# 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. 21793

#### PRE-HEARING STATEMENT

TITUS OIL & GAS PRODUCTION, LLC ("Titus") provides this Pre-Hearing Statement as required by the rules of the Division.

#### **APPEARANCES**

## **APPLICANT**

#### **APPLICANT'S ATTORNEY**

TITUS OIL & GAS PRODUCTION, LLC

Sharon T. Shaheen, Esq.
John F. McIntyre, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 986-2678

Email: sshaheen@montand.com jmcintyre@montand.com

## **OPPONENT**

None at this time.

## STATEMENT OF THE CASE

Case No. 21793. 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 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 SE/4 of Section 17 and the E/2 E/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico. Applicant proposes

to drill the following well: **Cattlemen Fed Com 204H** well, to be horizontally drilled from an approximate surface hole location 2174' FNL and 922' FEL of Section 17, T26S-R35E, to an approximate bottom hole location 10' FSL and 330' FEL of Section 20, T26S-R35E. The completed interval and first and last take points for this well will meet statewide setback requirements for horizontal wells. Also to be considered will be the cost of drilling and completing the well and the allocation of the costs, the designation of Applicant as Operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The well and lands are located approximately 13 miles southwest of Jal, New Mexico.

#### PROPOSED EVIDENCE

## APPLICANT:

WITNESSES	EXHIBITS
Walter Jones, Landman	8-10
Allen Frierson, Geologist	5-7

## PROCEDURAL MATTERS

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

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

Sharon T. Shaheen
Sharon T. Shaheen
John F. McIntyre
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@montand.com
jmcintyre@montand.com

Attorneys for Titus Oil & Gas Production, LLC