

HINKLE LAW FIRM LLC
1617 North Waterfront Parkway, Suite 400
Wichita, Kansas 67206
Telephone: 316-267-2000
Facsimile: 316-630-8466

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

In the matter of the failure of Satchell Creek
Petroleum, LLC (Operator) to comply with
K.A.R. 82-3-120 and K.A.R. 82-3-133 by
operating under a suspended license

DOCKET NO. 25-CONS-3004-CPEN
CONSERVATION DIVISION
LICENSE NOS.: 35970

**MOTION TO WITHDRAW AS COUNSEL
FOR SACHELL CREEK PETROLEUM, LLC**

COMES NOW, Casey L. Jones of Hinkle Law Firm LLC ("Counsel"), and submits his Motion to Withdraw as Counsel for Satchell Creek Petroleum, LLC ("Satchell Creek") and requests an order allowing him and his firm to withdraw as counsel for Defendant Satchell Creek in this matter. In support of this Motion, Counsel states as follows:

1. Counsel is counsel of record in this matter for Satchell Creek.
2. Counsel has been diligently working on behalf of Satchell Creek in this matter.
3. Counsel requests an order permitting him to withdraw as counsel for Defendant Satchell Creek in this Docket for, among other things, failing to fulfill an obligation to Counsel for its services rendered after being given reasonable warning that such continued failure would require Counsel to withdraw from further representation. Revealing the additional reasons for Counsel's request to withdraw would violate the applicable standards of professional conduct.
4. As of the date of filing this Motion, Satchell Creek has no other counsel of record, and Counsel is not aware of the identity of any substitute counsel who will enter his/her appearance on behalf of Satchell Creek.

5. Counsel has provided Satchell Creek with an admonition that it is personally responsible for complying with all orders of the KCC and time limitations established by applicable administrative rules or by order in this Docket. There are currently no deadlines in this Docket.

6. Counsel has duly communicated with Satchell Creek regarding his intention to file this Motion, and that he has also provided Satchell Creek with a copy of this Motion.

7. Counsel advises the KCC that, to the best of his knowledge, the current mailing address and phone number for Satchell Creek are:

Satchell Creek Petroleum, LLC
4320 Vine Street, Suite 80
PMB 386
Hays, KS 67601
Phone number: 970-989-4554

WHEREFORE, Casey L. Jones of Hinkle Law Firm LLC respectfully prays for an order allowing him and his firm to withdraw as counsel of record for Respondent Satchell Creek Petroleum, LLC in this matter.

Dated: August 14, 2024.

Respectfully submitted,

HINKLE LAW FIRM LLC
1617 North Waterfront Parkway, Suite 400
Wichita, Kansas 67206
Telephone: 316-267-2000
Facsimile: 316-630-8466
E-mail: cjones@hinklaw.com

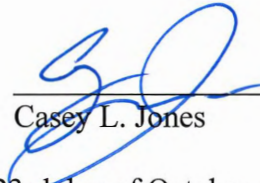
By /s/ Casey L. Jones
Casey L. Jones, SC NO. 24970
Attorney for Satchell Creek Petroleum, LLC

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Casey L. Jones, of lawful age, being first duly sworn upon oath, states:

That he is an attorney for parties hereto, Satchell Creek Petroleum, LLC, that he has read the above and foregoing Motion to Withdraw as Counsel for Satchell Creek Petroleum, LLC, knows the contents thereof, and knows that all the statements made therein are true and correct.



Casey L. Jones

Subscribed and sworn to before me on this 23rd day of October, 2024.



Notary Public

My Appointment Expires:

09-25-2027

[Seal]



CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October, 2024, a true and correct copy of the above and foregoing Motion to Withdraw as Counsel for Satchell Creek Petroleum LLC was filed electronically and mailed by U.S. Mail, First Class, postage prepaid, to:

Jonathan R. Myers, Presiding Officer
Assistant General Counsel
Kansas Corporation Commission
266 North Main Street, Suite 220
Wichita, KS 67202-1513
E-mail: jon.myers@ks.gov

Tristan Kimbrell, Litigation Counsel
Kansas Corporation Commission
266 North Main Street, Suite 220
Wichita, KS 67202-1513
E-mail: Tristan.kimbrell@ks.gov

Richard Williams, Hays District
Kansas Corporation Commission
District Office No. 4
2301 East 13th Street
Hays, KS 67601-2654
E-mail: richard.williams@ks.gov

With a copy to:

Satchell Creek Petroleum, LLC
4320 Vine Street, Suite 80
PMB 386
Hays, KS 67601
E-mail: mjh11holdings@gmail.com

By /s/ Casey L. Jones
Casey L. Jones, #24970