

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

In the matter of the failure of Ace Energy, ) Docket No.: 23-CONS-3135-CPEN  
LLC (Operator) to comply with K.A.R. 82-3- )  
400 and/or K.A.R. 82-3-409 at the Grundy B ) CONSERVATION DIVISION  
#5 SWD well in Greenwood County, Kansas )  
License No. 34998

Pursuant to Kansas Statutes & Administrative Regs.

**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, K.S.A. 77-542, and as otherwise provided by law. 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, contests all findings of fact and conclusion of law set forth in the Penalty Order filed herein.
- 3) An evidentiary hearing should be held in this matter to determine if the violations alleged in the Penalty Order occurred, and if so, whether the assessed penalty is proper or consistent with applicable law.
- 4) An evidentiary hearing should be held in this matter to determine if an actual violation of K.A.R. 82-3-400 occurred, and if so, whether the assessed penalty is consistent with applicable law, rules and administrative regulations.

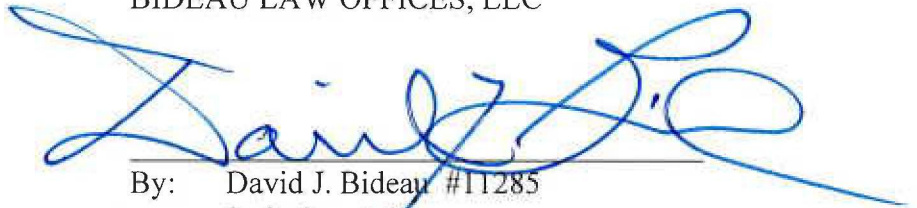
5) An evidentiary hearing should also be held in this matter to determine if the alleged findings of fact and conclusions of law set forth in the Penalty Order are correct and whether jurisdiction is proper.

6) 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 well 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



By: David J. Bideau #11285  
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Attorneys for Operator/Licensee  
Ace Energy, LLC

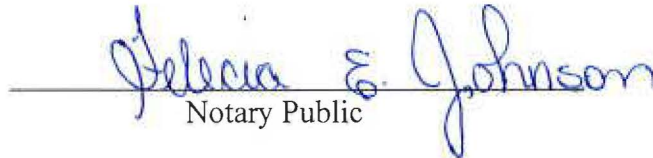
STATE OF KANSAS, COUNTY OF NEOSHO, SS:

Comes now, David J. Bideau, being of lawful age and first duly sworn upon oath states and declares as follows: That he is attorney for 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 to the best of his knowledge, information and belief at this time.

  
David J. Bideau

SUBSCRIBED AND SWORN to before me this 29th day of December, 2022.



  
Notary Public

My Appointment Expires:  
July 14, 2026

**CERTIFICATE OF SERVICE**

We hereby certify that a true and correct copy of the above and foregoing Request for Hearing was served upon the following parties via electronic filing or by depositing the same in the U.S. Mail, postage prepaid, addressed as follows on this 29th day of December, 2022.

Electronic filing to:

Kansas Corporation Commission  
Conservation Division  
266 North Main, Suite 220  
Wichita, Kansas 67202

In the matter of the failure of Ace Energy, LLC, (Operator) to comply with K.A.R. 82-3-400 and/or K.A.R. 82-3-409 at the Grundy B #5 SWD well in Greenwood County, Kansas  
Docket No. 23-CONS-3135-CPEN  
CONSERVATION DIVISION  
License No. 34998  
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Electronic filing to: Kansas Corporation Commission  
Conservation Division  
266 North Main, Suite 220  
Wichita, Kansas 67202

Electronic filing to: Cheryl Boyer  
Kansas Corporation Commission  
Conservation Division  
266 North Main, Suite 220  
Wichita, Kansas 67202  
Email: [c.boyer@kcc.ks.gov](mailto:c.boyer@kcc.ks.gov)

Electronic filing to: Todd Bryant, Geologist Specialist  
Kansas Corporation Commission  
266 North Main, Suite 220  
Wichita, Kansas 67202-1513  
Email: [t.bryant@kcc.ks.gov](mailto:t.bryant@kcc.ks.gov)

Electronic filing to: Tristan Kimbrell  
Litigation Counsel  
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BIDEAU LAW OFFICES, LLC



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