

000092

112
12D

RECEIVED
MAY 29 1973
OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

5166 Kelvin Avenue
Woodland Hills, Calif. 91364
May 21, 1973

REC'D - S.E.C.

MAY 23 1973
REC'D - S.E.C.

JUN - 7 1973

Mr. Neal S. McCoy, Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
Washington D. C. 20549

Dear Mr. McCoy:

On July 10, 1971, I acquired 367,742 shares of Union Petroleum Chemical Corporation of Nevada Common Capital Stock from C. N. & L. Regional Corporation in return for cancellation of this organization's indebtedness to me. I am attaching copies of correspondence and an investment letter describing this arrangement.

I recently became an Officer of Rockwell International and am required to dispose of any holdings in excess of 1% of total stock in any one company. It is my desire to attain this position as soon as possible which requires a disposal of approximately one half of my holdings in Union Petrochemical Corporation of Nevada.

I believe the length of time the stock has been held, along with the nature of acquisition, satisfies my investment intent. I would very much appreciate the Commission issuing me a "No Action Letter" allowing me to divest of at least one half my stock after July 10, 1973.

I am attaching the letter from the Los Angeles Regional Office which refers to Rule 144. I'm not sure if my case qualifies under this rule. If so, I would like to apply it. If not, I would appreciate your consideration of my case for divestment.

Sincerely,


C. J. Neechan

Attachments (5)