

COURT FILE NUMBER B301-135903  
25-3135903

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

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 **Ministry of the Attorney General (British Columbia)**  
Legal Services Branch, Ministry of Attorney General  
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**AFFIDAVIT #1 OF CHRIS PASZTOR**

**Affirmed on January 21, 2025**

I, Chris Pasztor, Executive Director of Tenure and Resource Stewardship in the British Columbia Ministry of Energy and Climate Solutions, AFFIRM AND SAY THAT:

1. I am employed by His Majesty the King in right of the Province of British Columbia ("Province") as the Executive Director of the Tenure and Resource Stewardship Branch of the Ministry of Energy and Climate Solutions. As such, I have personal knowledge of the matters herein referred to, except where indicated to be on information and belief, and where so stated I believe them to be true.
2. As the Executive Director of the Tenure and Resource Stewardship Branch, I am responsible for providing strategic leadership and direction regarding the disposition and administration of the Province's oil and gas, geothermal, and storage titles (those interests are commonly referred to as "tenure"). This involves overseeing several program areas focused on disposing and administering tenure, collecting tenure revenue, providing referral and consultation services, providing geological services and negotiating and mitigating resource and tenure access issues. All dispositions, transfers, expirations and cancellations of tenures under British Columbia's *Petroleum and Natural Gas Act* are administered through my office.
3. In or about 2019, Erikson National Energy Inc. ("Erikson") acquired over 200 oil and gas leases (a type of tenure under the *Petroleum and Natural Gas Act*) administered by the Tenure and Resource Stewardship Branch. Oil and gas lease holders must pay rent annually to the Province. If rent is not paid, the lease will expire. Between 2019 and 2022, 38 of Erikson's leases expired for non-payment of rent. In



