## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

)

In the matter of the failure of Ace Energy, LLC (Operator) to comply with K.A.R. 82-3-111 at seventeen wells in Crawford County, Kansas Docket No.: 22-CONS-3124-CPEN CONSERVATION DIVISION License No.: 34998

Pursuant to the Kansas Statutes & Administrative Regulations

## **REQUEST FOR HEARING**

Ace Energy, LLC, by and through its counsel, David J. Bideau, of Bideau Law Offices, LLC, Chanute, Kansas, hereby requests a hearing in the above-referenced matter pursuant to K.S.A. 55-164, K.S.A. 77-537 and K.S.A. 77-542. In support of its request for hearing, Ace Energy, LLC, alleges and states as follows:

1) Ace Energy, LLC, is the Operator/Licensee named herein.

2) Ace Energy, LLC, requests a hearing before the Commission on the denial of its applications for Temporary Abandonment (TA) and the Penalty Order filed herein.

3) An evidentiary hearing should be held in this matter to determine if an actual violation of K.A.R. 82-3-111 occurred, and if so, whether the assessed penalty is consistent with the requirements of K.A.R. 82-3-111 or other applicable law.

4) Ace Energy, LLC, also requests a hearing to address the Commission's concerns, obtain additional time to comply with the Commission's Rules, Regulations and Orders with regard to the wells involved in this matter.

WHEREFORE, Ace Energy, LLC prays for an order setting the above-entitled captioned docket for hearing pursuant to K.S.A. 55-164, K.S.A. 77-537, K.S.A. 77-542 or as otherwise provided by law.

Respectfully submitted,

BIDEAU LAW OFFICES, LLC

David J. Bideau #11285 By:

P. O. Box 945 Chanute, Kansas 66720-0945 (620) 431-2720 (Voice) (620) 431-2742 (Fax) E-mail: <u>djb@bideaulaw.com</u> Attorneys for Operator/Licensee Ace Energy, LLC

STATE OF KANSAS, COUNTY OF JOHNSON, SS:

Comes now, Jonathan Freiden, being of lawful age and first duly sworn upon oath states and declares as follows: That he is a Manager of Ace Energy, LLC, and is duly authorized to make this affidavit; that he has read the foregoing Request for Hearing, knows the contents thereof, and that the facts set forth therein are true and correct under penalty of perjury to the best of his knowledge, information and belief at this time.

ACE ENERGY, LLC a Kansas Limited Liability Company

By Jonathan Freiden, Manager/Authorized Representative

SUBSCRIBED AND SWORN to before me this Of day of October, 2021.

Eucel E. Emphane Notary Public

My Appointment Expires:



## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the above and foregoing Request for Hearing was served upon the following parties by depositing the same in the U.S. Mail, postage prepaid, addressed as follows on this 8th day of October, 2021.

Electronic filing to:	Kansas Corporation Commission Conservation Division 266 North Main, Suite 220 Wichita, Kansas 67202
Copy to:	Tristan Kimbrell Litigation Counsel Kansas Corporation Commission 266 North Main, Suite 220 Wichita, Kansas 67202 E-mail: <u>t.kimbrell@kcc.ks.gov</u>
	Rene Stucky Kansas Corporation Commission 266 North Main, Suite 220 Wichita, Kansas 67202 E-mail: <u>r.stucky@kcc.ks.gov</u>
Copy to:	John Almond Kansas Corporation Commission Conservation Division - District Office No. 3 137 East 21st Street Chanute, Kansas 66720 E-mail: j.almond@kcc.ks.gov
Copy to:	Troy Russell Kansas Corporation Commission Conservation Division - District Office No. 3 137 East 21st Street Chanute, Kansas 66720 E-mail: <u>t.russell@kcc.ks.gov</u>
In the Matter of the failure of Ace Energy, LLC (Operator) to comply with K.A.R.	

Copy to:

Ace Energy, LLC 11704 Aberdeen Road Leawood, Kansas 66211-2921 E-mail: <u>jfreiden@me.com</u>

BIDEAU LAW OFFICES, LLC David J. Bideau #11285 By: P. O. Box 945 Chanute, Kansas 66720-0945 (620) 431-2720 (Voice) (620) 431-2742 (Fax) E-mail: <u>djb@bideaulaw.com</u> Attorneys for Operator/Licensee Ace Energy, LLC