

**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.)
82-3-120 and K.A.R. 82-3-133 by operating)
under suspended license)
_____)
Docket No.: 23-CONS-3017-CPEN
CONSERVATION DIVISION
License No.: 34998

In the matter of the failure of Ace Energy,)
LLC (Operator) to comply with K.A.R. 82-)
3-407 at the E. C. Larson #2 and E. Larsen)
#6 wells in Allen County, Kansas)
_____)
Docket No.: 23-CONS-3029-CPEN
CONSERVATION DIVISION
License No.: 34998

MOTION FOR DISCOVERY AND INSPECTION

Comes now, Ace Energy, LLC, by and through its counsel of record, David J. Bideau, of Bideau Law Offices, LLC, Chanute, Kansas, and moves for entry of an order for discovery and inspection herein pursuant to K.S.A. 77-517(b) of the Kansas Administrative Procedures Act for the KCC and its staff to provide copies or photographs of the following:

- 1) All written documents or recorded statements in the possession of KCC relating to the allegations, issues or penalty orders issued in Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN.
- 2) Books, papers, documents, e-mails, electronic media, tangible objects, or copies or portions thereof, which are or have been within the possession, custody or control of the KCC or its staff that are material to the allegations contained in Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN.

3) Copies of notes, memorandum, reports, e-mails, electronic communications, written communications or documents. statements or affidavits, made, created, signed, adopted or approved by KCC staff or any party, person, witness or prospective witness, who has or will testify as a witness for the KCC or provide evidence, information, documents, direct or rebuttal testimony to or on behalf of the KCC relating to the allegations, issues, or penalty orders issued in Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN.

4) Results or reports of any scientific tests or experiments made by or at the direction of KCC or its staff relating to the allegations, penalty orders or issues in Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN.

5) Copies of any audio or visual recordings made by KCC or its staff relating to the allegations, issues or penalty orders issued in Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN, including but not limited to photographs, video recordings, digital records or recordings, electronic media, and all audio tapes or recordings.

6) Any recorded or written statements of any witness material to or relating to the allegations, penalty orders or issues in Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN.

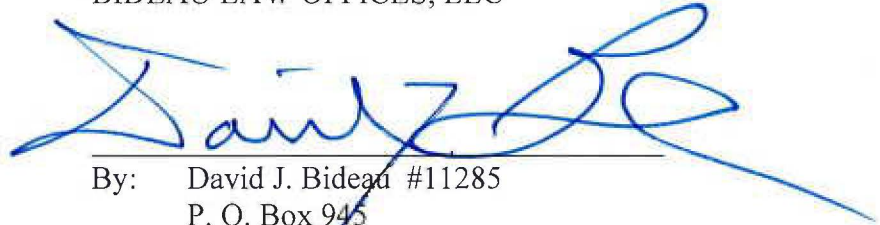
7) Names, current addresses and phone numbers of all witnesses who will testify or provide evidence, direct or rebuttal testimony for the KCC in connection Docket 23-CONS-3017-CPEN and 23-CONS-3029-CPEN.

WHEREFORE, Ace Energy, LLC, requests entry of an order for discovery and inspection by the hearing officer pursuant to K.S.A. 77-517(b) of the Kansas Administrative

Procedures Act or as otherwise provided by law.

Respectfully submitted,

BIDEAU LAW OFFICES, LLC



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Ace Energy, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing Motion for Discovery and Inspection was served upon the following parties via electronic e-filing or by depositing the same in the U.S. Mail, postage prepaid, addressed as follows on this 13th day of October, 2022.

Electronic filing to:

Kansas Corporation Commission
Conservation Division
266 North Main, Suite 220
Wichita, Kansas 67202-1513

Copy to:

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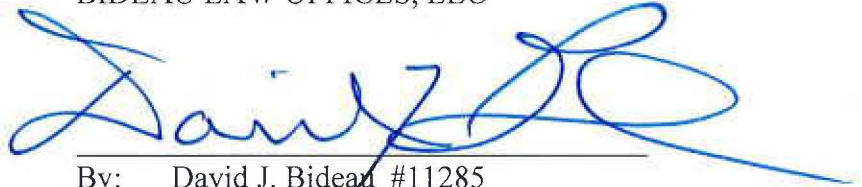
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