

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

In the matter of the failure of Ace Energy,	)	Docket No.: 22-CONS-3336-CPEN
LLC (Operator) to comply with K.A.R.	)	
82-3-111 at the Gillman #A-1 well in	)	CONSERVATION DIVISION
Montgomery County, Kansas	)	
<hr/>		License No.: 34998

**MOTION OF ACE ENERGY, LLC, FOR EXTENSION OF TIME TO SUBMIT  
PRE-FILED DIRECT AND REBUTTAL TESTIMONY**

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 an order extending its time to submit pre-filed direct and rebuttal testimony from September 16, 2022, to September 23, 2022, for good cause.

In support thereof, Ace Energy, LLC, states that discussions with KCC staff to resolve this Docket are ongoing. A proposal to resolve this Docket was recently submitted by Ace Energy, LLC to KCC staff for review. Counsel for KCC staff and counsel for Ace Energy, LLC, reviewed the proposal by telephone conference on September 14, 2022. An extension of time for Ace Energy, LLC, to submit its pre-filed direct and rebuttal testimony to September 23, 2022, is requested to give the parties additional time to try and resolve this Docket. Counsel for KCC legal counsel has no objection to this motion.

WHEREFORE, Ace Energy, LLC, moves for an order extending its time to submit pre-field direct and rebuttal testimony herein to September 23, 2022, for good cause.

Respectfully submitted,

BIDEAU LAW OFFICES, LLC



By: David J. Bideau #11285  
P. O. Box 945  
Chanute, Kansas 66720-0945  
(620) 431-2720 (Voice)  
(620) 431-2742 (Fax)  
E-mail: [djb@bideaulaw.com](mailto:djb@bideaulaw.com)  
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 Motion for Extension of Time for Ace Energy, LLC, to Submit Pre-Filed Direct and Rebuttal Testimony 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 14th day of September, 2022.

Electronic filing to:

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

Copy to:

Tristan Kimbrell  
Litigation Counsel  
Kansas Corporation Commission  
266 North Main, Suite 220  
Wichita, Kansas 67202-1513  
E-mail: [t.kimbrell@kcc.ks.gov](mailto:t.kimbrell@kcc.ks.gov)

Copy to:

Jonathan R. Myers  
Assistant General Counsel  
Kansas Corporation Commission  
266 North Main, Suite 220  
Wichita, Kansas 67202-1513  
E-mail: [j.myers@kcc.ks.gov](mailto:j.myers@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:

Ace Energy, LLC  
11704 Aberdeen Road  
Leawood, Kansas 66211-2921  
E-mail: [jfreiden@me.com](mailto:jfreiden@me.com)

BIDEAU LAW OFFICES, LLC



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