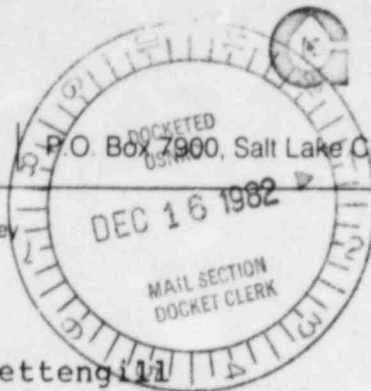


40-6659

PDR

Getty Oil Company | P.O. Box 7900, Salt Lake City, Utah 84107 • Telephone (801) 263-3850

George S. Young, Attorney



December 2, 1982



Mr. Harry Pettengill
Section Chief, Licensing Section II
Uranium Recovery Field Office
7915 Eastern Ave.
Silver Springs, MD 20910

Dear Mr. Pettengill:

Thank you for talking with me today concerning Source Material License No. SUA-551, Docket No. 40-6659 of the Petrotomics Company, a unit of Getty Oil Company. As we discussed, Getty would like to obtain a ruling from your office on the effect on the license of a proposed corporate modification within Getty.

We are planning to form a new first tier, wholly-owned subsidiary of Getty Oil Company which would serve as the employer for most of the present employees of the Petrotomics Company as well as personnel from other Getty-owned mineral properties. The new subsidiary would be able to better administer salary and benefit plans for Getty personnel employed in the mining industry.

The planned change would not affect the property ownership of the mine and mill facilities. Management personnel and control would also stay the same. Essentially, there would be no change in any of the operations.

We desire to make this change effective on January 1, 1983 in order to mesh with FICA withholdings, etc. Although our plans are still not final, we need to know as soon as possible whether or not we can effectuate the change under our license, or whether the license must be amended and/or transferred under 10 CFR Section 40.44 or 40.46. Further, if amendment and/or transfer is deemed appropriate, we would like to know if we could get verbal approval to make the change effective by January 1, 1983 in the event that the paperwork takes somewhat longer.

If you need any further details on our planned change, please call me at the letterhead number. I will gratefully appreciate your attention to this matter.

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GSY/fd

Sincerely,

George S. Young
George S. Young

DESIGNATED ORIGINAL

Certified By

B. Fisher

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Info only