

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

In the matter of the failure of Ace Energy,)	Docket No.: 22-CONS-3124-CPEN
LLC (Operator) to comply with K.A.R.)	22-CONS-3150-CPEN
82-3-111 at seventeen wells in Crawford)	22-CONS-3215-CPEN
County, Kansas)	
)	CONSERVATION DIVISION
)	
)	License No.: 34998

MOTION FOR DISCOVERY AND INSPECTION

Comes now, Ace Energy, LLC, as Applicant herein, 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 or its staff relating to the allegations, issues, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant.
- 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, issues, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant.

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, its 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, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant.

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, issues, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant.

5) Copies of any audio or visual recordings made by KCC or its staff relating to the allegations, issues, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant, 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, issues, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant.

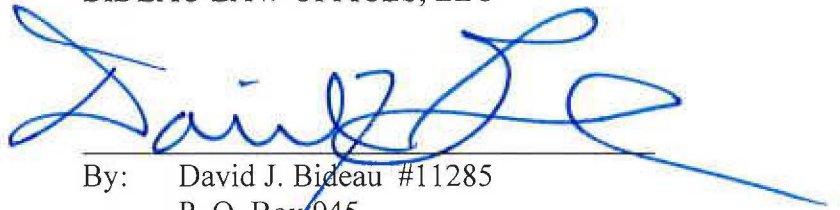
7) Names, current addresses, and phone numbers of all witnesses who will testify or provide evidence, direct or rebuttal testimony for the KCC or its staff regarding the

allegations, issues, penalty orders, orders or license suspension issued in these consolidated dockets or the Motion to Lift License Suspension filed by Applicant.

WHEREFORE, Ace Energy, LLC, requests entry of an order for discovery and inspection as set forth herein 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 28th day of October, 2022.

Via Electronic filing to:

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

Copy to: Tristan Kimbrell
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