

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Jim Snyder, ) Docket No. 19-CONS-3393-CUIC  
Inc. to Authorize the Injection of Saltwater into )  
the Bartlesville Formation at the Drumm #2, ) CONSERVATION DIVISION  
Drumm #23, and the Saco Drumm #4 Wells )  
Located in Section 20 and Section 30, Township ) License No.: 35164  
26 South, Range 8 East, Butler County, Kansas.

**MOTION TO WITHDRAW AS COUNSEL FOR APPLICANT**

COMES NOW, Jeff Kennedy of Martin, Pringle, Oliver, Wallace & Bauer, L.L.P. (“Counsel”), and respectfully requests an Order of the Commission allowing him to withdraw as counsel for Jim Snyder, Inc. (“Applicant”). In support of this Motion, Counsel would show as follows:

1. Applicant filed an Application for Injection Well on May 6, 2019.
2. A formal protest was filed in this matter on May 23, 2019.
3. Counsel entered his appearance on behalf of Applicant on June 24, 2019, after a formal protest was filed on May 23, 2019.
4. Counsel forwarded on October 24, 2019, a proposed Settlement Agreement to Linda Snyder for her review and to date has not heard from Ms. Snyder to discuss this matter in order to reply to counsel for Protestant. Counsel has had profound difficulties in communicating with his client.

WHEREFORE, Counsel requests the Commission issue an Order allowing him to withdraw as counsel for Applicant.

Respectfully submitted,

MARTIN, PRINGLE, OLIVER,  
WALLACE & BAUER, L.L.P.

By: /s/ Jeff Kennedy

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*Attorneys for Jim Snyder, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 13, 2019, a true and correct copy of the above and foregoing **Motion to Withdraw as Counsel for Applicant** was electronically filed with the Kansas Corporation Commission and electronically served on:

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and served electronically and by regular mail to:

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/s/ Jeff Kennedy  
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Jeff Kennedy, #12099