

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

Re: Proposed Regulations Regarding the Leasing of Oil Shale Lands (43 C.F.R. Part 3170).
DIRECTOR, BUREAU OF LAND MANAGEMENT,
Department of the Interior,
Washington, D.C.

DEAR SIR: We are pleased to have the opportunity to submit our suggestions concerning the proposed regulations, set forth in 32 Fed. Reg. 7086 (May 10, 1967), to govern the leasing of federally owned oil shale lands.

First, add a new subsection (f) to Section 3170.0-1 reading:

"(f) Not interfere with the leasing or mining of trona in Sweetwater County, Wyoming."

Second, modify subsection (b) of section 3170.0-5 (Definition of the term "Oil Shale") to read (new matter underscored and word to be deleted bracketed):

"(b) deposits subject to lease as oil and gas, asphaltic minerals, [or] coal, or sodium (trona) in Sweetwater County, Wyoming, to be used in a commercial facility for the production of soda ash and/or other chemical products."

Third, the present paragraph designated as section 3170.1 (Designation of available lands) be redesignated as subsection (a) and a new paragraph designated as subsection (b) be added reading:

"(b) Lands containing trona which are located in Sweetwater County, Wyoming and which are presently or hereafter held under sodium leases pursuant to the Mineral Leasing Act and which also contain oil shale shall not be designated hereunder unless the development of the oil shale therein would not adversely affect in any significant way the trona values of such lands. Any such oil shale lease shall contain terms and provisions governing the oil shale development as are adequate to fully protect and preserve the trona values of such lands."

Finally, it is urged that the proposed regulations be amended to incorporate a new provision designated as Section 3170.2 reading:

"Renewal of Wyoming Sodium (trona) Leases. Nothing contained herein shall be construed to limit, now or hereafter, in any manner whatsoever the application for and/or the granting of any renewal of any sodium lease for the mining of trona on lands located in Sweetwater County, Wyoming."

Attached hereto is this Company's letter of June 28, 1967, to the Bureau of Land Management, pertaining to the application by the Bureau of Land Management for withdrawal of oil shale lands. We trust that you will find that the statements made in that letter fully support the suggestions contained herein.

If there is any further information you desire, please feel free to call upon us.

Sincerely yours,

VICTOR FUTTER,
Assistant Director, Legal Department.

THE SUPERIOR OIL COMPANY,
Houston, Tex., July 26, 1967.

HON. CLIFFORD P. HANSEN,
United States Senate,
Washington, D.C.

DEAR SENATOR HANSEN: I thank you for your letter of June 13, 1967, soliciting the views of The Superior Oil Company with regard to the Department of the Interior's proposed oil shale leasing regulations. Our company has reviewed these proposed regulations, and, while we believe that they will not accomplish the purpose for which they are designed, there are certain things contained therein of merit. More importantly, however, is the fact that these proposed regulations indicate that after more than 30 years of inactivity, the Department of the Interior is thinking about oil shale development. Unfortunately, in our estimation the problems of economic development of oil shale are far too complex to be solved by any regulations within the existing legislative framework.

We take exception to the assumption explicit in the proposed regulations that the private sector of the economy cannot accomplish the task of developing an economic method or methods of extracting shale oil. The activities of a number of companies within the past few years indicate that techniques may soon be