

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Failure of Haas Petroleum,)	Docket No. 23-CONS-3061-CPEN
LLC (Operator) to Comply with K.A.R. 82-3-407)	
at the Dehlinger A #12 A Well in Greenwood)	CONSERVATION DIVISION
County, Kansas.)	License No.: 33640

MOTION TO WITHDRAW AS COUNSEL

Keith A. Brock states as follows in support of this Motion:

1. Keith A. Brock, Anderson & Byrd, LLP, moves the Commission for leave to withdraw as counsel for Haas Petroleum, LLC.
2. Keith A. Brock, Anderson & Byrd, LLP has appeared of record in this proceeding as attorney for Haas Petroleum, LLC.
3. Haas Petroleum, LLC has requested Keith A. Brock, Anderson & Byrd, LLP, resign from representation of such entity in this matter.
4. That it is reasonable and necessary to allow Keith A. Brock, Anderson & Byrd, LLP, to withdraw at this time; none of the parties are disadvantaged by allowing the withdraw of Keith A. Brock, Anderson & Byrd, LLP.
5. The withdraw of Keith A. Brock, Anderson & Byrd, LLP will leave Haas Petroleum, LLC without counsel.
6. Keith A. Brock, Anderson & Byrd, LLP has admonished Haas Petroleum, LLC that it is personally responsible for complying with all orders of the Commission and time limitations established by any subsequently issued Presiding Officer Order Setting Procedural Schedule.
7. A date has not been set for a hearing in this matter and there are no presently existing deadlines which have been set in this docket.

8. The current mailing address for Haas Petroleum, LLC is P. O. Box 8396, Prairie Village, Kansas 66208.

9. Counsel for Haas Petroleum, LLC has conferred with Staff attorney Tristan Kimbrell concerning this motion and he has indicated that Staff has no objection to the granting of the relief requested in this motion.



Keith A. Brock, #24130

ANDERSON & BYRD, LLP

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VERIFICATION

STATE OF KANSAS
COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Haas Petroleum, LLC named in the foregoing Motion to Withdraw as Counsel and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 16th day of February, 2023.



Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 16th day of February, 2023, addressed to: Todd Bryant, t.bryant@kcc.ks.gov; Ryan Duling, r.dulyin@kcc.ks.gov; Tristan Kimbrell, t.kimbrell@kcc.ks.gov; Jonathan R. Myers, j.myers@kcc.ks.gov and Troy Russell, t.russell@kcc.ks.gov.



Keith A. Brock