

MAY 18 1987

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May 15, 1987

Mr. William J. LeMay
Oil Conservation Commission
P. O. Box 2088
Santa Fe, New Mexico 87504

Re: Division Case 9134
Application to Amend Rule 1207(a)7
Notice to Royalty Owners

Dear Mr. LeMay:

On behalf of Sun Exploration and Production Company, please enter our appearance in Case 9134 which is set for hearing on the Commission docket of May 21, 1987.

Except in certain compulsory pooling cases and in statutory unitization cases, there is no legal necessity for, nor a practical means, by which royalty owners can or should be notified of Commission Cases. Royalty owners in Division cases should and are represented by their respective operators and working interest owners to whom they have contracted the right to explore and develop their respective leases.

In addition, we move to dismiss Case 9134 for the failure of the Division's staff to file a written application prior to ten days before the hearing pursuant to Rule 1203.

Very truly yours,


W. Thomas Kellahin

WTK:ca
Enc.

cc: Mr. Alan Tubb
Sun Exploration & Production Company
Four North Park East
Dallas, Texas 75221