

Thank you for your comment, Roger Moore.

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Comment Date: March 9, 2012 12:30:04PM

OSTS 2012 Draft PEIS

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Attachment: REMoore Comments on PEIS.pdf

Comment Submitted:

## Comments on PEIS

by Roger E. Moore, P.E. Chemical Engineer

The draft PEIS encourages surface mining in Utah and Wyoming and precludes surface mining in Colorado. The draft spells out the criteria for surface mining, < 500 ft of over burden and beds >25 ft thick, yet ignores the Donnell (1987) paper that the PEIS references. The Donnell paper identifies a large area in the northwest corner of the Piceance Basin which satisfy the selection criteria. Estimates of the surface mineable acreage are larger than the total proposed for new leasing in Alternative 2(b). (page 2-20). The maps in the various figure need section lines so they can be compared to previous work by others such as Donnell

The retorting technology discussion does not mention the Brazilian oil shale surface retorting process, Petrosix. This technology has operated a large commercial retort since the 1980's. (page 2-19)

The use of surface mining and surface retorting is probably the least expensive combination for producing shale oil commercially and is the most logical first step. Environmentally, it probably has the least long term impact, ie Unocal's project, and avoids the unanswered questions of cleaning up in-situ retorts.

The Alternative 2(b) identifies 35,000 acres to lease which is about 7% of the Piceance Basin resource. This PEIS is not encouraging development of the United States resources. (page 2-43)

The leasing program does not need to be an RD&D lease first. If a company believes they can do a commercial project, they will have to meet all the regulations for emissions and cleanup. The PEIS seems to ignore what was done in the 1980's. Shale mining and retorting was proven technically by Unocal but development stopped when the oil prices dropped from \$30-35/bbl to \$12-15/Bbl. We are certainly above those oil price levels now and those prices will never be seen again.(ES-7)

Personally, this plan reflects Secretary Salazar's "no development in Colorado" attitude.