202212071536082158 Filed Date: 12/07/2022 State Corporation Commission of Kansas

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the application of Ace	Docket No.: 23-CONS-3143-CMSC
Energy, LLC (Operator) for an Operator's License Renewal	CONSERVATION DIVISION
	License No. 34998
Pursuant to Kansas Statutes & Administrative Regs.	

OBJECTION AND REQUEST FOR TIME TO RESPOND

Comes now, Ace Energy, LLC, as Operator herein, by and through its counsel of record, David J. Bideau, of Bideau Law Offices, LLC, Chanute, Kansas, and objects to the Motion for the Designation of a Presiding Officer and the Scheduling of a Prehearing Conference filed herein by Staff of the State Corporation Commission.

In support of this request, on December 1, 2022, Tristan Kimbrell, Litgation Counsel for the Kansas Corporation Commission, confirmed that Operator submitted a timely and sufficient application for the renewal of License 34998. On December 1, 2022, Operator, by and through its legal counsel herein, requested that License 34998 be renewed forthwith on the basis that Operator's license renewal application was timely made and sufficient as confirmed by Mr. Kimbrell. The license renewal request was denied by Mr. Kimbrell. Operator believes that its license should have been renewed and requests reasonable time until 5:00 p.m. on January 13, 2023, to respond to the herein described Motion.

In the matter of the application of Ace Energy, LLC (Operator) for an Operator's License Renewal Docket No. 23-CONS-3143-CMSC CONSERVATION DIVISION License No. 34998 Page 1

Respectfully submitted,

BIDEAU LAW OFFICES, LLC

By: David J. Bideau #11285

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E-mail: <u>djb@bideaulaw.com</u> Attorneys for Operator/Licensee

Ace Energy, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing Objection and Request for Time to Respond 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 7th day of December, 2022.

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: t.kimbrell@kcc.ks.gov

Copy to: Ace Energy, LLC

11704 Aberdeen Road

Leawood, Kansas 66211-2921 E-mail: <u>ifreiden@me.com</u>

In the matter of the application of Ace Energy, LLC (Operator) for an Operator's License Renewal Docket No. 23-CONS-3143-CMSC CONSERVATION DIVISION License No. 34998 Page 2 BIDEAU LAW OFFICES, LLC

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Attorneys for Operator/Licensee

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