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OIL CONSERVATION  
DIVISION

APPLICATION OF PRIDE ENERGY COMPANY  
FOR CANCELLATION OF A DRILLING PERMIT  
AND RE-INSTATEMENT OF A DRILLING PERMIT,  
AN EMERGENCY ORDER HALTING OPERATIONS,  
AND COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.

Case No. 13153

**MOTION OF PRIDE ENERGY COMPANY  
TO RECONSIDER DECISION OF THE EXAMINER  
DENYING EMERGENCY RELIEF**

Pride Energy Company ("Pride"), for its motion, states:

1. By its Decision dated September 12, 2003, the Division denied (pending an evidentiary hearing) Pride's request for an emergency order requiring Yates Petroleum Corporation ("Yates") to cease all operations on the State "X" Well No. 1, located in the SW $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 12, Township 12 South, Range 34 East, N.M.P.M., Lea County, New Mexico.

2. At the time Pride's application was filed, Yates had a workover rig on the well. That rig has been removed, and (as of September 19, 2003) Yates has built location, an improved road to the wellsite, and a pit necessary for deepening the well. Yates is obviously planning on moving a drilling rig on-site in a matter of days (if it has not already done so).

3. If an emergency order is not granted, Yates will go the hearing on this matter, state that the well has drilled, and present its operations as an accomplished fact.

4. In short, if Yates is not ordered to cease operations, Pride may well be denied all relief, and that outcome will result directly from (a) the Hobbs' District Office's illegal cancellation of Pride's APD, and (b) the failure of the Division to grant an

emergency order halting operations.

5. Yates had an APD on the subject well for two years before Pride obtained its APD, without conducting any operations. Thus, there is no harm in making Yates wait several weeks to determine the outcome of this case.

**WHEREFORE**, Pride requests that the Division reconsider its decision, and enter an emergency order requiring Yates to cease all operations in the NW $\frac{1}{4}$  of Section 12 pending resolution of this matter.

Respectfully submitted,



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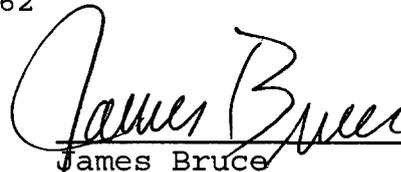
Attorney for Pride Energy Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 22nd day of September, 2003 by fax and United States Mail:

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