inventions. The President's Patent Policy from which the proposal stems is directed toward research bought and paid for by the Government. However, the 527grant of an oil shale lease is no more procurement than the grant of a homestead or a mineral lease. We see no justification for Government claims to any patents developed in the course of privately-financed research. We further believe that Government insistence on such a patent policy will prevent companies without extensive background from participation in the program. This, we are sure, is

CER believes that the oil industry will be willing to assure that technology developed in the research is available on reasonable terms. Therefore, we suggest that patent ownership reside in those who make the inventions with a royaltyfree license to the Government and licensing at reasonable royalties to third

We sincerely appreciate the opportunity to address ourselves to the proposed leasing rules. We trust that our comments will be given careful consideration in your revisions of the proposed rules. her was the special schooling to

HERBERT E. GRIER, President.

Washington, D.C., August 4, 1967.

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

DEAR MR. RASMUSSEN: This letter is written in response to your solicitation for comments with respect to the proposed Regulations for the development of oil shale, which appeared in the May 10 Federal Register.

We appreciate this opportunity of expressing our views on this most important subject. It is essential that the policy and the regulations thereunder, which are to result from your consideration, bring about the most effective and efficient utilization of this great natural resource.

Texaco has maintained a continuing interest in oil shale and its development. We are currently conducting research and development work on the recovery of shale oil of improved quality by a retorting process involving the use of hydrogen. Also, we are presently a participant in Project Bronco, a plan to utilize nuclear energy in connection with in situ retorting of oil shale. It is our hope that either or both of these endeavors will ultimately lead to an economically feasible procedure for production of marketable petroleum products from oil shale.

We feel that the public interest would be best served by the Government making available oil shale leases on a competitive-bid basis. The Department of the Interior has established such a procedure in administering the offerings of Federal lands under the Outer Continental Shelf Lands Act. A similar procedure with reference to oil shale lands, in our opinion, would lead to orderly development and result in the effective utilization of this great natural resource.

L. C. KEMP, Jr.

ROCKY MOUNTAIN OIL AND GAS ASSOCIATION, Casper, Wyo., August 30, 1967.

Hon. CLIFFORD P. HANSEN, Senate Office Building, Washington, D.C.

MY DEAR SENATOR: As you undoubtedly know Secretary of Interior Udall, on May 10, 1967, published in the Federal Register proposed Rules and Regulations

Because of the importance of developing oil shale resources on Federal lands and because of the far reaching effect the proposed regulations might have, we felt you would be interested in the comments the Rocky Mountain Oil and Gas Association made to Secretary Udall concerning the published proposals.

ROBERT H. MARTIN.