

February 28, 2025

**IN THE MATTER OF THE BANKRUPTCY OF  
WESTERN CANADIAN MULCHING LTD  
OF THE CITY OF CALGARY  
IN THE PROVINCE OF ALBERTA**

To all known creditors of Western Canadian Mulching Ltd.

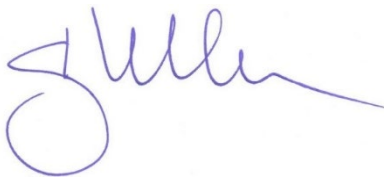
Enclosed are the following documents:

- Form 68
  - Notice of First Meeting of Creditors;
- Form 78
  - Statement of Affairs;
  - Creditors Listing;
- Bankruptcy Order; and
- Form 31 & 36
  - Proof of Claim / Proxy and related instructions.

Please complete your proof of claim form and submit it with required documentation to Hailey Liu by email at [Wolverine@fticonsulting.com](mailto:Wolverine@fticonsulting.com) or by fax at (403) 232-6116.

Yours truly,

FTI Consulting Canada Inc.



Deryck Helkaa, CIRP, LIT, CPA  
Senior Managing Director

District of: Alberta  
Division No. 02 - Calgary  
Court No. 25-3191524  
Estate No. 25-3191524

\_FORM 68\_  
Notice of Bankruptcy, First Meeting of Creditors  
(Subsection 102(1) of the Act)

Original  Amended

In the Matter of the Bankruptcy of  
Western Canadian Mulching Ltd.  
of the city of Niksu  
in the Province of Alberta

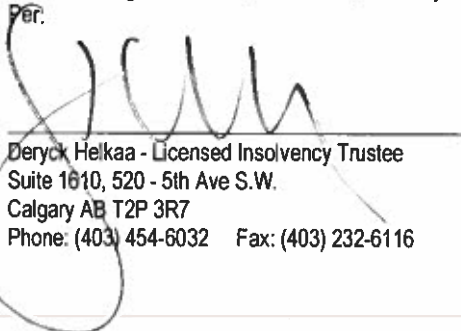
Take notice that:

1. Western Canadian Mulching Ltd. filed (or was deemed to have filed) an assignment (or a bankruptcy order was made against Western Canadian Mulching Ltd.) on the 21st day of February 2025 and the undersigned, FTI Consulting Canada Inc., was appointed as trustee of the estate of the bankrupt by the official receiver (or the Court); subject to affirmation by the creditors of the trustee's appointment or substitution of another trustee by the creditors.
2. The first meeting of creditors of the bankrupt will be held on the 12th day of March 2025 at 10:30 AM at Microsoft Teams, N/A or <https://www.microsoft.com/en-ca/microsoft-teams/join-a-meeting>, Meeting ID: 226 629 133 616 ; Passcode: f6aR9ec9, +1 587-319-2925,,835864416#.
3. To be entitled to vote at the meeting, a creditor must file with the trustee, before the meeting, a proof of claim and, where necessary, a proxy.
4. Enclosed with this notice are a proof of claim form, proxy form and list of creditors with claims amounting to \$25 or more showing the amounts of their claims.
5. Creditors must prove their claims against the estate of the bankrupt to share in any distribution of the proceeds realized from the estate.

Dated at the city of Calgary in the Province of Alberta, this 26th day of February 2025.

FTI Consulting Canada Inc. - Licensed Insolvency Trustee

Per:



Deryck Helkaa - Licensed Insolvency Trustee  
Suite 1610, 520 - 5th Ave S.W.  
Calgary AB T2P 3R7  
Phone: (403) 454-6032 Fax: (403) 232-6116

District of: Alberta  
 Division No. 02 - Calgary  
 Court No. 2301-16371  
 Estate No.

Original  Amended

-- Form 78 --  
 Statement of Affairs (Corporate Bankruptcy)  
 (Subsection 49(2) and Paragraph 158(d) of the Act / subsections 50(2) and 62(1) of the Act)

In the Matter of the Bankruptcy of  
 Western Canadian Mulching Ltd.  
 of the city of Niksu  
 in the Province of Alberta

To the bankrupt:

You are required to carefully and accurately complete this form and the applicable attachments showing the state of your affairs on the date of the bankruptcy, on the 21st day of February 2025. When completed, this form and the applicable attachments will constitute the Statement of Affairs and must be verified by oath or solemn declaration by a duly authorized director, if the bankrupt is a corporation, or by yourself, in other cases..

Give reasons for the bankrupt's/debtor's financial difficulty (Select all that apply and provide details):

- Negative market conditions;  Foreign Exchange Fluctuations;  Economic Downturn;  Poor Financial Performance;  Legal Matters (Provide details);  
 Lack of Working Capital/Funding;  Competition;  Legislated or Regulatory Restrictions;  Natural Disaster;  Increased Cost of Doing Business;  
 Overhead Increasing;  Faulty Infrastructure or Business Model;  Unsuccessful Marketing Initiatives;  Personal Issues;  Poor Management;  
 Faulty Accounting;  Tax Liabilities;  Labour;  Other (Please specify).

Provide relevant details:

ASSETS <small>(totals from the list of assets as stated and estimated by bankrupt/debtor)</small>	LIABILITIES <small>(totals from the list of liabilities as stated and estimated by bankrupt/debtor)</small>
1. Cash on hand <span style="float:right">0.00</span>	1. Secured creditors <span style="float:right">1.00</span>
2. Deposits in financial institutions <span style="float:right">0.00</span>	2. Preferred creditors, securities, and priorities <span style="float:right">0.00</span>
3. Accounts receivable and other receivables	3. Unsecured creditors <span style="float:right">30,378,673.25</span>
Total amount <span style="float:right">0.00</span>	4. Contingent, trust claims or other liabilities estimated to be provable for <span style="float:right">0.00</span>
Estimated realizable value <span style="float:right">0.00</span>	 Total liabilities <span style="float:right">30,378,674.25</span>
4. Inventory <span style="float:right">0.00</span>	 Surplus <span style="float:right">30,378,673.25</span>
5. Trade fixtures, etc. <span style="float:right">0.00</span>	
6. Livestock <span style="float:right">0.00</span>	
7. Machinery and equipment <span style="float:right">0.00</span>	
8. Real property or immovables <span style="float:right">0.00</span>	
9. Furniture <span style="float:right">0.00</span>	
10. Intangible assets (intellectual properties, licences, cryptocurrencies, digital tokens, etc.) <span style="float:right">0.00</span>	
11. Vehicles <span style="float:right">0.00</span>	
12. Securities (shares, bonds, debentures, etc.) <span style="float:right">0.00</span>	
13. Other property <span style="float:right">1.00</span>	
 Total of lines 1 to 13 <span style="float:right">1.00</span>	
 If bankrupt is a corporation, add:	
Amount of subscribed capital <span style="float:right">0.00</span>	
Amount paid on capital <span style="float:right">0.00</span>	
 Balance subscribed and unpaid <span style="float:right">0.00</span>	
Estimated to produce <span style="float:right">0.00</span> <span style="float:right">0.00</span>	
 Total assets <span style="float:right">1.00</span>	
 Deficiency <span style="float:right">-30,378,673.25</span>	
 Total value of assets located outside Canada included in lines 1 to 13 <span style="float:right">0.00</span>	

FORM 78 -- Continued

List of Assets

Arrange by Nature of asset and number consecutively

No.	Nature of asset <sup>1</sup>	Address/Location	Asset located outside Canada	Details	Percentage of bankrupt's/debtor's interest	Total value of the bankrupt's/debtor's interest	Estimated realizable value	Equity or Surplus	Placeholder (values on this line are for notification)
501	Other personal property	n/a	<input type="checkbox"/>	Other - No Asset	100.00	1.00	1.00	0.00	<input type="checkbox"/>
<b>Total</b>						<b>1.00</b>	<b>1.00</b>		

<sup>1</sup>Choose one option for each item: Cash on hand; Deposits in financial institutions; Accounts receivable and other receivables; Inventory; Trade fixtures, etc.; Livestock; Machinery and equipment; Residential rental property; Commercial building; Industrial building; Land; Immovable industrial equipment; Other real property; Furniture; Intangible assets (intellectual properties, licences, cryptocurrencies, digital tokens, etc.); Vehicles; Securities (shares, bonds, debentures, etc.); Bills of exchange, promissory note, etc.; Tax refunds; Other personal property.

  
 FTI Consulting Canada Inc. in its capacity  
 as Receiver

26-Feb-2025  
 Date

FORM 78 - Continued

List of Liabilities

No.	Name of creditor or claimant	Address	Nature of liability <sup>2</sup>	Details	Date given/ incurred	Amount of Claim					Asset securing the liability	Ground for the right to a priority <sup>3</sup>	Estimated surplus or (deficit) from security	Placeholder (values on this line are for notification only)
						Unsecured	Secured	Preferred/Priorities	Contingent, trust claims or other liabilities	Total amount of claim				
1	Fiera Private Debt Fund GP Inc.	70 University Ave, Suite 1200 Toronto ON M6J 2M4	Bank Loans except real property mortgage	N/A N/A	08-Dec-2023	28,857,999.00	1.00	0.00	0.00	28,858,000.00	501		-26,857,999.00	<input type="checkbox"/>
2	Canadian Western Bank	201,12230 Jasper Ave Edmonton AB T5N 3K3	Other	N/A N/A	08-Dec-2023	2,110,000.00	0.00	0.00	0.00	2,110,000.00			-2,110,000.00	<input type="checkbox"/>
3	1666321 AB Ltd.	Box 433 Worsley AB T0H 3W0	Other	N/A N/A		588.00	0.00	0.00	0.00	588.00			0.00	<input type="checkbox"/>
4	1827897 AB Ltd.	Box 1755 Fairview AB T0H 1L0	Other	N/A N/A		285,125.40	0.00	0.00	0.00	285,125.40			0.00	<input type="checkbox"/>
5	1932841 AB Ltd o/a Neufeld Farms	PO Box 26 Holchkiss AB T0H 2B0	Other	N/A N/A		23,987.25	0.00	0.00	0.00	23,987.25			0.00	<input type="checkbox"/>
6	829659 Alberta Ltd. o/a Krahn Logging	Box 1797 High Level AB T0H 1Z0	Other	N/A N/A		126,760.41	0.00	0.00	0.00	126,760.41			0.00	<input type="checkbox"/>
7	Anaconda Services Ltd.	P.O. Box 6132 Peace River AB T8S 1S1	Other	N/A N/A		88,638.42	0.00	0.00	0.00	88,638.42			0.00	<input type="checkbox"/>
8	B. Howells Trucking	Box 963 Charlie Lake BC V0C 1H0	Other	N/A N/A		63,220.50	0.00	0.00	0.00	63,220.50			0.00	<input type="checkbox"/>
9	Bassani Transportat ion Service Inc.	22643-113 Ave Edmonton AB T5S 2S3	Other	N/A N/A		807.98	0.00	0.00	0.00	807.98			0.00	<input type="checkbox"/>
10	BC Hydro	P.O. Box 9501 Stn Terminal Vancouver BC V6B 4N1	Other	N/A N/A		484.18	0.00	0.00	0.00	484.18			0.00	<input type="checkbox"/>
11	C.M.I. Inc.	1730 - 5 ieme RANG ST-CYRILL E QC J1Z 0E2	Other	N/A N/A		1,665.69	0.00	0.00	0.00	1,665.69			0.00	<input type="checkbox"/>
12	Cornac Safety Service Inc.	Box 2425 Fort Nelson BC V0C 1R0	Other	N/A N/A		78,038.31	0.00	0.00	0.00	78,038.31			0.00	<input type="checkbox"/>

26-Feb-2025

Date

FTI Consulting Canada Inc. in its capacity as Receiver

List of Liabilities

No.	Name of creditor or claimant	Address	Nature of liability <sup>2</sup>	Details	Date given/ incurred	Amount of Claim					Asset securing the liability	Ground for the right to a priority <sup>3</sup>	Estimated surplus or (deficit) from security	Place-holder (values on this line are for notification only)
						Unsecured	Secured	Preferred/Priorities	Contingent, trust claims or other liabilities	Total amount of claim				
13	D & M Contracting	Box 1541 Fairview AB T0H 1L0	Other	N/A N/A		6,741.00	0.00	0.00	0.00	6,741.00			0.00	<input type="checkbox"/>
14	Ditmarsia Holdings Ltd.	7907 -101 Ave Fort St. John BC V1J 2A1	Other	N/A N/A		5,040.00	0.00	0.00	0.00	5,040.00			0.00	<input type="checkbox"/>
15	Duncan's First Nation	Box 148 Brownvale AB T0H 0L0	Other	N/A N/A		22,090.07	0.00	0.00	0.00	22,090.07			0.00	<input type="checkbox"/>
16	Edge Equipment	12704-149 St NW Edmonton AB T5V 1B3	Other	N/A N/A		104,301.10	0.00	0.00	0.00	104,301.10			0.00	<input type="checkbox"/>
17	Fairview Auto & Ind Supplies	Box 1620 Fairview AB T0H 1L0	Other	N/A N/A		87.04	0.00	0.00	0.00	87.04			0.00	<input type="checkbox"/>
18	Flexxaire	10430 - 180 Street Edmonton AB T5S 1C3	Other	N/A N/A		7,231.22	0.00	0.00	0.00	7,231.22			0.00	<input type="checkbox"/>
19	Fort Radiator Ltd.	10903 89 Ave Fort St. John BC V1J 6V2	Other	N/A N/A		6,784.96	0.00	0.00	0.00	6,784.96			0.00	<input type="checkbox"/>
20	GFL Environmental Inc.	P.O. Box 150 Concord ON L4K 1B2	Other	N/A N/A		212.85	0.00	0.00	0.00	212.85			0.00	<input type="checkbox"/>
21	Great West Equipment	PO Box 6067 Fort St John BC V1J 2B0	Other	N/A N/A		60,844.59	0.00	0.00	0.00	60,844.59			0.00	<input type="checkbox"/>
22	Halfway River Limited Partnership	Unit 101-10012 97th Ave Fort St. John BC V1J 5P3	Other	N/A N/A		12,356.40	0.00	0.00	0.00	12,356.40			0.00	<input type="checkbox"/>
23	Halfway River Ventures LP	Unit 101 10012 97 Ave Fort St. John BC V1J 5P3	Other	N/A N/A		7,147.14	0.00	0.00	0.00	7,147.14			0.00	<input type="checkbox"/>

FTI Consulting Canada Inc. in its capacity  
as Receiver

26-Feb-2025

Date

List of Liabilities

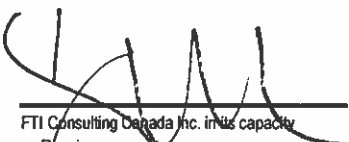
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						Unsecured	Secured	Preferred/Priorities	Contingent, trust claims or other liabilities	Total amount of claim				
24	Horizon North Camp & Catering	184 Kaska Road Sherwood Park AB T8A 4G7	Other	N/A N/A		34,718.25	0.00	0.00	0.00	34,718.25			0.00	<input type="checkbox"/>
25	Hydrus Innovations Ltd.	Box 237 Manning AB T0H 2M0	Other	N/A N/A		4,725.00	0.00	0.00	0.00	4,725.00			0.00	<input type="checkbox"/>
26	Jalco Machine Works Ltd.	8708 107th St Fort St John BC V1J 5R6	Other	N/A N/A		16.28	0.00	0.00	0.00	16.28			0.00	<input type="checkbox"/>
27	Jaymar Hauling 88 Ltd.	Box 1038 Slave Lake AB T0G 2A0	Other	N/A N/A		32,580.98	0.00	0.00	0.00	32,580.98			0.00	<input type="checkbox"/>
28	Kova Engineering Ltd.	Unit #101, 131 Portage Close Sherwood Park AB T8H 2R5	Other	N/A N/A		1,685.25	0.00	0.00	0.00	1,685.25			0.00	<input type="checkbox"/>
29	Lefley Honey Company Ltd.	Box 782 Spirit River AB T0H 3G0	Other	N/A N/A		22,138.08	0.00	0.00	0.00	22,138.08			0.00	<input type="checkbox"/>
30	MegMar Maintenance Ltd.	8704-107 ST Fort St John BC V1J 5R6	Other	N/A N/A		7,807.32	0.00	0.00	0.00	7,807.32			0.00	<input type="checkbox"/>
31	Millennium Maid Cleaning Services	8311 - 95 Avenue Fort St John BC V1J 1G9	Other	N/A N/A		771.75	0.00	0.00	0.00	771.75			0.00	<input type="checkbox"/>
32	Mulhco Ltd.	Box 2641 Stony Plain AB T7Z 1Y2	Other	N/A N/A		162,471.75	0.00	0.00	0.00	162,471.75			0.00	<input type="checkbox"/>
33	Neil's General Contracting Ltd.	Box 625 Manning AB T0H 2M0	Other	N/A N/A		43,155.00	0.00	0.00	0.00	43,155.00			0.00	<input type="checkbox"/>
34	Northern Mat & Bridge	8001 99 Street Clairmont AB T8X 5B1	Other	N/A N/A		130,359.61	0.00	0.00	0.00	130,359.61			0.00	<input type="checkbox"/>
35	Nova Hotels	1201 2nd Street, NE Manning AB T0H 2M0	Other	N/A N/A		1,523.91	0.00	0.00	0.00	1,523.91			0.00	<input type="checkbox"/>

  
 FTI Consulting Canada Inc. in its capacity as Receiver

26-Feb-2025  
 Date

List of Liabilities

No.	Name of creditor or claimant	Address	Nature of liability <sup>2</sup>	Details	Date given/ incurred	Amount of Claim					Asset securing the liability	Ground for the right to a priority <sup>3</sup>	Estimated surplus or (deficit) from security	Placeholder (values on this line are for notification only)
						Unsecured	Secured	Preferred/Priorities	Contingent, trust claims or other liabilities	Total amount of claim				
36	Pat's Auto (FSJ)	9708 108 St Fort St. John BC V1J 0A7	Other	N/A N/A		5,566.41	0.00	0.00	0.00	5,566.41			0.00	<input type="checkbox"/>
37	Quintel Communications Ltd.	220 - 19th Street SE Calgary AB T2E 6P1	Other	N/A N/A		703.50	0.00	0.00	0.00	703.50			0.00	<input type="checkbox"/>
38	Roadrunner Leasing & Sales Ltd.	Box 7056 Peace River AB T8S 1S7	Other	N/A N/A		45,793.39	0.00	0.00	0.00	45,793.39			0.00	<input type="checkbox"/>
39	Spotless Uniform Ltd.	3902 Kenworth Rd. Prince George BC V2N 1X6	Other	N/A N/A		3,183.95	0.00	0.00	0.00	3,183.95			0.00	<input type="checkbox"/>
40	Telus Communications Inc.	P.O. Box 7575 Vancouver BC V6B 8N9	Other	N/A N/A		907.67	0.00	0.00	0.00	907.67			0.00	<input type="checkbox"/>
41	Union Tractor Ltd.	3750 13 Street Nisku AB T9E 1C6	Other	N/A N/A		1,608.17	0.00	0.00	0.00	1,608.17			0.00	<input type="checkbox"/>
42	United Farmers Association (Fuel)	Suite 700 Calgary AB T3E 6L1	Other	N/A N/A		124.81	0.00	0.00	0.00	124.81			0.00	<input type="checkbox"/>
43	Venture Parts Supply	Box 808 115-3rd Ave SW Manning AB T0H 2M0	Other	N/A N/A		1,515.98	0.00	0.00	0.00	1,515.98			0.00	<input type="checkbox"/>
44	W Turner Gas & Oil Service Ltd.	10355 101st Ave Fort St. John BC V1J 2B6	Other	N/A N/A		1,627.50	0.00	0.00	0.00	1,627.50			0.00	<input type="checkbox"/>
45	Western Budget Motel -Grande Prairie #2	13920 99 St. Grande Prairie AB T8V 7W3	Other	N/A N/A		2,817.65	0.00	0.00	0.00	2,817.65			0.00	<input type="checkbox"/>
46	Willy's Trucking Service	#303, 12232-145 6 St Edmonton AB T5V 1E6	Other	N/A N/A		2,542.49	0.00	0.00	0.00	2,542.49			0.00	<input type="checkbox"/>

  
 FTI Consulting Canada Inc. in its capacity  
 as Receiver  
 Form 78 (2023-12)

26-Feb-2025  
 Date



List of Liabilities

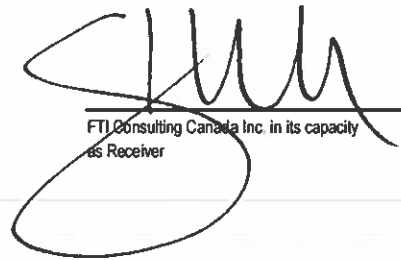
No.	Name of creditor or claimant	Address	Nature of liability <sup>2</sup>	Details	Date given/ incurred	Amount of Claim					Asset securing the liability	Ground for the right to a priority <sup>3</sup>	Estimated surplus or (deficit) from security	Placeholder (values on this line are for notification only)
						Unsecured	Secured	Preferred/Priorities	Contingent, trust claims or other liabilities	Total amount of claim				
47	Wurth Canada Limited	345 Hanion Creek Boulevard Guelph ON N1C 0A1	Other	N/A N/A		177.04	0.00	0.00	0.00	177.04			0.00	<input type="checkbox"/>
<b>Total</b>						<b>30,378,673.25</b>	<b>1.00</b>	<b>0.00</b>	<b>0.00</b>	<b>30,378,674.25</b>				

<sup>2</sup> Choose one option for each item: Accounts payable; Owed rent; Owed wages; Severance pay; Corporate taxes; Sales taxes; Employee source deductions; Litigation/legal costs and awards; Subordinated debenture; Bills of exchange; Promissory notes; Lien notes; Mortgages or hypothec on real or immovable property; Chattel mortgages or movable hypothec; General Security Agreement; Intercompany loans; Bank loans (except real property mortgage); Finance company loans; Shareholder loans; Shares and subscribed capital; Other claim or liability.

<sup>3</sup> Choose one option for each item with a preferred or priority amount: Unpaid supplier; Farmer, fisherman or aquaculturist; Owed wages; Unpaid amount regarding pension plan; Municipal taxes; Rent; Customer of a bankrupt securities firm; Deemed trust in favour of the Crown; Priming charges and interim financing; Environmental liabilities; Other.

I, FTI Consulting Canada Inc. in its capacity as Receiver, of the city of Calgary in the Province of Alberta, do swear (or solemnly declare) that this statement and the attached lists are, to the best of my knowledge, a full, true and complete statement of the affairs of the Corporation on the 21st day of February 2025 and fully disclose all property of every description that is in my possession or that may devolve on me in accordance with the Act.

SWORN (or SOLEMNLY DECLARED)  
before me at the city of Calgary in the Province of Alberta, on this 26th day of February 2025.

FTI Consulting Canada Inc. in its capacity  
as Receiver

**Laura Parvan**  
**Student-at-Law**

Clerk's Stamp

COURT FILE NO. 2301-16371

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF CANADIAN WESTERN BANK

DEFENDANTS WOLVERINE ENERGY AND INFRASTRUCTURE INC., WOLVERINE EQUIPMENT INC., WOLVERINE CONSTRUCTION INC., WOLVERINE MANAGEMENT SERVICES INC., HD ENERGY RENTALS LTD., BHW EMPLOYMENT SERVICES INC., FLO-BACK EQUIPMENT INC., LIBERTY ENERGY SERVICES LTD., WESTERN CANADIAN MULCHING LTD. and WOLVERINE GROUP INC.

APPLICANT FTI CONSULTING CANADA INC. in its capacity as Court-appointed Receiver and Manager of WOLVERINE ENERGY AND INFRASTRUCTURE INC., WOLVERINE EQUIPMENT INC., WOLVERINE CONSTRUCTION INC., HD ENERGY RENTALS LTD., BHW EMPLOYMENT SERVICES INC., FLO-BACK EQUIPMENT INC., LIBERTY ENERGY SERVICES LTD., WESTERN CANADIAN MULCHING LTD. and WOLVERINE GROUP INC.

DOCUMENT **BANKRUPTCY ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
Torys LLP  
4600 Eighth Avenue Place East  
525 - Eighth Ave SW  
Calgary, AB T2P 1G1  
  
Attention: Kyle Kashuba  
Telephone No.: +1 403.776.3744  
Fax No.: +1 403.776.3800  
File No.: 39586-2007

**DATE UPON WHICH ORDER WAS PRONOUNCED:** February 21, 2025

**NAME OF JUSTICE WHO MADE THIS ORDER:** Justice M.J. Lema

**LOCATION OF HEARING:** Edmonton, Alberta

**UPON THE APPLICATION** of FTI Consulting Canada Inc. (“**FTI**”), having an office at 1610, 520, 5<sup>th</sup> Ave SW, Calgary, AB T2P 3R7, in its capacity as the Court-appointed receiver and manager (the “**Receiver**”) of the assets, properties and undertakings of Wolverine Energy and Infrastructure Inc., Wolverine Equipment Inc., Wolverine Construction Inc., HD Energy Rentals Ltd., BHW Employment Services Inc., Flo-Back Equipment Inc., Liberty Energy Services Ltd. and Western Canadian Mulching Ltd.; **AND UPON** having read the Consent Receivership Order granted on December 8, 2023, as amended on December 22, 2023; **AND UPON** having read the Receivership Order filed December 8, 2023, as amended on December 22, 2023, the Application filed February 10, 2025 and the sixth report of the Receiver dated February 11, 2025 (the “**Sixth Report**”) and Confidential Appendix “A” to same; **AND UPON** having read the Affidavit of Service of Samantha Hawley, sworn and filed February 13, 2025; **AND UPON** hearing from counsel to the Receiver, counsel to Canadian Western Bank, counsel to Fiera Private Debt Fund V LP and Fiera Private Debt Fund VI LP and from any other interested parties who may be present; **AND UPON** it appearing that all interested and affected parties have been served with notice of this Application; **AND UPON** it appearing to the Court that the following acts of bankruptcy have been committed by the Debtor:

- (a) the debts owing by each of Wolverine Energy and Infrastructure Inc., Wolverine Equipment Inc., Wolverine Construction Inc., HD Energy Rentals Ltd., Flo-Back Equipment Inc., Liberty Energy Services Ltd. and Western Canadian Mulching Ltd. (collectively, the “**Debtors**”) exceed \$1,000; and
- (b) within the 6 months preceding the date of filing of the Application for Bankruptcy Order, each of the Debtors ceased to meet their liabilities generally as they became due.

**IT IS HEREBY ORDERED AND DECLARED THAT:**

1. Service of the notice of this Application and supporting materials is hereby declared to be good and sufficient, no other person is required to have been served with notice of this Application, and the time for service of this Application is abridged to that actually given.
2. FTI is permitted and authorized to be appointed as trustee in bankruptcy of the estate of each of the Debtors, without security.

3. FTI is permitted and authorized, upon attending to the necessary filings with the Office of the Superintendent of Bankruptcy, to assign the Debtors or any of them, each corporations incorporated pursuant to the laws of the Province of Alberta, into bankruptcy.
4. FTI, and any other interested party, shall be at liberty to apply for further advice, assistance and directions as may be necessary in order to give full force and effect to the terms of this Order.
5. This Court hereby requests the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals regulatory and administrative bodies are hereby respectfully requested to make such orders as to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.
6. Service of this Order shall be deemed good and sufficient by:
  - (a) Serving the same on:
    - (i) the persons listed on the service list created in these proceedings;
    - (ii) any other person served with notice of the application for this Order;
    - (iii) any other parties attending or represented at the application for this Order; and
  - (b) Posting a copy of this Order on the Receiver's website at:  
<http://cfcanada.fticonsulting.com/wolverine/>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

District of: Alberta  
Division No. 02 - Calgary  
Court No. 25-3191524  
Estate No. 25-3191524

**FORM 31**

Proof of Claim

(Sections 50.1, 81.5, 81.6, subsections 65.2(4), 81.2(1), 81.3(8), 81.4(8),  
102(2), 124(2), 128(1), and paragraphs 51(1)(e) and 66.14(b) of the Act)

In the Matter of the Bankruptcy of  
Western Canadian Mulching Ltd.  
of the city of Niksu  
in the Province of Alberta

The creditor's preference is to receive all notices and correspondence regarding this claim at the following address and/or facsimile number and/or email address (a mailing address must be provided in all cases):

Address: \_\_\_\_\_  
Facsimile: \_\_\_\_\_  
Email: \_\_\_\_\_  
Contact person name or position: \_\_\_\_\_  
Telephone number for contact person: \_\_\_\_\_

In the matter of the bankruptcy of Western Canadian Mulching Ltd. of the city of Niksu in the Province of Alberta and the claim of \_\_\_\_\_, creditor.

I, \_\_\_\_\_ (name of creditor or representative of the creditor), of \_\_\_\_\_ (city and province), do hereby certify:

1. That I am a creditor of the above named debtor (or that I am \_\_\_\_\_ (state position or title) of \_\_\_\_\_, (name of creditor or representative of the creditor) and that I am authorized to represent and (if the creditor is a corporation) that I have authority to bind the creditor of the above-named debtor).

2. That I have knowledge of all the circumstances connected with the claim referred to below.

3. That the debtor was, at the date of bankruptcy, namely the 21st day of February 2025, and still is, indebted to the creditor in the sum of \$\_\_\_\_\_, as specified in the statement of account (or affidavit) attached and marked Schedule "A", after deducting any counterclaims to which the debtor is entitled. Any debt payable in a currency other than Canadian currency was converted to Canadian currency as of the date of bankruptcy.

(The attached statement of account or affidavit must specify the supporting documents or other evidence in support of the claim)

4. That, to the best of my knowledge, this debt has never been (or this debt has been or part of this debt has been) statute-barred as determined under the relevant legislation.

5. That payment for this debt by the debtor to the creditor has been due (or has been in default) since the \_\_\_\_ day of \_\_\_\_\_, and that the last payment, if any, on this debt by the debtor to the creditor was made on the \_\_\_\_ day of \_\_\_\_\_, and/or that the last acknowledgement, if any, of liability for this debt by the debtor to the creditor was made on the \_\_\_\_ day of \_\_\_\_\_, as follows:

(Give full particulars of the claim, including its history, any acknowledgement or legal action)

6. (Check and complete appropriate category)

**A. Unsecured claim of \$\_\_\_\_\_**

(Other than as a customer contemplated by Section 262 of the Act)

That in respect of this debt, I do not hold any assets of the debtor as security and:

(Check appropriate description)

Regarding the amount of \$\_\_\_\_\_, I do not claim a right to a priority.

Regarding the amount of \$\_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(d) of the Act (Complete paragraph 6E below.)

District of Alberta  
Division No. 02 - Calgary  
Court No. 25-3191524  
Estate No. 25-3191524

FORM 31 --- Continued  
In the Matter of the Bankruptcy of  
Western Canadian Mulching Ltd.  
of the city of Niksu  
in the Province of Alberta

- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(d.01) of the Act.
- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(d.02) of the Act.
- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(d.1) of the Act.
- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(e) of the Act.
- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(f) of the Act.
- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(g) of the Act.
- Regarding the amount of \$ \_\_\_\_\_, I claim a right to a priority under paragraph 136(1)(i) of the Act.

(Set out on an attached sheet details to support priority claim)

- B. Claim of Lessor for disclaimer of a lease of \$ \_\_\_\_\_**

That I make a claim under subsection 65.2(4) of the Act, the particulars of which are as follows:  
(Give full particulars of the claim, including the calculations upon which the claim is based)

- C. Secured claim of \$ \_\_\_\_\_**

That in respect of this debt, I hold assets of the debtor valued at \$ \_\_\_\_\_ as security, the particulars of which are as follows:  
(Give full particulars of the security, including the date on which the security was given and the value at which you assess the security and attach a copy of the security documents.)

A trustee may, pursuant to subsection 128(3) of the Act, redeem a security on payment to the secured creditor of the debt or the value of the security as assessed, in the proof of security, by the secured creditor.

- D. Claim by Farmer, Fisherman or Aquaculturist of \$ \_\_\_\_\_**

That I make a claim under subsection 81.2(1) of the Act for the unpaid amount of \$ \_\_\_\_\_  
(Attach a copy of sales agreement and delivery receipts)

- E. Claim by Wage Earner of \$ \_\_\_\_\_**

- That I make a claim under subsection 81.3(8) of the Act in the amount of \$ \_\_\_\_\_,
- That I make a claim under subsection 81.4(8) of the Act in the amount of \$ \_\_\_\_\_,

- F. Claim by Pension Plan for unpaid amount of \$ \_\_\_\_\_**

- That I make a claim under subsection 81.5 of the Act in the amount of \$ \_\_\_\_\_,
- That I make a claim under subsection 81.6 of the Act in the amount of \$ \_\_\_\_\_,

- G. Claim against Director of \$ \_\_\_\_\_**

(To be completed when a proposal provides for the compromise of claims against directors)  
That I make a claim under subsection 50(13) of the Act, the particulars of which are as follows:  
(Give full particulars of the claim, including the calculations upon which the claim is based)

- H. Claim of a Customer of a Bankrupt Securities Firm of \$ \_\_\_\_\_**

That I make a claim as a customer for net equity as contemplated by section 262 of the Act, the particulars of which are as follows:  
(Give full particulars of the claim, including the calculations upon which the claim is based)

District of Alberta  
Division No. 02 - Calgary  
Court No. 25-3191524  
Estate No. 25-3191524

FORM 31 --- Concluded  
In the Matter of the Bankruptcy of  
Western Canadian Mulching Ltd.  
of the city of Niksu  
in the Province of Alberta

7. That, to the best of my knowledge, I am (or the above-named creditor is) (or am not or is not) related to the debtor within the meaning of section 4 of the Act, and have (or has) (or have not or has not) dealt with the debtor in a non-arm's-length manner.

8. That the following are the payments that I have received from the debtor, the credits that I have allowed to the debtor, and the transfers at undervalue within the meaning of section 2 of the Act that I have been privy to or a party to with the debtor within the three months (or, if the creditor and the debtor are related within the meaning of section 4 of the Act or were not dealing with each other at arm's length, within the 12 months) immediately before the date of the initial bankruptcy event within the meaning of section 2 of the Act:  
(Provide details of payments, credits and transfers at undervalue)

9. (Applicable only in the case of the bankruptcy of an individual.)

Whenever the trustee reviews the financial situation of a bankrupt to redetermine whether or not the bankrupt is required to make payments under section 68 of the Act, I request to be informed, pursuant to paragraph 68(4) of the Act, of the new fixed amount or of the fact that there is no longer surplus income.

I request that a copy of the report filed by the trustee regarding the bankrupt's application for discharge pursuant to subsection 170(1) of the Act be sent to the above address.

**Warning:** Subsection 201(1) of the Act provides for the imposition of severe penalties in the event that a creditor or person claiming to be a creditor makes any false claim, proof, declaration or statement of account.

Dated at \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Signature of creditor or representative





District of: Alberta  
Division No. 02 - Calgary  
Court No. 25-3191524  
Estate No. 25-3191524

FORM 36  
Proxy  
(Subsection 102(2) and paragraphs 51(1)(e) and 66.15(3)(b) of the Act)

In the Matter of the Bankruptcy of  
Western Canadian Mulching Ltd.  
of the city of Niksu  
in the Province of Alberta

I, \_\_\_\_\_, of \_\_\_\_\_, a creditor in the above matter, hereby  
appoint \_\_\_\_\_, of \_\_\_\_\_, to be  
my proxyholder in the above matter, except as to the receipt of dividends, \_\_\_\_\_ (with or without)  
power to appoint another proxyholder in his or her place.

Dated at \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
Witness

\_\_\_\_\_  
Individual Creditor

\_\_\_\_\_  
Witness

\_\_\_\_\_  
Name of Corporate Creditor

Per \_\_\_\_\_  
Name and Title of Signing Officer

Return To:

FTI Consulting Canada Inc. - Licensed Insolvency Trustee

\_\_\_\_\_  
Suite 1610, 520 - 5th Ave S.W.  
Calgary AB T2P 3R7  
Fax: (403) 232-6116  
E-mail: cameron.browning@fticonsulting.com



## **CHECKLIST FOR PROOF OF CLAIM**

This checklist is provided to assist you in preparing the proof of claim form and, if appropriate, the proxy form in a complete and accurate manner. Please check each requirement.

### **GENERAL**

- The signature of a witness is required.
- The document must be signed by the individual completing the declaration.
- Provide the complete address where all notices or correspondence are to be forwarded along with your phone number, fax number and email address where appropriate.

### Notes:

- It is permissible to file a proof of claim by fax or by other electronic means.
- A creditor may vote either in person or by proxy at any meeting of creditors if the proof of claim is filed with the trustee prior to the time appointed for the meeting.
- Quorum is established at a meeting of creditors by at least one creditor with a valid proof of claim being in attendance in person, or by any other mode of communication, subject to: the practicability and technological capability of the participants, creditors' preference to attend in person, and the chair's ability to validate the identity of participating creditors, or by proxy.
- A corporation may vote by an authorized agent or mandatary at meetings of creditors.
- In order for a duly authorized person to have a right to vote, they must be a creditor or be the holder of a properly executed proxy. The name of the creditor must appear in the proxy.
- A creditor who is participating in any distribution from an estate must have filed a proof of claim prior to the distribution being declared.
- In the case of an individual bankrupt, by checking the appropriate box or boxes at the bottom of the proof of claim form, you may request that the trustee advise you of any material change in the financial situation of the bankrupt or the amount the bankrupt is required to pay into the bankruptcy, and a copy of the trustee's report on the discharge of the bankrupt.

### **PARAGRAPH 1**

- Creditor must state full and complete legal name of the individual, company or firm.
- If the individual completing the proof of claim is a representative of the creditor, the individual's position or title must be identified.

### **PARAGRAPH 3**

- The amount owing must be set out in paragraph 3.
- A detailed statement of account must be attached to the proof of claim and marked "Schedule A" and must show the date, number and amount of all invoices or charges, together with the date, number and amount of all credits or payments. The amount on the statement of account must correspond to the amount indicated on the proof of claim.

### **PARAGRAPH 4**

Notes:

- Paragraph A applies to *ordinary unsecured claims*. In addition to recording the amount of the claim, please indicate whether the claim has a priority pursuant to section 136 of the Act.
- Paragraph B applies to *lessor claims* in a commercial proposal. Please ensure that the claim applies to a commercial proposal and, if so, include the full particulars of the claim.
- Paragraph C applies to *secured claims*. Please indicate the dollar value of the security and attach copies of the security document. In addition, please attach copies of the security registration documents, where appropriate.
- Paragraph D applies to *inventory claims of farmers, fishermen and aquaculturists*. Please note that such claims apply only to inventory supplied from farmers, fishermen and aquaculturists within 15 (fifteen) days of the date of bankruptcy. In addition, please attach copies of any applicable sales agreements and delivery slips.
- Paragraph E applies to *claims by wage earners*. Please note that such claims apply only for unpaid wages owed upon the bankruptcy of an employer or when the employer becomes subject to a receivership.
- Paragraph F applies to *claims by employees for unpaid amounts regarding pension plans*. Please note that such claims apply only to unremitted pension contributions outstanding when the sponsoring employer becomes bankrupt or is subject to a receivership.
- Paragraph G applies to *claims against directors*. Please note that such claims apply only to directors of corporations that have filed a commercial proposal to creditors that includes a compromise of statutory claims against directors.
- Paragraph H applies to *claims of customers of a bankrupt securities firm*. Please ensure that the claim of the customer is for net equity and, if so, include the full particulars of the claim, including the calculations upon which the claim is based.

### **PARAGRAPH 5**

All claimants must indicate whether or not they are related to the debtor, as defined in section 4

of the Act, or dealt with the debtor in a non-arm's-length manner.

## **PARAGRAPH 6**

All claimants must attach a detailed list of all payments or credits received or granted, as follows:

- (a) within the three (3) months preceding the initial bankruptcy event (including the bankruptcy or the proposal);
- (b) within the twelve (12) months preceding the initial bankruptcy event (including the bankruptcy or the proposal) in the case where the claimant and the debtor were not dealing at arm's length.

## **-PROXYHOLDER-**

### **NOTE**

The Act permits a proof of claim to be made by a duly authorized representative of a creditor but, in the absence of a properly executed proxy, does not give such an individual the power to vote at the first meeting of creditors nor to act as the proxyholder of the creditors.

### **GENERAL**

In order for duly authorized persons to have a right to vote, they must themselves be creditors or be the holders of a properly executed proxy. The name of the creditor must appear in the proxy.

Notes:

- A creditor may vote either in person or by proxyholder.
- A proxy may be filed at any time prior to a vote at a meeting of creditors.
- A proxy can be filed with the trustee in person, by mail or by any form of telecommunication.
- A proxy does not have to be under the seal of a corporation unless required by its incorporating documents or its bylaws.
- The individual designated in a proxy cannot be substituted unless the proxy provides for a power of substitution.
- Bankrupts/debtors may not be appointed as proxyholders to vote at any meeting of their creditors. The trustee may be appointed as a proxyholder for any creditor.
- A corporation cannot be designated as a proxyholder.