above & below)	none
<b>Joinder</b>	
Sample Copy of Proposal Letter	Exhibit A-7

List of Interest Owners (ie Exhibit A of JOA)	Exhibit A-4
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	n/a
Cost Estimate to Drill and Complete	See AFE at Exhibit A-7
Cost Estimate to Equip Well	See AFE at Exhibit A-7
Cost Estimate for Production Facilities	See AFE at Exhibit A-7
<b>Geology</b>	
Summary (including special considerations)	Exhibit B-1
Spacing Unit Schematic	Exhibit B-3
Gunbarrel/Lateral Trajectory Schematic	Exhibit B-7
Well Orientation (with rationale)	Exhibit B-1
Target Formation	Exhibits B-5 & B-6
HSU Cross Section	Exhibit B-6
Depth Severance Discussion	n/a; see Exhibit A, ¶ 12
<b>Forms, Figures and Tables</b>	
C-102	Exhibit A-6
Tracts	Exhibit A-2
Summary of Interests, Unit Recapitulation (Tracts)	Exhibits A-2, A-3, & A-4
General Location Map (including basin)	Exhibit A-1
Well Bore Location Map	Exhibit B-3
Structure Contour Map - Subsea Depth	Exhibit B-4
Cross Section Location Map (including wells)	Exhibit B-2
Cross Section (including Landing Zone)	Exhibit B-6
<b>Additional Information</b>	
<b>CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.</b>	
<b>Printed Name</b> (Attorney or Party Representative):	Sharon T. Shaheen
<b>Signed Name</b> (Attorney or Party Representative):	<i>Sharon T. Shaheen</i>
<b>Date:</b>	8/18/2020

Tab 2

**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. 21252**

**APPLICATION**

Titus Oil & Gas Production, LLC (“Titus”), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and John F. McIntyre), hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all mineral interests in the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Section 32 is an irregular section in which the south line of the E/2 NW/4 is the New Mexico-Texas border. In support of its application, Titus states as follows:

1. Titus is a working interest owner in the proposed HSU and has the right to drill thereon.
2. Titus proposes to drill the following 1.5-mile well in the proposed HSU: El Campeon Fed Com 322H well, to be horizontally drilled from an approximate surface hole location 579’ FSL and 2077’ FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1650’ FWL of Section 32, T26S-R35E.
3. The completed interval and first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

4. Titus has in good faith sought and been unable to obtain voluntary agreement for the development of these lands from all of the mineral interest owners in the HSU.

5. Approval of the HSU and the pooling of all mineral interest owners in the Bone Spring formation underlying the HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

6. In order to permit Titus to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this HSU should be pooled and Titus should be designated the operator of the HSU.

WHEREFORE, Titus requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 14, 2020, and that, after notice and hearing as required by law, the Division enter an order:

A. Creating a standard 240-acre, more or less, horizontal spacing and proration unit comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico;

B. Pooling all mineral interests in the Bone Spring formation underlying the HSU;

C. Allowing the drilling of the 1.5 mile El Campeon Fed Com 322H well in the HSU;

D. Designating Titus as operator of the HSU and the wells to be drilled thereon;

E. Authorizing Titus to recover its costs of drilling, equipping and completing the well;

F. Approving the operating charges and costs of supervision while drilling of \$8,000/month and, after completion, \$800/month, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and



G. Imposing a 200% penalty for the risk assumed by Titus in drilling and completing the well against any interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

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*Attorneys for Titus Oil & Gas Production, LLC*

**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. 21253

**APPLICATION**

Titus Oil & Gas Production, LLC (“Titus”), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and John F. McIntyre), hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all mineral 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 comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Section 32 is an irregular section in which the south line of the E/2 NW/4 is the New Mexico-Texas border. In support of its application, Titus states as follows:

1. Titus is a working interest owner in the proposed HSU and has the right to drill thereon.
2. Titus proposes to drill the following 1.5-mile wells in the proposed HSU:
  - El Campeon Fed Com 432H well, to be horizontally drilled from an approximate surface hole location 579’ FSL and 2137’ FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10’ FSL and 2310’ FWL of Section 32, T26S-R35E.

- El Campeon Fed Com 512H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2107' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1850' FWL of Section 32, T26S-R35E.

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

4. Titus has in good faith sought and been unable to obtain voluntary agreement for the development of these lands from all of the mineral interest owners in the HSU.

5. Approval of the HSU and the pooling of all mineral interest owners in the Wolfcamp formation underlying the HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

6. In order to permit Titus to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this HSU should be pooled and Titus should be designated the operator of the HSU.

WHEREFORE, Titus requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 14, 2020, and that, after notice and hearing as required by law, the Division enter an order:

A. Creating a standard 240-acre, more or less, horizontal spacing and proration unit comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico;

B. Pooling all mineral interests in the Wolfcamp formation underlying the HSU;

C. Allowing the drilling of the 1.5 mile El Campeon Fed Com 432H and the 1.5-mile El Campeon Fed Com 512H well in the HSU;

- D. Designating Titus as operator of the HSU and the wells to be drilled thereon;
- E. Authorizing Titus to recover its costs of drilling, equipping and completing the wells;
- F. Approving the operating charges and costs of supervision while drilling of \$8,000/month and, after completion, \$800/month, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- G. Imposing a 200% penalty for the risk assumed by Titus in drilling and completing the wells against any interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

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Santa Fe, NM 87504-2307

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*Attorneys for Titus Oil & Gas Production, LLC*

Tab 3

**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. 21252**

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

**Case No. 21253**

**AFFIDAVIT OF REED BRUNETTE**

I, being duly sworn on oath, state the following:

1. I am over the age of 18 and have the capacity to execute this Affidavit, which is based on my personal knowledge.
2. I am employed as a Staff Landman with Titus Oil & Gas Production, LLC (“Titus”), and I am familiar with the subject applications and the lands involved.
3. This affidavit is submitted in connection with the filings by Titus of the above-referenced compulsory pooling applications pursuant to 19.15.4.12.A(1) NMAC.
4. I have not previously testified before the New Mexico Oil Conservation Division as an expert witness in petroleum land matters. My education and work experience are as follows: I graduated from The University of Texas in 2014 with a liberal arts degree in earth science and a certificate in the Energy Management Program. I have been employed by Titus since 2018. Prior to being employed by Titus, I worked for Apache Corporation as a Land Analyst in Texas and Bergman Resources, LLC as a Landman in Texas and New Mexico. I have been working on New Mexico oil and gas matters for approximately 5 years.

5. The purpose of these applications is to force pool working interest owners and uncommitted mineral interest owners into the horizontal spacing and proration units (“HSU”) described below, and in the wells to be drilled in those units.

6. No opposition is expected. The interest owners being pooled have been contacted regarding the proposed well, but have failed or refused to voluntarily commit their interests in the wells.

7. In **Case No. 21252**, Titus seeks an order 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, HSU comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Section 32 is an irregular section in which the south line of the E/2 NW/4 is the New Mexico-Texas border. Titus proposes to drill the following well in the HSU: **El Campeon Fed Com 322H** well, to be horizontally drilled from an approximate surface hole location 579’ FSL and 2077’ FWL (Unit N) of Section 20, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1650’ FWL (Lot 3) of Section 32, T26S-R35E. The proposed true vertical depth is approximately 12,500’ and the total measured depth is approximately 20,420’. The first take point will be located at approximately 100’ FNL and 1650’ FWL of Section 29-T26S-R35E, and the last take point will be located at approximately 100’ FSL and 1650’ FWL of Section 32-T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal wells.

8. In **Case No. 21253**, Titus seeks an order pooling all uncommitted interests in the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) in a standard 240-acre, more or less, HSU comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the

E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Section 32 is an irregular section in which the south line of the E/2 NW/4 is the New Mexico-Texas border. Titus proposes to drill the following wells in the HSU:

- **El Campeon Fed Com 432H** well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2137' FWL (Unit N) of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 2308' FWL (Lot 3) of Section 32, T26S-R35E. The proposed true vertical depth is approximately 12,760' and the total measured depth is approximately 20,680'. The first take point will be located at approximately 100' FNL and 2310' FWL of Section 29-T26S-R35E, and the last take point will be located at approximately 100' FSL and 2308' FWL of Section 32-T26S-R35E. The completed interval and first and last take points meet the setback requirements set forth in the statewide rules for horizontal oil wells.
  - **El Campeon Fed Com 512H** well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2107' FWL (Unit N) of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1850' FWL (Lot 3) of Section 32, T26S-R35E. The proposed true vertical depth is approximately 13,050' and the total measured depth is approximately 20,970'. The first take point will be located at approximately 100' FNL and 1850' FWL of Section 29-T26S-R35E, and the last take point will be located at approximately 100' FSL and 1850' FWL of Section 32-T26S-R35E. The completed interval and first and last take points meet the setback requirements set forth in the statewide rules for horizontal oil wells.
9. A general location map, including the basin, is included as **Exhibit A-1**.



10. Maps illustrating the tracts in the proposed HSUs and the ownership of each individual tract can be found in the exhibit package as **Exhibit A-2**.

11. **Exhibit A-3** is a list of owners in the HSU, with lease numbers and the location of the wellbores.

12. The ownership breakdown of interests and list of parties to be pooled can be found at **Exhibit A-4**. There are no depth severances.

13. A chronology of contacts with the non-joined working interest owners is attached as **Exhibit A-5**.

14. The locations of the proposed wells within the respective HSUs are depicted in the draft C-102 Forms attached as **Exhibit A-6**. The draft C-102 Forms also indicate the locations of the surface hole, the bottom hole, and the first and last take points.

15. I have conducted a diligent search of the public records in Lea County, New Mexico, where the wells will be located, and conducted phone directory and computer searches to obtain contact information for parties entitled to notification. I mailed all parties well proposals, including an Authorization for Expenditure (“AFE”) for each well.

16. **Exhibit A-7** includes sample copies of the well proposal letters and AFEs for the proposed wells. The estimated costs of the wells set forth in the AFEs are fair, reasonable, and comparable to the costs of other wells of similar depths and lengths drilled in this area of New Mexico.

17. Titus has made a good faith effort to obtain voluntary joinder of the working interest owners in the proposed wells.

18. **Exhibit A-8** include copies of the notice letters that were sent with the applications to all of the uncommitted interest owners in the proposed HSUs.

19. Titus requests the Division to approve operating charges and costs of supervision while drilling of \$8,000/month and, after completion, \$800/month, together with a provision adjusting the rates pursuant to the COPAS accounting procedures

20. Titus requests the maximum cost, plus 200% risk charge, be assessed against non-consenting working interest owners.

21. Titus requests that it be designated operator of the wells.

22. The Exhibits to this Affidavit were prepared by me, or compiled from Titus's business records.

23. The granting of these Applications is in the interests of conservation, the prevention of waste, and the protection of correlative rights.

24. The foregoing is correct and complete to the best of my knowledge and belief.

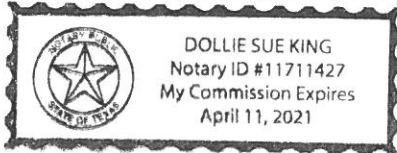
FURTHER AFFIANT SAYETH NAUGHT

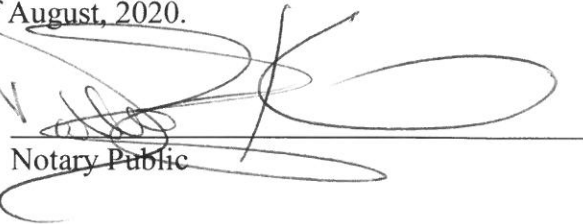


Reed Brunette

STATE OF TEXAS            )  
  )ss  
COUNTY OF TARRANT    )

Subscribed to and sworn before me this 18th day of August, 2020.



  
Notary Public

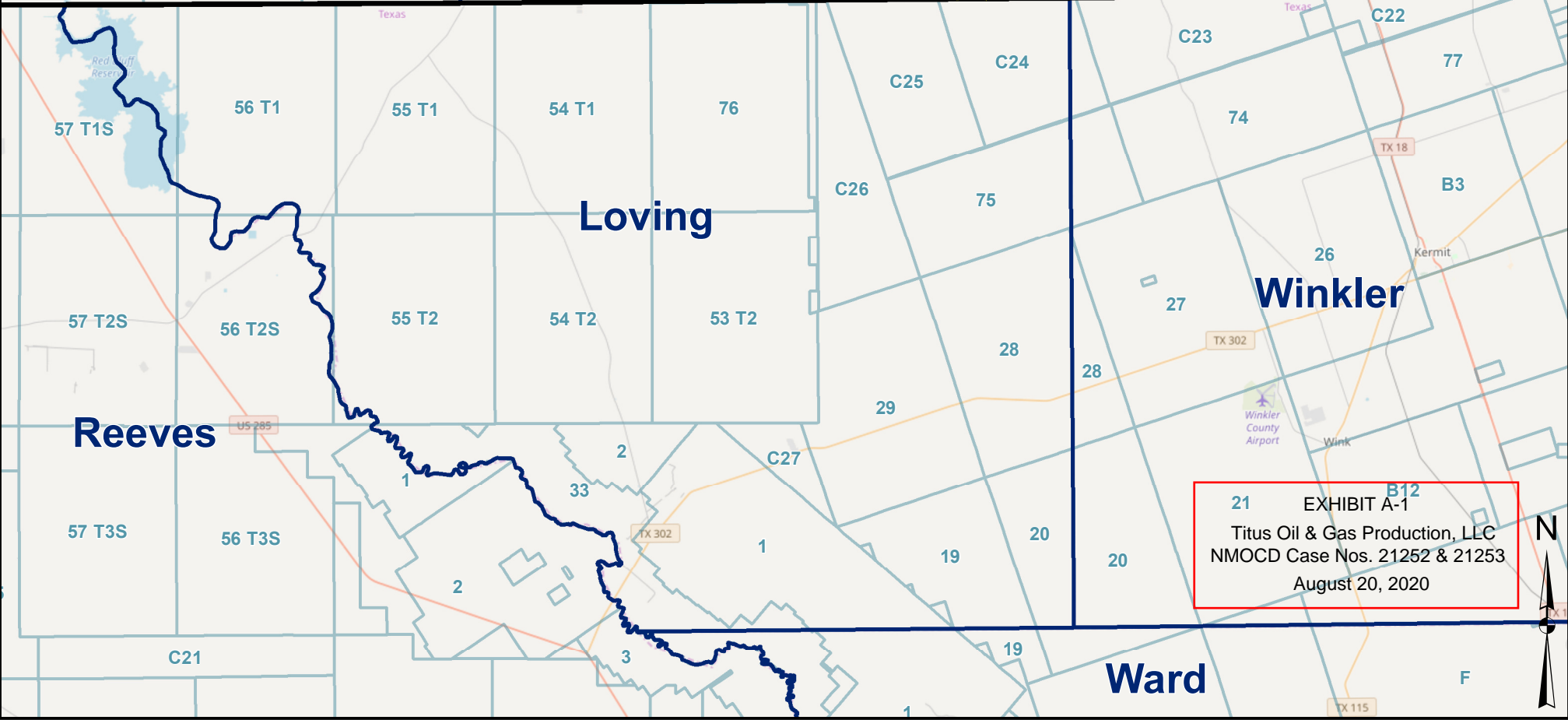
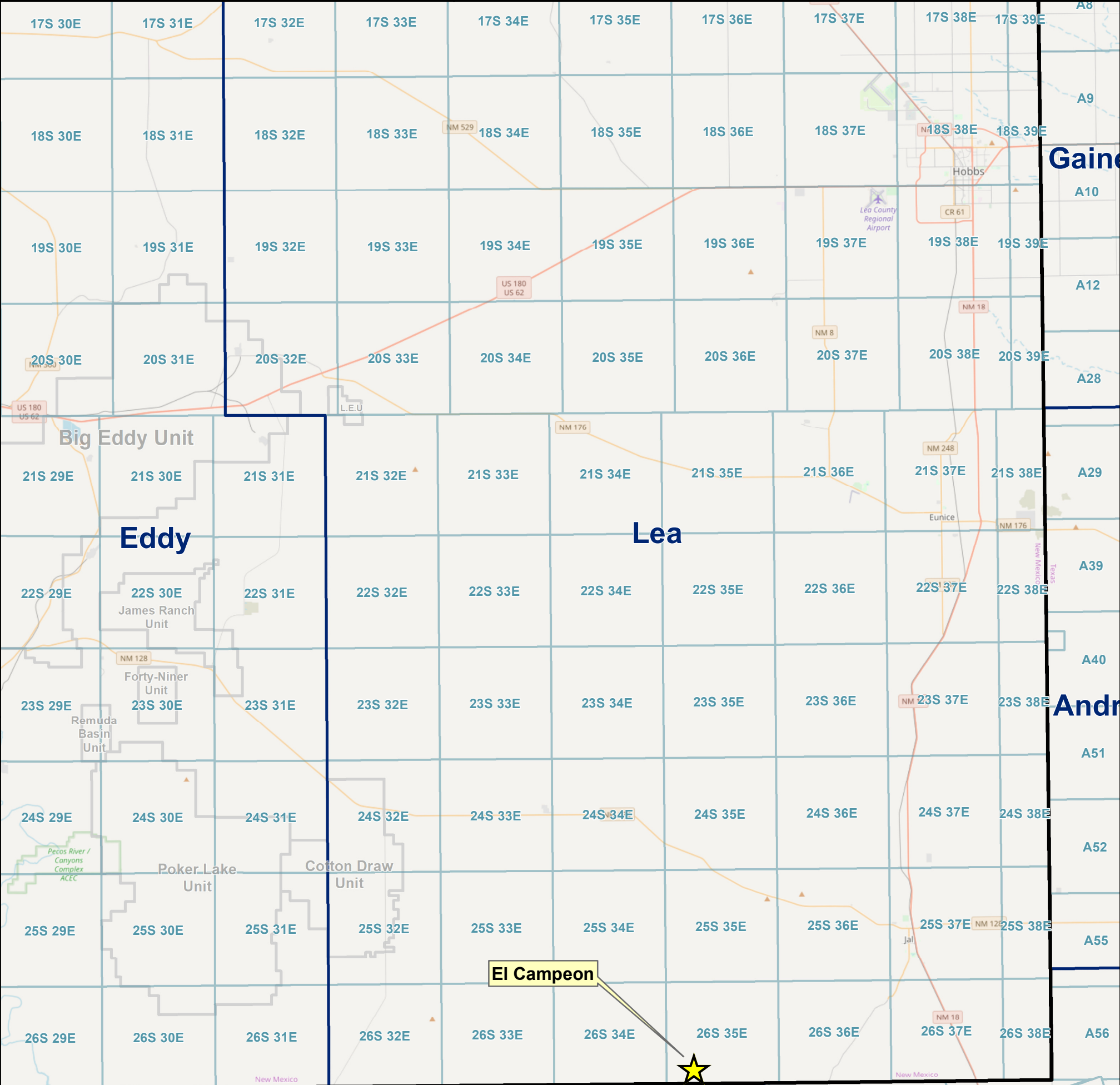
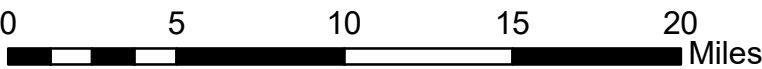
My Commission expires 2-11-21.

Tab 4



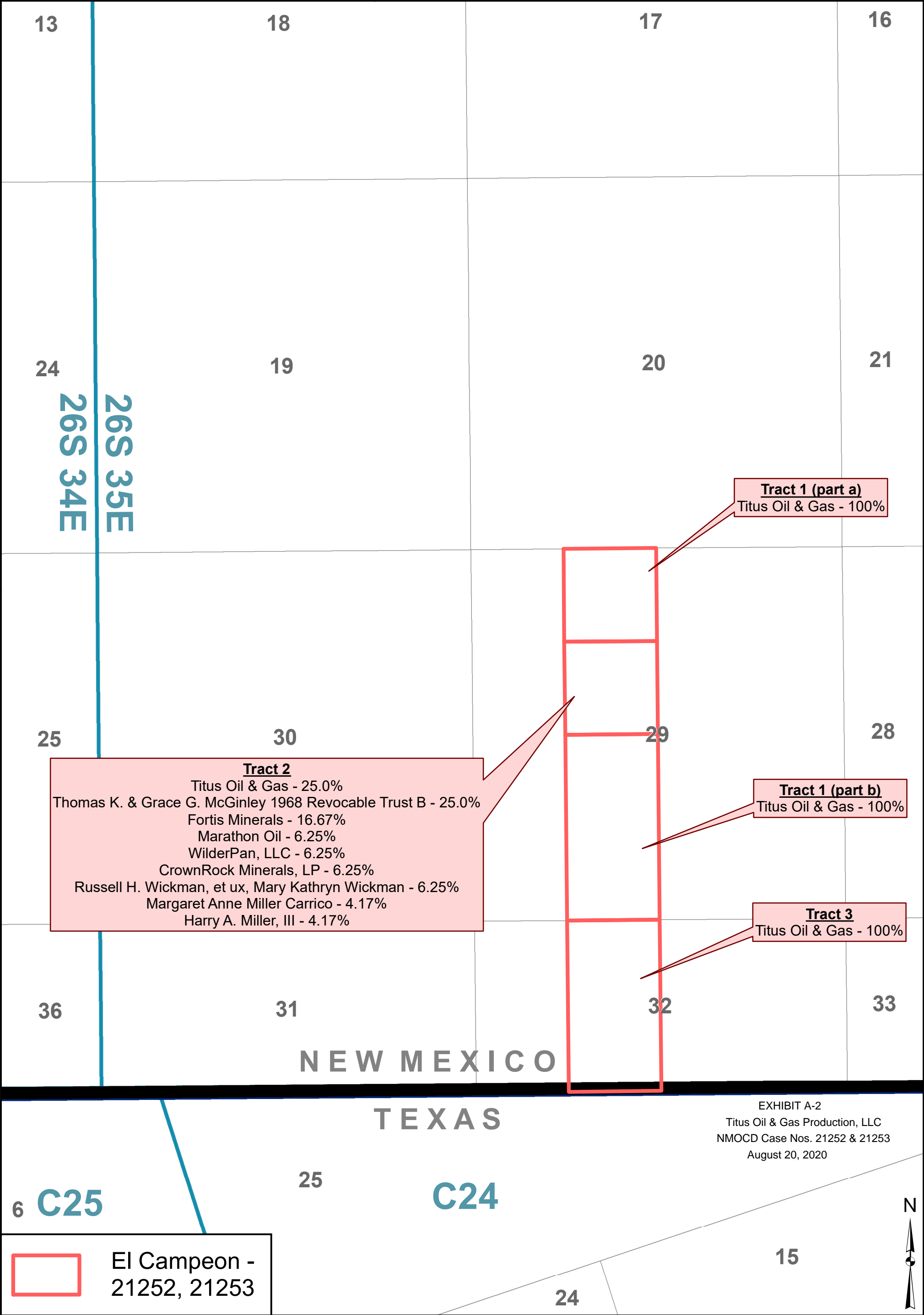
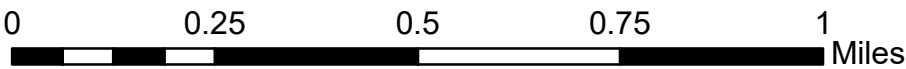
# El Campeon - Delaware Basin

Lea County, New Mexico; T-26-S, R-35-E



21 EXHIBIT A-1  
Titus Oil & Gas Production, LLC  
NMOCD Case Nos. 21252 & 21253  
August 20, 2020

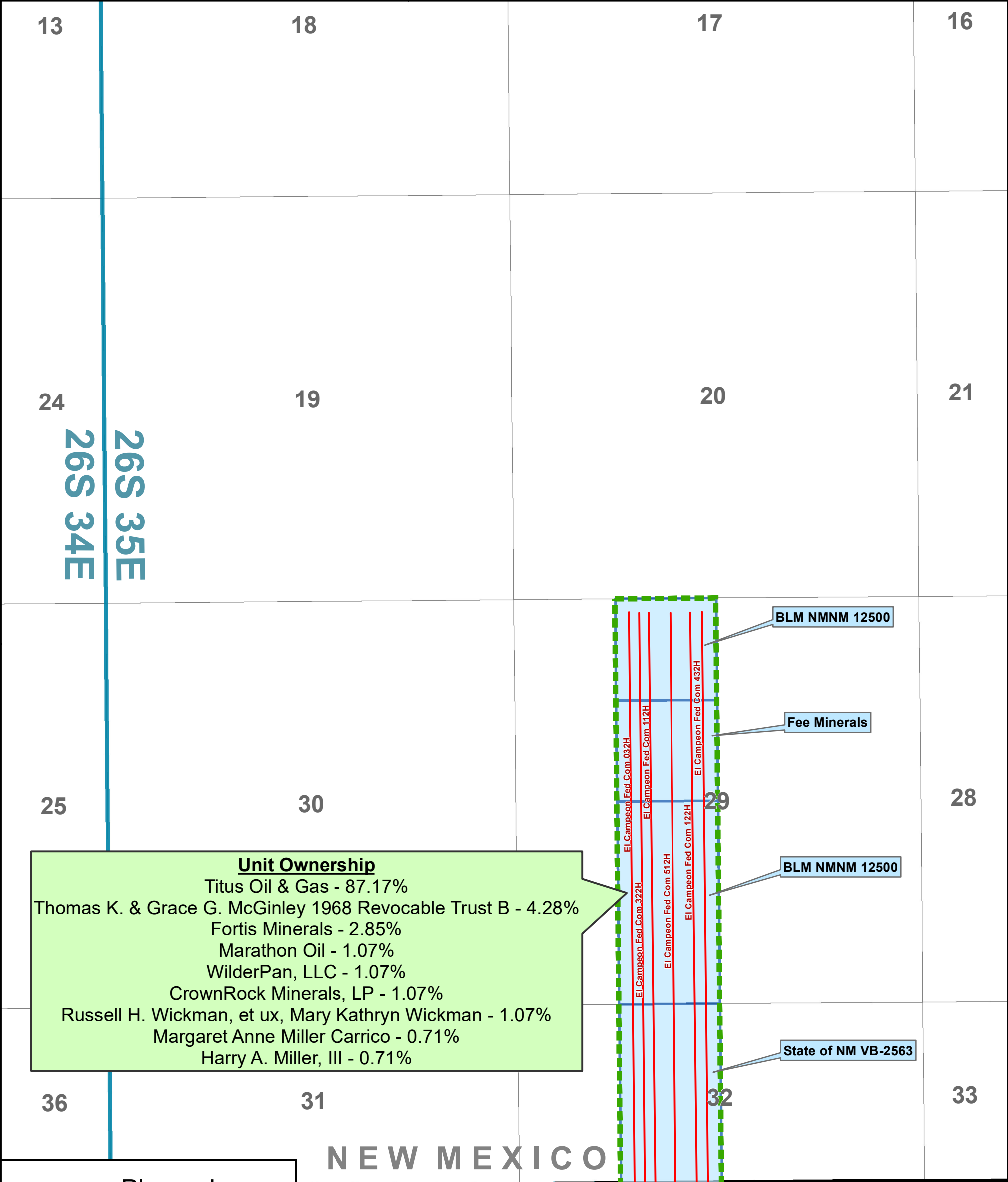
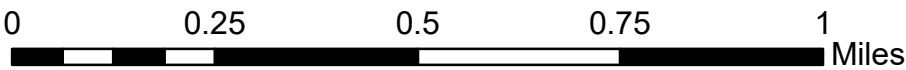






El Campeon Fed Com - Unit Ownership  
21252 & 21253

Lea County, New Mexico; T-26-S, R-35-E



**Unit Ownership**

Titus Oil & Gas - 87.17%

Thomas K. & Grace G. McGinley 1968 Revocable Trust B - 4.28%

Fortis Minerals - 2.85%

Marathon Oil - 1.07%

WilderPan, LLC - 1.07%

CrownRock Minerals, LP - 1.07%

Russell H. Wickman, et ux, Mary Kathryn Wickman - 1.07%

Margaret Anne Miller Carrico - 0.71%

Harry A. Miller, III - 0.71%

Planned Wellbores

Tracts

Unit

NEW MEXICO

TEXAS

C24

25

24

15

EXHIBIT A-3

Titus Oil & Gas Production, LLC

NMOCD Case Nos. 21252 & 21253

August 20, 2020

N

**CONTRACT AREA:**

T26S-R35E  
Section 29: E/2 W/2  
Section 32: E/2 NW/4  
Lea County, New Mexico, containing 233.79 acres, more or less.

**DEPTH RESTRICTIONS:**

All depths.

**INTEREST OF THE PARTIES:**

<b><u>Interest Owners</u></b>	<b><u>Ownership %</u></b>
Titus Oil & Gas Production, LLC	87.168%
Thomas K. & Grace G. McGinley 1968 Revocable Trust B	4.277%
Fortis Minerals	2.852%
Marathon Oil	1.069%
WilderPan, LLC	1.069%
CrownRock Minerals, LP	1.069%
Russell H. Wickman, et ux, Mary Kathryn Wickman	1.069%
Margaret Anne Miller Carrico	0.713%
Harry A. Miller, III	0.713%
Total:	100.000%

**OIL AND GAS LEASES SUBJECT TO THIS AGREEMENT:**

Lessor:	United States of America – USA NMNM 125400
Lessee:	Santa Fe Energy Resources, Inc.
Date:	December 1, 1996
Description:	NE/4 NW/4, E/2 SW/4 of Section 29, T26S, R35E, NMPM Lea County, NM
Lessor:	State of New Mexico VB-2563
Lessee:	Reagan Smith Energy Solutions, Inc.
Date:	August 1, 2015
Description:	E/2 NW/4 of Section 32, T26S, R35E, NMPM Lea County, NM
Lessor:	Various Fee Leases and Unleased Mineral Owners
Lessee:	Various
Date:	Various
Description:	SE/4 NW/4 of Section 29, T26S, R35E, NMPM Lea County, NM



Contact	Type	Notes	Contact Info
Wilderpan, LLC	Emails and Phone Calls	6/12/2020 - interested in leasing, but could not come to an agreement on lease bonus. Said they intend to speak with other parties in the area. Requested that they advise us if/when they lease to another party.	Dustin Pannell
Crownrock Minerals	Emails and Phone Calls	6/30/2020 - interested in leasing, but they felt that our offer was too low. Said they intend to speak to other parties in the area to attempt to lease their interest. Requested that they advise us if/when they lease to another party.	Tim Wimberly
McGinley Trust B	Emails and Phone Calls	5/7/2020 - Sent offer letter to Bank of America Trustee. They advised that they had received multiple offers and were seeking "best and final" offers. Advised them that our offer would remain as sent.  7/30/2020 - Trustee advised us that they had leased their interest but it was not yet filed of record and they could not send us a copy yet.	Bank of America Trustee
Margaret Carrico and Harry Miller	Emails and Phone Calls	8/12/2020 - these parties are interested in leasing. We are negotiating lease form and final payment, etc.	Margaret Carrico and Harry Miller

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (505) 334-6170  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office  
☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	2 Pool Code 96672	3 Pool Name WC-025 G-08 S263412K; Bone Spring
4 Property Code	5 Property Name EL CAMPEON FED COM	6 Well Number 322H
7 OGRID No. 373986	8 Operator Name TITUS OIL & GAS PRODUCTION LLC	9 Elevation 3174'

10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	20	26-S	35-E		579'	SOUTH	2077'	WEST	LEA

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
3	32	26-S	35-E		10'	SOUTH	1650'	WEST	LEA

12 Dedicated Acres 240	13 Joint or Infill Y	14 Consolidation Code	15 Order No.
---------------------------	-------------------------	-----------------------	--------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

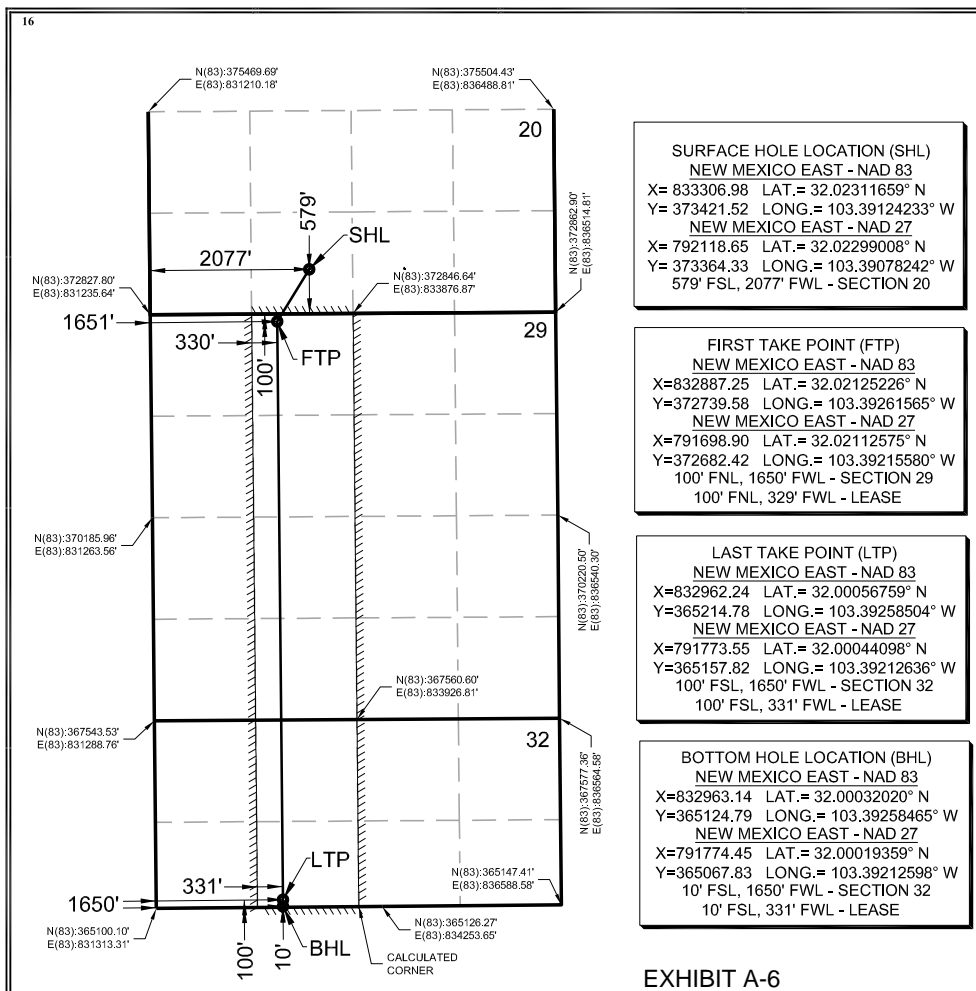


EXHIBIT A-6

17 OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature: *Ryan DeLong* Date: 1/22/2020

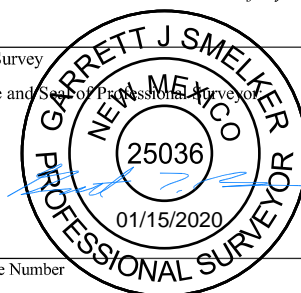
Ryan DeLong - Regulatory Manager  
Printed Name

rdelong@titusoil.com  
E-mail Address

18 SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey  
Signature and Seal of Professional Surveyor  
Certificate Number



Titus Oil & Gas Production, LLC  
NMOCD Case Nos. 21252 & 21253  
August 20, 2020

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
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Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office  
☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	2 Pool Code 98234	3 Pool Name WC-025 G-09 S263619C; Wolfcamp
4 Property Code	5 Property Name EL CAMPEON FED COM	6 Well Number 432H
7 OGRID No. 373986	8 Operator Name TITUS OIL & GAS PRODUCTION LLC	9 Elevation 3174'

10 Surface Location

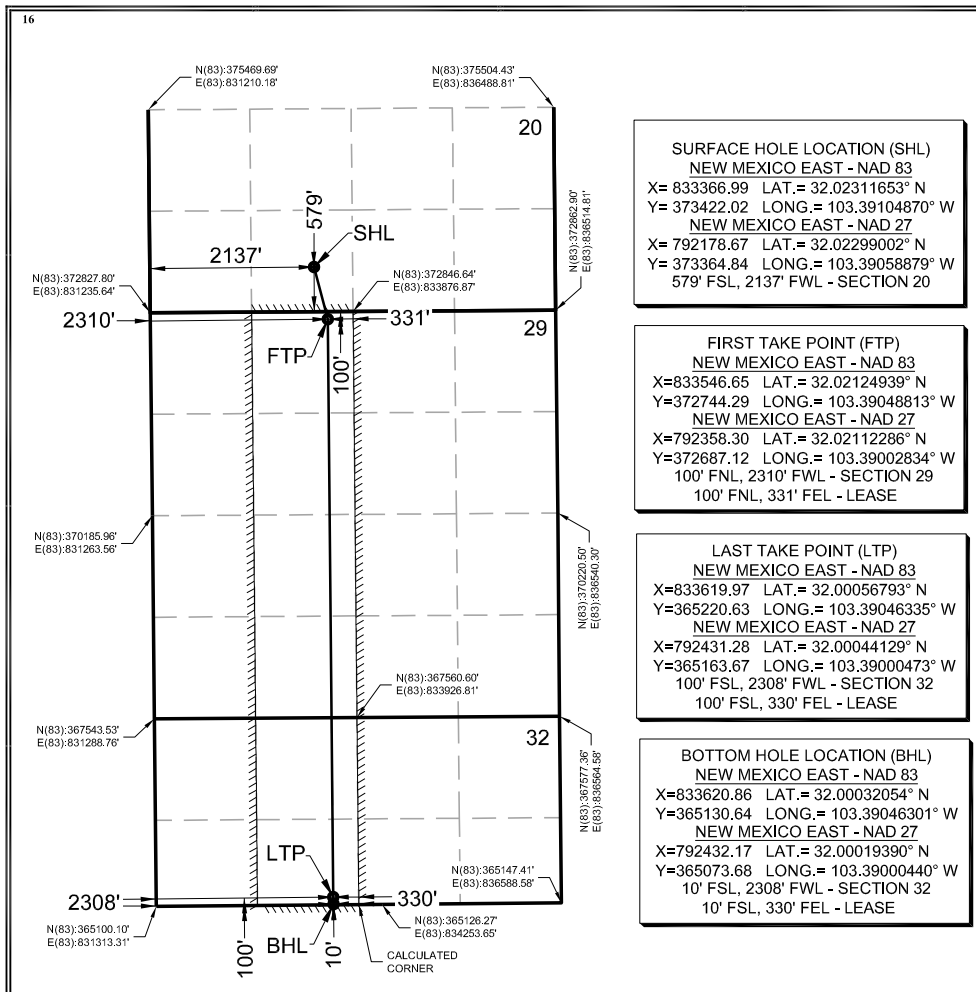
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	20	26-S	35-E		579'	SOUTH	2137'	WEST	LEA

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
3	32	26-S	35-E		10'	SOUTH	2308'	WEST	LEA

12 Dedicated Acres 240	13 Joint or Infill Y	14 Consolidation Code	15 Order No.
---------------------------	-------------------------	-----------------------	--------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



17 OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature: *Ryan DeLong* Date: 1/22/2020

Ryan DeLong - Regulatory Manager  
Printed Name

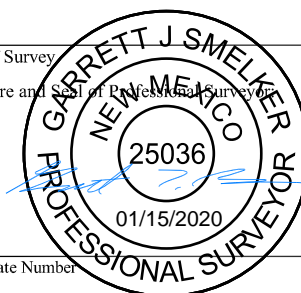
rdelong@titusoil.com  
E-mail Address

18 SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey

Signature and Seal of Professional Surveyor



Certificate Number

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811 S. First St., Artesia, NM 88210  
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State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office  
☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	2 Pool Code 98234	3 Pool Name WC-025 G-09 S263619C; Wolfcamp
4 Property Code	5 Property Name EL CAMPEON FED COM	6 Well Number 512H
7 OGRID No. 373986	8 Operator Name TITUS OIL & GAS PRODUCTION LLC	9 Elevation 3174'

10 Surface Location

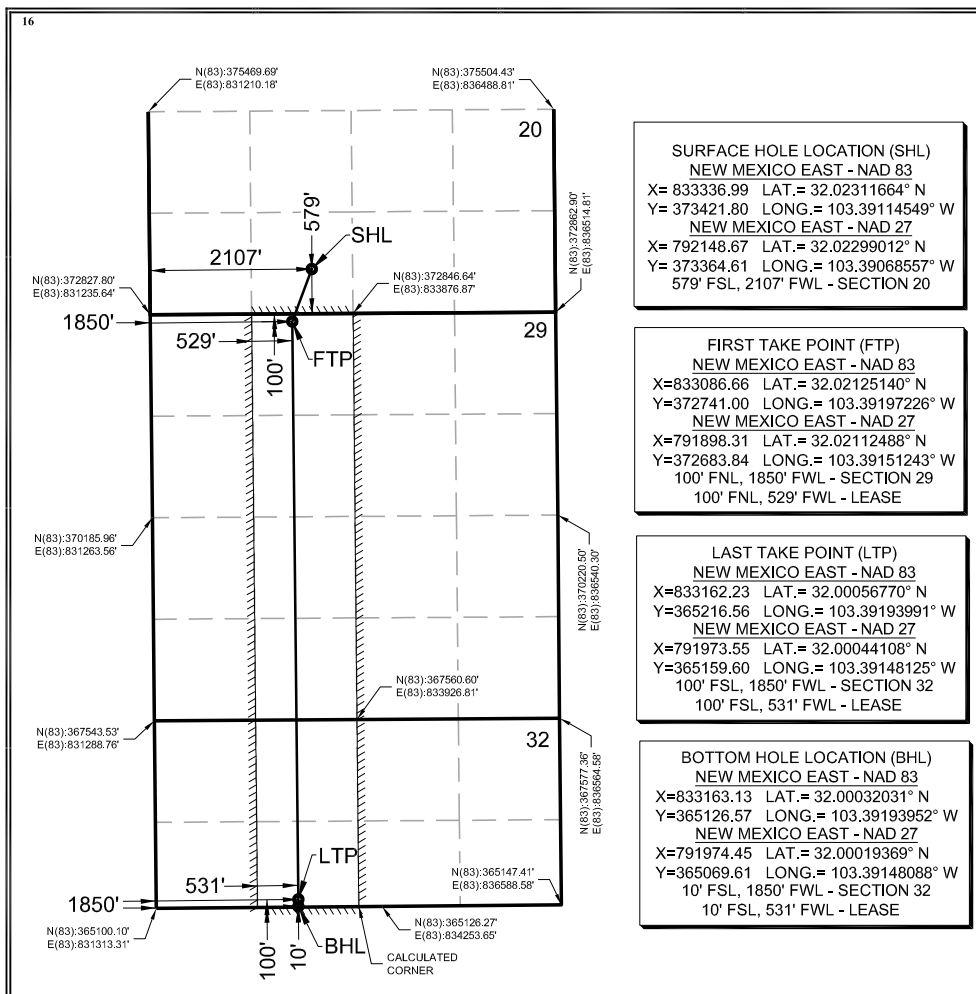
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	20	26-S	35-E		579'	SOUTH	2107'	WEST	LEA

11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
3	32	26-S	35-E		10'	SOUTH	1850'	WEST	LEA

12 Dedicated Acres 240	13 Joint or Infill Y	14 Consolidation Code	15 Order No.
---------------------------	-------------------------	-----------------------	--------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



17 OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

*[Signature]* 1/22/2020  
Signature Date

Ryan DeLong - Regulatory Manager  
Printed Name

rdelong@titusoil.com  
E-mail Address

18 SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey  
Signature and Seal of Registered Surveyor  
Garrett J. Smelker  
25036  
01/15/2020  
Certificate Number

## Titus Oil & Gas Production, LLC

420 Throckmorton St., Ste. 1150  
Fort Worth, Texas 76102

June 3, 2020

### USPS

WilderPan, LLC  
PO Box 50088  
Midland, TX 79710

RE: El Campeon Fed Com 512H Well Proposal  
T26S-R35E  
Lea County, New Mexico

Dear Mineral Interest Owner,

Titus Oil & Gas Production, LLC ("Titus"), as Operator, hereby proposes the drilling of the El Campeon Fed Com 512H ("Subject Well") to an approximate True Vertical Depth of 13,050' and an approximate Total Measured Depth of 20,970' in order to test the Wolfcamp formation. The proration unit will include the E2W2 Section 29 & E2NW4 Section 32, T26S-R35E, Lea County, New Mexico.

The estimated cost of drilling, completing, and equipping the Subject Well is \$7,018,949, as itemized on the enclosed Authorization for Expenditure ("AFE"), dated April 28, 2020. The Subject Well's surface location will be located approximately 579' FSL and 2107' FWL of Section 20, T26S-R35E. The Subject Well's bottom-hole location will be approximately 10' FSL and 1850' FWL of Section 32, T26S-R35E. The Subject Well's first take point will be approximately 100' FNL and 1850' FWL of Section 29, T26S-R35E, and the last take point will be approximately 100' FSL and 1850' FWL of Section 32, T26S-R35E. The proposed location and drilling plans described above are subject to change if surface or subsurface issues are encountered which necessitate a change.

Your mineral interest was previously subject to an existing oil and gas lease and Titus sent well proposals to the leaseholder in January 2020. In the time since those proposals were sent, it appears as though the previous lease no longer covers the tract in the SE4NW4 of Section 29, 26S-35E. Accordingly, we are now sending this proposal for your review. Please note that our AFE has been updated to reflect the reduction in drilling and completion costs after the economic downturn.

In the event you elect to participate in the proposed well, please execute the enclosed AFE and return to Titus within 30 days. Titus proposes the drilling of the well under the terms of a modified AAPL Form 610-1989H Operating Agreement ("JOA"), which is available for your review upon request. The proposed JOA will cover all depths of Section 29: E2W2 and Section 32: E2NW4 of T26S-R35E, Lea County, New Mexico. If you would prefer a single well JOA that is also available upon request.

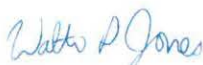
If you do not wish to participate in the drilling of the well, Titus would like to offer the following terms:

- Oil & Gas Lease, 3-year primary term
- 20% Royalty Interest, proportionately reduced
- \$750 per net acre bonus consideration

If an agreement has not been reached within 30 days from the date of this letter, Titus reserves the right to apply to the New Mexico Oil Conservation Division for compulsory pooling.

Should you have any questions, please feel free to contact the undersigned at the contact information outlined below.

Sincerely,



Walter P. Jones  
(817) 852-6875  
wjones@titusoil.com

EXHIBIT A-7  
Titus Oil & Gas Production, LLC  
NMOCD Case Nos. 21252 & 21253  
August 20, 2020



Please select one of the following and return:

\_\_\_\_\_ I/We hereby elect to participate for our proportionate share of the costs detailed in the enclosed AFE associated with the drilling and completion of the El Campeon Fed Com 512H.

\_\_\_\_\_ I/We hereby elect **NOT** to participate for our proportionate share of the costs detailed in the enclosed AFE associated with the drilling and completion of the El Campeon Fed Com 512H.

\_\_\_\_\_ I/We are interested in selling or leasing our interest, please contact us to discuss further.

WilderPan, LLC

By: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_



# Titus Oil & Gas Production, LLC

Proposed Authorization for Expenditure.

Prepared by: Smith / Hinkel

Date Prepared: 4/28/2020

Well Name	El Campeon Fed Com 512H			MD / TVD	20,970'	13,050'
Legal	E2W2 Section 29 & E2W2 Section 32, T26S-R35E			Cty / State	Lea	NM
Formation	Wolfcamp B			Field	Jabalina	
INTANGIBLE COSTS		DRILL	COMPL	PROD	FAC	TOTAL
Land/ Legal/ Regulatory/ Insurance	\$ 45,614	\$ -	\$ -	\$ -	\$ -	\$ 45,614
Location/ Surveys/ Damages	\$ 187,525	\$ 2,170	\$ -	\$ -	\$ -	\$ 189,695
Daywork Contract	\$ 612,243	\$ 189,928	\$ 22,991	\$ -	\$ -	\$ 825,162
Mob / Trucking / Cranes/ Fork Lift	\$ 50,682	\$ 226,901	\$ 6,844	\$ 33,065	\$ -	\$ 317,492
Fuel & Power	\$ 115,556	\$ 2,331	\$ -	\$ -	\$ -	\$ 117,887
Directional Drilling Services	\$ 301,053	\$ -	\$ -	\$ -	\$ -	\$ 301,053
Bits	\$ 98,324	\$ -	\$ -	\$ -	\$ -	\$ 98,324
Mud & Chemicals	\$ 202,729	\$ -	\$ -	\$ -	\$ -	\$ 202,729
Water	\$ 40,546	\$ 226,339	\$ -	\$ -	\$ -	\$ 266,885
Disposal/ Closed Loop/ HES	\$ 152,047	\$ 12,378	\$ 95,994	\$ -	\$ -	\$ 260,419
Cement/ Csg equip & services	\$ 268,616	\$ -	\$ -	\$ -	\$ -	\$ 268,616
Rental - Surface	\$ 126,706	\$ 193,143	\$ 98,821	\$ -	\$ -	\$ 418,670
Rental - Subsurface	\$ 76,023	\$ 36,812	\$ 12,656	\$ -	\$ -	\$ 125,491
Company Supervision	\$ 13,988	\$ 17,361	\$ -	\$ -	\$ -	\$ 31,350
Contract Supervision	\$ 100,949	\$ 62,774	\$ 8,002	\$ -	\$ -	\$ 171,725
Geologic Evaluation	\$ 28,382	\$ 27,730	\$ -	\$ -	\$ -	\$ 56,112
Perf & Wireline Services	\$ -	\$ 108,266	\$ 6,844	\$ -	\$ -	\$ 115,110
Contract Labor	\$ 29,396	\$ 11,012	\$ 29,542	\$ 104,499	\$ -	\$ 174,449
Plugging & Abandonment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fluid Hauling	\$ -	\$ 20,576	\$ 165,717	\$ -	\$ -	\$ 186,293
Services Wellhead	\$ 12,164	\$ 32,070	\$ 5,264	\$ -	\$ -	\$ 49,498
Stimulation	\$ -	\$ 909,374	\$ -	\$ -	\$ -	\$ 909,374
Material Consumables	\$ -	\$ 307,197	\$ -	\$ -	\$ -	\$ 307,197
Contingency	\$ -	\$ 119,278	\$ 22,634	\$ 6,878	\$ -	\$ 148,790
Total Intangibles	\$ 2,462,543	\$ 2,505,640	\$ 475,308	\$ 144,442	\$ -	\$ 5,587,933
TANGIBLE COSTS		DRILL	COMPL	PROD	FAC	TOTAL
Casing	\$ 631,502	\$ -	\$ -	\$ -	\$ -	\$ 631,502
Material Tubing and Accs	\$ -	\$ -	\$ 36,851	\$ -	\$ -	\$ 36,851
Wellhead & Production Tree	\$ 70,955	\$ 65,024	\$ 6,752	\$ -	\$ -	\$ 142,731
Material Subsurface Lift Equipment	\$ -	\$ -	\$ 61,067	\$ -	\$ -	\$ 61,067
Packers, Liner Hangers	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Material Surface Other	\$ -	\$ -	\$ 8,501	\$ -	\$ -	\$ 8,501
Compressor	\$ -	\$ -	\$ 32,200	\$ -	\$ -	\$ 32,200
Tanks	\$ -	\$ -	\$ -	\$ 200,134	\$ -	\$ 200,134
Production Vessels	\$ -	\$ -	\$ -	\$ 66,711	\$ -	\$ 66,711
Gas Conditioning/ Dehydration	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Flow Lines	\$ -	\$ -	\$ -	\$ 143,776	\$ -	\$ 143,776
Valves, Dumps, Controllers	\$ -	\$ -	\$ -	\$ 11,742	\$ -	\$ 11,742
Electrical / Grounding	\$ -	\$ -	\$ -	\$ 20,013	\$ -	\$ 20,013
Flares/Combustion/Emission	\$ -	\$ -	\$ -	\$ 15,410	\$ -	\$ 15,410
Communications	\$ -	\$ -	\$ -	\$ 36,691	\$ -	\$ 36,691
Meters/LACT/Instrumentation	\$ -	\$ -	\$ -	\$ 23,689	\$ -	\$ 23,689
Total Tangibles	\$ 702,457	\$ 65,024	\$ 145,370	\$ 518,165	\$ -	\$ 1,431,016
Total DC&E	\$ 3,165,000	\$ 2,570,664	\$ 620,678	\$ 662,607	\$ -	\$ 7,018,949
Non Operating Partner Approval						
Company:		By:		Date:		
		Its:				

## Titus Oil & Gas Production, LLC

420 Throckmorton St., Ste. 1150  
Fort Worth, Texas 76102

June 3, 2020

### USPS

WilderPan, LLC  
PO Box 50088  
Midland, TX 79710

RE: El Campeon Fed Com 432H Well Proposal  
T26S-R35E  
Lea County, New Mexico

Dear Mineral Interest Owner,

Titus Oil & Gas Production, LLC ("Titus"), as Operator, hereby proposes the drilling of the El Campeon Fed Com 432H ("Subject Well") to an approximate True Vertical Depth of 12,760' and an approximate Total Measured Depth of 20,680' in order to test the Wolfcamp formation. The proration unit will include the E2W2 Section 29 & E2NW4 Section 32, T26S-R35E, Lea County, New Mexico.

The estimated cost of drilling, completing, and equipping the Subject Well is \$6,914,793, as itemized on the enclosed Authorization for Expenditure ("AFE"), dated April 28, 2020. The Subject Well's surface location will be located approximately 579' FSL and 2137' FWL of Section 20, T26S-R35E. The Subject Well's bottom-hole location will be approximately 10' FSL and 2310' FWL of Section 32, T26S-R35E. The Subject Well's first take point will be approximately 100' FNL and 2310' FWL of Section 29, T26S-R35E, and the last take point will be approximately 100' FSL and 2310' FWL of Section 32, T26S-R35E. The proposed location and drilling plans described above are subject to change if surface or subsurface issues are encountered which necessitate a change.

Your mineral interest was previously subject to an existing oil and gas lease and Titus sent well proposals to the leaseholder in January 2020. In the time since those proposals were sent, it appears as though the previous lease no longer covers the tract in the SE4NW4 of Section 29, 26S-35E. Accordingly, we are now sending this proposal for your review. Please note that our AFE has been updated to reflect the reduction in drilling and completion costs after the economic downturn.

In the event you elect to participate in the proposed well, please execute the enclosed AFE and return to Titus within 30 days. Titus proposes the drilling of the well under the terms of a modified AAPL Form 610-1989H Operating Agreement ("JOA"), which is available for your review upon request. The proposed JOA will cover all depths of Section 29: E2W2 and Section 32: E2NW4 of T26S-R35E, Lea County, New Mexico. If you would prefer a single well JOA that is also available upon request.

If you do not wish to participate in the drilling of the well, Titus would like to offer the following terms:

- Oil & Gas Lease, 3-year primary term
- 20% Royalty Interest, proportionately reduced
- \$750 per net acre bonus consideration

If an agreement has not been reached within 30 days from the date of this letter, Titus reserves the right to apply to the New Mexico Oil Conservation Division for compulsory pooling.

Should you have any questions, please feel free to contact the undersigned at the contact information outlined below.

Sincerely,



Walter P. Jones  
(817) 852-6875  
wjones@titusoil.com



Please select one of the following and return:

\_\_\_\_\_ I/We hereby elect to participate for our proportionate share of the costs detailed in the enclosed AFE associated with the drilling and completion of the El Campeon Fed Com 432H.

\_\_\_\_\_ I/We hereby elect **NOT** to participate for our proportionate share of the costs detailed in the enclosed AFE associated with the drilling and completion of the El Campeon Fed Com 432H.

\_\_\_\_\_ I/We are interested in selling or leasing our interest, please contact us to discuss further.

WilderPan, LLC

By: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**Titus Oil & Gas Production, LLC**

Proposed Authorization for Expenditure.

Prepared by: Smith / Hinkel

Date Prepared: 4/28/2020

<b>Well Name</b>	El Campeon Fed Com 432H		<b>MD / TVD</b>	20,680'	12,760'
<b>Legal</b>	E2W2 Section 29 & E2W2 Section 32, T26S-R35E		<b>Cty / State</b>	Lea	NM
<b>Formation</b>	Wolfcamp A		<b>Field</b>	Jabalina	
<b>INTANGIBLE COSTS</b>	<b>DRILL</b>	<b>COMPL</b>	<b>PROD</b>	<b>FAC</b>	<b>TOTAL</b>
Land/ Legal/ Regulatory/ Insurance	\$ 44,966	\$ -	\$ -	\$ -	\$ 44,966
Location/ Surveys/ Damages	\$ 184,858	\$ 2,120	\$ -	\$ -	\$ 186,979
Daywork Contract	\$ 603,538	\$ 185,558	\$ 22,991	\$ -	\$ 812,087
Mob / Trucking / Cranes/ Fork Lift	\$ 49,962	\$ 221,680	\$ 6,844	\$ 33,065	\$ 311,550
Fuel & Power	\$ 113,913	\$ 2,277	\$ -	\$ -	\$ 116,190
Directional Drilling Services	\$ 296,773	\$ -	\$ -	\$ -	\$ 296,773
Bits	\$ 96,926	\$ -	\$ -	\$ -	\$ 96,926
Mud & Chemicals	\$ 199,847	\$ -	\$ -	\$ -	\$ 199,847
Water	\$ 39,969	\$ 221,130	\$ -	\$ -	\$ 261,100
Disposal/ Closed Loop/ HES	\$ 149,885	\$ 12,093	\$ 95,994	\$ -	\$ 257,972
Cement/ Csg equip & services	\$ 264,797	\$ -	\$ -	\$ -	\$ 264,797
Rental - Surface	\$ 124,904	\$ 188,699	\$ 98,821	\$ -	\$ 412,424
Rental - Subsurface	\$ 74,943	\$ 35,965	\$ 12,656	\$ -	\$ 123,563
Company Supervision	\$ 13,789	\$ 16,962	\$ -	\$ -	\$ 30,751
Contract Supervision	\$ 99,514	\$ 61,329	\$ 8,002	\$ -	\$ 168,845
Geologic Evaluation	\$ 27,979	\$ 27,092	\$ -	\$ -	\$ 55,070
Perf & Wireline Services	\$ -	\$ 105,775	\$ 6,844	\$ -	\$ 112,619
Contract Labor	\$ 28,978	\$ 10,758	\$ 29,542	\$ 104,499	\$ 173,777
Plugging & Abandonment	\$ -	\$ -	\$ -	\$ -	\$ -
Fluid Hauling	\$ -	\$ 20,103	\$ 165,717	\$ -	\$ 185,820
Services Wellhead	\$ 11,991	\$ 31,332	\$ 5,264	\$ -	\$ 48,587
Stimulation	\$ -	\$ 888,447	\$ -	\$ -	\$ 888,447
Material Consumables	\$ -	\$ 300,128	\$ -	\$ -	\$ 300,128
Contingency	\$ -	\$ 116,533	\$ 22,634	\$ 6,878	\$ 146,045
<b>Total Intangibles</b>	<b>\$ 2,427,530</b>	<b>\$ 2,447,980</b>	<b>\$ 475,308</b>	<b>\$ 144,442</b>	<b>\$ 5,495,260</b>
<b>TANGIBLE COSTS</b>	<b>DRILL</b>	<b>COMPL</b>	<b>PROD</b>	<b>FAC</b>	<b>TOTAL</b>
Casing	\$ 622,523	\$ -	\$ -	\$ -	\$ 622,523
Material Tubing and Accs	\$ -	\$ -	\$ 36,851	\$ -	\$ 36,851
Wellhead & Production Tree	\$ 69,946	\$ 63,528	\$ 6,752	\$ -	\$ 140,226
Material Subsurface Lift Equipment	\$ -	\$ -	\$ 61,067	\$ -	\$ 61,067
Packers, Liner Hangers	\$ -	\$ -	\$ -	\$ -	\$ -
Material Surface Other	\$ -	\$ -	\$ 8,501	\$ -	\$ 8,501
Compressor	\$ -	\$ -	\$ 32,200	\$ -	\$ 32,200
Tanks	\$ -	\$ -	\$ -	\$ 200,134	\$ 200,134
Production Vessels	\$ -	\$ -	\$ -	\$ 66,711	\$ 66,711
Gas Conditioning/ Dehydration	\$ -	\$ -	\$ -	\$ -	\$ -
Flow Lines	\$ -	\$ -	\$ -	\$ 143,776	\$ 143,776
Valves, Dumps, Controllers	\$ -	\$ -	\$ -	\$ 11,742	\$ 11,742
Electrical / Grounding	\$ -	\$ -	\$ -	\$ 20,013	\$ 20,013
Flares/Combustion/Emission	\$ -	\$ -	\$ -	\$ 15,410	\$ 15,410
Communications	\$ -	\$ -	\$ -	\$ 36,691	\$ 36,691
Meters/LACT/Instrumentation	\$ -	\$ -	\$ -	\$ 23,689	\$ 23,689
<b>Total Tangibles</b>	<b>\$ 692,470</b>	<b>\$ 63,528</b>	<b>\$ 145,370</b>	<b>\$ 518,165</b>	<b>\$ 1,419,532</b>
<b>Total DC&amp;E</b>	<b>\$ 3,120,000</b>	<b>\$ 2,511,508</b>	<b>\$ 620,678</b>	<b>\$ 662,607</b>	<b>\$ 6,914,793</b>
<i>Non Operating Partner Approval</i>					
Company:	By:		Date:		
	Its:				

## Titus Oil & Gas Production, LLC

420 Throckmorton St., Ste. 1150  
Fort Worth, Texas 76102

June 3, 2020

### USPS

WilderPan, LLC  
PO Box 50088  
Midland, TX 79710

RE: El Campeon Fed Com 322H Well Proposal  
T26S-R35E  
Lea County, New Mexico

Dear Mineral Interest Owner,

Titus Oil & Gas Production, LLC ("Titus"), as Operator, hereby proposes the drilling of the El Campeon Fed Com 322H ("Subject Well") to an approximate True Vertical Depth of 12,500' and an approximate Total Measured Depth of 20,420' in order to test the Wolfcamp formation. The proration unit will include the E2W2 Section 29 & E2NW4 Section 32, T26S-R35E, Lea County, New Mexico.

The estimated cost of drilling, completing, and equipping the Subject Well is \$6,884,793, as itemized on the enclosed Authorization for Expenditure ("AFE"), dated April 28, 2020. The Subject Well's surface location will be located approximately 579' FSL and 2077' FWL of Section 20, T26S-R35E. The Subject Well's bottom-hole location will be approximately 10' FSL and 1650' FWL of Section 32, T26S-R35E. The Subject Well's first take point will be approximately 100' FNL and 1650' FWL of Section 29, T26S-R35E, and the last take point will be approximately 100' FSL and 1650' FWL of Section 32, T26S-R35E. The proposed location and drilling plans described above are subject to change if surface or subsurface issues are encountered which necessitate a change.

Your mineral interest was previously subject to an existing oil and gas lease and Titus sent well proposals to the leaseholder in January 2020. In the time since those proposals were sent, it appears as though the previous lease no longer covers the tract in the SE4NW4 of Section 29, 26S-35E. Accordingly, we are now sending this proposal for your review. Please note that our AFE has been updated to reflect the reduction in drilling and completion costs after the economic downturn.

In the event you elect to participate in the proposed well, please execute the enclosed AFE and return to Titus within 30 days. Titus proposes the drilling of the well under the terms of a modified AAPL Form 610-1989H Operating Agreement ("JOA"), which is available for your review upon request. The proposed JOA will cover all depths of Section 29: E2W2 and Section 32: E2NW4 of T26S-R35E, Lea County, New Mexico. If you would prefer a single well JOA that is also available upon request.


If you do not wish to participate in the drilling of the well, Titus would like to offer the following terms:

- Oil & Gas Lease, 3-year primary term
- 20% Royalty Interest, proportionately reduced
- \$750 per net acre bonus consideration

If an agreement has not been reached within 30 days from the date of this letter, Titus reserves the right to apply to the New Mexico Oil Conservation Division for compulsory pooling.

Should you have any questions, please feel free to contact the undersigned at the contact information outlined below.

Sincerely,



Walter P. Jones  
(817) 852-6875  
wjones@titusoil.com

Please select one of the following and return:

\_\_\_\_\_ I/We hereby elect to participate for our proportionate share of the costs detailed in the enclosed AFE associated with the drilling and completion of the El Campeon Fed Com 322H.

\_\_\_\_\_ I/We hereby elect **NOT** to participate for our proportionate share of the costs detailed in the enclosed AFE associated with the drilling and completion of the El Campeon Fed Com 322H.

\_\_\_\_\_ I/We are interested in selling or leasing our interest, please contact us to discuss further.

WilderPan, LLC

By: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_





**Titus Oil & Gas Production, LLC**  
Proposed Authorization for Expenditure.

Prepared by: Smith / Hinkel  
Date Prepared: 4/28/2020

<b>Well Name</b>	El Campeon Fed Com 322H		<b>MD / TVD</b>	20,420'	12,500'
<b>Legal</b>	E2W2 Section 29 & E2W2 Section 32, T26S-R35E		<b>Cty / State</b>	Lea	NM
<b>Formation</b>	3rd Bone Spring		<b>Field</b>	Jabalina	
<b>INTANGIBLE COSTS</b>	<b>DRILL</b>	<b>COMPL</b>	<b>PROD</b>	<b>FAC</b>	<b>TOTAL</b>
Land/ Legal/ Regulatory/ Insurance	\$ 44,533	\$ -	\$ -	\$ -	\$ 44,533
Location/ Surveys/ Damages	\$ 183,081	\$ 2,120	\$ -	\$ -	\$ 185,201
Daywork Contract	\$ 597,734	\$ 185,558	\$ 22,991	\$ -	\$ 806,284
Mob / Trucking / Cranes/ Fork Lift	\$ 49,481	\$ 221,680	\$ 6,844	\$ 33,065	\$ 311,070
Fuel & Power	\$ 112,817	\$ 2,277	\$ -	\$ -	\$ 115,095
Directional Drilling Services	\$ 293,919	\$ -	\$ -	\$ -	\$ 293,919
Bits	\$ 95,994	\$ -	\$ -	\$ -	\$ 95,994
Mud & Chemicals	\$ 197,925	\$ -	\$ -	\$ -	\$ 197,925
Water	\$ 39,585	\$ 221,130	\$ -	\$ -	\$ 260,715
Disposal/ Closed Loop/ HES	\$ 148,444	\$ 12,093	\$ 95,994	\$ -	\$ 256,531
Cement/ Csg equip & services	\$ 262,251	\$ -	\$ -	\$ -	\$ 262,251
Rental - Surface	\$ 123,703	\$ 188,699	\$ 98,821	\$ -	\$ 411,223
Rental - Subsurface	\$ 74,222	\$ 35,965	\$ 12,656	\$ -	\$ 122,843
Company Supervision	\$ 13,657	\$ 16,962	\$ -	\$ -	\$ 30,619
Contract Supervision	\$ 98,557	\$ 61,329	\$ 8,002	\$ -	\$ 167,888
Geologic Evaluation	\$ 27,710	\$ 27,092	\$ -	\$ -	\$ 54,801
Perf & Wireline Services	\$ -	\$ 105,775	\$ 6,844	\$ -	\$ 112,619
Contract Labor	\$ 28,699	\$ 10,758	\$ 29,542	\$ 104,499	\$ 173,499
Plugging & Abandonment	\$ -	\$ -	\$ -	\$ -	\$ -
Fluid Hauling	\$ -	\$ 20,103	\$ 165,717	\$ -	\$ 185,820
Services Wellhead	\$ 11,876	\$ 31,332	\$ 5,264	\$ -	\$ 48,472
Stimulation	\$ -	\$ 888,447	\$ -	\$ -	\$ 888,447
Material Consumables	\$ -	\$ 300,128	\$ -	\$ -	\$ 300,128
Contingency	\$ -	\$ 116,533	\$ 22,634	\$ 6,878	\$ 146,045
<b>Total Intangibles</b>	<b>\$ 2,404,189</b>	<b>\$ 2,447,980</b>	<b>\$ 475,308</b>	<b>\$ 144,442</b>	<b>\$ 5,471,919</b>
<b>TANGIBLE COSTS</b>	<b>DRILL</b>	<b>COMPL</b>	<b>PROD</b>	<b>FAC</b>	<b>TOTAL</b>
Casing	\$ 616,537	\$ -	\$ -	\$ -	\$ 616,537
Material Tubing and Accs	\$ -	\$ -	\$ 36,851	\$ -	\$ 36,851
Wellhead & Production Tree	\$ 69,274	\$ 63,528	\$ 6,752	\$ -	\$ 139,554
Material Subsurface Lift Equipment	\$ -	\$ -	\$ 61,067	\$ -	\$ 61,067
Packers, Liner Hangers	\$ -	\$ -	\$ -	\$ -	\$ -
Material Surface Other	\$ -	\$ -	\$ 8,501	\$ -	\$ 8,501
Compressor	\$ -	\$ -	\$ 32,200	\$ -	\$ 32,200
Tanks	\$ -	\$ -	\$ -	\$ 200,134	\$ 200,134
Production Vessels	\$ -	\$ -	\$ -	\$ 66,711	\$ 66,711
Gas Conditioning/ Dehydration	\$ -	\$ -	\$ -	\$ -	\$ -
Flow Lines	\$ -	\$ -	\$ -	\$ 143,776	\$ 143,776
Valves, Dumps, Controllers	\$ -	\$ -	\$ -	\$ 11,742	\$ 11,742
Electrical / Grounding	\$ -	\$ -	\$ -	\$ 20,013	\$ 20,013
Flares/Combustion/Emission	\$ -	\$ -	\$ -	\$ 15,410	\$ 15,410
Communications	\$ -	\$ -	\$ -	\$ 36,691	\$ 36,691
Meters/LACT/Instrumentation	\$ -	\$ -	\$ -	\$ 23,689	\$ 23,689
<b>Total Tangibles</b>	<b>\$ 685,811</b>	<b>\$ 63,528</b>	<b>\$ 145,370</b>	<b>\$ 518,165</b>	<b>\$ 1,412,874</b>
<b>Total DC&amp;E</b>	<b>\$ 3,090,000</b>	<b>\$ 2,511,508</b>	<b>\$ 620,678</b>	<b>\$ 662,607</b>	<b>\$ 6,884,793</b>
<i>Non Operating Partner Approval</i>					
Company:	By:		Date:		
	Its:				



**MONTGOMERY  
& ANDREWS**  
LAW FIRM

**SHARON T. SHAHEEN**  
Direct: (505) 986-2678  
Email: [sshaheen@montand.com](mailto:sshaheen@montand.com)  
[www.montand.com](http://www.montand.com)

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July 31, 2020

*Via U.S. Certified Mail, return receipt requested*

**TO: ALL INTEREST OWNERS ON ATTACHED LIST**

**Re: Case Nos. 21252 and 21253** – Applications of Titus Oil & Gas Production, LLC for Compulsory Pooling, Lea County, New Mexico

Dear Interest Owner:

This will advise that pursuant to NMSA 1978, § 70-2-17, Titus Oil & Gas Production, LLC ("Titus") has filed two applications with the New Mexico Oil Conservation Division for orders pooling all uncommitted interests in the proposed wells described below. You are receiving this notice because you may have an interest in one or more of these wells.

**Case No. 21252:** In this case, Titus 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 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: El Campeon Fed Com 322H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2077' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1650' FWL of Section 32, 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 14 miles southwest of Jal, New Mexico.

**Case No. 21253:** In this case, Titus 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 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea

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**REPLY TO:**

325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

EXHIBIT A-8  
Titus Oil & Gas Production, LLC  
NMOCD Case Nos. 21252 & 21253  
August 20, 2020

County, New Mexico. Applicant proposes to drill the following wells: (1) El Campeon Fed Com 432H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2137' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 2310' FWL of Section 32, T26S-R35E, and (2) El Campeon Fed Com 512H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2107' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1850' FWL of Section 32, 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 wells and the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 14 miles southwest of Jal, New Mexico.

The attached Applications will be set for hearing before a Division Examiner at the New Mexico Oil Conservation Division. During the COVID-19 Public Health Emergency, state buildings are closed to the public and hearings will be conducted remotely. The hearing will be conducted on **August 20, 2020** beginning at 8:15 a.m. To participate in the electronic hearing, see the instructions posted on the docket for the hearing date: <http://www.emnrd.state.nm.us/OCD/hearings.html>. You are not required to attend this hearing, but as an owner of an interest that may be affected, you may appear and present testimony.

Failure to appear at that time and become a party of record will preclude you from challenging this application at a later time. If you intend to attend the hearing and present testimony or evidence, you must enter your appearance by **August 12, 2020**, and serve the Division, counsel for the Applicant, and other parties with a pre-hearing statement by **August 13, 2020**, in accordance with Division Rule 19.15.4.13 NMAC.

Please feel free to contact me if you have any questions about this Application.

Very truly yours,

/s/ Sharon T. Shaheen

Sharon T. Shaheen

STS/lt

Enclosures

cc: Titus Oil & Gas Production, LLC, *via email*

## EXHIBIT A

### **INTEREST OWNERS**

#### **Working Interest Owners:**

Marathon Oil Co.  
5555 San Felipe Street  
Houston, TX 77056-2723

#### **Overriding Royalty Interest Owners:**

C. Mark Wheeler and wife, J'Lynn Wheeler  
719 W. Kansas Avenue  
Midland, TX 79701

Penwell Employee Royalty Pool  
310 W. Wall Street – Suite 1001  
Midland, TX 79701

Paul R. Barwis  
c/o Dutton, Harris & Co.  
P.O. Box 230  
Midland, TX 79702

Jareed Partners, Ltd.  
P.O. Box 51451  
Midland, TX 79710

Sandra Mary Borden  
8530 Mill Run Road  
Athens, TX 75751

John Kyle Thoma, Trustee  
P.O. Box 558  
Peyton, CO 80831

#### **Unleased Mineral Owners:**

WilderPan, LLC  
P.O. Box 50088  
Midland, TX 79710

CrownRock Minerals, LP  
P.O. Box 53310  
Midland, TX 79710

Fortis Minerals  
1111 Bagby Street  
Suite 2150  
Houston, TX 77002

Margaret Anne Miller Carrico  
c/o Plains Capital Bank  
2705 Bee Caves Road – Suite 120  
Austin, TX 78746

Thomas K. and Grace G. McGinley  
1968 Revocable Trust B,  
Bank of America, N.A., Trustee  
P.O. Box 830308  
Dallas, TX 75283

Russell H. Wickman, et ux,  
Mary Kathryn Wickman  
2505 Princeton  
Midland, TX 79701



Harry A. Miller III, individually and as  
independent Executor of the Estate of  
Harry A. Miller, Jr.  
1402 Foxwood Cove  
Austin, TX 78704

**Additional Party(ies):**

Bureau of Land Management  
625 E. Greene Street  
Carlsbad, NM 88220-6292

State Land Office  
310 Old Santa Fe Trail  
Santa Fe, NM 87501

**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. 21252**

**APPLICATION**

Titus Oil & Gas Production, LLC ("Titus"), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and John F. McIntyre), hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all mineral interests in the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) in a standard 240-acre, more or less, horizontal spacing and proration unit comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Section 32 is an irregular section in which the south line of the E/2 NW/4 is the New Mexico-Texas border. In support of its application, Titus states as follows:

1. Titus is a working interest owner in the proposed HSU and has the right to drill thereon.
2. Titus proposes to drill the following 1.5-mile well in the proposed HSU: El Campeon Fed Com 322H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2077' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1650' FWL of Section 32, T26S-R35E.
3. The completed interval and first and last take points will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

4. Titus has in good faith sought and been unable to obtain voluntary agreement for the development of these lands from all of the mineral interest owners in the HSU.

5. Approval of the HSU and the pooling of all mineral interest owners in the Bone Spring formation underlying the HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

6. In order to permit Titus to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this HSU should be pooled and Titus should be designated the operator of the HSU.

WHEREFORE, Titus requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 14, 2020, and that, after notice and hearing as required by law, the Division enter an order:

A. Creating a standard 240-acre, more or less, horizontal spacing and proration unit comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico;

B. Pooling all mineral interests in the Bone Spring formation underlying the HSU;

C. Allowing the drilling of the 1.5 mile El Campeon Fed Com 322H well in the HSU;

D. Designating Titus as operator of the HSU and the wells to be drilled thereon;

E. Authorizing Titus to recover its costs of drilling, equipping and completing the well;

F. Approving the operating charges and costs of supervision while drilling of \$8,000/month and, after completion, \$800/month, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and

G. Imposing a 200% penalty for the risk assumed by Titus in drilling and completing the well against any interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

Post Office Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.com)

[jmcintyre@montand.com](mailto:jmcintyre@montand.com)

*Attorneys for Titus Oil & Gas Production, LLC*

**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.** 21253

**APPLICATION**

Titus Oil & Gas Production, LLC ("Titus"), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and John F. McIntyre), hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all mineral 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 comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Section 32 is an irregular section in which the south line of the E/2 NW/4 is the New Mexico-Texas border. In support of its application, Titus states as follows:

1. Titus is a working interest owner in the proposed HSU and has the right to drill thereon.
2. Titus proposes to drill the following 1.5-mile wells in the proposed HSU:
  - El Campeon Fed Com 432H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2137' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 2310' FWL of Section 32, T26S-R35E.

- El Campeon Fed Com 512H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2107' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1850' FWL of Section 32, T26S-R35E.

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

4. Titus has in good faith sought and been unable to obtain voluntary agreement for the development of these lands from all of the mineral interest owners in the HSU.

5. Approval of the HSU and the pooling of all mineral interest owners in the Wolfcamp formation underlying the HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

6. In order to permit Titus to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this HSU should be pooled and Titus should be designated the operator of the HSU.

WHEREFORE, Titus requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 14, 2020, and that, after notice and hearing as required by law, the Division enter an order:

A. Creating a standard 240-acre, more or less, horizontal spacing and proration unit comprised of the E/2 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico;

B. Pooling all mineral interests in the Wolfcamp formation underlying the HSU;

C. Allowing the drilling of the 1.5 mile El Campeon Fed Com 432H and the 1.5-mile El Campeon Fed Com 512H well in the HSU;

- D. Designating Titus as operator of the HSU and the wells to be drilled thereon;
- E. Authorizing Titus to recover its costs of drilling, equipping and completing the wells;
- F. Approving the operating charges and costs of supervision while drilling of \$8,000/month and, after completion, \$800/month, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- G. Imposing a 200% penalty for the risk assumed by Titus in drilling and completing the wells against any interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

Post Office Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.com)

[jmcintyre@montand.com](mailto:jmcintyre@montand.com)

*Attorneys for Titus Oil & Gas Production, LLC*

Tab 5



**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. 21252**

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

**Case No. 21253**

**AFFIDAVIT OF ALLEN FRIERSON**

I, being duly sworn on oath, state the following:

1. I am over the age of 18 and have the capacity to execute this Affidavit, which is based on my personal knowledge.

2. I am a petroleum geologist employed as the Geology Manager for Titus Oil & Gas Production, LLC (“Titus”) and familiar with the subject application and geology involved.

3. This affidavit is submitted in connection with the filings by Titus of the above-referenced compulsory pooling applications pursuant to 19.15.4.12.A(1) NMAC.

4. I have previously testified before the New Mexico Oil Conservation Division as an expert witness in petroleum geology matters. My credentials as a petroleum geologist have been accepted by the Division and made a matter of record. My education and work experience are as follows: I graduated from Washington & Lee University with a bachelor of science degree in geology. I received a master of science degree in geology from the Colorado School of Mines and a master of business administration degree from the University of Oklahoma. I have been employed at Titus as a petroleum geologist since 2017 to the present. Prior to working at Titus, I was with Devon Energy from 2013 to 2017. I have been working on New Mexico oil and gas matters for approximately five years.

5. **Exhibits B-1**, provided for each above-referenced application, are geological summaries for the proposed horizontal spacing units (“HSU”) and related wells. *See* Table of Contents (“TOC”) for the exhibit package.

6. **Exhibits B-2** are locator maps with the cross-sections indicated. *See* TOC.

7. **Exhibits B-3** include the spacing unit schematics for each of the above-referenced applications, which illustrate the location of each HSU for each corresponding application outlined by a red-hashed polygon; the approximate location(s) of the proposed well(s); and the wells in the two-well cross-section referenced in the stratigraphic cross-section exhibits (Exhibits B-6). *See* TOC.

8. **Exhibits B-4**, provided for each application, are structure maps. The red-hashed polygon in each structure map indicates the proposed HSU for each corresponding application. The contour intervals of the structure maps are 50’ contour intervals and are green lines on the map with depth labels. Data control points are posted in pink. I do not observe any faulting, pinch-outs, or other geologic impediments or hazards to developing these targeted intervals with horizontal wells. *See* TOC.

9. **Exhibits B-5**, provided for each application, are isopach maps, which are formatted similarly to the structure maps (Exhibits B-4). Contour intervals are 10’ on these maps. *See* TOC.

10. In Case No. 21252, which proposes the Bone Spring El Campeon Fed Com 322H (“322H”), **Exhibit B-5** indicates that these wells are placed in a zone that is consistently greater than 350’ thick for the entirety of the lateral.

11. In Case No. 21253, which proposes the Wolfcamp A El Campeon Fed Com 432H (“432H”), **Exhibit B-5** for the 432H indicates that these wells are placed in a zone that is consistently greater than 310’ thick for the entirety of the lateral.

12. Also in Case No. 21253, which proposes the Wolfcamp B El Campeon Fed Com 512H (“512H”), **Exhibit B-5** for the 512H indicates that these wells are placed in a zone that is consistently greater than 300’-thick for the entirety of the lateral.

13. **Exhibits B-5** further support that there are no interpreted faults, pinch-outs, or other geologic impediments or hazards to developing these targeted intervals with horizontal wells.

14. **Exhibits B-6**, provided for each application, are stratigraphic cross-sections portraying a triple combo log. In each **Exhibit B-6**, Track 1 is the gamma ray log, which is scaled from 0 to 150 api units. Track 2 consists of neutron (blue) and density (red) porosity logs scaled from 40% to -10%. The green shading on the density porosity log is greater than 6%. Track 3 is the deep resistivity log from 0.2 ohmm to 2000 ohmm. The red shading on the curve is greater than 20 ohmm. A combination of these logs was used to determine “pay” and select the landing zone for each well. The cross-sections identify the key tops used to evaluate reservoirs and landing targets for the proposed wells. Simplified wellbores are on the cross-sections showing the landing target intervals in the Northwest to Southeast stratigraphic cross-sections. *See TOC.*

15. **Exhibits B-7**, included for each application, contain gunbarrel diagrams depicting each well. These show the approximate landing zones in reference to the type logs for the area, and the associated spacing of the wellbores within the quarter-section width HSUs. *See TOC.*

16. The measured depths and true vertical depths for each well are approximately as follows:

	<u>MD</u>	<u>TVD</u>	<u>CASE NO.</u>
322H	20,420’	12,500’	21252
432H	20,680’	12,760’	21253
512H	20,970’	13,050’	21253

17. In Case No. 21252, which proposes the 322H, the true vertical depth of the target formation is approximately 12,137' (Top of the 3rd Bone Spring) to approximately 12,515' (Base of the 3rd Bone Spring) based on the Beckham 19 1 (API: 30025370) type log.

18. In Case No. 21253, the true vertical depth of the target formation for the 432H is approximately 12,645' (Top of the Wolfcamp A) to approximately 12,959' (Base of the Wolfcamp A) based on the Beckham 19 1 (API: 30025370) type log; and the true vertical depth of the target formation for the 512H is approximately 12,959' (Top of the Wolfcamp B) to approximately 13,337' (Base of the Wolfcamp B) based on the Beckham 19 1 (API: 30025370) type log.

19. Based on my geologic study of the area, I conclude the following:

- a. The horizontal spacing and proration units are justified from a geologic standpoint.
- b. There are no structural impediments or faulting that will interfere with horizontal development.
- c. Each quarter-quarter section in the units will contribute more or less equally to production.
- d. The preferred well orientation in this area is north-south. This is because the inferred orientation of the maximum horizontal stress is roughly east-west.

20. The Exhibits to this Affidavit were prepared by me, or compiled from Titus's business records.

21. The granting of this Application is in the interests of conservation and the prevention of waste.

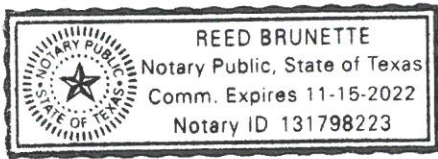
22. The foregoing is correct and complete to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NAUGHT

  
Allen Frierson

STATE OF TEXAS            )  
                                      )ss  
COUNTY OF TARRANT    )

Subscribed to and sworn before me this 18th day of August, 2020.



  
Notary Public

My Commission expires 11/15/2022.

Tab 6

Bone Spring Pooling

E2 W2

CASE NO. 21252

# Summary

## Bone Spring Pooling – Lea County, New Mexico

Titus Oil & Gas Production, LLC (“Titus”) 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 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: **El Campeon Fed Com 322H** well, to be horizontally drilled from an approximate surface hole location 579’ FSL and 2077’ FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1650’ FWL of Section 32, T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal wells.. The well will target the 3<sup>rd</sup> Bone Spring at an approximate True Vertical Depth of 12,500’.

The well will be drilled from north-to-south for a couple of reasons. Published literature related to the maximum horizontal stress in this part of the Delaware Basin supports a near east-to-west orientation; thus, preferred drilling orientation is orthogonal to this in order to complete a more successful stimulation. Also, this aligns with the remainder of Titus’ planned development in the adjoining tracts, and therefore, doesn’t strand any acreage or reserves.

No depth severances apply.

See attached exhibits for spacing unit schematic, gunbarrel/lateral trajectory schematic, and horizontal spacing unit cross-section.

EXHIBIT B-1  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020



# Locator Map

With Cross-Section



Pooling outline



Cross-Section  
line

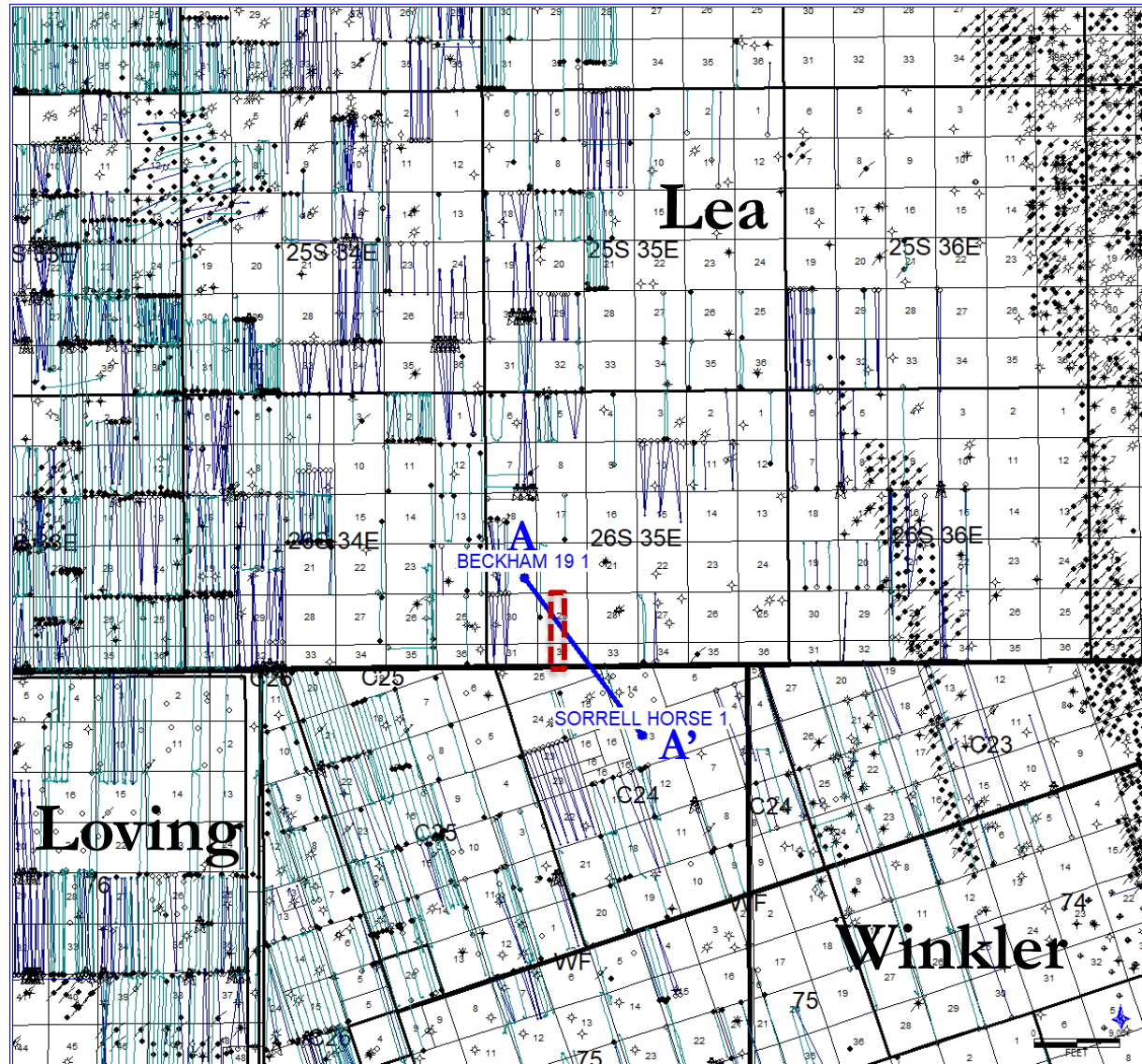





EXHIBIT B-2  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020

# Spacing Unit Schematic

With Approximate Well Location

-  Pooling outline
-  Cross-Section line
-  El Campeon Fed Com 322H Wellbore

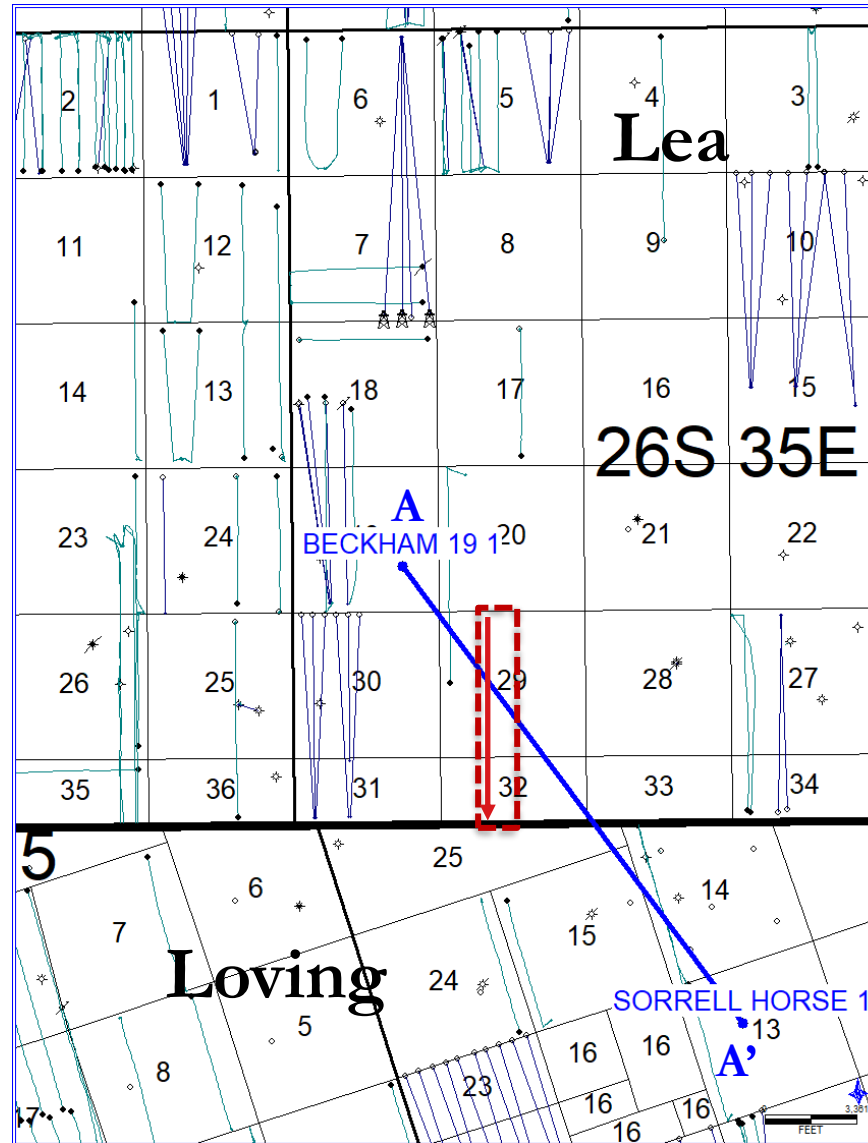







EXHIBIT B-3  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020

# 3<sup>rd</sup> Bone Spring Sand Structure Map

Contour Interval: 50 ft.

Subsea Depth

-  Pooling outline
-  Cross-Section line
-  El Campeon Fed Com 322H Wellbore
-  3<sup>rd</sup> Bone Spring Sand structure contours
-  -8,900 Control points

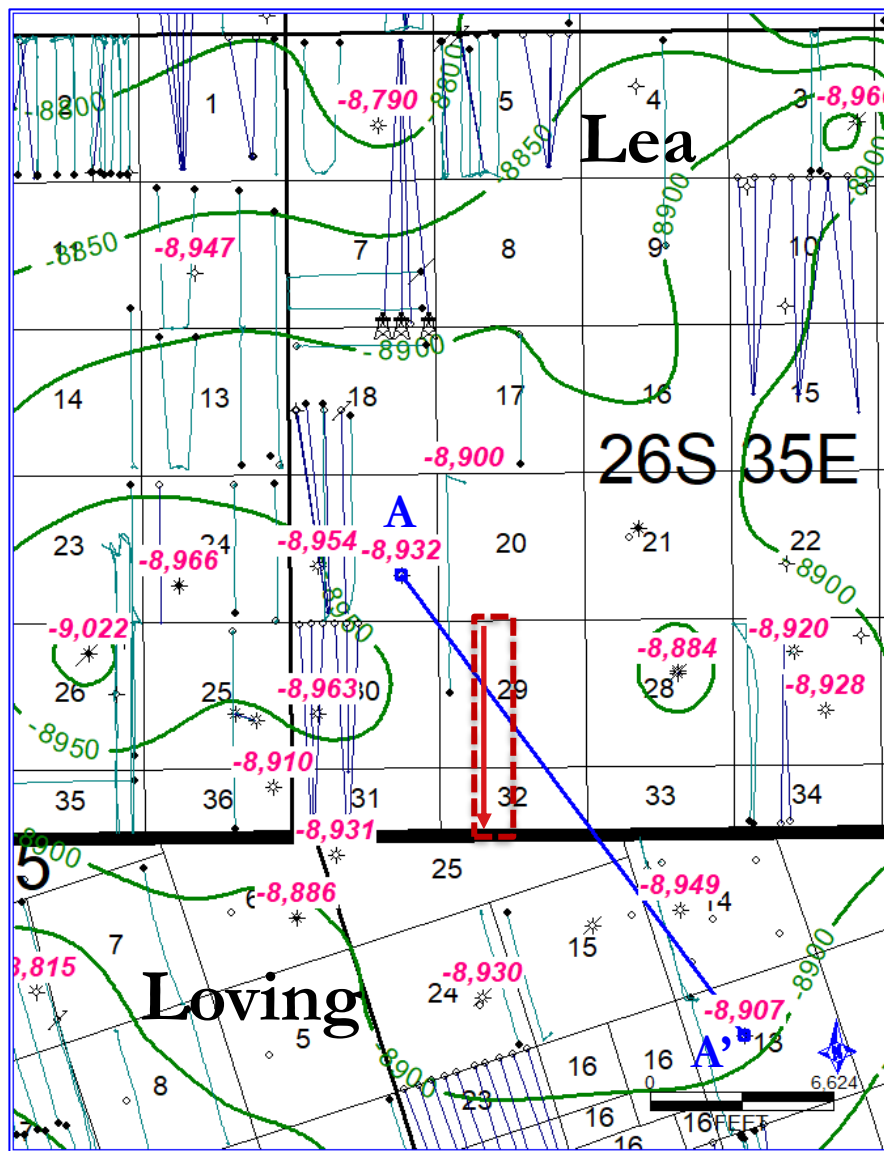






EXHIBIT B-4  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020

# 3<sup>rd</sup> Bone Spring Sand Isopach Map

Contour Interval: 10 ft.

-  Pooling outline
-  Cross-Section line
-  El Campeon Fed Com 322H Wellbore
-  3<sup>rd</sup> Bone Spring Sand isopach contours
- 300 Control points

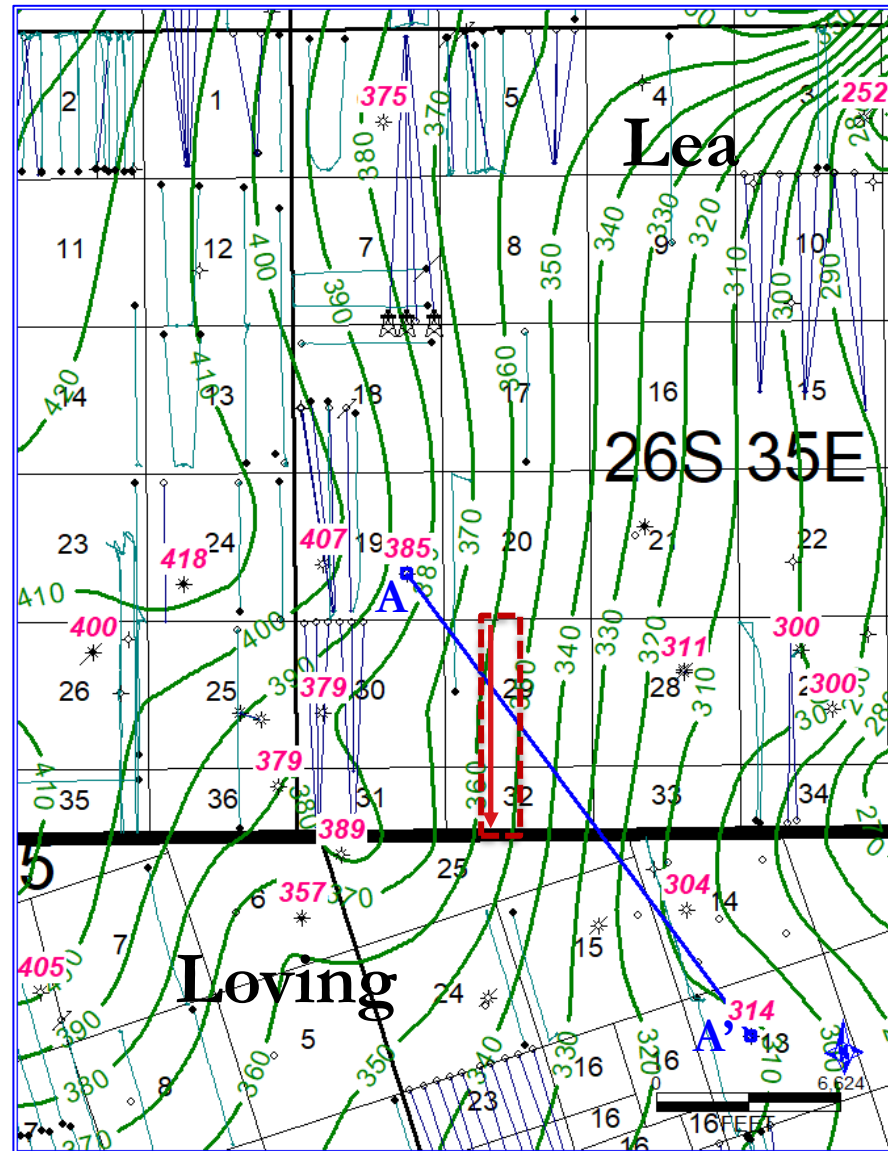


EXHIBIT B-5  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020

# HSU Cross-Section

## Petrophysical Logs Support 3<sup>rd</sup> Bone Spring Sand Target / Landing Zone

A

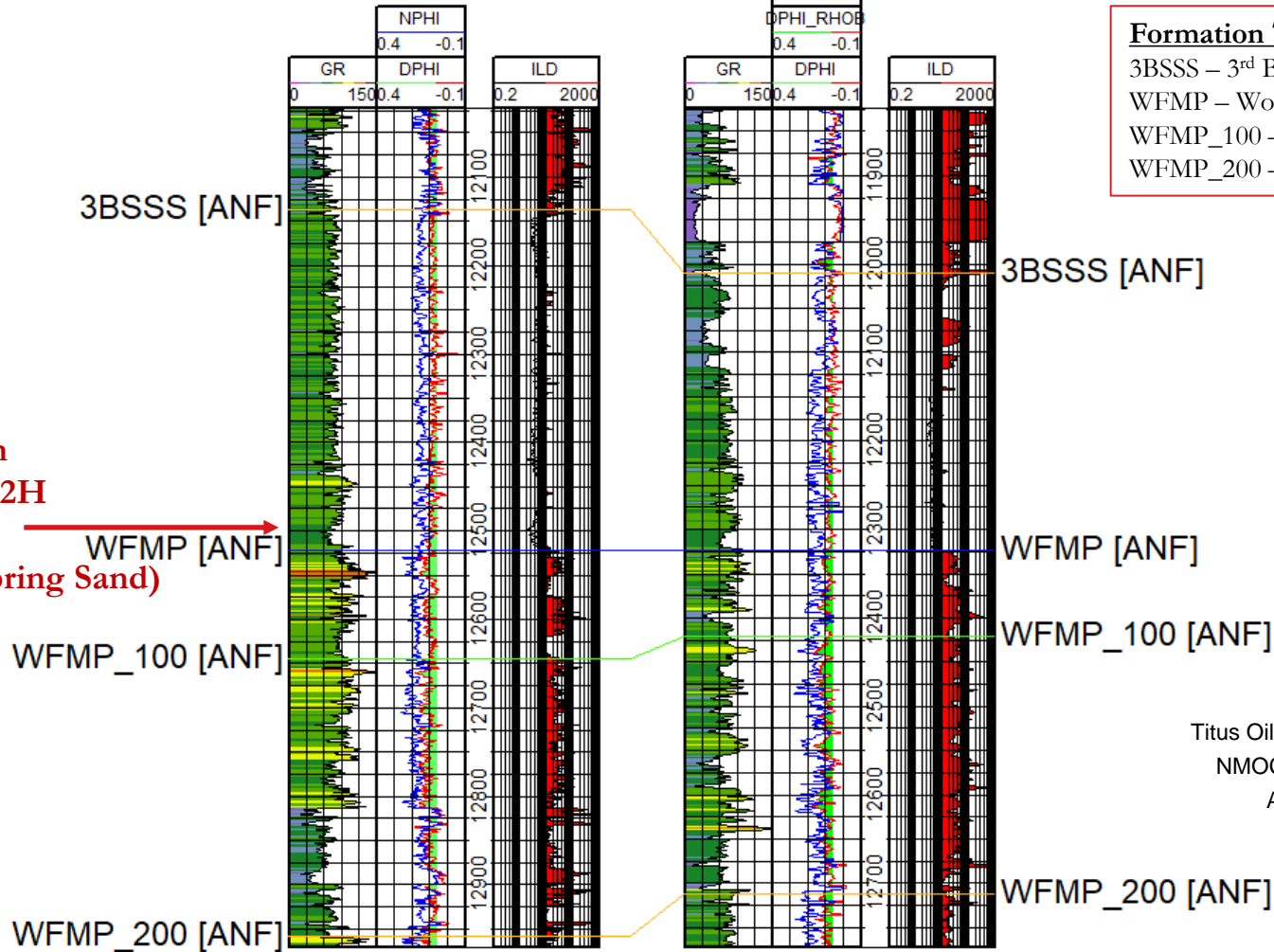
T26S R35E S19  
30025370800000  
BECKHAM 19 1



BC24 S13  
42301303570000  
SORRELL HORSE 1



A'



### Formation Top Key:

3BSSS – 3<sup>rd</sup> Bone Spring Sandstone  
WFMP – Wolfcamp  
WFMP\_100 – Wolfcamp A  
WFMP\_200 – Wolfcamp B

El Campeon  
Fed Com 322H  
Target  
(3<sup>rd</sup> Bone Spring Sand)

EXHIBIT B-6  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020

# Titus' El Campeon Horizontal Spacing Unit Gunbarrel

El Campeon Fed Com 322H – 3<sup>rd</sup> Bone Spring Sand target

EXHIBIT B-7  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21252  
August 20, 2020

El Campeon  
HSU

Beckham 19 1  
Sec. 19 – 26S – 35E

*LOWER BRUSHY*

*LEONARD A*

*LEONARD B*

*LEONARD C*

*1<sup>ST</sup> BONE SPRING SAND*

*2<sup>ND</sup> BONE SPRING SHALE*

*2<sup>ND</sup> BONE SPRING LIME*

*2<sup>ND</sup> BONE SPRING SAND*

*3<sup>RD</sup> BONE SPRING LIME*

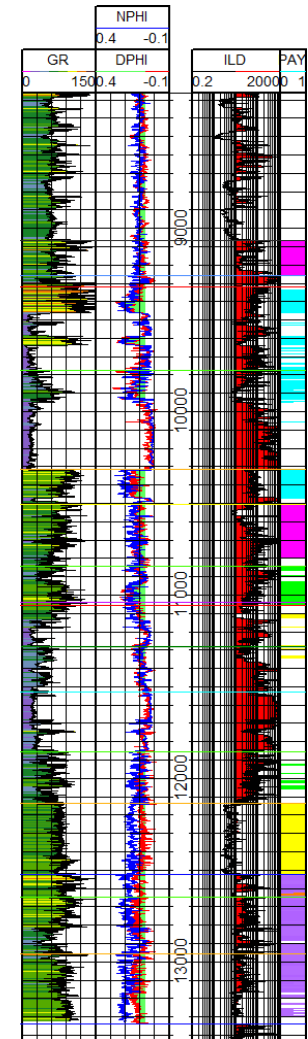
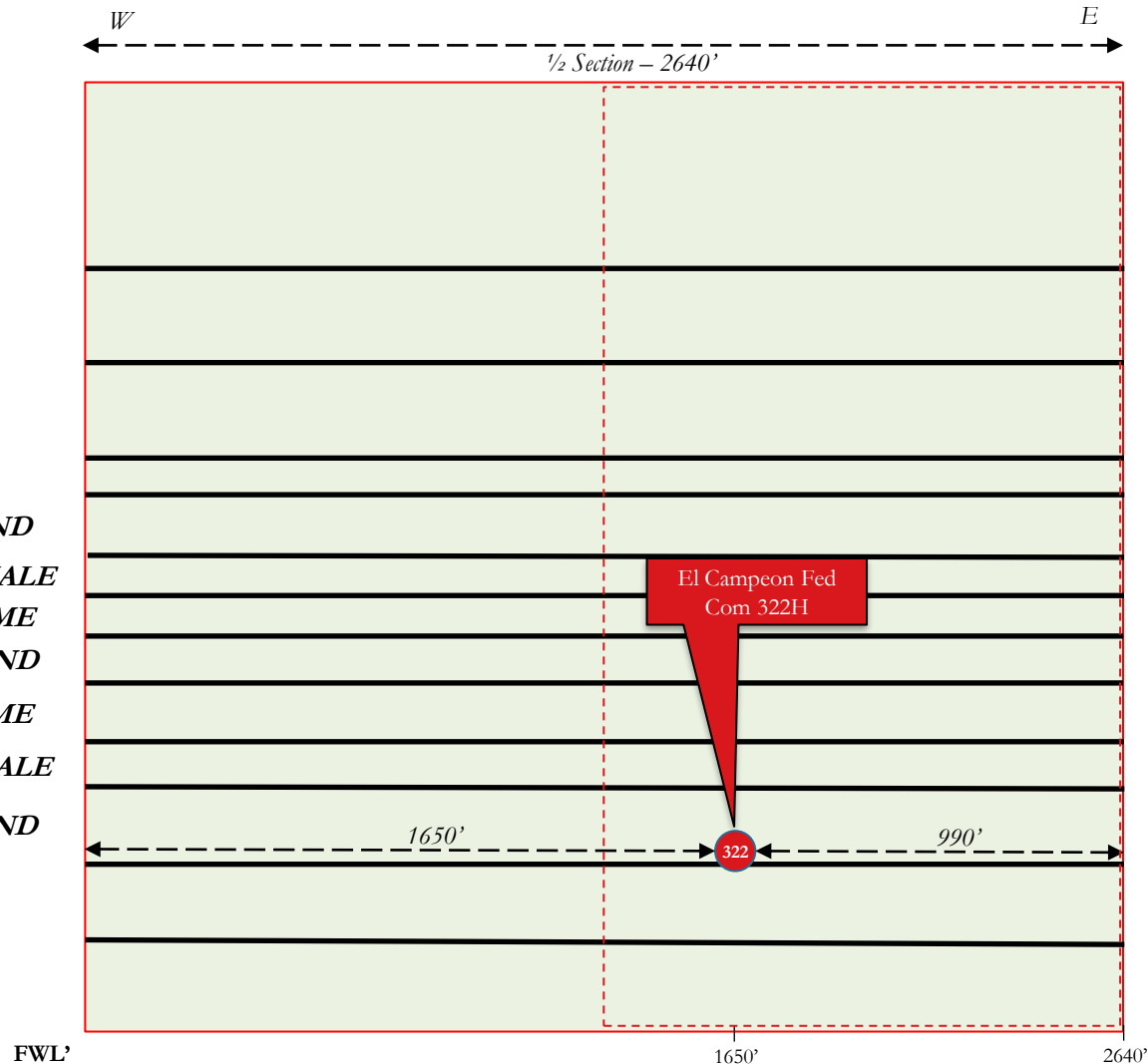
*3<sup>RD</sup> BONE SPRING SHALE*

*3<sup>RD</sup> BONE SPRING SAND*

*WOLFCAMP XY*

*WOLFCAMP A*

*WOLFCAMP B*



\*Depth ticks = 100'

Tab 7

Wolfcamp Pooling

E2 W2

CASE NO. 21253



# Summary

## Wolfcamp Pooling – Lea County, New Mexico

Titus Oil & Gas Production, LLC (“Titus”) 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 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) **El Campeon Fed Com 432H** well, to be horizontally drilled from an approximate surface hole location 579’ FSL and 2137’ FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10’ FSL and 2310’ FWL of Section 32, T26S-R35E, and (2) **El Campeon Fed Com 512H** well, to be horizontally drilled from an approximate surface hole location 579’ FSL and 2107’ FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10’ FSL and 1850’ FWL of Section 32, T26S-R35E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal wells. The **El Campeon Fed Com 432H** will target the Wolfcamp A Shale at an approximate True Vertical Depth of 12,760’. The **El Campeon Fed Com 512H** will target the Wolfcamp B Shale at an approximate True Vertical Depth of 13,050’.

The well will be drilled from north-to-south for a couple of reasons. Published literature related to the maximum horizontal stress in this part of the Delaware Basin supports a near east-to-west orientation; thus, preferred drilling orientation is orthogonal to this in order to complete a more successful stimulation. Also, this aligns with the remainder of ‘Titus’ planned development in the adjoining tracts, and therefore, doesn’t strand any acreage or reserves.

No depth severances apply.

See attached exhibits for spacing unit schematic, gunbarrel/lateral trajectory schematic, and horizontal spacing unit cross-section.

EXHIBIT B-1  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21253  
August 20, 2020

# Locator Map

With Cross-Section



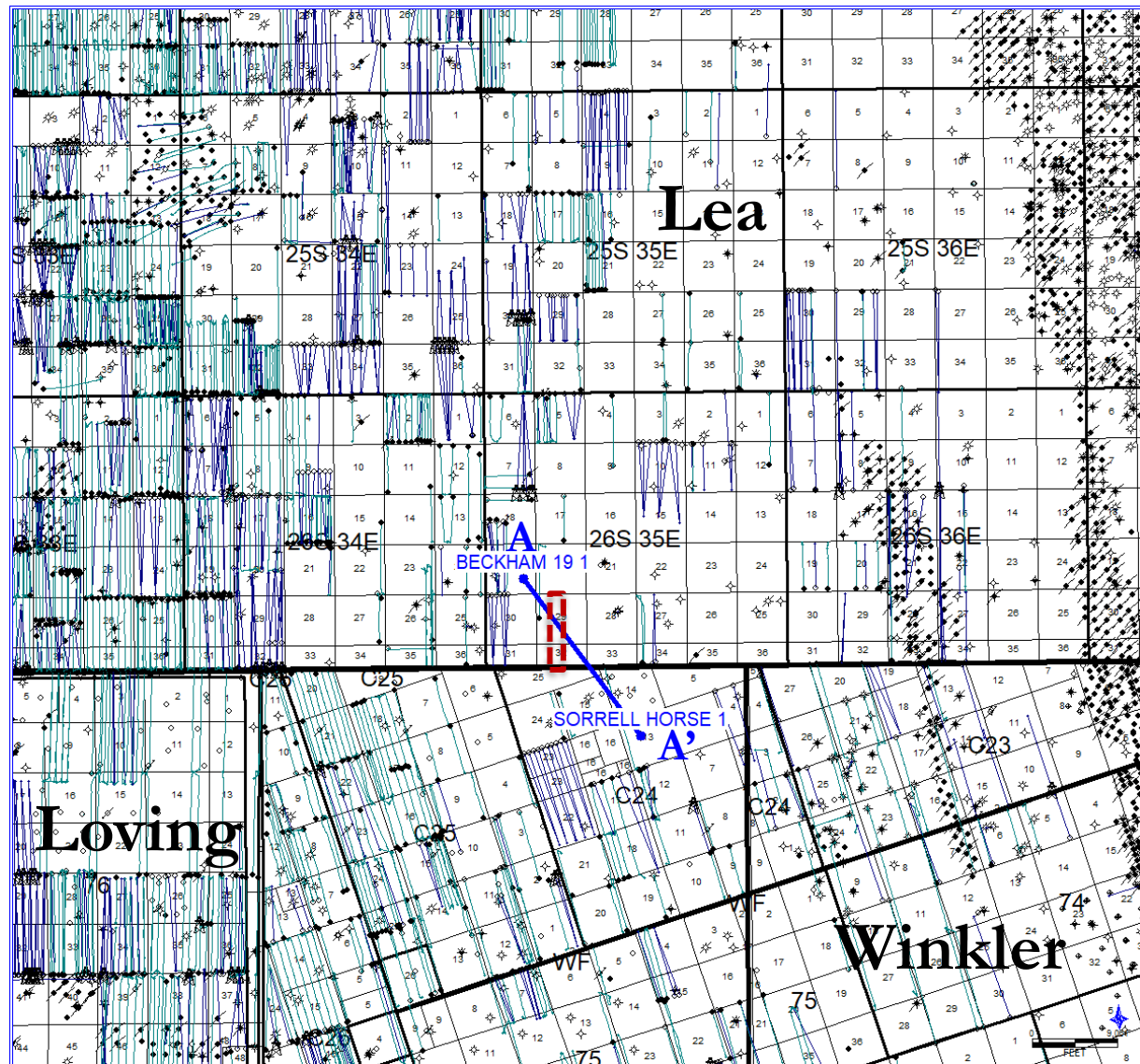
-  Pooling outline
-  Cross-Section line

EXHIBIT B-2

Titus Oil & Gas Production, LLC





NMOCD Case No. 21253

August 20, 2020



# Spacing Unit Schematic

With Approximate Well Location

-  Pooling outline
-  Cross-Section line
-  El Campeon Fed Com 432H Wellbore
-  El Campeon Fed Com 512H Wellbore

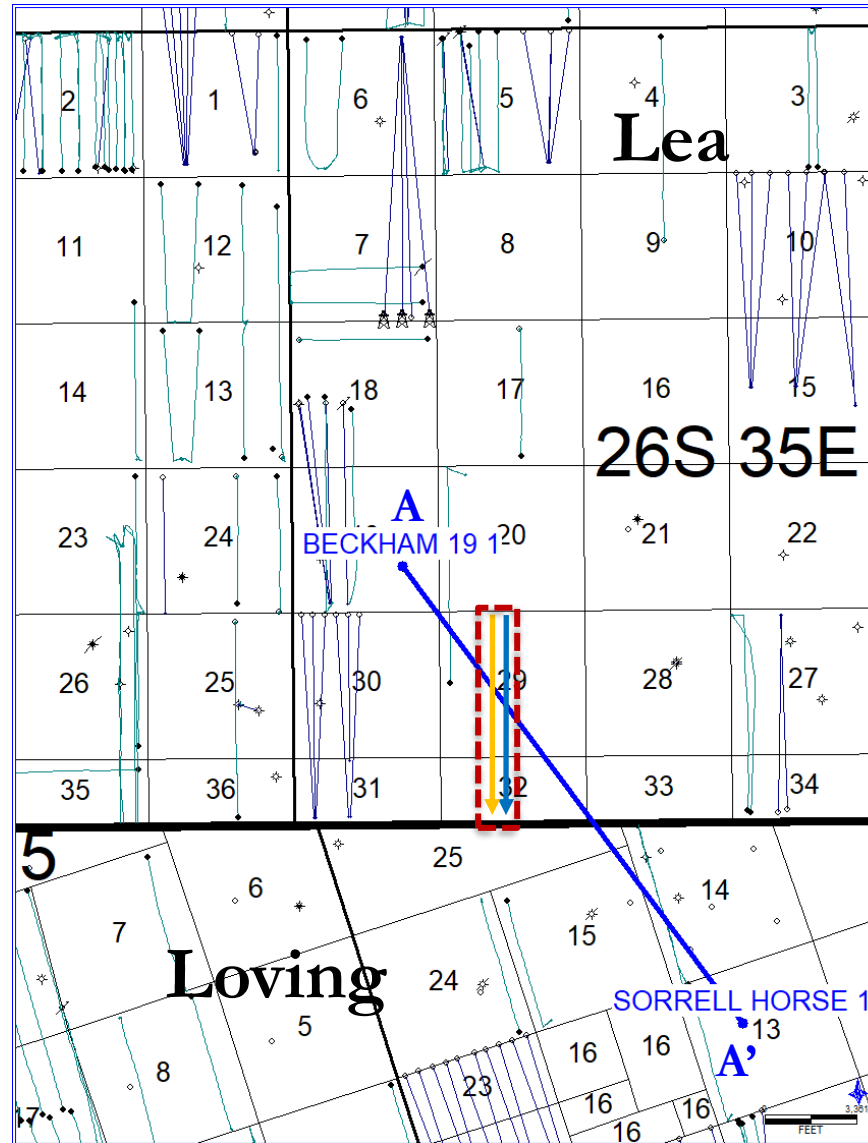


EXHIBIT B-3  
 Titus Oil & Gas Production, LLC  
 NMOCD Case No. 21253  
 August 20, 2020

# Wolfcamp Structure Map

Contour Interval: 50 ft.

Subsea Depth

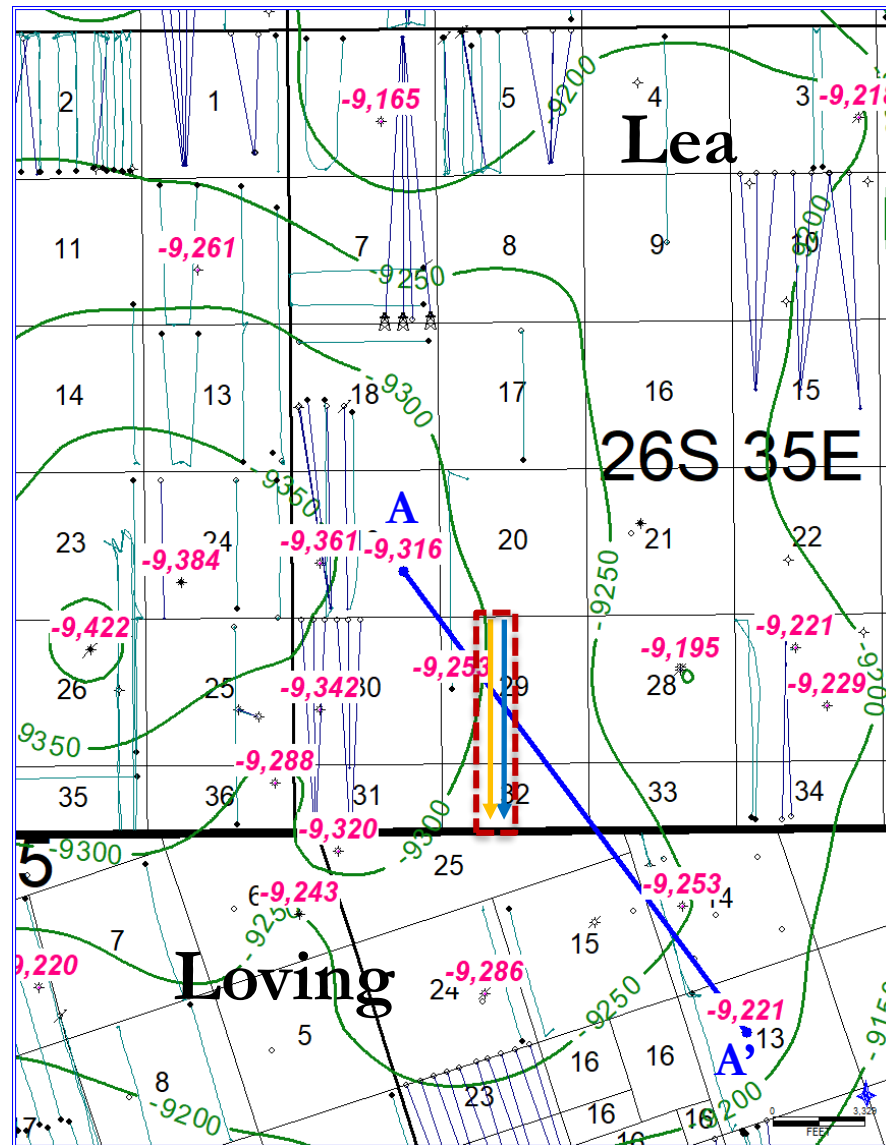
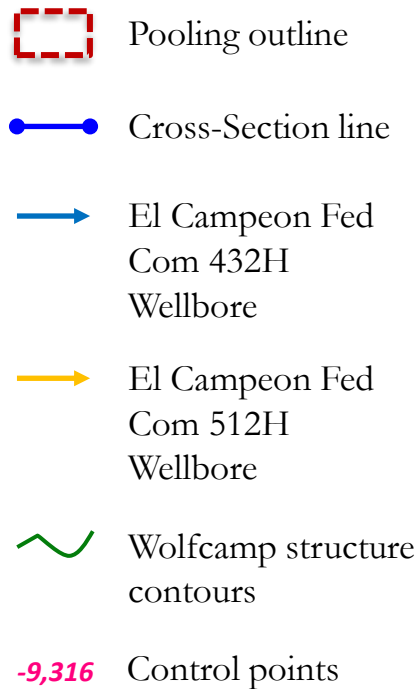






EXHIBIT B-4  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21253  
August 20, 2020

# Wolfcamp A Isopach Map

Contour Interval: 10 ft.

-  Pooling outline
-  Cross-Section line
-  El Campeon Fed Com 432H Wellbore
-  Wolfcamp isopach contours
- 300** Control points

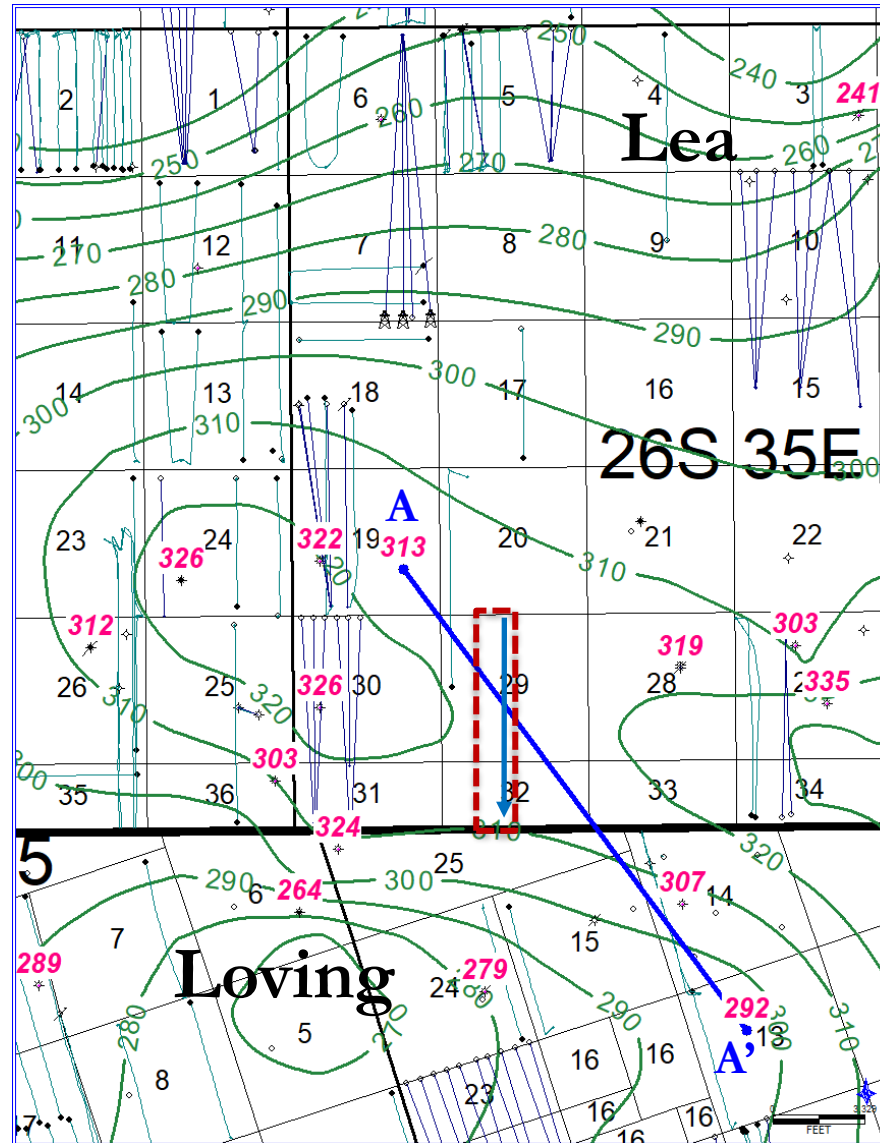





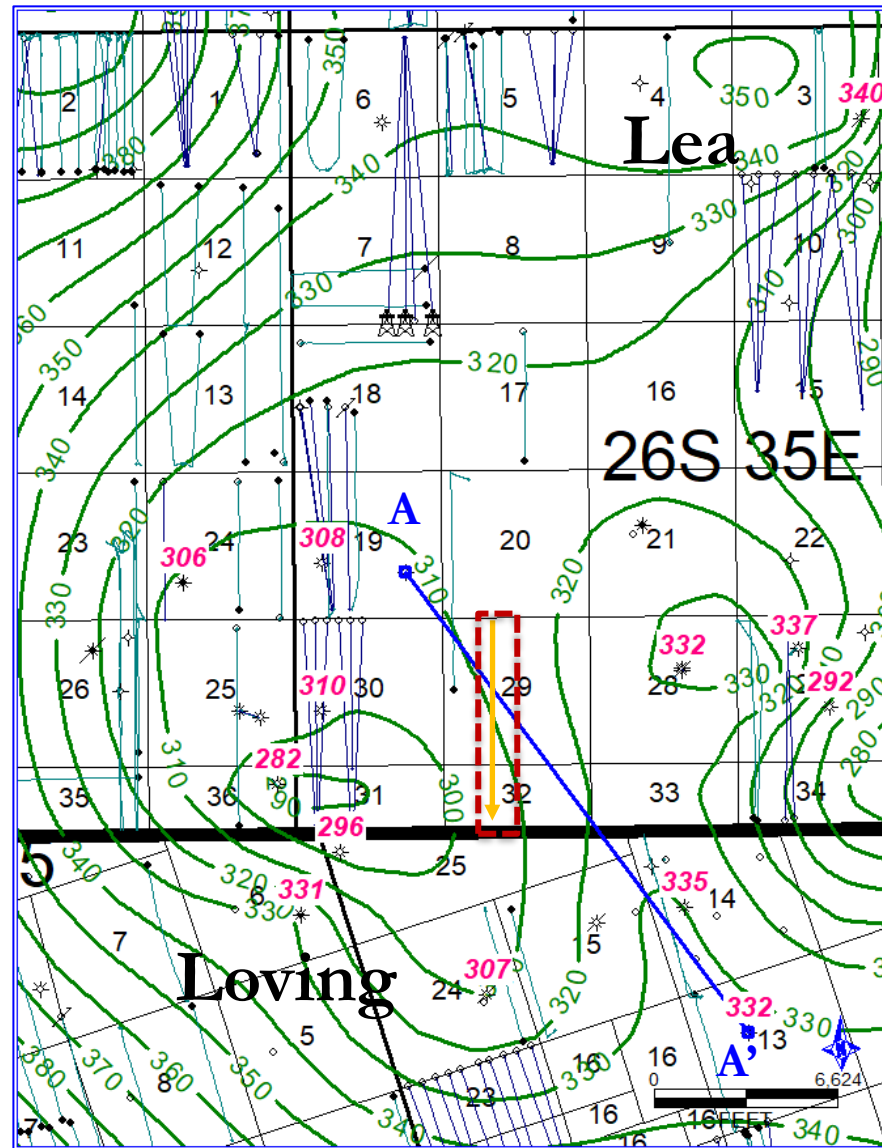


EXHIBIT B-5  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21253  
August 20, 2020

# Wolfcamp B Isopach Map

Contour Interval: 10 ft.

-  Pooling outline
-  Cross-Section line
-  El Campeon Fed  
Com 512H  
Wellbore
-  Wolfcamp isopach  
contours
-  Control points



# HSU Cross-Section

## Petrophysical Logs Support Wolfcamp A & B Shale Targets / Landing Zones

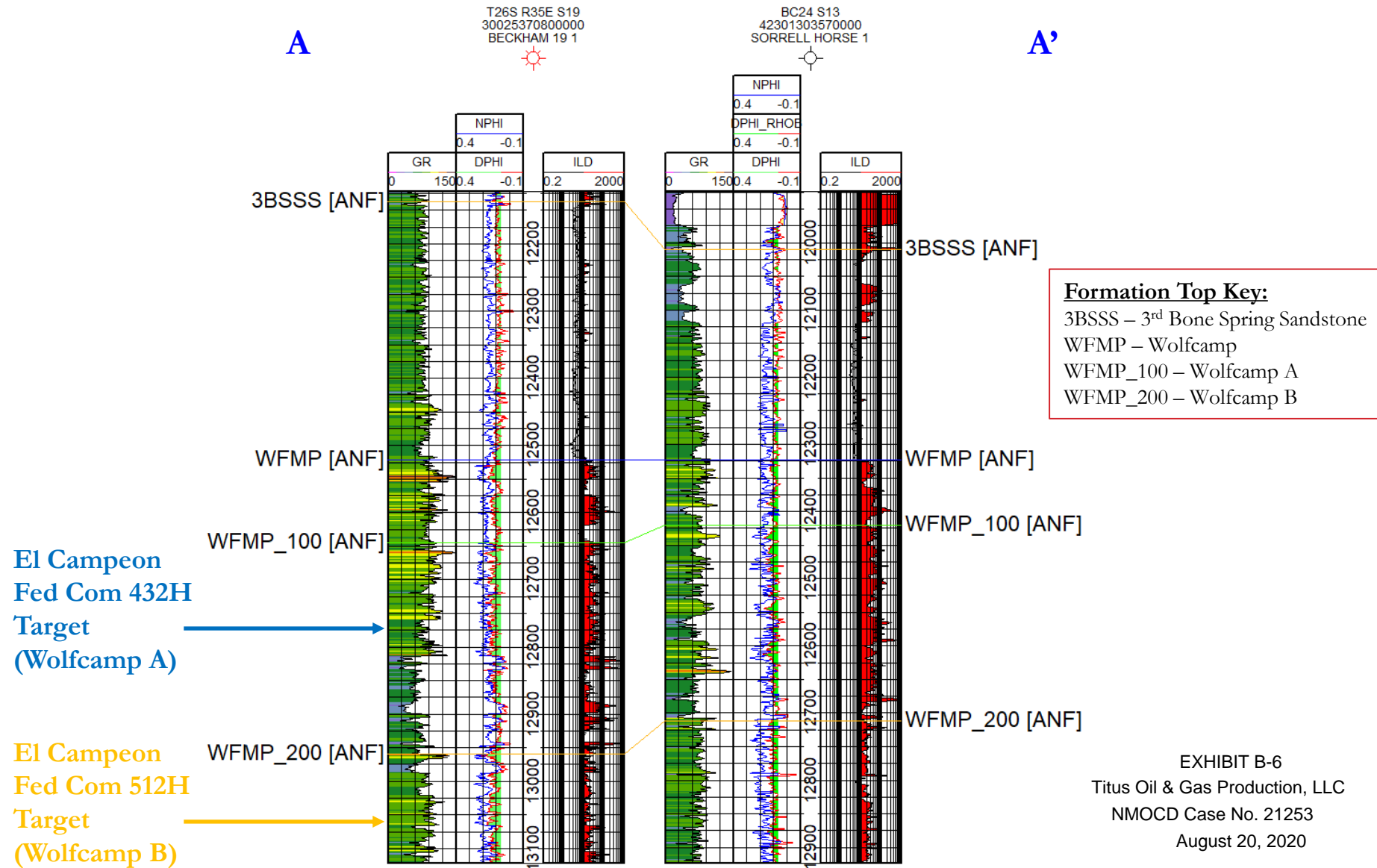


EXHIBIT B-6  
 Titus Oil & Gas Production, LLC  
 NMOCD Case No. 21253  
 August 20, 2020



# Titus' El Campeon Horizontal Spacing Unit Gunbarrel

El Campeon Fed Com 432H & 512H – Wolfcamp A & B Targets

EXHIBIT B-7  
Titus Oil & Gas Production, LLC  
NMOCD Case No. 21253  
August 20, 2020

## El Campeon HSU

*LOWER BRUSHY*

*LEONARD A*

*LEONARD B*

*LEONARD C*

*1<sup>ST</sup> BONE SPRING SAND*

*2<sup>ND</sup> BONE SPRING SHALE*

*2<sup>ND</sup> BONE SPRING LIME*

*2<sup>ND</sup> BONE SPRING SAND*

*3<sup>RD</sup> BONE SPRING LIME*

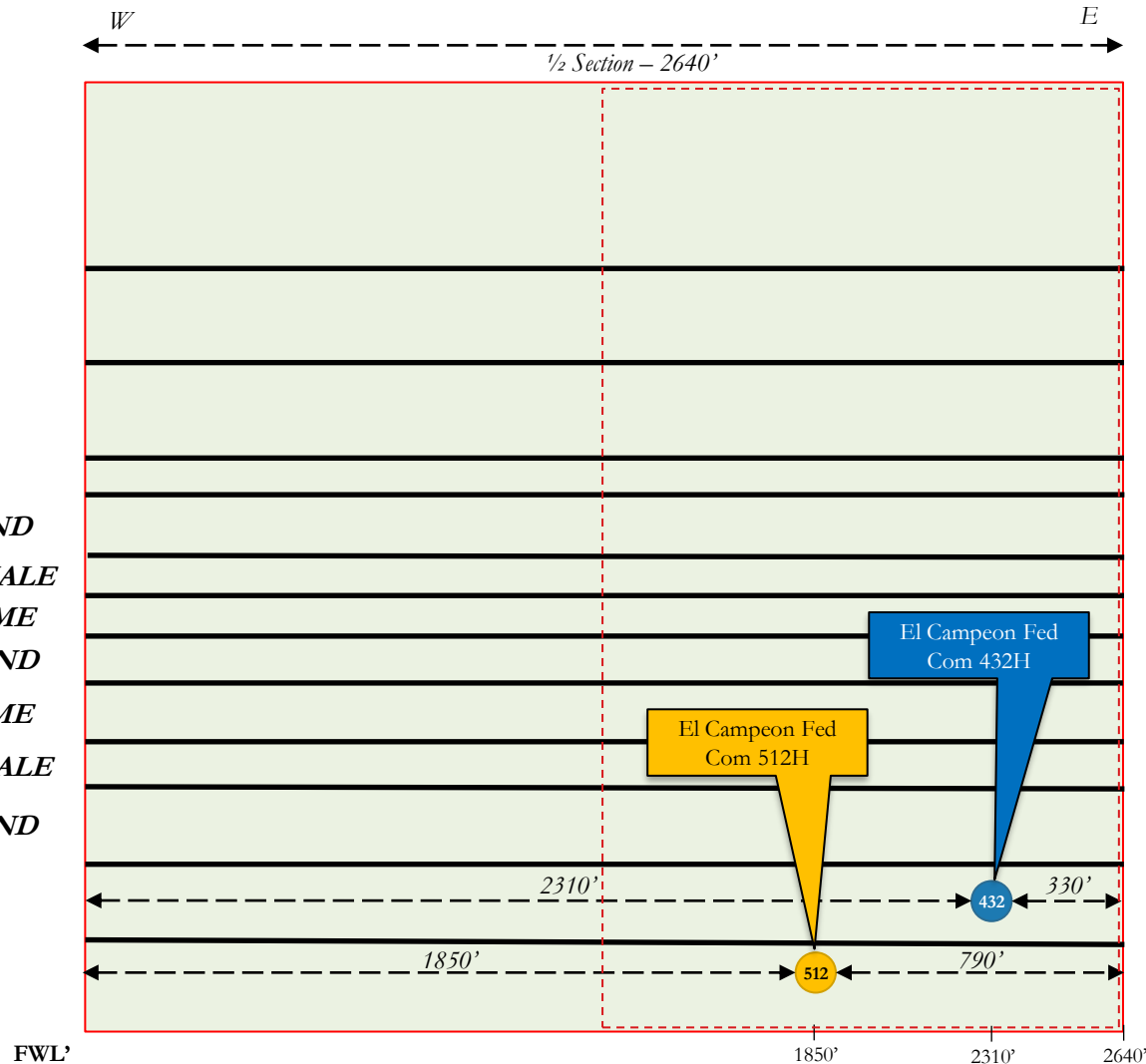
*3<sup>RD</sup> BONE SPRING SHALE*

*3<sup>RD</sup> BONE SPRING SAND*

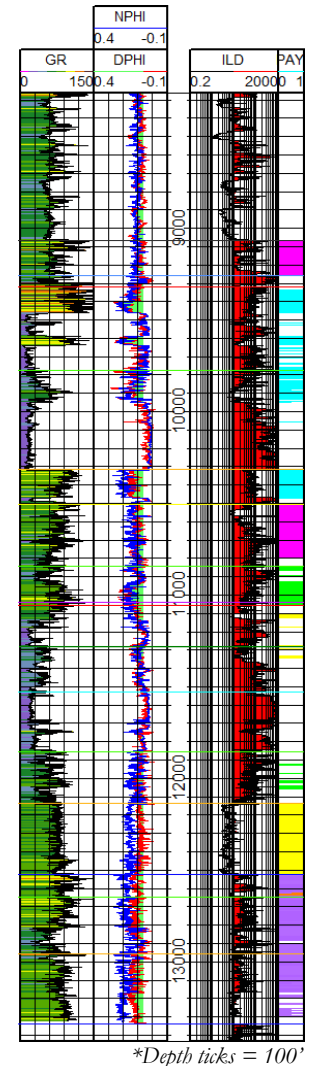
*WOLFCAMP XY*

*WOLFCAMP A*

*WOLFCAMP B*



## Beckham 19 1 Sec. 19 – 26S – 35E





Tab 8

**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. 21252**

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

**Case No. 21253**

**AFFIDAVIT OF NOTICE**

STATE OF NEW MEXICO   )  
  ) ss.  
COUNTY OF SANTA FE    )

I, Sharon T. Shaheen, attorney for TITUS OIL & GAS PRODUCTION, LLC, ("Titus"), the Applicant in the above-captioned matter, being first duly sworn, upon oath and state the following:

2. I caused notice of the application to be sent by certified mail through the United States Postal Service ("USPS") on July 31, 2020, to all uncommitted interest owners sought to be pooled in this proceeding. Evidence of mailing to all parties and proof of receipt to all of the parties is attached hereto as Exhibit A. In an abundance of caution, notice was directed to all owners to whom notice was mailed by publication in the Hobbs News-Sun on August 6, 2020, which is reflected in the Affidavit of Publication attached hereto as Exhibit B. Exhibit B demonstrates to my satisfaction that those owners who did not receive personal notice through the certified mailing were properly served by publication.

3. Titus has conducted a good faith, diligent effort to find the names and correct addresses for the interest owners entitled to receive notice of the Application filed herein.

EXHIBIT C

Sharon T. Shaheen  
SHARON T. SHAHEEN

SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of August, 2020.



Lorraine B. Palacios  
Notary Public

My Commission Expires:

04-30-2022

Certified/RRR  
Mailings - Cards  
Returned

USPS TRACKING #



9590 9402 1257 5246 5839 74

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•



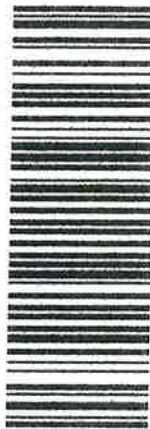
MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STS

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE  
**CERTIFIED MAIL™**



7014 0150 0000 5153 0330  
7014 0150 0000 5153 0330

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total		
Sent	WilderPan, LLC	
Street or P.O.	P.O. Box 50088	
City	Midland, TX 79710	



PS Form 3800, August 2006

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

WilderPan, LLC  
P.O. Box 50088  
Midland, TX 79710



9590 9402 1257 5246 5839 74

Article Number (Transfer from service label)

7014 0150 0000 5153 0330

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature 	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name) Dexter Bonnell	C. Date of Delivery
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	

**3. Service Type**

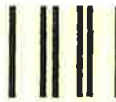
- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                         | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery     | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®              | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery      | <input checked="" type="checkbox"/> Return Receipt for Merchandise  |
| <input type="checkbox"/> Collect on Delivery                     | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Restricted Delivery                     |   |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

EXHIBIT A

USPS TRACKING #



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 1257 5246 5839 67

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box\*



MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STS

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS; FOLD AT DOTTED LINE  
**CERTIFIED MAIL™**



7014 0150 0000 5153 0347  
7014 0150 0000 5153 0347

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

Postage \$  
Certified Fee  
Return Receipt Fee  
(Endorsement Required)  
Restricted Delivery Fee  
(Endorsement Required)  
Total Postage



Sent To CrownRock Minerals, LP  
Street, or PO Box P.O. Box 53310  
City, State Midland, TX 79710

PS Form

See Reverse for Instructions

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CrownRock Minerals, LP  
P.O. Box 53310  
Midland, TX 79710



9590 9402 1257 5246 5839 67

2. Article Number (Transfer from service label)

7014 0150 0000 5153 0347

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Ellenie Arampato*

☐ Agent  
☐ Addressee

B. Received by (Printed Name)

*Ellenie Arampato*

C. Date of Delivery

*8/4/20*

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt





9590 9402 1257 5246 5839 29

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

MONTGOMERY  
& ANDREWS  
LAW FIRMP.O. Box 2307  
Santa Fe, New Mexico 87504-2307Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STSFirst-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE  
CERTIFIED MAIL®7015 1730 0000 9793 9230  
7015 1730 0000 9793 9230U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail OnlyFor delivery information, visit our website at [www.usps.com](http://www.usps.com)

Certified Mail Fee

Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$

Postage

\$ Total Post

\$ Sent To

Street and

City, State

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City, State

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City, State

Russell H. Wickman, et ux,  
Mary Kathryn Wickman  
2505 Princeton  
Midland, TX 79701

PS Form 3811, July 2015 PSN 7530-02-000-9053

See reverse for instructions

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Russell H. Wickman, et ux,  
Mary Kathryn Wickman  
2505 Princeton  
Midland, TX 79701

9590 9402 1257 5246 5839 29

(Transfer from service label)

7015 1730 0000 9793 9230

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

D-19 40

C. Date of Delivery

8-3-20

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☒ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

USPS TRACKING #



9590 9402 1257 5246 5839 12



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•



MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STS

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL®



7015 1730 0000 9793 9247  
7015 1730 0000 9793 9247

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy)

☐ Return Receipt (electronic)

☐ Certified Mail Restricted Delivery

☐ Adult Signature Required

☐ Adult Signature Restricted Delivery

Postage

\$

Total

\$

Sent

Street

City, State

ZIP+4

Marathon  
5555 San Felipe Street  
Houston, TX 77056-2723

PS Form 3811, July 2015 PSN 7530-02-000-9053

See Reverse for Instructions

SANTA FE NM  
JUL 31 2015  
USPO 87504

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Marathon  
5555 San Felipe Street  
Houston, TX 77056-2723



9590 9402 1257 5246 5839 12

2. Article Number (Transfer from service label)

7015 1730 0000 9793 9247

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  
If YES, enter delivery address below:

☐ Yes

☒ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Restricted Delivery

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☒ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

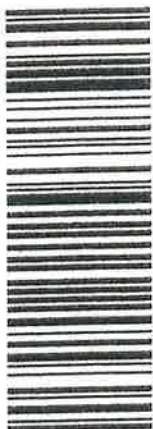




9590 9402 1257 5246 5838 82

**United States  
Postal Service**

• Sender: Please print your name, address, and ZIP+4® in this box•

**MONTGOMERY  
& ANDREWS**  
LAW FIRMP.O. Box 2307  
Santa Fe, New Mexico 87504-2307Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STSFirst-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS FOLD AT DOTTED LINE  
**CERTIFIED MAIL**7015 1730 0000 9775 0682  
7015 1730 0000 9775 0682**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
Domestic Mail OnlyFor delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

## Certified Mail Fee

Extra Services & Fees (check box, add fee as appropriate)	\$
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

## Postage

\$

Total

\$

Sent

Street

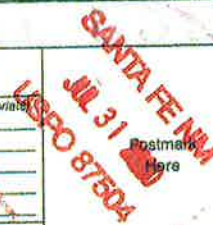
City

State

ZIP+4

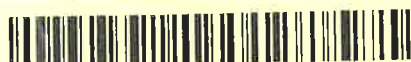
PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

Paul R. Barwis  
c/o Dutton, Harris & Co.  
P.O. Box 230  
Midland, TX 79702**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Paul R. Barwis  
c/o Dutton, Harris & Co.  
P.O. Box 230  
Midland, TX 79702

9590 9402 1257 5246 5838 82

## 2. Article Number (Transfer from service label)

7015 1730 0000 9775 0682

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

X

☐ Agent☐ Addressee

## B. Received by (Printed Name)

Session Rodriguez

## C. Date of Delivery

## D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☒ No

## 3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery☐ Signature Confirmation Restricted Delivery



USPS TRACKING#



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 1257 5246 5838 68

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•



MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STS

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL®



7015 1730 0000 9775 0705  
7015 1730 0000 9775 0705

## U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total

\$

Sent

Street

City, S

State

ZIP+4

PS Form

Sandra Mary Borden  
8530 Mill Run Road  
Athens, TX 75751

SANTA FE NM  
JUL 31 2010  
USPO 87504

See Reverse for Instructions

### SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Sandra Mary Borden  
8530 Mill Run Road  
Athens, TX 75751



9590 9402 1257 5246 5838 68

2. Article Number (Transfer from service label)

7015 1730 0000 9775 0705

### COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery

☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Mail Restricted

☐ Collect on Delivery

Restricted Delivery

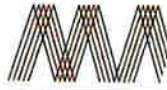
Restrictive Delivery



9590 9402 1257 5246 5838 75

**United States  
Postal Service**

\* Sender: Please print your name, address, and ZIP+4® in this box\*

**MONTGOMERY  
& ANDREWS**  
LAW FIRMP.O. Box 2307  
Santa Fe, New Mexico 87504-2307Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STSFirst-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.  
**CERTIFIED MAIL®**7015 1730 0000 9775 0699  
7015 1730 0000 9775 0699**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
Domestic Mail OnlyFor delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

\$

Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$☐ Return Receipt (electronic) \$☐ Certified Mail Restricted Delivery \$☐ Adult Signature Required \$☐ Adult Signature Restricted Delivery \$

Postage:

\$

Total F

\$

Sent To

Street

City, St

Jareed Partners, Ltd.

P.O. Box 51451

Midland, TX 79710

PS Form 3800, April 2015 PSN 7530-02-000-9057

See Reverse for Instructions

SANTA FE, NM  
JUL 31 2020  
USPO 87504  
Postmark Here**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jareed Partners, Ltd.  
P.O. Box 51451  
Midland, TX 79710

9590 9402 1257 5246 5838 75

2. Article Number (Transfer from service label)

7015 1730 0000 9775 0699

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Lea Lavea

C. Date of Delivery

8-5-20

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Restricted Delivery





9590 9402 1257 5246 5838 44

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

MONTGOMERY  
& ANDREWS  
LAW FIRMP.O. Box 2307  
Santa Fe, New Mexico 87504-2307Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STSFirst-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLLOW DOTTED LINE.  
**CERTIFIED MAIL®**7015 1730 0000 9775 0729  
7015 1730 0000 9775 0729U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail OnlyFor delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

\$

Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$☐ Return Receipt (electronic) \$☐ Certified Mail Restricted Delivery \$☐ Adult Signature Required \$☐ Adult Signature Restricted Delivery \$

Postage

\$

Total

\$

Sent 1

Street

City, \$

Harry A. Miller III, individually and as  
independent Executor of the Estate of  
Harry A. Miller, Jr.  
1402 Foxwood Cove  
Austin, TX 78704

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

SANTA FE, NM  
JUL 31 2020  
USPO 87504

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Harry A. Miller III, individually and as  
independent Executor of the Estate of  
Harry A. Miller, Jr.  
1402 Foxwood Cove  
Austin, TX 78704

9590 9402 1257 5246 5838 44

## 2. Article Number (Transfer from service label)

7015 1730 0000 9775 0729

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

☐ Agent☒ Addressee

## B. Received by (Printed Name)

H. A. Miller

## C. Date of Delivery

7/31/20

D. Is delivery address different from Item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

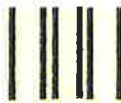
## 3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Registered Mail Restricted Delivery☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

USPS TRACKING #



9590 9402 1257 5246 5838 37



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•



MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STS

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.  
**CERTIFIED MAIL®**



7015 1730 0000 9775 0736  
7015 1730 0000 9775 0736

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total

\$

Sent

Street

City

Bureau of Land Management  
625 E. Greene Street  
Carlsbad, NM 88220-6292

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

SANTA FE NM  
JUL 31 2015  
USPO 8504

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bureau of Land Management  
625 E. Greene Street  
Carlsbad, NM 88220-6292



9590 9402 1257 5246 5838 37

2. Article Number (Transfer from service label)

7015 1730 0000 9775 0736

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*Chrismae Gray*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

*Chrismae Gray*

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Insured Mail

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☒ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



USPS TRACKING #



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 1257 5246 5838 20

United States  
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box •



MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307  
Santa Fe, New Mexico 87504-2307

Titus/El Campeon Fed Com  
(21252 & 21253)  
15412-2001/STS

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.



7015 1730 0000 9775 0743  
7015 1730 0000 9775 0743

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total

\$

Sent To

Street

City, S

State Land Office  
310 Old Santa Fe Trail  
Santa Fe, NM 87501

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

SANTA FE NM  
JUL 31 2015  
USPO 87504

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

State Land Office  
310 Old Santa Fe Trail  
Santa Fe, NM 87501



9590 9402 1257 5246 5838 20

2. Article Number (Transfer from service label)

7015 1730 0000 9775 0743

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

**3. Service Type**

- ☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail

- ☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☒ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Certified Mailings/RRR  
Cards Not Returned

USPS TRACKING #



9590 9402 1257 5246 5839 50

United States  
Postal Service

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Permit No. G-10

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7014 0150 0000 5153 0354  
7014 0150 0000 5153 0354

U.S. Postal Service™  
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Certified Fee  
Return Receipt Fee  
(Endorsement Required)  
Restricted Delivery Fee  
(Endorsement Required)

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Sent To  
Street, #  
or PO B  
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Fortis Minerals  
1111 Bagby Street  
Suite 2150  
Houston, TX 77002

PS Form 3800, August 2006

See back for instructions



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Fortis Minerals  
1111 Bagby Street  
Suite 2150  
Houston, TX 77002



9590 9402 1257 5246 5839 50

2. Article Number (Transfer from service label)

7014 0150 0000 5153 0354

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



USPS TRACKING #



9590 9402 1257 5246 5839 43

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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS - FOLD AT DOTTED LINE

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7015 1730 0000 9793 9216  
7015 1730 0000 9793 9216

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Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy)

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☐ Return Receipt (electronic)

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☐ Certified Mail Restricted Delivery

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☐ Adult Signature Required

\$

☐ Adult Signature Restricted Delivery

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Postage

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Total

\$

Sent

Street

City

State

ZIP+4

PS F

Margaret Ann Miller Carrico  
c/o Plains Capital Bank  
2705 Bee Coves Road – Suite 120  
Austin, TX 78704

SANTA FE NM  
JUL 31 2015  
USPO 87504

Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Margaret Ann Miller Carrico  
c/o Plains Capital Bank  
2705 Bee Coves Road – Suite 120  
Austin, TX 78704



9590 9402 1257 5246 5839 43

2. Article Number (Transfer from service label)

7015 1730 0000 9793 9216

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature

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☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

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☐ Priority Mail Express®

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☐ Registered Mail Restricted Delivery

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☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

USPS TRACKING #



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(21252 & 21253)  
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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL®



7015 1730 0000 9793 9223  
7015 1730 0000 9793 9223

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Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$

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Total Po:

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Thomas K. and Grace G. McGinley  
1968 Revocable Trust B  
Bank of America, N.A., Trustee  
P.O. Box 83028  
Dallas, TX 75283

PS Form 3800, April 2015 PSN 7530-02-000-9037

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Thomas K. and Grace G. McGinley  
1968 Revocable Trust B  
Bank of America, N.A., Trustee  
P.O. Box 83038  
Dallas, TX 75283



9590 9402 1257 5246 5839 36

2. Article Number (Transfer from service label)

7015 1730 0000 9793 9223

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express®  
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☒ Return Receipt for Merchandise  
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Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



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9590 9402 1257 5246 5839 05

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USPS  
Permit No. G-10PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
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**CERTIFIED MAIL®**7015 1730 0000 9775 0668  
7015 1730 0000 9775 0668U.S. Postal Service™  
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Certified Mail Fee

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Extra Services &amp; Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage

\$

Sent To

Street address

City, State

C. Mark Wheeler and wife,  
J'Lynn Wheeler  
719 W. Kansas Ave.  
Midland, TX 79701

PS Form 3811, July 2015 PSN 7530-02-000-9053 Instructions

SANTA FE NM  
JUL 31 2015  
USPO 87504**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

C. Mark Wheeler and wife,  
J'Lynn Wheeler  
719 W. Kansas Ave.  
Midland, TX 79701

9590 9402 1257 5246 5839 05

2. Article Number (Transfer from service label)

7015 1730 0000 9775 0668

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

**X**☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

(over \$500)

Domestic Return Receipt

PS Form 3811, July 2015 PSN 7530-02-000-9053

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9590 9402 1257 5246 5838 99

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15412-2001/STSFirst-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10
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OF THE RETURN ADDRESS. FOLD ON DOTTED LINE.  
**CERTIFIED MAIL®**
7015 1730 0000 9775 0675  
7015 1730 0000 9775 0675U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail OnlyFor delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

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Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$☐ Return Receipt (electronic) \$☐ Certified Mail Restricted Delivery \$☐ Adult Signature Required \$☐ Adult Signature Restricted Delivery \$

Postage

\$

Total

\$

Sent

Street

City

Penwell Employee Royalty Pool  
310 W. Wall Street – Suite 1001  
Midland, TX 79701

PS Form 3811, April 2015 PSN 7530-02-000-9053

 SANTA FE NM  
JUL 31 2015  
USPO 87504

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Penwell Employee Royalty Pool  
310 W. Wall Street – Suite 1001  
Midland, TX 79701

9590 9402 1257 5246 5838 99

2 Article Number (Transfer from service label)

7015 1730 0000 9775 0675

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery

Restricted Delivery

☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery



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15412-2001/STSFirst-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.  
CERTIFIED MAIL®7015 1730 0000 9775 0712  
7015 1730 0000 9775 0712U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail OnlyFor delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee

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Extra Services &amp; Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$

Postage

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Total F

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Sent To

Street

City, S

PS Fo

John Kyle Thoma, Trustee  
P.O. Box 558  
Peyton, CO 80831SANTA FE NM  
JUL 31 2020  
USPS 87504

## SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Kyle Thoma, Trustee  
P.O. Box 558  
Peyton, CO 80831

9590 9402 1257 5246 5838 51

2. Article Number (Transfer from service label)

7015 1730 0000 9775 0712

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☒ No

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
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☒ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

# Affidavit of Publication

STATE OF NEW MEXICO  
COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

Beginning with the issue dated  
August 06, 2020  
and ending with the issue dated  
August 06, 2020.



Publisher

Sworn and subscribed to before me this  
6th day of August 2020.

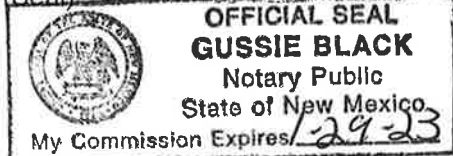


Business Manager

My commission expires

January 29, 2023

(Seal)



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

## LEGAL NOTICE August 6, 2020

To the following entities, individuals, their heirs, personal representatives, trustees, successors or assigns, and any other uncommitted interest owners:

Marathon Oil Co.; C. Mark Wheeler and wife, J'Lynn Wheeler; Penwell Employee Royalty Pool; Paul R. Barwis; Jared Partners, Ltd.; Sandra Mary Borden; John Kyle Thomas, Trustee; WilderPan, LLC; CrownRock Minerals, LP; Fortis Minerals; Margaret Anne Miller Carrico, c/o Plains Capital Bank; Thomas K. and Grace G. McGinley 1968 Revocable Trust B, Bank of America, N.A., Trustee; Russell H. Wickman, et ux, Mary Kathryn Wickman; Henry A. Miller III, Individually and as Independent Executor of the Estate of Harry A. Miller, Jr.; Bureau of Land Management; State Land Office.

Titus Oil & Gas Production, LLC, has filed applications with the New Mexico Oil Conservation Division as follows:

**Case No. 21252: Application of Titus Oil & Gas Production, LLC for Compulsory Pooling, Lea County, New Mexico.** 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 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following well: El Campeon Fed Com 322H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2077' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1650' FWL of Section 32, 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 14 miles southwest of Jal, New Mexico.

**Case No. 21253: Application of Titus Oil & Gas Production, LLC for Compulsory Pooling, Lea County, New Mexico.** 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 W/2 of Section 29, Township 26 South, Range 35 East, and the E/2 NW/4 of Section 32, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes to drill the following wells: (1) El Campeon Fed Com 432H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2137' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 2310' FWL of Section 32, T26S-R35E, and (2) El Campeon Fed Com 512H well, to be horizontally drilled from an approximate surface hole location 579' FSL and 2107' FWL of Section 20, T26S-R35E, to an approximate bottom hole location 10' FSL and 1850' FWL of Section 32, 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 wells and the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 14 miles southwest of Jal, New Mexico.

These applications will be set for hearing before a Division Examiner at the New Mexico Oil Conservation Division in Santa Fe, New Mexico on **August 20, 2020, at 8:15 a.m.** During the COVID-19 Public Health Emergency, state buildings are closed to the public and hearings will be conducted remotely. The hearing will be conducted on **August 20, 2020** beginning at 8:15 a.m. To participate in the electronic hearing, see the instructions posted on the docket for the hearing date: <http://www.emnrd.state.nm.us/OCD/hearings.html>. You are not required to attend this hearing, but as an owner of an interest that may be affected, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging this application at a later time. If you intend to attend the hearing and present testimony or evidence, you must enter your appearance by **August 12, 2020**, and serve the Division, counsel for the Applicant, and other parties with a pre-hearing statement by **August 13, 2020**, in accordance with Division Rule 19.15.4.13 NMAC. For further information, contact the applicant's attorney, Sharon T. Shaheen, Montgomery & Andrews, P.A., 325 Paseo de Peralta, Santa Fe, New Mexico 87501, (505) 986-2678. #35707

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00245204

SHARON T. SHAHEEN  
MONTGOMERY & ANDREWS, P.A.  
P.O. BOX OFFICE BOX 2307  
A/C 451986  
SANTA FE, NM 87504-2307

EXHIBIT B