



COURT FILE NUMBER 24-3260771

COURT COURT OF KING'S BENCH OF ALBERTA IN  
BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE EDMONTON

IN THE MATTER OF THE *BANKRUPTCY  
AND INSOLVENCY ACT*, R.S.C. 1985, C. B-  
3, AS AMENDED

AND IN THE MATTER OF THE NOTICES OF  
INTENTION TO MAKE A PROPOSAL OF  
FORDEN ENERGY INC. AND 2150865  
ALBERTA LTD.

APPLICANT G. CHAN & ASSOCIATES INC. IN ITS  
CAPACITY AS PROPOSAL TRUSTEE

DOCUMENT **APPLICATION**

ADDRESS FOR SERVICE AND CONTACT  
INFORMATION OF PARTY  
FILING THIS DOCUMENT **OGILVIE LLP**  
Barristers & Solicitors  
2800, 10220 103 Avenue NW  
Edmonton, AB T5J 0K4

**Attention: Susy Trace / Sydney V. Moore**  
Phone: 780.429.6246  
Email: [STrace@ogilvielaw.com](mailto:STrace@ogilvielaw.com)  
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File No.: 73348.1

**NOTICE TO RESPONDENT(S):**

This application is made against you. You are a respondent. You have the right to state your side of this matter before the Court.

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

Date: January 23, 2026

Time: 2:00 p.m.

Where: <https://albertacourts.webex.com/meet/virtual.courtroom86>

Before whom: The Honourable Justice J.T. Nielson

### Remedy claimed or sought:

1. G. Chan & Associates Inc., in its capacity as proposal trustee (the “**Proposal Trustee**”) in the matter of the notices of intention to make a proposal of Forden Energy Inc. (“**Forden**”) and 2150865 Alberta Ltd. (“**215**” and together with Forden, the “**Debtors**”), brings an application for the following relief:
  - (a) An order substantially in the form attached to this Application as **Schedule “A”**, among other things, approving:
    - i. The activities undertaken by the Proposal Trustee as set out in the Third Report of the Proposal Trustee, dated December 9, 2025 (the “**Third Report**”) and the fourth Report of the Proposal Trustee, to be filed (the “**Fourth Report**”).
    - ii. The Proposal Trustee’s accounts for its interim fees and disbursements, as set out in the Affidavit of Garrett Chan, sworn January 11, 2026.
    - iii. The accounts of the Proposal Trustee’s legal counsel, Ogilvie LLP (“**Trustee’s Counsel**”), for its interim fees and disbursements, as set out in the Affidavit of Garrett Chan, sworn January 11, 2026.
  - (b) Such further and other relief as this Honourable Court may deem just.

### Ground for Making this Application

2. Forden filed a Notice of Intention to make a Proposal (“**NOI**”) pursuant to section 50.4 of the *Bankruptcy and Insolvency Act*, RSC 1985 c. B-3 (the “**BIA**”) on August 17, 2025.
3. On October 1, 2025, 2150865 Alberta Ltd. (“**215**”) filed an NOI.
4. The Proposal Trustee was named in the NOI of both Debtors and consented to act as Proposal Trustee pursuant to the *BIA*.
5. On October 28, 2025, this Honourable Court granted the application of the Proposal Trustee to, among other things, approve the activities of the Proposal Trustee, and the interim fees and disbursements of the Proposal Trustee and its legal counsel, as set out in the Proposal Trustee’s First Report and Second Report.
6. On October 28, 2025, this Honourable Court granted the application of Forden to, among other things, administratively consolidate the NOI proceedings of Forden and 215.
7. On December 12, 2025, this Honourable Court granted the Debtors’ application to, among other things, extend the period of time in which the Debtors may file a proposal to January 29, 2026.
8. All the activities of the Proposal Trustee and its legal counsel in the administration of the NOI proceedings of the Debtors since October 28, 2025, and as described in the Third Report and the Fourth Report are reasonable and appropriate in the circumstances.

9. The requested fees are fair and reasonable, having regard to the complexity of the matter, the time expended and the benefit to the estate.

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

10. Third Report of the Proposal Trustee, dated December 9, 2025.
11. Fourth Report of the Proposal Trustee, to be filed.
12. Affidavit of Garrett Chan, sworn January 11, 2026.
13. Such further and other material as counsel may advise and this Honourable Court may permit.

**Applicable Rules:**

14. *Bankruptcy and Insolvency General Rules*, CRC, c 368, Rules 18-27.

**Applicable Acts and regulations:**

15. *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3, as amended.
16. *Judicature Act*, RSA 2000, c J-2.
17. *Alberta Rules of Court*, Alta Reg 124/2010.
18. Such further and other acts and regulations as counsel may advise and this Honourable Court may permit.

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

19. N/A

**WARNING**

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) 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 give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant(s) a reasonable time before the application is to be heard or considered.

**SCHEDULE "A"**

Clerk's Stamp

COURT FILE NUMBER 24-3260771

COURT

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE

EDMONTON

MATTER

IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, C. B-3, AS AMENDED

AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF FORDEN ENERGY INC.

AND IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 2150865 ALBERTA LTD.

APPLICANT

G. CHAN &amp; ASSOCIATES INC. IN ITS CAPACITY AS PROPOSAL TRUSTEE

DOCUMENT

**ORDER**ADDRESS FOR  
SERVICE AND  
CONTACT  
INFORMATION  
OF PARTY FILING  
THIS DOCUMENT**OGILVIE LLP**Barristers and Solicitors  
2800, 10220 103 Avenue  
Edmonton AB T5J 0K4**Attention: Susy Trace / Sydney V. Moore**

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[SMoore@ogilvielaw.com](mailto:SMoore@ogilvielaw.com)

Fax: 780.429.4453

File No.: 73348.1

DATE ON WHICH ORDER WAS PRONOUNCED:

January 23, 2026

LOCATION WHERE ORDER WAS PRONOUNCED:

Edmonton, Alberta

NAME OF JUDGE WHO MADE THIS ORDER:

Justice J.T. Nielson

**UPON THE APPLICATION** of G. Chan & Associates, in its capacity as proposal trustee (the "**Proposal Trustee**"); **AND UPON HAVING REVIEWED** the Proposal Trustee's Third Report (the "**Third Report**"), dated December 9, 2025, and the Proposal Trustee's Fourth Report (the "**Fourth**

**Report"**), dated January \_\_\_\_\_, 2026; **AND UPON HAVING CONSIDERED** the activities undertaken by the Proposal Trustee, as set out in the Third Report and Fourth Report; **AND UPON HAVING CONSIDERED** the Proposal Trustee's accounts, and the accounts of the Proposal's Trustee's legal counsel, as set out in the Affidavit of Garrett Chan, sworn January 11, 2026; **AND UPON HEARING** FROM counsel for the Proposal Trustee, and any other counsel present;

**IT IS HEREBY ORDERED THAT;**

1. The activities of the Proposal Trustee, as set out in the Third Report and Fourth Report are hereby approved.
2. The accounts of the Proposal Trustee for interim fees and disbursements are hereby approved.
3. The accounts of the Proposal Trustee's legal counsel, Ogilvie LLP, as set out in the Affidavit of Garrett Chan sworn on January 11<sup>th</sup>, 2026, are hereby approved.
4. The Proposal Trustee is hereby authorized and directed to pay its approved interim fees and disbursements and those of its counsel from the debtors' estates.
5. This Order is without prejudice to the rights of the Proposal Trustee and its counsel to seek approval of any further fees and disbursements incurred.

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**J. C. K. B. A.**