

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

In the matter of resolving various	)	Docket No.: <b>23-CONS-3017-CPEN</b>
regulatory violations associated with	)	23-CONS-3029-CPEN
Ace Energy, LLC, (Operator).	)	23-CONS-3087-CPEN
	)	23-CONS-3135-CPEN
	)	
	)	CONSERVATION DIVISION
	)	
	)	License No. 34998
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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

**REQUEST FOR DISCOVERY AND INSPECTION ORDER**

Comes now, Ace Energy, LLC, as Operator herein, and moves for entry of an order for discovery and inspection in Docket No. 23-CONS-3135-CPEN pursuant to K.S.A. 77-517(b) of the Kansas Administrative Procedures Act or as otherwise provided by law for the KCC and its staff to provide documents, information, copies or photographs of the following:

- 1) All written documents or recorded statements in the possession of KCC relating to the allegations, issues or orders issued in Docket 23-CONS-3135-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 relate to any allegation, issue or order issued or contained in Docket 23-CONS-3135-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 any allegation, issue or order issued or contained in Docket 23-CONS-3135-CPEN.

4) Results or reports of any scientific tests or experiments made by or at the direction of KCC or its staff relating to any allegation, issue or order issued or contained in Docket 23-CONS-3135-CPEN.

5) Copies of any audio or visual recordings made by KCC or its staff relating to the any allegation, issue or order issued or contained in Docket 23-CONS-3135-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 any allegation, issue or order issued or contained in Docket 23-CONS-3135-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 with Docket 23-CONS-3135-CPEN.

WHEREFORE, Ace Energy, LLC, requests entry of an order for discovery and inspection by the presiding hearing officer pursuant to K.S.A. 77-517(b) of the Kansas Administrative Procedures Act or as otherwise provided by law in Docket No. 23-CONS-3135-CPEN pending before the KCC in connection with the above-described consolidated dockets.

BIDEAU LAW OFFICES, LLC

/s/ David J. Bideau

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Ace Energy, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of March, 2023, I caused the original of the foregoing Request for Discovery and Inspection Order to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and provided electronic copies of the same to be emailed to the following parties:

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  
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E-mail: [t.kimbrell@kcc.ks.gov](mailto:t.kimbrell@kcc.ks.gov)

Copy to:

Ryan Duling  
Kansas Corporation Commission  
Conservation Division - District Office No. 3  
137 East 21st Street  
Chanute, Kansas 66720  
E-mail: [r.duling@kcc.ks.gov](mailto:r.duling@kcc.ks.gov)

Copy to: Troy Russell  
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Copy to: Cheryl Boyer  
Kansas Corporation Commission  
266 North Main, Suite 220  
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Leawood, Kansas 66211-2921  
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