

1 **WARREN ANDERSON**
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5 **STATE OF NEW MEXICO**
6 **ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**
7 **OIL CONSERVATION DIVISION HEARINGS**

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10 **ALPHA ENERGY PARTNERS, LLC.) CASE NO: 24944**
11 **Applicant,)**
12 **v.) DECLARATION OF RESPONDENTS**
13 **) WARREN ANDERSON AND**
14 **WARREN ANDERSON AND) LILLIE ANDERSON.**
15 **WARREN ANDERSON AND) Thursday, November 21, 2024**
16 **LILLIE ANDERSON, LAND-) 9:00 a.m.**
17 **OWNERS OF SUBJECT PROPERTY)**
18 **IN EDDY COUNTY, NEW MEXICO,) 1220South St. Francis,**
19 **Respondents.) Santa Fe, New Mexico 87505**
20 **) and via MS Teams**
21 **)**

22 I, Warren Anderson, the first son of Mr. Bobby Wayne
23 Anderson (deceased), and Mrs. Lillie Anderson, of Pasadena,
24 California, Make Oath And Say That:

25 We contest and object to Alpha Energy Partners LLC drilling
26 & holding operations and producing on our subject land under
27 the terms set for seven wells, because they are non-
28 contractual, unreasonable and done in bad faith.

1 We believe that Alpha Energy Partners LLC filed the
2 compulsory pooling application against are property in Eddy
3 County New Mexico under false pretenses by stating that they
4 were not able to get in touch with us, the property owners.
5

6 However, we have repeatedly emailed both Alpha Energy
7 Partners LLC & Legacy Onshore LLC.

8 Also, we object to Alpha Energy Partners LLC trying to
9 push a three-year Lease into a five-year Lease.
10

11 We also have advised Legacy Onshore LLC, who sent out the
12 first oil gas mineral Lease, saying that they were representing
13 Alpha Energy Partners LLC, that the terms of their oil gas
14 mineral Lease are unreasonable.

15 We also dealt with John Coffman who is the contact
16 representative for Alpha Energy Partners LLC. We advised him by
17 email and also called Mr. John Coffman to tell him that we knew
18 that he needed to send the oil gas mineral Lease in Mrs. Lillie
19 Anderson name. He advised us that he would.
20

21 Nonetheless, we received a compulsory pooling application
22 file from Alpha Energy Partners LLC was against our property in
23 Eddy County New Mexico.
24

25 We also told Mrs. Nelson the same exact thing. Mrs.
26 Nelson, who represents Legacy Onshore LLC & Alpha Energy
27 Partners LLC, did eventually forward the oil gas mineral Lease
28 in the right name, back in August or September.

1 We are respondents in the above-entitled case. We have read
2 the foregoing Declaration and know the contents thereof that the
3 same is true of our own knowledge except as to the matters which
4 are therein stated on our information and belief, and as to
5 those matters, our believe them to be true.

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8 We declare under the penalty of perjury under State of
9 California laws that the foregoing is true and correct. This
10 Declaration was executed on this 17th day of November 2024 in Los
11 Angles, California.

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16 WARREN ANDERSON

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19 LILLIE ANDERSON