



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*, RSC 1985, c C-36, as amended

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

DOCUMENT **CONSENT ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT:

BENNETT JONES LLP
Suite 4500, 855 – 2nd Street S.W.
Calgary, AB T2P 4K7

Attention: Kelsey Meyer / Michael Selnes
Telephone No.: 403-298-3323 / 3311
Fax No.: 403-265-7219
Client File No.: 76142.18

DATE ON WHICH ORDER WAS PRONOUNCED: Monday, September 9, 2024

LOCATION OF HEARING OR TRIAL: Calgary Courts Centre

NAME OF JUSTICE WHO MADE THIS ORDER: The Honourable Justice D. R. Mah

UPON THE APPLICATION of FTI Consulting Canada Inc., the Court-appointed monitor (“**Monitor**”) with enhanced powers of the debtors, Long Run Exploration Ltd. and Calgary Sinoenergy Investment Corp. (collectively, the “**Debtors**”); AND UPON having read the Third Report of the Monitor filed September 5, 2024 (the “**Third Report**”); AND UPON reviewing

the Second Amended and Restated Initial Order granted by the Honourable Justice J. R. Little in these proceedings on July 30, 2024 (the “SARIO”); AND UPON hearing counsel for the Monitor, counsel for Henenghaixin Corp. (“H Corp.”), and counsel for other interested parties; AND UPON noting the consent of counsel for H Corp.;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE

1. The time for service of the application for this order is hereby abridged and deemed good and sufficient and this application is properly returnable today.

SPECIAL LEGAL COUNSEL

2. This Honourable Court directs that the Monitor retain special legal counsel to advise and represent the Monitor and to appear for and make submissions on behalf of the Monitor to this Court in relation to the claim advanced by H Corp. in Court of King’s Bench of Alberta Action No. 2001-03353 (the “H Corp. Action”), including as the H Corp. Action relates to the stalking horse sale and investment solicitation process (the “SISP”) approved by this Honourable Court pursuant to the SARIO in these *Companies’ Creditors Arrangement Act* (“CCAA”) proceedings, and including as the H Corp. Action relates to any application of the Monitor for approval of a transaction resulting from the SISP.
3. For certainty, Bennett Jones LLP is not restricted from acting as legal counsel for the Monitor in these CCAA proceedings in any manner, including in relation to any application of the Monitor for approval of a transaction resulting from the SISP (and including any application for a reverse vesting order in relation to any such transaction), save and except that Bennett Jones LLP shall not appear for or make submissions on behalf of the Monitor in relation to the claim advanced by H Corp. in the H Corp. Action, including as the H Corp. Action relates to the SISP, and including as the H Corp. Action relates to any application of the Monitor for approval of a transaction resulting from the SISP. For greater certainty, Bennett Jones LLP may coordinate with special legal counsel for the Monitor with respect to the special legal

counsel appearing for and making submissions on behalf of the Monitor to this Court within these CCAA proceedings.

SEALING ORDER

4. Confidential Appendix “J” to the Third Report (the “**Confidential Materials**”) shall be sealed on the Court File in these CCAA Proceedings until further Order of the Court.
5. The Clerk of the Court shall file the Confidential Materials in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS, BEING CONFIDENTIAL APPENDIX “J” TO THE THIRD REPORT OF THE MONITOR, FTI CONSULTING CANADA INC., DATED SEPTEMBER 5, 2024, PURSUANT TO THE SEALING ORDER GRANTED BY THE HONOURABLE JUSTICE D. R. MAH ON SEPTEMBER 9, 2024. THE CLERK OF THE COURT SHALL NOT RELEASE THE CONFIDENTIAL MATERIALS TO THE PUBLIC UNLESS OR UNTIL FURTHER ORDER OF THE COURT.

6. The Monitor is authorized, but not required, to provide the Confidential Materials (or any portion thereof or information contained therein) to any interested party, entity or person that the Monitor considers reasonable in the circumstances, subject to confidentiality arrangements satisfactory to the Monitor.
7. Leave is hereby granted to any person affected by this Order to apply to this Honourable Court for a further order modifying or varying the terms of this Order, with such application to be brought on no less than 5 days’ notice in accordance with the Alberta Rules of Court.

8. Service of this Order shall be deemed good and sufficient by serving same on the Service List maintained for this Action. No other persons are entitled to be served with a copy of this Order.



J.C.K.B.A.

CONSENTED TO THIS 05 DAY OF SEPTEMBER, 2024


FIELD LLP

WILSON LAYCRAFT LLP

Per:

Douglas Nishimura
Solicitors for Henenghaixin Corp.


Per:



Robert Stack
Solicitors for Henenghaixin Corp.

SONG & HOWARD LAW OFFICE

Per:



Roger Song
Solicitors for Henenghaixin Corp.


8. Service of this Order shall be deemed good and sufficient by serving same on the Service List maintained for this Action. No other persons are entitled to be served with a copy of this Order.

J.C.K.B.A.

CONSENTED TO THIS 5th DAY OF SEPTEMBER, 2024

FIELD LLP

Per:



Douglas Nishimura
Solicitors for Henenghaixin Corp.

WILSON LAYCRAFT LLP

Per:

Robert Stack
Solicitors for Henenghaixin Corp.

SONG & HOWARD LAW OFFICE

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