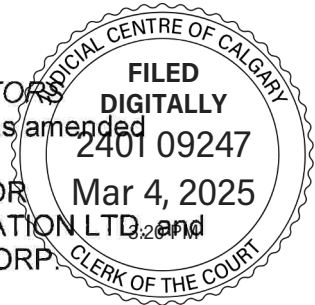


COURT FILE NUMBER 2401-09247
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

IN THE MATTER OF COMPANIES' CREDITORS'
ARRANGEMENT ACT, RSC 1985, c C-36, as amended

AND IN THE MATTER OF COMPROMISE OR
ARRANGEMENT OF LONG RUN EXPLORATION LTD. and
CALGARY SINOENERGY INVESTMENT CORP.



APPLICANT ORPHAN WELL ASSOCIATION
RESPONDENT LONG RUN EXPLORATION LTD.

DOCUMENT AFFIDAVIT OF SERVICE

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Phone: 403.693.5420/(780) 969.3051
Email: rzahara@mltaikins.com / mmcintosh@mltaikins.com
File: 0148745.00007

AFFIDAVIT OF AMEENA QUAZI

Sworn on March 4, 2025

I, Ameena Quazi, of the City of Edmonton, in the Province of Alberta, SWEAR AND SAY THAT:

1. I am a legal assistant employed at MLT Aikins LLP ("**MLT Aikins**"), solicitors for the Applicant, Orphan Well Association (the "**OWA**") and as such, I have personal knowledge of the matters deposed to herein, except where stated to be based on information and belief, in which case, I verily believe the same to be true.
2. Attached hereto and marked as **Exhibit "A"** is a copy of the Service List for this Action, updated as of January 16, 2025.

3. On February 26, 2025, our office sent filed copies of the following materials via email to those parties on the Service List with email addresses (the "**Email Parties**"):
 - (a) Application to appoint PricewaterhouseCoopers Inc. as receiver over Long Run Exploration Ltd., filed on February 26, 2025;
 - (b) Affidavit of Lars De Pauw, sworn February 26, 2025, filed on February 26, 2025; and
 - (c) Brief (and Authorities) of the OWA, filed on February 26, 2025.(collectively, the "**Receivership Application Materials**")
4. Attached hereto and collectively marked as **Exhibit "B"** is a copy of the email dated February 26, 2025, along with a copy of the service letter to the Email Parties enclosing the Receivership Application Materials.
5. On February 26, 2025, our office sent copies of the Receivership Application Materials to the parties on the Service List with physical addresses via courier (the "**Courier Parties**").
6. Attached hereto and collectively marked as **Exhibit "C"** is a copy of the letter to the Courier Parties enclosing the Receivership Application materials, dated February 26, 2025, along with copies of the confirmation of deliveries of the Receivership Application Materials.
7. We received automated messages from certain Email Parties in response to our initial email on February 26, 2025 indicating that the email was not delivered due to the size of the Receivership Application Materials. As such, on February 27, 2025, we resent the Application Materials via LiquidFiles to those Email Parties on the Service List. Attached hereto and collectively marked as **Exhibit "D"** is a copy of our File Transfer Link to the Undelivered Emails along with our service letter and Application Materials attached thereto. With the exception of Briko Energy Corp., I can confirm that there have been no undelivered email responses thereafter.

8. On March 4, 2025, our office instructed the courier to send copies of the Receivership Application Materials to Briko Energy Corp. at its physical address listed in the Service List.

SWORN BEFORE ME at the City of
Edmonton, in the Province of Alberta,
this 4th day of March, 2025

)
)
)
)


A Commissioner for Oaths in and for Alberta

)
)
)
)


Ameena Quazi

JAMIE-LEE DUROCHER
Commission Expires
July 18, 2025

Clerk's Stamp

COURT FILE NUMBER 2401-09247
COURT COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c C-36, AS AMENDED
AND IN THE MATTER OF THE PLAN OF COMPROMISE OR
ARRANGEMENT OF LONG RUN EXPLORATION LTD.

DOCUMENT

SERVICE LIST

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

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Blake, Cassels & Graydon LLP

Barristers and Solicitors

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855 – 2nd Street SW

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Telephone No: 403-260-9697 / 403-260-9760

E-mail: kelly.bourassa@blakes.com /
farrukh.ahmad@blakes.com

File: 14438/2

This is Exhibit A referred to in the Affidavit of

Ameena Quazi

Sworn before me this 4th day

Of March A.D., 20 25


A Notary Public, A Commissioner for Oaths
in and for Alberta

JAMIE-LEE DUROCHER
Commission Expires
July 18, 2025

SERVICE LIST
(as at January 16, 2025)

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<p>ALBERTA ENERGY REGULATOR Suite 1000, 250 – 5 Street SW Calgary, Alberta T2P 0R4</p> <p>Attention: Maria Lavelle E-mail: maria.lavelle@aer.ca</p> <p>E-mail: insolvency@aer.ca</p>	<p>BENNETT JONES LLP 4500 Bankers Hall East 855 2nd Street SW Calgary, Alberta T2P 4K7</p> <p>Attention: Kelsey Meyer E-mail: meyerk@bennettjones.com</p> <p>Attention: Michael Selnes E-mail: selnesm@bennettjones.com</p> <p>Attention: Kaamil Khalfan Email: khalfank@bennettjones.com</p> <p><i>Counsel to the Monitor</i></p>
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<p>CALGARY SINOENERGY INVESTMENT CORP.</p> <p>1500, 444 – 5 Avenue SW Calgary, Alberta T2P 2T8</p>	<p>CALTEX RESOURCES LTD.</p> <p>1500, 717 – 7 Avenue SW Calgary, Alberta T2P 0Z3</p>

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<p>Attention: Robert Stack Email: rstack@wilcraft.com</p> <p><i>Counsel to Henenhaixin Corp.</i></p>	
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<p>PRAIRIE PROVIDENT RESOURCES CANADA LTD.</p> <p>1100, 640 – 5 Street SW Calgary, Alberta T2P 3G4</p> <p>E-mail: jdunne@ppr.ca</p>	<p>RCAP LEASING INC.</p> <p>5575 North Service Road, Ste 300 Burlington, Ontario L7L 6M1</p> <p>E-mail: cms_alberta_notifications@teranet.ca</p>
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<p>Special Areas Board</p> <p>Email: sue.carl@specialareas.ab.ca</p>	<p>M.D. of Wainwright</p> <p>Email: taxes@mdwainwright.ca</p>
<p>Alberta Environment and Protected Areas</p> <p>Attention: Vaughan Molen, Lucas Zhang</p> <p>Email: Vaughan.Molen@gov.ab.ca; Lucas.Zhang@gov.ab.ca</p>	<p>Rose LLP 2100, 440 2nd Avenue SW, Calgary, AB, Canada T2P 5E9</p> <p>Attention: Samatha E. Stokes, David Wachowich</p> <p>Email: Samantha.Stokes@rosellp.com; David.Wachowich@rosellp.com</p> <p><i>Counsel to Mr. Michael Lam, a defendant in the Henenghaixin Corp v Deng, et al, ABKB 2001- 03353 action</i></p>

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CANADA REVENUE AGENCY

Surrey National Verification and Collections Centre
9755 King George Boulevard
Surrey, British Columbia V3T 5E1

Amcena Quazi

Sworn before me this 4th day

Of March A.D., 20 25



A Notary Public, A Commissioner for Oaths
in and for Alberta

JAMIE-LEE DUROCHER
Commission Expires
July 18, 2025

Regie Agcaoili

From: Regie Agcaoili
Sent: Wednesday, February 26, 2025 2:54 PM
To: bennett.wong@dentons.com; brett.wilson@fticonsulting.com;
 bryan.walker@nortonrosefulbright.com; farrukh.ahmad@blakes.com;
 cms_alberta_notifications@teranet.ca; deryck.helkaa@fticonsulting.com;
 dm@gocip.com; dustin.olver@fticonsulting.com; eddiezou@ca.ccb.com;
 george.body@justice.gc.ca; insolvency@aer.ca; jdunne@ppr.ca;
 jenine.urquhart@nortonrosefulbright.com; jenna.oreilly@midstreamequipment.com;
 john.regush@dentons.com; kasydi.mack@justice.gc.ca; KBenders@brikoenergy.com;
 kelly.bourassa@blakes.com; kristopher.lensink@gov.ab.ca; legal-icengx-ppr@ice.com;
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 pb@gocip.com; rod@perronventures.com; Ryan Zahara;
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Cc: Ryan Zahara; Molly McIntosh

Subject: ITMO Long Run Exploration Ltd. et al; Court of King's Bench Action No. 2401-09247

Attachments: Letter to Service List re Application Materials.pdf; Receivership Application, filed Feb 26, 2025.pdf; Affidavit of Lars De Pauw (sworn Feb 26, 2025), filed Feb 26, 2025.pdf; Brief (and Authorities), filed Feb 26, 2025.pdf

Good afternoon,

Please see attached correspondence and enclosures from Ms. McIntosh.

Kind regards,

Regie Agcaoili
Legal Assistant

P: (403) 693-5402 | E: ragcaoili@mltaikins.com

Assistant to: R. Zahara, E. Ashworth and M. MacGillivray

MLT Aikins LLP

2100 Livingston Place

222 3rd Ave SW

Calgary, AB T2P 0B4

MLT AIKINS

Our offices are located on the territories of Indigenous peoples, including the First Nations of Treaties 1, 4, 6 and 7, the Coast Salish peoples, as well as other non-Treaty First Nations and Métis. We are committed to reconciliation.

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WESTERN CANADA'S LAW FIRM

MLT Aikins LLP
2100 - 222 3rd Avenue SW
Calgary, AB T2P 0B4
T: (780) 969-3500
F: (403) 508-4349

February 26, 2025

VIA E-MAIL and COURIER

TO THE SERVICE LIST:

Molly McIntosh
Direct Line: (780) 969-3501
E-mail: mmcIntosh@mltaikins.com

Ameena Quazi
Legal Assistant
Direct Line: (780) 969-5091
E-mail: aquazi@mltaikins.com

Re: ITMO CCAA of Long Run Exploration Ltd. and Calgary Sinoenergy Investment Corp., ABKB Action No. 2401 09247

We are counsel to the Orphan Well Association (“**OWA**”), which acts under the delegated authority of the Alberta Energy Regulator in respect of Long Run Exploration Ltd. (“**Long Run**”) in the above-noted matter and we write in respect of our Application to Appoint a Receiver over Long Run, which is scheduled before the Honourable Justice Campbell on March 5, 2025 at 2:00 p.m. (the “**Application**”).

Please find enclosed, for service upon you, filed copies of the materials we intend to rely on at the Application (“**Application Materials**”):

1. Receivership Application, filed on February 26, 2025;
2. Affidavit of Lars De Pauw, sworn on February 26, 2025, and filed on February 26, 2025; and
3. Brief (with List of Authorities) in support of the Receivership Application, filed on February 26, 2025.

Details of the WebEx link are attached as Appendix “A” to the Receivership Application.

Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

MLT AIKINS LLP



Molly McIntosh

Encls.

cc: Ryan Zahara, MLT Aikins LLP, via email

39928909

MLT AIKINS

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E-mail: mmcIntosh@mltaikins.com

Ameena Quazi
Legal Assistant
Direct Line: (780) 969-5091
E-mail: aquazi@mltaikins.com

February 26, 2025

VIA E-MAIL and COURIER

TO THE SERVICE LIST:

Re: ITMO CCAA of Long Run Exploration Ltd. and Calgary Sinoenergy Investment Corp., ABKB Action No. 2401 09247

We are counsel to the Orphan Well Association ("OWA"), which acts under the delegated authority of the Alberta Energy Regulator in respect of Long Run Exploration Ltd. ("Long Run") in the above-noted matter and we write in respect of our Application to Appoint a Receiver over Long Run, which is scheduled before the Honourable Justice Campbell on March 5, 2025 at 2:00 p.m. (the "Application").

Please find enclosed, for service upon you, filed copies of the materials we intend to rely on at the Application ("Application Materials"):

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2. Affidavit of Lars De Pauw, sworn on February 26, 2025, and filed on February 26, 2025; and
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Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

MLT AIKINS LLP



Molly McIntosh

Encls.

cc: Ryan Zahara, MLT Aikins LLP, via email

This is Exhibit C referred to in the Affidavit of

Ameena Quazi

Sworn before me this 4th day

Of March A.D., 20 25


A Notary Public, A Commissioner for Oaths
in and for Alberta

JAMIE-LEE DUROCHER
Commission Expires
July 18, 20 25

39928909



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 Phone Number: **403-693-4300**
 Email: **twuthrich@mltaikins.com**

Dropoff:

Company Name: **Bearspaw Petroleum Ltd.**
 Address: **5309, 333 96 Avenue NE, Calgary T3K 0S3, Alberta, Canada**
 Contact Name: **None Provided**
 Phone Number: **None Provided**
 Email: **None Provided**

Item	Price	Qty	Total
Trip: 90 Min	\$22	1	\$22

Delivered by: **N/A**
 Received by: **Janice**
 Special Instructions: **Deliver package to Bearspaw Petroleum Ltd.**
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Grand Total	\$23.1

Jordan Matthews

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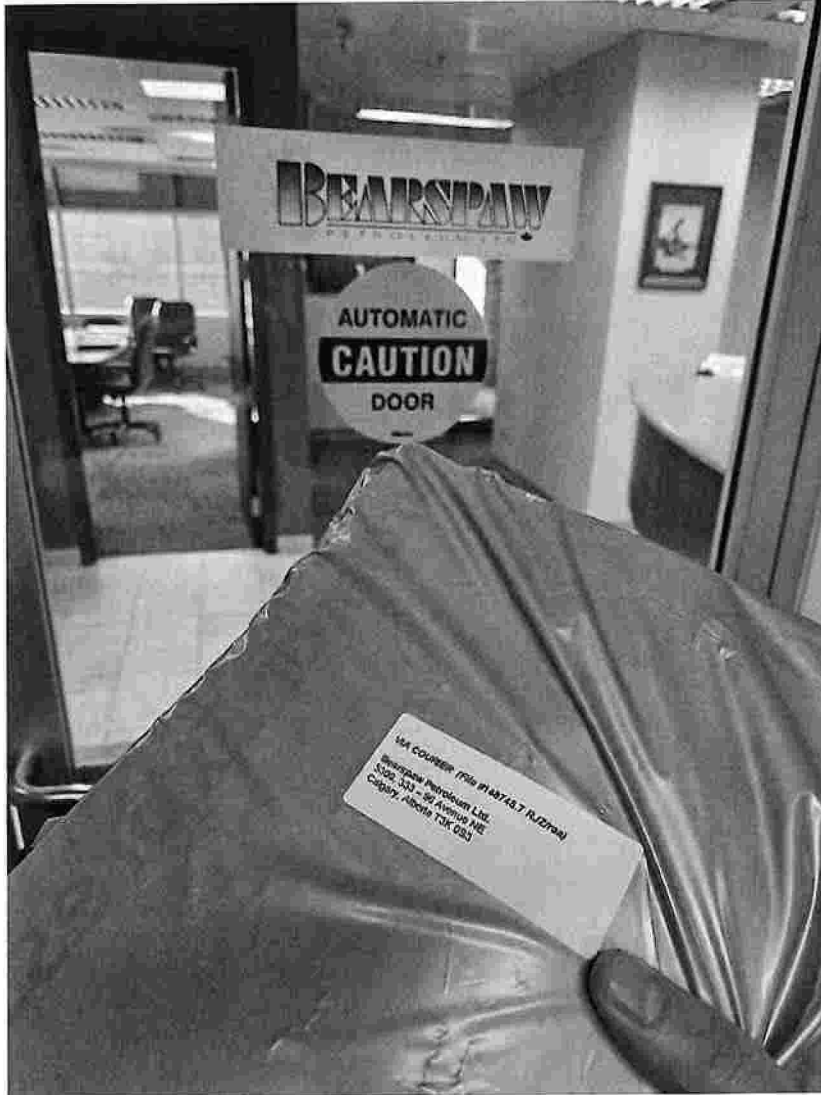


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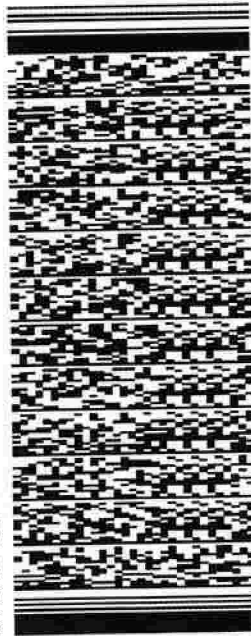
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T2P 0B4
403-693-4300
REF: 6420

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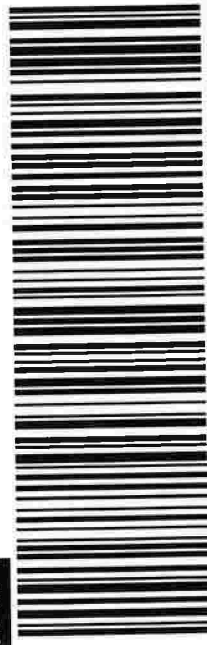
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Last updated: Thu. Feb. 27, 2025

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Destination	SURREY, BC, CA
References	0148745.00007 6420
Service	Purolator Express Pack
Est. Weight	1 lb
Shipment Date	Wed. Feb. 26, 2025

History

Date	City	Description
Thu. Feb. 27, 2025 - 9:46 a.m.	SURREY, BC	Shipment delivered
Thu. Feb. 27, 2025 - 7:37 a.m.	SURREY, BC	On vehicle for delivery
Thu. Feb. 27, 2025 - 7:28 a.m.	LANGLEY, BC	Arrived at sort facility
Thu. Feb. 27, 2025 - 7:09 a.m.	LANGLEY, BC	Arrived at sort facility
Wed. Feb. 26, 2025 - 7:41 p.m.	CALGARY, AB	Arrived at sort facility
Wed. Feb. 26, 2025 - 3:18 p.m.	CALGARY, AB	Picked up by Purolator
Wed. Feb. 26, 2025 - 4:48 p.m.	PUROLATOR	Label information electronically submitted

Regie Agcaoili

From: Regie Agcaoili <ragcaoili@mltaikins.com>
Sent: Thursday, February 27, 2025 9:45 AM
To: cfyfe@birchcliffenergy.com; hgrigore@birchcliffenergy.com;
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tfc@ca.ccb.com; mineralland@birchcliffenergy.com; tthomas@saturnoil.com;
eddiezou@ca.ccb.com; vhahn@mdprovost.ca; gfederuik@mdprovost.ca;
kbenders@brikoenergy.com
Cc: Ryan Zahara; Molly McIntosh
Subject: ITMO Long Run Exploration Ltd. et al; Court of King's Bench Action No. 2401-09247

Good morning,

We received a couple of email bounce back from yesterday's service.

Please see attached correspondence and enclosures from Ms. Molly McIntosh.

Kind regards,

Regie A.

This is Exhibit D referred to in the Affidavit of

Ameena Quazi

Sworn before me this 4th day

Of March A.D., 2025



A Notary Public, A Commissioner for Oaths
in and for Alberta

JAMIE-LEE DUROCHER
Commission Expires
July 18, 2025

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Files attached to this message

Filename	Size
Letter to Service List re Application Materials.pdf	276 KB
Receivership Application, filed Feb 26, 2025.pdf	1.37 MB
Affidavit of Lars De Pauw (sworn Feb 26, 2025), filed Feb 26, 2025.pdf	9.6 MB

Brief (and Authorities), filed Feb 26, 2025.pdf

8.29 MB

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Regie Agcaoili

Legal Assistant

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February 26, 2025

VIA E-MAIL and COURIER

TO THE SERVICE LIST:

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Ameena Quazi
Legal Assistant
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Re: ITMO CCAA of Long Run Exploration Ltd. and Calgary Sinoenergy Investment Corp., ABKB Action No. 2401 09247

We are counsel to the Orphan Well Association ("OWA"), which acts under the delegated authority of the Alberta Energy Regulator in respect of Long Run Exploration Ltd. ("Long Run") in the above-noted matter and we write in respect of our Application to Appoint a Receiver over Long Run, which is scheduled before the Honourable Justice Campbell on March 5, 2025 at 2:00 p.m. (the "Application").

Please find enclosed, for service upon you, filed copies of the materials we intend to rely on at the Application ("Application Materials"):

1. Receivership Application, filed on February 26, 2025;
2. Affidavit of Lars De Pauw, sworn on February 26, 2025, and filed on February 26, 2025; and
3. Brief (with List of Authorities) in support of the Receivership Application, filed on February 26, 2025.

Details of the WebEx link are attached as Appendix "A" to the Receivership Application.

Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

MLT AIKINS LLP



Molly McIntosh

Encls.

cc: Ryan Zahara, MLT Aikins LLP, via email

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