1. There is considerable uncertainty as to the amount of acreage that would be granted to a company after it completed the research phase. The maximum amount is clearly stated (5,120 acres), but the regulations leave uncertain the criteria for determining: (a) whether a research lease will be extended into the commercial production term, and (b) how much land in addition to that part of the R&D lease used during the research term ultimately can be obtained.

2. The provisions dealing with patents and disclosure of information seem so stringent as to interfere with the timely development of oil shale. The incentive to develop new techniques is limited by the requirement that results of research become public domain immediately. Free play of competition would encourage the development and simultaneous evaluation of several recovery methods. A term of non-disclosure after the R&D phase or the establishment of equitable licensing arrangements would be necessary to encourage competition.

We believe that the matters enumerated above are so basic as to require modification of the regulations and presume that comments and suggestions from others will result in further changes. We would appreciate the opportunity to review and comment upon subsequent revisions before the proposed regulations are finally adopted.

The proposed amendment to the regulations under the Taylor Grazing Act to allow for exchange of privately owned oil shale land is a most worthwhile revision of the regulations and we support this proposal.

We appreciate the opportunity to offer these suggestions for your consideration.

Yours very truly,

J. F. BOOKOUT,
Vice President, Denver Area.

ALLIED CHEMICAL CORP.,
New York, N.Y., July 7, 1967.

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

DEAR SENATOR HANSEN: Since we know how concerned you are with respect to the recent proposal for the withdrawal of oil shale lands and the proposed regulations regarding the leasing of oil shale lands, enclosed herewith are copies of two letters which we have recently sent to the Bureau of Land Management. Please note that we have not commented on the merits of our problems involved in the proposed oil shale withdrawal generally, but, rather have restricted our comments to the manner in which any adverse effect on the Wyoming soda ash industry might be avoided.

Please feel free to call upon us if we can be of any further assistance to you in this matter.

Copies of our letters to the Bureau of Land Management are also being sent to Senator McGee, Governor Hathaway and Congressman Harrison.

With all best wishes, I am,

Sincerely yours,

VICTOR FUTTER,
Assistant Director, Legal Department.

ALLIED CHEMICAL CORP.,
New York, N.Y., June 28, 1967.

Re: Proposed Withdrawal and Reservation of Lands F.R. Doc. 67–1118, filed January 27, 1967; as amended, F.R. Doc. 62–2855, Filed March 13, 1967.

BUREAU OF LAND MANAGEMENT,
Washington, D.C.

GENTLEMEN: This letter is written in response to your request for comments on the Bureau of Land Management's application for withdrawal of oil shale deposits and lands containing said deposits from mineral leasing. Without commenting on the merits or problems involved in the proposed withdrawal generally, we submit that it is essential to the continued economic well being and development of Wyoming that no proposal be considered without incorporation of the modifications discussed herein.

PROPOSED MODIFICATIONS OF WITHDRAWAL POLICY

For the reasons set forth below, we respectfully request two modifications in the proposed withdrawals: