

FORM 49
[RULE 13.19]

Clerk's Stamp

COURT FILE NO. B301-13590
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

PROCEEDING IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,
R.S.C. 1985, c. B-3, as amended

AND IN THE MATTER OF ERIKSON NATIONAL ENERGY INC.

DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
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SUPPLEMENTAL AFFIDAVIT OF PETER NEELANDS

Sworn on February 19, 2025

I, **Peter Neelands**, of City of Toronto, Ontario, SWEAR AND SAY THAT:

1. I am the sole director of the applicant, Erikson National Energy Inc. ("**Erikson**" or "**Applicant**") as of November 25, 2024 and also hold the title of Principal for Third Eye Capital Corporation ("**TEC**" or "**Agent**"), the agent for the secured lenders of Erikson. I am not a member of the board of directors of TEC, nor am I a member of any of TEC's governing bodies.

2. I have personal knowledge of the matters deposed to in this affidavit, except when stated to be based upon information and belief, in which case I believe the same to be true.
3. I am swearing this Affidavit to supplement my Affidavit sworn on February 10, 2025 and in response to the Affidavit #1 of Kathy Brulotte (“**Brulotte Affidavit**”) sworn on February 18, 2025.
4. Following my review of the Brulotte Affidavit, I conducted internal inquiries to account for the discrepancy between the 1250 dekatherms of production that I was aware of and the 1875 dekatherms set out in the Brulotte Affidavit.
5. On December 18, 2024, Erikson’s production accountant provided December 2025 production figures in the amount of 746.1 dekatherms. I had understood this amount to capture all of the production that occurred in December, however yesterday I learned that the figures provided excluded the 659.4 dekatherms which were produced December 11 to 13, 2024.
6. I have confirmed with the production accountant that the amounts reported are correct.
7. I swear this supplemental affidavit to correct and clarify certain items described in my February 10, 2025 Affidavit and for no other or improper purpose.

SWORN BEFORE ME at Toronto, Ontario
this 19th day of February, 2025



A Commissioner for Oaths
in and for Ontario

Patrick T. Harnett
Barrister and Solicitor



PETER NEELANDS