

COURT FILE NUMBER 1801-10960

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF PRICEWATERHOUSECOOPERS INC.,
LIT in its capacity as the TRUSTEE IN
BANKRUPTCY OF SEQUOIA
RESOURCES CORP. and not in its
personal capacity

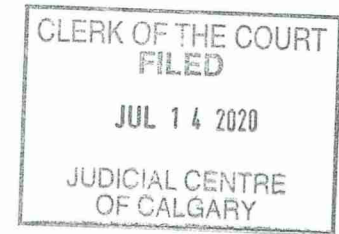
DEFENDANTS PERPETUAL ENERGY INC.,
PERPETUAL OPERATING TRUST,
PERPETUAL OPERATING CORP., and
SUSAN RIDDELL ROSE

APPLICANT CENOVUS ENERGY INC.
(NOT A PARTY)

DOCUMENT **AFFIDAVIT IN SUPPORT OF
APPLICATION FOR LEAVE TO
INTERVENE**

ADDRESS FOR SERVICE Parlee McLaws LLP
AND 3300, 421 - 7th Ave SW
CONTACT Calgary, Alberta T2P 4K9

INFORMATION OF
PARTY FILING THIS
DOCUMENT Attention: G. Scott Watson/Charles W. Ang
Telephone: (403) 294-7038 / 3457
Facsimile: (403) 767-8875
File No. 22-921



AFFIDAVIT OF ANTONIO JACKSON
Sworn on JULY 14, 2020

I, Antonio Jackson, of the City of Calgary, in the Province of Alberta, MAKE OATH
AND SAY THAT:

COURT FILE NUMBER	1801-10960
COURT	COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
PLAINTIFF	PRICEWATERHOUSECOOPERS INC., LIT in its capacity as the TRUSTEE IN BANKRUPTCY OF SEQUOIA RESOURCES CORP. and not in its personal capacity
DEFENDANTS	PERPETUAL ENERGY INC., PERPETUAL OPERATING TRUST, PERPETUAL OPERATING CORP., and SUSAN RIDDELL ROSE
APPLICANT (NOT A PARTY)	CENOVUS ENERGY INC.
DOCUMENT	AFFIDAVIT IN SUPPORT OF APPLICATION FOR LEAVE TO INTERVENE
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	Parlee McLaws LLP 3300, 421 - 7th Ave SW Calgary, Alberta T2P 4K9 Attention: G. Scott Watson/Charles W. Ang Telephone: (403) 294-7038 / 3457 Facsimile: (403) 767-8875 File No. 22-921

AFFIDAVIT OF ANTONIO JACKSON
Sworn on JULY 14, 2020

I, Antonio Jackson, of the City of Calgary, in the Province of Alberta, MAKE OATH
AND SAY THAT:

POSITION OF DEPONENT

1. I am an employee of and the Director of Environment and Regulatory matters at Cenovus Energy Inc. (“**Cenovus**”), an integrated oil and natural gas company headquartered in Calgary, Alberta. I have worked at Cenovus (and predecessor companies) for over 15 years in various roles related to the environmental and regulatory affairs of Cenovus, most recently as Director, Environment and Regulatory. I am authorized to swear this Affidavit on behalf of Cenovus. I have personal knowledge of the matters hereinafter deposed to, except where stated to be based upon information and belief, in which case, I believe the same to be true.
2. I graduated with a Bachelor of Science, Environmental Science from the University of Alberta in 1997, and have over 20 years of experience working in the field of environmental and regulatory affairs. The majority of my involvement pertains to environmental matters relating to the oil and gas industry.
3. In my capacity as Director, Environment and Regulatory, amongst other matters, I am responsible for managing abandonment and reclamation liabilities for Cenovus.
4. Capitalized terms used herein shall have the meaning set forth in the Statement of Claim unless otherwise defined herein.

BACKGROUND ON CENOVUS

5. Cenovus is a Canadian integrated oil and natural gas company headquartered in Calgary that is committed to maximizing value by sustainably developing assets in a safe, innovative and cost-efficient manner, integrating environmental, social and governance considerations into Cenovus’ business plan.
6. Cenovus currently owns and operates two producing projects in the Alberta oil sands: Foster Creek and Cristina Lake, as well as regulatory approval for future oil sands development projects, including the wholly owned Narrows Lake and Telephone Lake assets. Furthermore, Cenovus maintains ownership interests in the Deep Basin assets located in Alberta and British Columbia, as well as ownership interests in

refineries located in the United States. As of December 31, 2019, Cenovus employed 3,189 people.

7. Cenovus believes that strong environmental management and strong business performance go hand in hand, and are thus committed to addressing environmental challenges and opportunities. From the initial planning and design phase, to the decommissioning and reclamation of project areas and facilities, Cenovus integrates and incorporates environmental considerations in the entirety of its operations.

PURPOSE OF CENOVUS' INTERVENOR APPLICATION

8. Cenovus seeks to assist the Court strictly on the issues concerning section 96 of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 ("*BIA*"), and as they relate to the Application to Strike and for Summary Dismissal (the "*BIA* Application")

CONCERNS WITH THE ASSET TRANSACTION

9. I understand Cenovus learned of the Transactions after they occurred.
10. Cenovus has continued to maintain great interest in the outcome of this matter before the Court, due in part to the direct financial consequences to be imposed upon Cenovus – both as a creditor and as a significant contributor to the Orphan Fund Levy – but also to consider the implications of the outcome of the BIA Application on the sustainability of the Orphan Well Association (the "OWA"), the authority of the Alberta Energy Regulator (the "AER"), the future business arrangements of industry members, and the general public of Alberta.
11. Cenovus accepts and endorses the Plaintiff's timeline of events as related to the impugned Transactions, and as described in the Affidavit of Paul Darby sworn and filed on August 2, 2018
12. Parties seeking to transfer oil and gas assets, as per the Transactions, would typically require the approval of the AER: the single regulator of energy development in Alberta, responsible for the lifecycle of energy production in the Province; however, I understand the Transactions were completed in a manner that avoided the triggering conditions for obligatory AER approval.

13. I understand the Transactions resulted in the assignment of significant regulatory obligations to Sequoia, which I understand to be an entity with limited or no assets, incapable of fully complying with its compelled regulatory abandonment obligations, and unable to satisfy its municipal tax liabilities.
14. I understand the Transactions have enabled PEOC to transfer and effectively avoid the abandonment and reclamation obligations as well as the municipal taxes anchored to the Goodyear Assets
15. I verily believe that the Transactions conflict with the oil and gas industry's understanding, expectation, and application of standard contractual provisions, as the stepwise scheme allow contracting parties to circumvent standard contractual obligations, including customary ROFR requirements.
16. I understand that if the Transaction is permitted to endure, the approximately \$200,000,000.00 cost to abandon and reclaim the Goodyear Assets, as estimated by the Trustee, will be unfairly and unjustly borne by the licensees of Alberta's oil and gas regulatory regime, including Cenovus. Cenovus expects these financial consequences to persist beyond the principal year as the liabilities are expected to substantially increase the Levy in future years.

DIRECT AND SIGNIFICANT IMPACT

17. Cenovus is a creditor of Sequoia and the outcome of the *BIA* Application will directly affect Cenovus's ability to recover in the bankruptcy proceedings. I understand that the declaration of the Asset Transfer as void pursuant to section 96 of the *BIA* would result in the increase of available assets for Sequoia, and consequently available for distribution to its creditors. Attached hereto as **Exhibit "A"** is a copy of Cenovus' Proof of Claim for \$6,237,887.92 as of March 23, 2018.
18. Cenovus holds several licenses for wells located in the Province of Alberta, and accordingly is a significant contributor to the Orphan Fund Levy (the "Levy"). Attached hereto as **Exhibit "B"** is a chart displaying the proportional shares of licenses for Alberta wells held by licensees, and utilized to calculate the respective contributions to the Levy.

19. If the Transactions is permitted, and the estimated \$200,000,000.00 cost to abandon and reclaim the Goodyear Assets is consequently transferred to the OWA, then Cenovus will bear a significant financial impact as a contributor to the Levy.
20. The estimated direct financial impact to Cenovus of the Transactions is approximately \$6,000,000.00.

CENOVUS' EXPERTISE AND FRESH PERSPECTIVE ON INDUSTRY PRACTICE AND STANDARDS

Distinguished from the OWA

21. While the OWA is posed to speak effectively to the regulatory measures imposed upon Alberta's oil and gas industry, the OWA is bound by the duties, responsibilities, and perspectives of a regulator. The OWA remains separate and apart from the active participants in this economic sector, and thus unable to fully represent or protect the perspectives and business interests of the private sector.

Cenovus' Unique Ability to Address Environmental Policy Concerns

22. The oil and gas industry is the main driver of the Alberta economy, and its development plays a critical role to Canada's economy. Given the growing concerns for the environmental impacts of such development, Alberta's oil and gas industry have responded through regulatory measures, by investing in new technologies, and implementing new protocols to seek balance between these dual objectives.
23. Furthermore, the oil and gas private sector generally recognize the purpose, authority, and need for the AER to ensure sustainability of the environment, and the industry, as well as the regulatory framework imposing predictable costs to any oil and gas venture.
24. In recognition of its regulatory obligations, Cenovus has committed much care and attention into understanding the environment in an area, prior to the initiation of any project. Abiding by the rigorous and transparent regulatory framework imposed by the AER, Cenovus consults with community and key stakeholders during the

Environmental Impact Assessment, models potential environmental impacts, and monitors environmental conditions throughout the life of all Cenovus projects.

25. In addition, Cenovus strives to ensure that their activities on the landscape are temporary, and develop restoration plans prior to the start of any work on a project. When Cenovus designs facilities and operating procedures, it accounts for biodiversity considerations in order to restore the natural diversity of plants and animals at the end of a facility's life. Ultimately, all the land utilized by Cenovus will be reclaimed, including access roads, well pads and seismic lines.
26. Cenovus has committed to completing the reclamation of 1,500 decommissioned well sites over the next 10 years.
27. Cenovus' commitment to environmental sustainability and the regulatory framework has been costly. Cenovus' records indicate that abandonment expenditures in 2019 totaled approximately \$ 40,000,000 in 2019.

Cenovus' Unique Ability to Address Commercial Policy Concerns and Industry Standards

28. As a developer of vast Canadian oil sands assets, with diversified ownership interests in Western Canada and in the United States, Cenovus is ideally situated to be an industry representative in the *BIA* Application, lending its unique perspective to assist the Court to recognize the immediate and long-term impacts of its decision.
29. As an industry leader, Cenovus is willing to share its expertise on the consequential effects of the Court's decision in the *BIA* Application, on all levels of Alberta's oil and gas industry, including the acquisition, exploration, development, production, marketing and sale of energy products, as well as the risk-benefit assessments utilized by industry members to conduct business, and make informed operational decisions.
30. Cenovus' contributions to the development of law and policy that has shaped Alberta's oil and gas industry, enables Cenovus to recognize and express the concerns of industry members on both the interplay between section 96 of the *BIA* and the regulatory obligations, as well as allowing process to override the substantive purposes of the *BIA* and the regulatory regime.

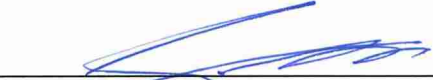
31. Specifically, Cenovus seeks to address the resulting legal and commercial issues arising from the outcome of the *BIA* Application, as well as the potentially crippling consequences to Alberta's oil and gas regulatory regime, from the perspective of an industry participant.
32. Backed by its extensive experience and ongoing foothold in Alberta's oil and gas industry, Cenovus proposes to assist the Court in understanding the Transactions' significant and material departure from industry standards, as well as the serious and collective apprehension of industry members in permitting the purposeful evasion of abandonment and reclamation obligations through multiple, sequential, transactions.
33. Cenovus intends to submit that if the Transactions are tolerated, the Court's determination in the *BIA* Application would effectively sanction similar obligation dispensing schemes, and provide guidance to Alberta's oil and gas industry on methods of avoiding municipal taxes, and escaping abandonment and reclamation obligations.
34. Furthermore, if such transactions to avoid liabilities become routine, all participants in Alberta's oil and gas industry would be pressured to adopt similar strategies, thus incentivizing insolvency and causing the regulatory regime to spiral into obsolescence. This would occur to the detriment of the environment, and lead to the disconnect of costs from benefits: the costs no longer allocated pursuant to the polluter-pay principle, but rather to solvent third party industry members, and ultimately Albertans.

OTHER CONSIDERATIONS FOR THE APPLICATION

35. Cenovus will act to minimize any risk of delay or disruption in this Action, or any pending applications before the Court in this Action.
36. I do not believe that Cenovus' intervention in this Action will aggravate the dispute between the parties as Cenovus' proposed submissions relate entirely to issues already before the Court.
37. Cenovus' intention is to assist the Court to better comprehend the matter before it.

38. I make this Affidavit in support of Cenovus' application for leave to intervene in the BIA Application, as submitted by Canadian Natural Resources Limited, Cenovus Energy Inc. and Torxen Energy Ltd., and for no improper purpose.


SWORN BEFORE ME at the City of Calgary,)
in the Province of Alberta, this 14th day of)
July, 2020.)


_____)
A Commissioner for Oaths in and for Alberta)

Jong-Suk Ko
Barrister & Solicitor


_____)
ANTONIO JACKSON

This Exhibit "A" referred to in the
Affidavit of Antonio Jackson
Sworn before me this 14th day
of July, 2020



A Commissioner for Oaths in and
for the Province of Alberta

Jong-Suk Ko
Barrister & Solicitor



PROOF OF CLAIM
(see Page 3 for instructions)

IN THE MATTER OF THE BANKRUPTCY OF SEQUOIA RESOURCES CORP. (referred to in this form as "the debtor")

and the claim of Cenovus Energy Inc. (referred to in this form as "the creditor")

All notices or correspondence regarding this claim to be forwarded to the creditor at the following address:

Cenovus Energy Inc., Attention: Kathy Ruhe
500 Centre Street S.E., P.O. Box 766, Calgary Alberta T2P 2M5
Telephone: 403.766.3435 Fax: E-Mail Address: Kathy.Ruhe@cenovus.com

I, Kathy Ruhe residing in the city of Calgary in the Province of Alberta

Do hereby certify that:

If an officer of the company, state position or title.

1. I am the creditor or I am Contracts Analyst of the creditor

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

The attached statement of account or affidavit must specify the vouchers or other evidence in support of the claim.

3. The debtor was, at the date of the bankruptcy, namely the 23rd day of March, 2018, and still is, indebted to the creditor in the sum of \$ 6,237,887.92 as specified in the statement of account (or affidavit) attached hereto and marked Schedule "A", after deducting any counterclaims to which the debtor is entitled.

Check and complete appropriate category. Other than as a customer contemplated by Section 262 of the Act

Check appropriate description. Set out an attached sheet details to support priority claim.

Give full particulars of the claim, including the calculations upon which the claim is based.

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.

Attach a copy of sales agreement and delivery receipts.

Give full particulars of any wage earner's claim, including the calculations upon which the claim is based.

To be completed when a proposal provides for the compromise of claims against directors. Give full particulars of the claim, including the calculations upon which the claim is based.

Give full particulars of the claim, including the calculations upon which the claim is based.

Strike out "is" or "is not"

Provide details of payments, credits and transfers at undervalue.

4. A Unsecured claim of \$ 6,237,887.92 In respect to the said debt, the creditor does not hold any assets of the debtor as security and

- (i) Regarding the amount of \$, does not claim a right to a priority or
(ii) Regarding the amount of \$, claims a right to a priority under section 136 of the Bankruptcy and Insolvency Act (the "Act").

B Claim of lessor for disclaimer of a lease of \$ I hereby make a claim under subsection 65.2(4) of the Act, particulars of which are as follows:

C Secured claim of \$ In respect of this debt, I hold assets of the debtor valued at \$ as security, particulars of which are as follows:

D Claim by farmer, fisherman, or aquaculturist of \$ I hereby claim under subsection 81.2(1) of the Act for the unpaid amount of \$

E Claim by wage earner of \$
(i) I hereby claim under subsection 81.3(8) of the Act in the amount of \$
or
(ii) I hereby claim under subsection 81.4(8) of the Act in the amount of \$

F Claim against director of \$ I hereby make a claim under subsection 50(13) of the Act, particulars of which are as follows:

G Claim of a customer of a bankrupt securities firm of \$ I hereby make a claim as a customer for net equity as contemplated by section 262 of the Act, particulars of which are as follows:

5. To the best of my knowledge, the creditor is/is not related to the debtor within the meaning of section 4 of the Act, and has/has not dealt with the debtor in a non-arm's-length manner.

6. The following are the payments that the creditor has received from, the credits that I have allowed to, and the transfers at undervalue within the meaning of subsection 2(1) 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(1) of the Act:

Applicable only in the case of the bankruptcy of an individual

7. 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.

8. Dated at Calgary, AB this 11 day of April, 2018

Must be signed and witnessed

[Signature] Witness [Signature] (signature of individual completing this form)

Notes: All references to "the Act" refer to the Bankruptcy and Insolvency Act. If an affidavit or solemn declaration is attached, it must have been made before a person qualified to take affidavits or solemn declarations. If a copy of this Form is sent electronically by means such as email, the name and contact information of the sender, prescribed in Form 1.1, must be added at the end of the document.
Warning: 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 a proof of security, by the secured creditor. Subsection 201(1) of the Act provides severe penalties for making any false claim, proof, declaration or statement of account.

General Proxy:

If it is desired to appoint a proxy, the proxy form must be completed and signed by the creditor; if the creditor is a corporation, the proxy form must be signed in the corporate name (not necessarily by the individual signing the proof of claim form) and the proxy must be witnessed.

GENERAL PROXY
(with power of substitution)

In the matter of the bankruptcy or proposal of the debtor, the creditor hereby appoints (with power of substitution)

Kendall Dilling of the city of Calgary, Alberta

to be the creditor's general proxy in the above matter (excepting only as to the receipt of dividends).

Dated at Calgary AB this 11 day of APRIL, 2018

[Signature] Cenovus Energy Inc.
Witness Signature

Schedule "A"
Attached to and forming part of Proof of Claim
In the matter of the bankruptcy of Sequoia Resources Corp.

Receiver: Cenovus Energy Inc.
 Payor: Sequoia Resources Corp.

1 Amounts Owning under Agreements:

Reference Number	Invoice Date	Gross Amount	Open Amount
M044477E		\$	47,987.25
M00991A		\$	1,913.06
M009970E		\$	(10,798.13)
M009973A		\$	885.14
M009980A		\$	(6,269.04)
M009995WB		\$	3,746.92
M009999A		\$	3,471.27
M009983A		\$	6,679.23
M009981F		\$	517.34
Birch C,O&O		\$	17,751.84
M00999		\$	63.34
M009967A		\$	1,191.68
M009967C		\$	170.24
M009967E		\$	340.48
M009974A	Refer to Appendix "A" for Accounting Period	\$	170.24
M009975A		\$	851.20
M009975C		\$	170.24
M009977A		\$	1,532.16
M009978A		\$	170.24
M013005A		\$	170.24
M009968A		\$	170.24
M009969A		\$	1,021.44
M009969D		\$	340.48
M009969E		\$	1,021.44
M009972A		\$	1,021.44
M009972B		\$	680.96
M010000A		\$	126.16
RU171012841-5507130-08		\$	420.00
RU171012843-5507130-06		\$	420.00
LD-711-707		\$	340.48
Amounts owed to Cenovus:			Total \$ 76,277.58

2 Reclamation & Remediation Cost Estimates

Area	Location	Total
Leismer	12-16-079-09W4	undetermined
Birch	4-33-090-14W4	\$2MM Gross/ \$0.38MM Net
	20 locations	\$4.5MM Gross/ \$0.855MM Net
R&R Amounts owing to Cenovus		Total \$1,235,000.00

3 Abandonment Cost Estimates

Area	Location	Abandonment Liability	Equipment Removal/Pipeline Abandonment / Wellsite Decommissioning
Leismer	12-16-079-09W4	~\$5 MM Gross/ \$2.5MM Net	Facility abandonment
Birch	4-33-098-14W4	\$8.5MM Gross/ \$1.615MM Net	facility and pipeline abandonment
	18 locations	\$5.4MM Gross/ \$1.028MM Net	Well abandonment
Abandonment Amounts owing to Cenovus			Total \$5,141,000.00

4 Amounts owed by Cenovus to Sequoia Resources Corp.

Area	Invoice #	Invoice Date	
Christina Lake	M201712009	2017-12-04	(358.40)
	R201612009	2017-06-05	(63.00)
			(\$421.40)
Leismer	2019	2017-06-01	-
	2187	2017-06-30	(15,623.39)
	2349	2017-07-20	-
	2609	2017-08-21	(2,150.86)
	2942	2017-09-21	(27,754.28)
	3611	2017-10-19	(24,255.52)
	S201710025	2017-10-19	(302.80)
	3806	2017-11-20	(23,013.83)
	3988	2017-12-07	(7,900.14)
	4173	2018-01-16	(42,911.92)
	4382	2018-02-08	(22,080.82)
			(\$165,993.56)
Marketing	OT4201802-170900	2018-03-22	(17,839.59)
	OT4201801-168857	2018-03-07	(30,135.11)
Amount Owed by Cenovus to Sequoia Resources Corp.			Total (\$214,389.66)


Total Amounts Owning to Cenovus under Items 1, 2 & 3 less amounts owed to Sequoia under Item 4 = **TOTAL CLAIM: \$ 6,237,887.92**

Appendix "A"

Accounting Period

Lease File / Inc	201612	201701	201702	201703	201704	201705	201706	201707	201708	201709	201710	201711	201712	201801	201802	201803	Grand Total
M044477E	-	-	-	-	-	-	-	(6,692)	(36,907)	(1,695)	-	(2,651)	-	-	(42)	-	(47,987)
M00991A	-	-	-	-	-	-	-	-	-	(700)	-	-	(292)	(921)	-	-	(1,913)
M009970E	-	(134)	-	(57)	-	-	(774)	6,718	2,716	1,199	862	517	(1,598)	(402)	890	860	10,798
M009973A	(4)	(80)	(4)	(6)	-	(11)	-	(163)	(29)	(341)	(4)	-	(170)	(72)	-	-	(885)
M009980A	706	701	854	992	1,051	747	135	(74)	772	(427)	546	511	(280)	(234)	491	(220)	6,269
M009995WB	-	(129)	62	(7)	-	-	(1,246)	(430)	(43)	(588)	(3)	(129)	(691)	(542)	(62)	62	(3,747)
M009999A	-	-	-	-	-	-	-	-	-	(2,162)	-	-	(865)	(445)	-	-	(3,471)
M009983A	-	-	-	(3)	-	-	-	(1,516)	(1,837)	(1,750)	(189)	-	(527)	(700)	(79)	(79)	(6,679)
M009981F	(3)	(8)	(56)	(4)	-	(8)	-	(178)	(20)	(181)	(3)	-	-	(3)	(54)	-	(517)
Birch C,O&O	-	-	-	-	-	-	-	-	(8)	(15,293)	(413)	(1,880)	(7)	(44)	-	(107)	(17,752)
M00999	-	-	-	-	-	-	-	-	-	-	-	-	-	(63)	-	-	(63)
M009967A	-	-	-	-	-	-	-	-	-	-	-	-	(1,192)	-	-	-	(1,192)
M009967C	-	-	-	-	-	-	-	-	-	-	-	-	(170)	-	-	-	(170)
M009967E	-	-	-	-	-	-	-	-	-	-	-	-	(340)	-	-	-	(340)
M009974A	-	-	-	-	-	-	-	-	-	-	-	-	(170)	-	-	-	(170)
M009975A	-	-	-	-	-	-	-	-	-	-	-	-	(851)	-	-	-	(851)
M009975C	-	-	-	-	-	-	-	-	-	-	-	-	(170)	-	-	-	(170)
M009977A	-	-	-	-	-	-	-	-	-	-	-	-	(1,532)	-	-	-	(1,532)
M009978A	-	-	-	-	-	-	-	-	-	-	-	-	(170)	-	-	-	(170)
M013005A	-	-	-	-	-	-	-	-	-	-	-	-	(170)	-	-	-	(170)
M009968A	-	-	-	-	-	-	-	-	-	-	-	-	-	(170)	-	-	(170)
M009969A	-	-	-	-	-	-	-	-	-	-	-	-	-	(1,021)	-	-	(1,021)
M009969D	-	-	-	-	-	-	-	-	-	-	-	-	-	(340)	-	-	(340)
M009969E	-	-	-	-	-	-	-	-	-	-	-	-	-	(1,021)	-	-	(1,021)
M009972A	-	-	-	-	-	-	-	-	-	-	-	-	-	(1,021)	-	-	(1,021)
M009972B	-	-	-	-	-	-	-	-	-	-	-	-	-	(681)	-	-	(681)
M010000A	-	-	-	-	-	-	-	-	-	-	-	-	-	(126)	-	-	(126)
R201612009	-	-	-	-	-	-	(63)	-	-	-	-	-	-	-	-	-	(63)
S201710025	-	-	-	-	-	-	-	-	-	-	(303)	-	-	-	-	-	(303)
M201712009	-	-	-	-	-	-	-	-	-	-	-	-	(358)	-	-	-	(358)
Total	699.58	349.57	854.97	914.43	1,050.82	727.26	(1,885.24)	(2,334.16)	(35,357.30)	(21,938.12)	795.71	(3,631.37)	(9,196.17)	(7,808.36)	1,144.77	516.51	(75,821.10)

This Exhibit "B" referred to in the
Affidavit of Antonio Jackson
Sworn before me this 14th day
of July, 2020



A Commissioner for Oaths in and
for the Province of Alberta

Jong-Suk Ko
Barrister & Solicitor

Grand Total

68,604

171,756

86,053

326,413

LicenseeName	ABN	Active	Inactive	Grand Total	Share
CANADIAN NATURAL RESOURCES LIMIT	17,311	36,237	21,322	74,870	22.9%
TORXEN ENERGY LTD.	778	14,367	2,172	17,317	5.3%
IPC CANADA LTD.	543	11,452	801	12,796	3.9%
EMBER RESOURCES INC.	477	10,609	877	11,963	3.7%
CENOVUS ENERGY INC.	2,729	4,980	2,117	9,826	3.0%
HUSKY OIL OPERATIONS LIMITED	3,324	3,193	3,058	9,575	2.9%
IMPERIAL OIL RESOURCES LIMITED	2,182	4,480	1,485	8,147	2.5%
CANLIN ENERGY CORPORATION	798	6,285	914	7,997	2.4%
LYNX ENERGY ULC	136	6,165	300	6,601	2.0%
OBSIDIAN ENERGY LTD.	1,203	2,112	3,082	6,397	2.0%
PINE CLIFF ENERGY LTD.	671	4,558	875	6,104	1.9%
TAQA NORTH LTD.	960	2,832	1,519	5,311	1.6%
PARAMOUNT RESOURCES LTD.	2,051	1,282	1,412	4,745	1.5%
LONG RUN EXPLORATION LTD.	763	1,996	1,973	4,732	1.4%
HARVEST OPERATIONS CORP.	1,005	1,254	2,298	4,557	1.4%
CARDINAL ENERGY LTD.	525	2,392	1,329	4,246	1.3%
BP CANADA ENERGY GROUP ULC	4,192	21		4,213	1.3%
ALPHABOW ENERGY LTD.	883	1,088	1,726	3,697	1.1%
SUNCOR ENERGY INC.	1,759	1,418	299	3,476	1.1%
BONAVISTA ENERGY CORPORATION	596	1,972	858	3,426	1.0%
SURGE ENERGY INC.	750	1,283	1,229	3,262	1.0%
WEST LAKE ENERGY CORP.	800	945	1,336	3,081	0.9%
BAYTEX ENERGY LTD.	636	1,022	1,260	2,918	0.9%
REPSOL OIL & GAS CANADA INC.	353	2,150	381	2,884	0.9%
SEQUOIA RESOURCES CORP.	682	5	2,165	2,852	0.9%
TOURMALINE OIL CORP.	147	2,041	551	2,739	0.8%
ARC RESOURCES LTD.	280	1,486	847	2,613	0.8%
TAMARACK ACQUISITION CORP.	293	1,592	613	2,498	0.8%
SANLING ENERGY LTD.	602	630	1,040	2,272	0.7%
KARVE ENERGY INC.	323	1,296	637	2,256	0.7%
PRAIRIE PROVIDENT RESOURCES CANA	798	603	751	2,152	0.7%
TRIDENT EXPLORATION (ALBERTA) COR	240	72	1,736	2,048	0.6%
MEDICINE HAT, CITY OF	374	1,265	376	2,015	0.6%
NAL RESOURCES LIMITED	212	1,125	514	1,851	0.6%
BONTERRA ENERGY CORP.	193	1,039	594	1,826	0.6%
CANADIAN NATURAL UPGRADING LIMIT	1,264	391	169	1,824	0.6%
CONOCOPHILLIPS CANADA RESOURCES	975	767	82	1,824	0.6%
PEYTO EXPLORATION & DEVELOPMENT	9	1,663	150	1,822	0.6%
COR4 OIL CORP.	181	1,020	587	1,788	0.5%
CRESCENT POINT ENERGY CORP.	553	503	653	1,709	0.5%
JOURNEY ENERGY INC.	172	936	591	1,699	0.5%
CNOOC PETROLEUM NORTH AMERICA	1,004	442	205	1,651	0.5%
WHITECAP RESOURCES INC.	203	1,060	373	1,636	0.5%
OVINTIV CANADA ULC	333	1,150	131	1,614	0.5%
BATTLE RIVER ENERGY LTD.	451	680	422	1,553	0.5%
SINOPEC DAYLIGHT ENERGY LTD.	317	583	650	1,550	0.5%