Uinta basis in Utah[3] except to the extent that it would interfere with the mining of trona, the purpose of the withdrawal would certainly be effected.

C. If the Wyoming sodium lands are not included in the withdrawal, the feasibility of future oil shale development in Wyoming would not be materially impaired.

A. *The development of the commercially value sodium deposits should not be jeopardized for the benefit of the oil shale deposits in Wyoming most of which are not now commercially practical to develop.*—It is submitted that the proposed withdrawal of trona (sodium) lands with their proved values because of their possible oil shale value is not justifiable on the basis of any evidence that the value of such oil shale exceeds the value of the trona deposits. Whereas the development of Wyoming's sodium (trona) lands and the production of soda ash therefrom is a thriving industrial reality, the purpose and thrust of the proposed withdrawal is based on the mere possibility that commercially feasible methods of extraction of the oil values will be developed.

Speaking before the Subcommittee on Antitrust and Monopoly Legislation of the Senate Committee on the Judiciary on April 26, 1967, Secretary of the Interior Udall made clear the highly speculative nature of the proposed oil shale development. In commenting upon the fact that in the 47 years since the passage of the Mineral Leasing Act, there has been no commercial development of oil shale he stated:

"There are a number of reasons to explain this fact, but the principal or dominant one has been the absence of a *technology* that would make shale oil *competitive with conventional petroleum.*

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". . . if we were actually on the threshold of *commercially feasible production*, there would be little need for the program that I have proposed." [Italic added.]

The Congressional Quarterly Fact Sheet for June 2, 1967 refers (p. 940) to "the *prospect* of an economical method of extracting oil from the oil shale approaches reality." Some sources (see *Denver Post* editorial of April 23, 1967, 113 Cong. Rec. S.6561) predict that the cost of extraction will be exceedingly high on the basis of current research, all of which seems to cloud the future competitive marketability of oil shale when extracted.

Contrasting these speculative values against the demonstrated value of sodium deposits in the area of Sweetwater County, Wyoming, the withdrawal seems unwarranted and would deny both the nation and the State of Wyoming the economic benefits of the highly competitive and growing natural soda ash industry. This could seriously hamper the spreading economic development in this area of Wyoming with the consequence that new jobs needed to spur growth and maintain economic health would not be created and substantial capital outlays now planned would be substantially curtailed. Why, one might ask, should a commercial reality be hampered for the sake of an admittedly speculative development, particularly when, as will be shown in the next point, the least important part of that development is in Wyoming?

B. *The purpose of the oil shale withdrawal could be effected even if the Wyoming trona were not withdrawn.*—Leaving aside the issue of the specula-

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[3] *The Congressional Quarterly Fact Sheet* for June 2, 1967 states (p. 941):

"A USGS spokesman April 18 told the Senate Judiciary Antitrust and Monopoly Subcommittee that the Piceance Creek Basin alone contained total mineral resources 'that tax the imagination'."

Geological Survey Circular 523, *supra*, states at p. 10:

"Shale units that yield a few gallons to about 65 gallons of oil per ton are distributed throughout much of the Green River Formation, which ranges in thickness from a few hundred feet to about 7,000 feet. In general the central parts of the Piceance Basin and the Uinta Basin contain thick rich oil-shale sequences that grade to thinner and leaner oil shale at the basin margins. Somewhat thinner and generally lower grade oil shale in the Green River basin and Washakie Basin, Wyoming, also show decrease in grade toward the basin margins."

Russell I. Cameron, a consulting engineer, has stated (113 Cong. Rec. A3017, see extension of remarks of Mr. Aspinall):

"Our major oil shale reserves are in Colorado, Utah and Wyoming. The areas are well defined and we are confident that the largest reserve is in Colorado's Piceance Creek Basin. Utah has some areas that may be developed at reasonabl cost my open-pit mining but much of its oil shale is deeply-buried and cannot be economically produced with technology now available.

"*Wyoming has only marginal oil shale prospects despite a large area of Green River formation*, but additional exploration is needed especially with regard to associated minerals. I will have more to say on these other minerals later." [Italic added.]