1 WARREN ANDERSON 1301 Forest Avenue 2 Pasadena California 91103 WarZulu91@gmail.com 3 (310) 980-45314 5 STATE OF NEW MEXICO 6 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT 7 OIL CONSERVATION DIVISION HEARINGS 8 9 ALPHA ENERGY PARTNERS, LLC.) CASE NO: 24944 10 11 Applicant, DECLARATION OF RESPONDENTS WARREN ANDERSON AND 12 LILLIE ANDERSON. ν. 13 WARREN ANDERSON AND Thursday, November 21, 2024 14 LILLIE ANDERSON, LAND-9:00 a.m. OWNERS OF SUBJECT PROPERTY 15 IN EDDY COUNTY, NEW MEXICO,) 1220South St. Francis, Santa Fe, New Mexico 87505 16 Respondents.) and via MS Teams 17 18 19 I, Warren Anderson, the first son of Mr. Bobby Wayne 20 Anderson (deceased), and Mrs. Lillie Anderson, of Pasadena, 21 California, Make Oath And Say That: 22 We contest and object to Alpha Energy Partners LLC drilling 23 & holding operations and producing on our subject land under 24 the terms set for seven wells, because they are non-25 26 contractual, unreasonable and done in bad faith. 27 28

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

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

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

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

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

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

We also told Mrs. Nelson the same exact thing. Mrs.

Nelson, who represents Legacy Onshore LLC & Alpha Energy

Partners LLC, did eventually forward the oil gas mineral Lease
in the right name, back in August or September.

Nonetheless, when we added adjustments to the oil gas mineral Lease, under the terms that Mrs. Anderson and I believe are unreasonable, and sent it back to Mrs. Nelson. However, we never heard back from Mrs. Nelson.

Later, we were contacted by John Coffman, who sent a Lease with the same terms, but the Lease was once again in my father's name, who is deceased.

Afterwards, we received said compulsory pooling application against the land in Eddy County New Mexico. It appears that the Lease had taken on the tone and character of bullying.

We believe the statements made about the attached oil gas mineral Lease, see Exhibit A, the first oil gas mineral Lease sent by Legacy Onshore LLC. See Exhibit B, the second oil gas mineral Lease, that was sent back with adjustments.

See Exhibit C, the oil gas mineral Lease sent by Alpha
Energy Partners LLC Representative, John Coffman. See Exhibit
D, the compulsory pooling application file against our land in
Eddy County New Mexico, aka Section 17 and 18 in Township 22
South Range 27 East, Eddy County, New Mexico

See Exhibit E, the last oil gas mineral Lease sent out on or about November 11, 2024.

///

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

///

We declare under the penalty of perjury under State of California laws that the foregoing is true and correct. This Declaration was executed on this $17^{\rm th}$ day of November 2024 in Los Angles, California.

Ulanen Robeson

WARREN ANDERSON

Lillie Pokeron

LILLIE ANDERSON