BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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

Pursuant to the Kansas Statutes & Administrative Regulations

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 and K.S.A. 77-542. 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, requests a hearing before the Commission with respect to its alleged obligations under K.A.R. 82-3-111 regarding the Gillman #A-1 well located in Montgomery County, Kansas.

3) An evidentiary hearing should be held in this matter to determine if an actual violation of K.A.R. 82-3-111 occurred, and if so, whether the assessed penalty is consistent with the requirements of K.A.R. 82-3-111 or other applicable law.

4) 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 David J. Bidean #11285 By: P. O. Box 945

P. O. Box 945 Chanute, Kansas 66720-0945 (620) 431-2720 (Voice) (620) 431-2742 (Fax) E-mail: <u>djb@bideaulaw.com</u> Attorneys for Operator/Licensee Ace Energy, LLC

STATE OF KANSAS, COUNTY OF JOHNSON, SS:

Comes now, Jonathan Freiden, being of lawful age and first duly sworn upon oath states and declares as follows: That he is a Manager of 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 under penalty of perjury to the best of his knowledge, information and belief at this time.

	ACE ENERGY, LLC
	a Kansas Limited Liability Company
	Λ
	By: Jonathan Freiden
	Manager/Authorized Representative
SUBSCRIBED AND SV	WORN to before me this $\frac{1}{12}$ day of April, 2022.
	Morany Public
My Appointment Expires:	NOTARY PUBLIC State of Kansas MEGAN PATRICK My Appt. Exp. (2) 04 (2022)

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing Request for Hearing was served upon the following parties by depositing the same in the U.S. Mail, postage prepaid, addressed as follows on this 14th day of April, 2021.

Via 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: <u>t.kimbrell@kcc.ks.gov</u>
Copy to:	Troy Russell Kansas Corporation Commission Conservation Division - District Office No. 3 137 East 21st Street Chanute, Kansas 66720 E-mail: <u>t.russell@kcc.ks.gov</u>
Copy to:	Ryan Duling Kansas Corporation Commission Conservation Division - District Office No. 3 137 East 21st Street Chanute, Kansas 66720 E-mail: <u>r.duling@kec.ks.gov</u>
Copy to:	Ace Energy, LLC 11704 Aberdeen Road Leawood, Kansas 66211-2921 E-mail: jfreiden@me.com

BIDEAU LAW OFFICES, LLC

By: David J. Bideau #11285

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