

1 **WARREN ANDERSON**

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5 (310) 980-4531

6 **STATE OF NEW MEXICO**

7 **ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**

8 **OIL CONSERVATION DIVISION HEARINGS**

9
10 **ALPHA ENERGY PARTNERS, LLC.) CASE NO: 25496**
11)
12 **Applicant,) DECLARATION OF RESPONDENTS**
13)
14 **v.) WARREN ANDERSON AND**
15)
16 **WARREN ANDERSON AND) LILLIE ANDERSON.**
17)
18 **WARREN ANDERSON AND) Thursday, August 7, 2025**
19 **LILLIE ANDERSON, LAND-) 9:00 a.m.**
20 **OWNERS OF SUBJECT PROPERTY)**
21 **IN EDDY COUNTY, NEW MEXICO,) 1220 South St. Francis,**
22)
23 **Respondents.) Santa Fe, New Mexico 87505**
24)
25)
26)
27)
28)

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's
23 drilling & holding operations, and producing on our subject
24 land under the terms set for seven wells, because they are
25 non-contractual, unreasonable, and done in bad faith.
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27
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1 We believe that Alpha Energy Partners LLC filed the
2 compulsory pooling application against our 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 and been in contact with
7 Alpha Energy Partners LLC.

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

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

17 Nonetheless, we received a compulsory pooling application
18 file from Alpha Energy Partners LLC that was against our
19 property 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.
23
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1 Nonetheless, we added adjustments to the oil gas mineral
2 Lease, under the terms that Mrs. Anderson and I believe are
3 reasonable, 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 a harrassing tone.

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. Please also see the letter attached
28 discussing the lease at hand.

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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