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BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF :
GULF OIL CORPORATION for the promul- :
gation of an Order revising Rule 15, :
General Order No. 4 "Oil Tanks and :
Fire Walls". :

A P P L I C A T I O N

COMES NOW THE GULF OIL CORPORATION, hereinafter called the applicant,
and shows to the Honorable Oil Conservation Commission of the State of New Mex-
ico that:

1. Gulf Oil Corporation is incorporated in the State of Pennsylvania
and is duly authorized to do business in the State of New Mexico.

2. Gulf Oil Corporation is actively engaged in the exploration, de-
velopment and production of oil and gas in the State of New Mexico, and that Gulf
Oil Corporation is one of the larger producers of crude oil in that state.

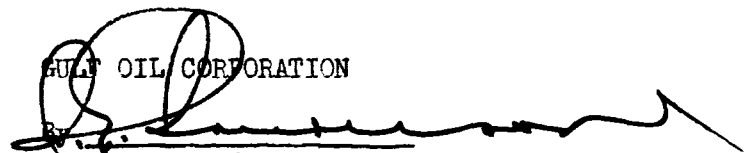
3. Rule 15 of General Order No. 4, quoted herewith for convenience of
reference, states: "Oil shall not be stored or retained in earthen reservoirs,
or in open receptacles. All lease, stock and oil storage tanks shall be protected
by a proper fire wall, which wall shall form a reservoir having a capacity one-
third larger than the inclosed tank or tanks. Such tanks shall not be erected,
inclosed or maintained closer than 150 feet to the nearest producing well."

4. This application is concerned only with the provision of Rule 15
which requires the construction of fire walls at all storage tanks and tank bat-
teries. It is the opinion of the applicant that such fire walls are unnecessary
except where tanks or tank batteries are placed in the vicinity of inhabited
buildings or public facilities, and that the construction of such fire walls, in
many instances, causes unnecessary expense both in the initial construction and
maintenance. Applicant's opinion is based on its own experience and observation
regarding the probable failure of tanks and loss of oil and the damage resulting

therefrom. This opinion is further influenced by the isolated location and nature of the terrain of many of the tank batteries in New Mexico, which conditions render unlikely any significant damage from loss of oil.

Wherefore your applicant prays that the Honorable Commission promulgate an order revising or amending Rule 15 of General Order No. 4, and deleting the requirement that fire walls be constructed around lease flow tanks or storage tanks, except where such tanks are closer than 500 feet to inhabited dwellings or highways or closer than 1000 feet to schools or churches.

Respectfully submitted,


GULF OIL CORPORATION
J. J. [unclear]
Manager of Production

Dec. 16, 1946