

Section 3172.3.—This gives the Secretary the right to tell you where you are going to do your work. I don't see how he can possibly assume to be so knowledgeable. Later in this section, they discuss fairly reasonable reserves. The word "reasonable" is very, very loose.

Section 3172.9.—The first part of this again puts human safety after everything else. Later in this section it discusses disclosure of all work which means that you spend millions on research and then give it to the Federal Government. This is absolutely ridiculous. Also, in the section further down, it discusses the patent rights belonging to the Federal government. Here again, I don't think there are many companies that would spend this kind of money to turn over their results to their competitors.

All in all, this set of regulations is just about ridiculous as the Federal Government can get, and it would be my hope that the powers-to-be would do something about this deplorable situation.

I don't think that Wyoming has ever been as green and beautiful as it is now, so if you have an opportunity to return in the near future it would certainly be worthwhile.

I am sorry that I have not written you sooner and congratulated you on your record to date in the Senate. Please do not hesitate to notify me if you feel there is anything I can do to be of assistance.

Very truly yours,

JAMES H. OGG.

PAN AMERICAN PETROLEUM CORP.,
Tulsa, Okla., August 14, 1967.

Hon. CLIFFORD P. HANSEN,
U.S. Senate, Washington, D.C.

DEAR SENATOR HANSEN: This will supplement Mr. Yost's letter to you of June 21, regarding Pan American Petroleum Corporation's statements and recommendations concerning proposed amendment of the regulations covering the leasing of oil shale lands and exchanges under the Taylor Grazing Act.

I am very sorry that we have been so delayed in compiling these comments; however, we have just today mailed Mr. Rasmussen the enclosed letter even though it shows a date of August 4.

We trust that these comments will be of assistance to you in your appraisal of the proposed regulations and we wish to again point out that in our opinion the entirely wrong approach has been taken by the Department to this subject which we think is based on the general misconception concerning the nature of oil shale operations and the net value of the products to be derived therefrom.

If we can be of any further assistance to you in this matter, please advise us.

Yours very truly,

J. W. HAMILTON,
Chief Landman.

PAN AMERICAN PETROLEUM CORP.,
Tulsa, Okla., August 4, 1967.

Re amendment of regulations governing the leasing of oil shale lands (43 CFR, Part 3170) and exchanges under the Taylor Grazing Act (43 CFR, Subpart 2244).

Mr. BOYD L. RASMUSSEN,
Director, Bureau of Land Management,
Department of the Interior, Washington, D.C.

DEAR MR. RASMUSSEN: Comments have been solicited by the government concerning the proposal by the Department of the Interior to amend the regulations regarding the leasing of oil shale lands (43 CFR, Part 3170) and regarding exchanges of privately owned lands for public lands to facilitate oil shale development (43 CFR, Subpart 2244). This letter sets out Pan American Petroleum Corporation's comments concerning both proposals.

Pan American has long been actively interested in oil shale beginning in 1949 when it participated in the National Petroleum Council's original economic feasibility studies and continuing today through participation in the industry's cooperative project at Rifle, Colorado, and through preliminary refinery research. Consequently, we believe that the establishment of a policy relating to these