

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

**AMENDED APPLICATION OF ALPHA ENERGY
PARTNERS, LLC, FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**

CASE NO. 25166

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by an affected party in the case, as required by Division rules.

APPEARANCES

APPLICANT

Alpha Energy Partners, LLC

ATTORNEY

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AFFECTED PARTIES

Covenant Hercules, LLC, Christian Capstone, LLC, and Crusader Royalties, LLC,

Kaitlyn A. Luck
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STATEMENT OF THE CASE

Covenant Hercules, LLC, Christian Capstone, LLC, and Crusader Royalties, LLC (“Covenant”) files this pre-hearing statement as interest owners in the Unit whose interests have not been properly pooled.

PROPOSED EVIDENCE

WITNESSES

EST. TIME

EXHIBITS

Kevin Christian, *CEO*

15 min.

Rebuttal

Graham Cox, *Executive VP*
Land & Acquisitions

15 min.

Rebuttal

PROCEDURAL MATTERS

Covenant Hercules, LLC, Christian Capstone, LLC, and Crusader Royalties, LLC, respectfully request the Division deny Alpha's amended application in this case for failure to properly pool their interests in the Unit.

Respectfully,

A handwritten signature in blue ink, appearing to read "Kaitlyn Luck", is written over a horizontal line.

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*Attorney for Covenant Hercules, LLC, Christian
Capstone, LLC, and Crusader Royalties, LLC*

CERTIFICATE OF SERVICE

I certify that on this 25th of February 2025, the foregoing pleading was electronically filed by email with the New Mexico Oil Conservation Division Clerk and served on all parties of record through counsel as follows:

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