

COURT FILE NUMBER B301-135903  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY



IN THE MATTER OF THE NOTICE OF  
INTENTION TO MAKE A PROPOSAL OF  
ERIKSON NATIONAL ENERGY INC.

DOCUMENT **APPLICATION FOR A RESTRICTED  
COURT ACCESS ORDER**

C110896

COM  
Nov 21, 2024

ADDRESS FOR SERVICE AND CONTACT  
INFORMATION OF PARTY FILING THIS  
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File Number: 267908.00025

**NOTICE TO RESPONDENTS LISTED AT SCHEDULE "A" ATTACHED HERETO**

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the judge.

To do so, you must be in Court when the application is heard as shown below:

Date November 21, 2024  
Time 10:00 a.m.  
Where Edmonton Law Courts, by videoconference  
<https://albertacourts.webex.com/meet/virtual.courtroom86>  
Before Whom The Honourable Justice M. E. Burns

Go to the end of this document to see what else you can do and when you must do it.

**Remedy claimed or sought:**

1. All capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Second Report of the Proposal Trustee, dated November 18, 2024 (the “**Second Report**”).
2. The Applicant, KSV Restructuring Inc. in its capacity as the “**Proposal Trustee**” in the within proceedings, seeks a restricted court access order substantially in the form attached hereto as **Schedule “B”** (the “**Sealing Order**”):
  - (a) sealing Confidential Appendix “1” to the Second Report; and
  - (b) granting such further and other relief as may be sought by the Proposal Trustee and this Honourable Court may deem appropriate.

**Grounds for making this application:**

3. The Proposal Trustee seeks a Sealing Order over Confidential Appendix “1” to the Second Report on the basis that it contains a copy of the summary prepared by Sayer Energy Advisors (“**Sayer**”) of the bids received by the bid deadline of the Court-approved sale and investment solicitation process (“**SISP**”) conducted for the assets of Erikson National Energy Inc. (“**Erikson**”) in the within proceedings.
4. Confidential Appendix “1” contains confidential and commercially sensitive information about the SISP and the bids received as part of that process. If such information is made publicly available prior to the closing of a transaction or transactions for the assets of Erikson under the SISP, then the value of such transaction(s) could be detrimentally impacted. In the event that a transaction or transactions do not close, disclosure of the information contained in Sayer’s bid summary could unduly hinder any future efforts taken by Erikson or the Proposal Trustee to remarket Erikson’s assets in these proceedings or any other insolvency processes.
5. Sealing Confidential Appendix “1” is the least restrictive method available to prevent the dissemination of confidential and commercially sensitive information. The salutary effects of the Sealing Order, which are to protect the general commercial interest of maintaining

confidentiality and commercially sensitive information, far outweigh the deleterious effects of restricting the accessibility of court proceedings. Further, the effects of the Sealing Order will be time limited to the closing of any transaction(s) for substantially all of Erikson's assets as part of any type of insolvency proceedings, or upon further Order of this Court.

6. Such further and other grounds as counsel may advise and this Honourable Court may permit.

**Material or evidence to be relied on:**

7. Second Report of the Proposal Trustee, dated November 18, 2024.
8. Any other materials and pleadings previously filed in the within proceedings.
9. Such further and other material or evidence as counsel may advise and this Honourable Court permits.

**Applicable rules:**

10. *Alberta Rules of Court*, AR 124/2010, in particular Part 6, Division 4.
11. *Bankruptcy and Insolvency General Rules*, CRC, c 368.
12. Such further and other rules as counsel may advise and this Honourable Court permits.

**Applicable Acts and regulations:**

13. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3.
14. Such further and other legislation as counsel may advise and this Honourable Court permits.

**Any irregularity complained of or objection relied on:**

15. None.

**How the application is proposed to be heard or considered:**

16. The Proposal Trustee proposes that this Application be heard before the Honourable Justice M. E. Burns on November 21, 2024, at 10:00 a.m. sitting on the Commercial List, via WebEx video conference (or in person if the Court so approves), which appearance has been scheduled with the Commercial Coordinator, on affidavit evidence with some or all of the parties present.

**WARNING**

If you do not come to Court either in person or by your lawyer, the Court may give the applicant what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

**SCHEDULE "A"**  
**SERVICE LIST**

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.

**SERVICE LIST  
(October 28, 2024)**

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<p><b>Freehold Royalties Partnership</b> 1000, 517 - 10th Avenue SW Calgary, AB T2R 0A8</p> <p>Fax: 403-221-0888</p>	
<p><b>Indoil Montney Ltd.</b> 4300 Bankers Hall West 888-3 Street SW Calgary, AB T2P 5C5</p> <p>Fax: 403-266-9034</p>	
<p><b>Ish Energy Ltd.</b> 900, 700 - 4 Avenue SW Calgary, AB T2P 3J4</p> <p>Fax: 403-265-1792</p>	
<p><b>Northriver Midstream Inc</b> Suite 1400, 888 - 3rd Street SW Calgary, AB T2P 5C5</p> <p>Fax: 587-318-2544</p>	
<p><b>Prairiesky Royalty Ltd.</b> 1700, 350 - 7 Avenue SW Calgary, AB T2P 3N9</p> <p>Fax: 587-293-4001</p>	
<p><b>Sinopec Huadian Montney Limited</b> C/O Sinopec Huadian Canada Lng Ltd. Sun Life Plaza, East Tower Calgary, AB T2P 0H3</p> <p>Fax: 403-266-6988</p>	
<p><b>Stikeman Elliott LLP</b> 1155 Rene-Levesque Blvd W. 41 Floor Montreal, QC H3B 3V2</p> <p>Fax: 514-397-3222</p>	



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<b>AAA Field Services Ltd</b> Unit A, 10219 Alaska Road Fort St. John, BC V1J 1A9	<b>Bailey Helicopters Ltd</b> 600 Palmer Road NE Calgary, AB T2E 7R3
<b>Baron Oilfield Supply Ltd</b> 4107 50 <sup>th</sup> Ave South Box 1600 Fort Nelson, BC V0C 1R0	<b>Be Montney Holdings Limited</b> 4240 Blackfoot Trail Se Calgary, AB T2G 4E6
<b>Bouffloux, George William</b> 6936 - 261 Road Fort St. John, BC V1J 8B4	<b>Braun, Jesse and Randa</b> Box 151 Montney, BC V0C 1Y0
<b>Bueckert, Curtis Peter</b> 8420 - 269 Road Fort St. John, BC V1J 8A4	<b>Canadian Cardium Oils Limited</b> 3405, 13 Street SW Calgary, AB T2T 3P9
<b>Caps Transport Ltd (101116)</b> Po Box 316 Rpo Downtown Fort St. John, BC V1J 0K9	<b>Conocophillips Canada Marketing &amp; Commercial Canada</b> 401 - 9th Avenue SW Calgary, AB T2P 3C5
<b>Dan's Oilfield Rentals</b> Div 478940 B.C. Ltd. 8811 - 103rd Street Fort St. John, BC V1J 5R3	<b>Dawz Consulting Ltd</b> 447 Douglas Ridge Mews SE Calgary, AB T2Z 2M4
<b>E-Qwest Consulting Ltd</b> 6768 Dixon Dam Rd Vernon, BC V1B 3J9	<b>E &amp; A Ventures Ltd.</b> Box 286 Prespatou, BC V0C 2S0
<b>Fireweed Energy Ltd.</b> Suite 500, 900 - 3rd Avenue SW Calgary, AB T2G 0G5	<b>Garcia &amp; Sons Transfer Ltd</b> Box 3220 4308 - 55th Street Fort Nelson, BC V0C 1R0
<b>Gloria Bonnett Jr</b> 2382 Ridgeland Street Memphis, Tennessee 38119	<b>Henry Lee Mitchell</b> Po Box 284 Paris, Kentucky 40362
<b>Highway Gas Pool</b> 200, 207 - 9 Avenue SW Calgary, AB T2P 1K3	<b>IHS Markit (101174)</b> 112 4 Ave SW #800 Calgary, AB T2P 0H3

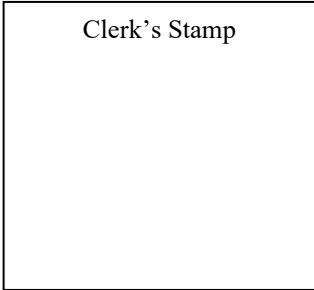
<b>Japex Montney Ltd.</b> Stock Exchange Tower Suite 2320, 300 5th Avenue, S.W. Calgary, Alberta T2P 3C4	<b>Jason Goosney (101300)</b>
<b>JCI Filtration &amp; Separation Inc</b> 2929 - 15th Street NE Calgary, AB T2E 7L8	<b>Jerome Santiago (101304)</b>
<b>Ms. Catherine Schroeder Talan</b> RR 2, 23 Bray Court Pelham, Massachusetts 01002	<b>Northwestel Inc</b> PO Box 2710 Whitehorse, Yukon Territory Y1A 4Z8
<b>Peace Hotshot &amp; Picker Services</b> Box 288 Charlie Lake, BC V0C 1H0	<b>Petro-Canada Lubricants Inc</b> C/O 913950 Po Box 4090, Station A Toronto, ON M5W 0E9
<b>Pineview Management Ltd</b> RR1, Site 16, Comp 12 Fort St. John, BC V1J 4M6	<b>Receiver General – NRT</b> 875 Heron Road Ottawa, ON K1A 1B1
<b>Roy Northern Land Service Ltd</b> Box 847 10912-100 Ave Fairview, AB T0H 1L0	<b>Talan, Deborah R</b> 15260 Ventura Boulevard 2100 Sherman Oaks, California 91403
<b>Talan, Susannah</b> 39 Cumberland Avenue Portland, Maine 04101	<b>Storm Resources Ltd.</b> PO Box 1420 Station M Calgary, AB T2P 2L6
<b>Vernon Einar Mjgodal</b> C/O Noreen Kramer Box 66 Montney, BE V0C 1Y0	<b>Vipond Controls Ltd.</b> Suite 510, 940-6 Ave SW Calgary, AB T2P 3T1

### EMAIL SERVICE

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**SCHEDULE "B"**  
**FORM OF SEALING ORDER**



COURT FILE NUMBER      B301-135903

COURT                      COURT OF KING’S BENCH OF ALBERTA

JUDICIAL CENTRE        CALGARY

                                  IN THE MATTER OF THE NOTICE OF INTENTION  
                                  TO MAKE A PROPOSAL OF ERIKSON NATIONAL  
                                  ENERGY INC.

DOCUMENT                **ORDER: RESTRICTED COURT ACCESS**

APPLICANT                KSV RESTRUCTURING INC. IN ITS CAPACITY AS  
                                  THE PROPOSAL TRUSTEE

ADDRESS FOR              **Fasken Martineau DuMoulin LLP**  
SERVICE AND              Barristers and Solicitors  
CONTACT                    3400 First Canadian Centre  
INFORMATION OF         350 – 7<sup>th</sup> Avenue SW  
PARTY FILING THIS       Calgary, Alberta T2P 3N9  
DOCUMENT

**Attention: Robyn Gurofsky / Jessica Cameron**  
Phone: (403) 261-9469 / (403) 261-9468  
Email: [rgurofsky@fasken.com](mailto:rgurofsky@fasken.com) / [jcameron@fasken.com](mailto:jcameron@fasken.com)

File Number: 267908.00025

**DATE ON WHICH ORDER WAS PRONOUNCED:**                      November 21, 2024

**LOCATION OF HEARING:**    Edmonton Law Courts

**NAME OF JUSTICE WHO MADE THIS ORDER:**                              The Honourable Justice M. E. Burns

**UPON** the Application of the Applicant, KSV Restructuring Inc. in its capacity as the Proposal Trustee (the “**Proposal Trustee**”) of Erikson National Energy Inc. (“**Erikson**”), seeking an order sealing Confidential Appendix “1” to the Second Report of the Proposal Trustee, dated November 18, 2024 (the “**Second Report**”); **AND UPON** having read the Application, the Second Report, and the other pleadings and materials previously filed in the within proceedings; **AND UPON** hearing counsel for the Proposal Trustee, counsel for Erikson, and other counsel in attendance at the hearing;

**IT IS HEREBY ORDERED AND DECLARED THAT**

**SERVICE**

1. Service of notice of this Application and materials in support of this Order is hereby declared good and sufficient, and the time for service of this Application and supporting materials is hereby abridged to the time actually given and this Application is properly returnable today.

**RESTRICTED COURT ACCESS**

2. Confidential Appendix “1” to the Second Report shall immediately be sealed by the Clerk of the Court, kept confidential and shall not form part of the public record, and not be available for public inspection until the closing of a transaction or transactions for substantially all of the assets of Erikson as part of any type of insolvency proceedings or unless otherwise ordered by this Court.
3. Confidential Appendix “1” to the Second Report shall be sealed and filed in an envelope containing the following statement thereon:

THIS ENVELOPE CONTAINS CONFIDENTIAL APPENDIX “1” TO THE SECOND REPORT OF THE PROPOSAL TRUSTEE, DATED NOVEMBER 18, 2024, WHICH SHALL BE SEALED ON THE COURT RECORD AND IS NOT TO BE PLACED ON THE PUBLIC RECORD OR MADE PUBLICLY ACCESSIBLE UNTIL THE CLOSING OF A TRANSACTION OR TRANSACTIONS FOR SUBSTANTIALLY ALL OF THE ASSETS OF ERIKSON NATIONAL ENERGY INC. AS PART OF ANY TYPE OF INSOLVENCY PROCEEDINGS OR UNTIL FURTHER ORDER OF THIS COURT.

4. The Proposal Trustee may share Confidential Appendix “1” to the Second Report with any party who enters into a confidentiality agreement with the Proposal Trustee in a form satisfactory to the Proposal Trustee in its sole discretion.

5. In the event an interested party wishes to unseal the contents of Confidential Appendix “1” to the Second Report, such interested party may bring an application to Court in the within proceedings on no less than 7 days’ notice to the Proposal Trustee, Erikson, and Sayer.
6. Service of this Order shall be deemed good and sufficient by serving the same on:
  - a. the persons listed on the service list created in these proceedings;
  - b. any other person served with notice of the Application for this Order;
  - c. any other parties attending or represented at the Application for this Order; and
  - d. posting a copy of this Order on the Proposal Trustee’s website at:  
<https://www.ksvadvisory.com/experience/case/erikson>,

and service on any other person is hereby dispensed with.

7. Service of this Order may be effected by facsimile, electronic mail, personal delivery, or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

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Justice of the Court of King’s Bench of Alberta