

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

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC
TO AMEND ORDER NO. R-21371,
LEA COUNTY, NEW MEXICO**

**Case No. 21867
Order No. R-21371
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC
TO AMEND ORDER NO. R-21372,
LEA COUNTY, NEW MEXICO**

**Case No. 21868
Order No. R-21372
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC
TO AMEND ORDER NO. R-21376,
LEA COUNTY, NEW MEXICO**

**Case No. 21869
Order No. R-21376
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC
TO AMEND ORDER NO. R-21377,
LEA COUNTY, NEW MEXICO**

**Case No. 21870
Order No. R-21377
(Re-Open)**

**APPLICATION OF TITUS OIL & GAS PRODUCTION, LLC
TO AMEND ORDER NO. R-21378,
LEA COUNTY, NEW MEXICO**

**Case No. 21871
Order No. R-21378
(Re-Open)**

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

TITUS OIL & GAS
PRODUCTION, LLC

ATTORNEY:

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OTHER PARTY

ALLAR COMPANY
(In Case Nos. 21869, 21870, and 21871)

ATTORNEY:

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STATEMENT OF THE CASE

Case No. 21867. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21371, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 21208 for the limited purpose of amending Order No. R-21371 to extend by one year, through July 6, 2022, the time to commence drilling the **Cattlemen Fed Com 322H** well (API #30-025-48124), proposed to be drilled into the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) underlying the E/2 SW/4 of Section 17 and the E/2 W/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

Case No. 21868. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21372, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 21209 for the limited purpose of amending Order No. R-21372 to extend by one year, through July 6, 2022, the time to commence drilling (1) the **Cattlemen Fed Com 432H** well (API # 30-025-48128) and (2) the **Cattlemen Fed Com 512H** well (API # 30-025-48130), proposed to be drilled into the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp

[98234]) underlying the E/2 SW/4 of Section 17 and the E/2 W/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

Case No. 21869. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21376, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 21210 for the limited purpose of amending Order No. R-21376 to extend by one year, through July 22, 2022, the time to commence drilling the **Cattlemen Fed Com 323H** well (API #30-025-48125), proposed to be drilled into the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) underlying the W/2 SE/4 of Section 17 and the W/2 E/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

Case No. 21870. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21377, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 21211 for the limited purpose of amending Order No. R-21377 to extend by one year, through July 22, 2022, the time to commence drilling (1) the **Cattlemen Fed Com 403H** well (API # 30-025-48126) and (2) the **Cattlemen Fed Com 513H** well (API # 30-025-48131), proposed to be drilled into the Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) underlying the W/2 SE/4 of Section 17 and the W/2 E/2 of Section 20, Township 26 South, Range 35 East, NMPM, in Lea County, New Mexico.

Case No. 21871. *Application of Titus Oil & Gas Production, LLC to Amend Order No. R-21378, Lea County, New Mexico (Re-Open).* Applicant in the above-styled cause seeks to re-open Case No. 21212 for the limited purpose of amending Order No. R-21378 to extend by one year, through July 22, 2022, the time to commence drilling (1) the **Cattlemen Fed Com 404H** well (API # 30-025-48127), (2) the **Cattlemen Fed Com 434H** well (API # 30-025-48129), and (3) the **Cattlemen Fed Com 514H** well (API # 30-025-48132), proposed to be drilled into the

Wolfcamp formation (WC-025 G-09 S263619C; Wolfcamp [98234]) underlying 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.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

Landman Walter Jones

EXHIBITS

12-14

OTHER PARTY:

TBD

PROCEDURAL MATTERS

Assuming no opposition by time of hearing, Applicant will present these matters together by affidavit. If Allar opposes presentation of Case Nos. 21869, 21870, and 21871 by affidavit, Titus may present Case Nos. 21867 and 21868 by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2021, a true and correct copy of the foregoing pleading was emailed to counsel of record, as follows:

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