

WARREN ANDERSON

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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION HEARINGS

ALPHA ENERGY PARTNERS, LLC.)	CASE NO: 25496
)	
Applicant,)	DECLARATION OF RESPONDENTS
)	WARREN ANDERSON AND
v.)	LILLIE ANDERSON.
)	
WARREN ANDERSON AND)	Wednesday, August 27, 2025
LILLIE ANDERSON, LAND-)	9:00 a.m.
OWNERS OF SUBJECT PROPERTY)	
IN EDDY COUNTY, NEW MEXICO,)	1220 South St. Francis,
)	Santa Fe, New Mexico 87505
Respondents.)	and via MS Teams
)	

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

We contest and object to Alpha Energy Partners LLC drilling
& holding operations and producing on our subject land under
the terms set for seven wells, because they are non-
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 Alpha Energy Partners
7 LLC.
8

9 Also, we object to Alpha Energy Partners LLC trying to
10 push a three-year Lease into a five-year Lease.
11

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

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

20 We also told Permian Asset Co. LLC the same exact thing.
21 Permian Asset Co. LLC did eventually forward the oil gas
22 mineral Lease in the right name, back in August or September.
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1 Nonetheless, when we added adjustments to the oil gas
2 mineral Lease, under the terms that Mrs. Anderson and I believe
3 are unreasonable, and sent it back to Alpha Energy Partners LLC
4 and Permian Asset Co. LLC. However, we never heard back from
5 Alpha Energy Partners LLC and Permian Asset Co. LLC.
6

7 Later, we were contacted by John Coffman, who sent a Lease
8 with the same terms, but the Lease was once again in my
9 father's name, who is deceased.
10

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

14 We believe the statements made about the attached oil gas
15 mineral Lease, see Exhibit A, the first oil gas mineral Lease
16 sent by Alpha Energy Partners LLC and Permian Asset Co. LLC.
17 See Exhibit B, the second oil gas mineral Lease, that was sent
18 back with adjustments.
19

20 See Exhibit C, the oil gas mineral Lease sent by Alpha
21 Energy Partners LLC Representative, John Coffman. See Exhibit
22 D, the compulsory pooling application file against our land in
23 Eddy County New Mexico, aka Section 17 and 18 in Township 22
24 South Range 27 East, Eddy County, New Mexico
25

26 See Exhibit E, the last oil gas mineral Lease sent out on
27 or about June or July 2025.
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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.

6 ///

7
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 5th day of August 2025 in Los
11 Angles, California.

12 *Warren Anderson*
13 WARREN ANDERSON

14
15 *Lillie Anderson*
16 LILLIE ANDERSON