

COURT FILE NUMBER:

24-3356741

COURT:

COURT OF KING'S BENCH OF ALBERTA

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 NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
ENDRUM ENERGY CORP.

DOCUMENT:

**APPLICATION BY THE PROPOSAL
TRUSTEE FOR THE APPROVAL OF FEES
AND ACTIVITIES**

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

Witten LLP

Barristers & Solicitors

Suite 2500 - 10303 Jasper Avenue

Edmonton, AB T5J 3N6

Phone: (780) 428-0501

Fax: (780) 429-2559

Solicitors for G. Chan & Associates Inc. in its
capacity as Proposal Trustee of Endrum Energy
Corp.

Attention: Bren R. Cargill / Amanda E. Coleman
File No.: 137173.1/BRC

NOTICE TO THE ATTACHED SERVICE LIST AT SCHEDULE "A"

This application is made against you. You are the Respondents.

You have the right to state your side of this matter before the presiding Justice.

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

Date September 17, 2026

Time 10:00 a.m.

Where Edmonton Law Courts Building, 1A Sir Winston Churchill Square,

Before The Honourable Justice J.T. Nielson, in Commercial Chambers via Webex

Go to the end of this document to see what else you can do and when you must do it.

Remedy claimed or sought:

1. G. Chan & Associates Inc., in its capacity as Trustee (the **“Proposal Trustee”**) of Endrum Energy Corp. (the **“Debtor”**) under a Notice of Intention to Make a Proposal (the **“NOI”**) brings an application for the following relief:
 - (a) an Order substantially in the form attached hereto as **Schedule “B”**, among other things, approving:
 - (i) the Proposal Trustee’s accounts for its fees and disbursements, as set out in the Fee Affidavit of the Trustee sworn September 10, 2026 (the **“Fee Affidavit”**) for the period to September 8, 2026;
 - (ii) the accounts of the Proposal Trustee’s legal counsel, Witten LLP, for its fees and disbursements, as set out in the Fee Affidavit;
 - (iii) the actions, conduct and activities of the Proposal Trustee as set out in the Third Report, dated July 31, 2026, the Fourth Report, dated August 27, 2026, the Fifth Report to be dated and filed at the time of this Notice of Application, and all supplements thereto; and
 - (b) such further and other relief as counsel may request and this Honourable Court may deem appropriate.

Grounds for making this application:

2. On April 7th, 2026, the Proposal Trustee was appointed as trustee of the Debtor under an NOI.
3. The Proposal Trustee seeks approval of its and its legal counsel’s fees and expenses for the period from June 11, 2026, to September 8, 2026.
4. The Proposal Trustee has been extensively involved in all aspects of these proceedings since their commencement, including advancing matters through applications for, amongst other things, extensions of the time to file a proposal under the NOI as well as monitoring emergent restructuring issues throughout the proceedings.
5. The Trustee is of the view that the fees and disbursements invoices by the Proposal Trustee and its legal counsel are reasonable in the circumstances and have been validly incurred with the obligations of the Proposal Trustee under the NOI.

Material or evidence to be relied on:

6. The Proposal Trustee’s Third Report, filed August 7, 2026;
7. The Proposal Trustee’s Fourth Report, filed September 1, 2026;
8. The Proposal Trustee’s Fifth Report, to be filed;

9. Fee Affidavit of Garrett Chan, for the Proposal Trustee, sworn September 10, 2026, to be filed and served herewith;
10. Such other pleadings previously filed in this matter as counsel may refer to; and
11. Such further and other materials and evidence as counsel may advise and this Honourable Court may permit.

Applicable Acts and regulations:

12. *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3, as amended.
13. 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:

14. N/A

How the application is proposed to be heard or considered:

The proceedings will take place at the Courthouse as set out on the first page of this Notice of Application. The solicitors for the Applicant will attend electronically pursuant to Rules 6.9(2) and 6.10 of the *Alberta Rules of Court*.

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.

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF
ENDRUM ENERGY CORP.**

SCHEDULE "A" - SERVICE LIST

Party being Served	Counsel	Primary Email	Method of Service
Endrum Energy Corp.	Ogilvie LLP #2800, 10220 – 103 Avenue NW Edmonton AB T5J 0K4 Attention: Susy Trace Attention: Leah Macklin	strace@ogilvIELaw.com lmacklin@ogilvIELaw.com	Via Email
G. Chan & Associates Proposal Trustee 201, 9426 – 51 Avenue NW Edmonton AB T6E 5A6 Attention: Garrett Chan		garrett@gcalit.ca	Via Email
G. Chan & Associates Proposal Trustee	Witten LLP Suite 2500, 10303 Jasper Avenue Edmonton AB T5J 3N6 Attention: Bren R. Cargill	bcargill@wittenlaw.com	Via Email
SUBSEQUENT ENCUMBRANCERS/SECURED CREDITORS/GUARANTORS			
Alberta Energy Regulator	Suite 1000, 250 – 5 Street SW Calgary AB T2P 0R4 Attention: Maria Lavelle	Maria.lavelle@aer.ca insolvency@aer.ca Shauna.Gibbons@aer.ca	Via Email
Government of Alberta – Alberta Energy and Minerals	11 th Floor, South Petroleum Plaza 9915 – 108 Street Edmonton AB T5K 2G8	Emmett.Larsen@gov.ab.ca Robert.Sonego@gov.ab.ca	Via Email

	Attention: Emmett Larsen Attention: Robert Sonogo		
Orphan Well Association	MLT Aikins LLP 2100 Livingston Place 222 – 3 rd Avenue SW Calgary AB T2P 0B4 Attention: Ryan Zahara Attention: Erinn Wilson	RZahara@mltaikins.com ewilson@mltaikins.com	Via Email
Alberta Land and Property Rights Tribunal 2 nd Floor, Summerside Business Centre 1229 – 91 Street SW Edmonton AB T6X 1E9		lprr.recovery@gov.ab.ca RentalRecovery@gov.ab.ca lprr.appeals@gov.ab.ca	Via Email
President of Treasury Board and Minister of Finance Members of Executive Council Executive Branch 208 Legislature Building 10800 – 97 Avenue Edmonton AB T5K 2B8 Attention: Honourable Jason Nixon		tbf.minister@gov.ab.ca	Via Email
Minister of Municipal Affairs Members of Executive Council Executive Branch 320 Legislature Building 10800 – 97 Avenue Edmonton AB T5K 2B6		minister.municipalaffairs@gov.ab.ca	Via Email
Minister of Energy and Minerals Members of Executive Council Executive Branch 324 Legislature Building 10800 - 97 Avenue Edmonton, AB T5K 2B6 ATTN: Honourable Brian Jean		minister.energy@gov.ab.ca	Via Email

Minister of Environment and Protected Areas #204 Legislature Building 10800 – 97 Avenue NW Edmonton, AB T5K 2B6 ATTN: Honourable Grant Hunter		epa.minister@gov.ab.ca	Via Email
The Coterie Partners Inc. 5 Margaret Street Tilbury Ontario N0P 1L0 Attention: Chris J. Gallant		chris@thecoteriegroup.com	Via Email
The Coterie Group-Holdings Ltd. 600-13300 Tecumseh Rd. E. Tecumseh, Ontario N8N 4R8 Attention: Chris J. Gallant		chris@thecoteriegroup.com	Via Email
Emtra Business Services Inc. Attention: Peter Bilodeau		info@pbilodeau.ca	Via Email
Beyond Fintech Canada Ltd. Attention: Jenny Zhan 1433 – 90 Burnhamthorpe Rd W Mississauga ON L5B 3C3		Jenny.zhan@beyondgm.com	Via Email
Bounty Onsite Inc.	McLeod Law LLP 500, 707 – 5 th Street SW Calgary AB T2P 1V8 Attention: Doris Vucijak	dvucijak@mcleod-law.com	Via Email
Harmonica Oil and Gas Ltd. o/a Triumph Well Services	MLT Aikins LLP 2100, 222 – 3 rd Avenue SW Calgary AB T2P 0B4 Attention: Jonathan J. Bouchier Attention: Mikaela MacGillivray	jbourchier@mltaikins.com mmacgillivray@mltaikins.com	Via Email
Big Guns Energy Services Inc.	PEAK Legal Counsel 1150, 707 – 7 th Avenue SW Calgary Alberta T2P 3H6 Attention: Corey Sandquist	corey@peaklc.ca gerhard@peaklc.ca	Via Email

RMC Transport Ltd.	Warren Sinclair LLP 600, 4911 – 51 Street Red Deer AB T4N 6V4 Attention: Dallin Higham	dhigham@warrensinclair.com	Via Email
Starland County	Brownlee LLP Watermark Tower #1500, 530 – 8 Avenue SW Calgary AB T2P 3S8 Attention: C.J. Auch Attention: Greg Plester	cauch@brownleelaw.com gplester@brownleelaw.com	Via Email
Flagstaff County	Brownlee LLP Watermark Tower #1500, 530 – 8 Avenue SW Calgary AB T2P 3S8 Attention: C.J. Auch Attention: Greg Plester	cauch@brownleelaw.com gplester@brownleelaw.com	Via Email
Stettler County	Brownlee LLP Watermark Tower #1500, 530 – 8 Avenue SW Calgary AB T2P 3S8 Attention: C.J. Auch Attention: Greg Plester	cauch@brownleelaw.com gplester@brownleelaw.com	Via Email
Canada Revenue Agency	Canada Revenue Agency Surrey National Verification and Collections Centre 9755 King George Blvd Surrey, BC V3T 5E1		Via Facsimile 1-866-219-0311
Minister of Finance Province of Alberta	Minister of Finance Province of Alberta 9915 – 108 Street Edmonton AB T5K 2G8		Via Courier
Office of the Superintendent of Bankruptcy Canada	Office of the Superintendent of Bankruptcy Canada Canada Place Building 9700 Jasper Avenue,	osbservice-bsfservice@ised-isde.gc.ca	Via Email

	Suite 725 Edmonton, AB T5J 4C3		
1673532 Alberta Ltd. 524 Highland Dr Sherwood Park AB T8A 6E3			Posting on website
2Com Consulting Inc. Box 576 Okotoks AB T1S 1A7		vern@2com.ca	Via Email
3d Patch Work Ltd. Box 47 Rumsey AB T0J 2Y0		tracey@3dpatchwork.com	Via Email
Alan Wade Hampton (All-In Inc.) Box 216 Morrin AB T0J 2B0 Attn: Alan Wade Hampton Morrin			Posting on website
Alexander J. Jensen Box 83 Rumsey AB T0J 2Y0		mattiej@telus.net	Via Email
Alfred Gerdung Box 83 Rumsey AB T0J 2Y0			Posting on website
All Gotta Go Ltd. 4116 61A Street Stettler AB T0C 2L1		all_gotta_go@hotmail.com	Via Email
Andrichuk Limited Partnership c/o Andrichuk Holdings Ltd, P.O. Box 15070 Aspen Woods Calgary AB T3H 0N8			Posting on website
Anna Mary Kashuba Box 14 Rumsey AB T0J 2Y0			Posting on website

Armcor Corrosion Services Inc. Po Box 1497 Okotoks AB T1S 1B4			Posting on website
Arthur Zegler & Sons 169, 53049 Rge Rd 22-0 Ardrossan AB T8E 2C8			Posting on website
Bearspaw Petroleum Ltd. Suite #5309 333 - 96th Avenue N.E. Calgary AB T3K 0S3			Posting on website
Beyond Holdings US, LLC 15615 Alton Parkway Suite 125 Irvine CA 92618 USA		mark.huang@beyond-wm.com	Via Email
Breakaway Hotshot Ltd. 38136 Range Road 282 Red Deer County AB T4E 1Y7		office@breakawayhotshot.com	Via Email
Canadian Natural Resources 2500, 855 - 2Nd Street SW Calgary AB T2P 4J8			Posting on website
Carol Kashuba Box 34 Rumsey AB T0J 2Y0			Posting on website
Cayle Mathew Griffith P.O. Box 61 Rumsey AB T0J 2Y0			Posting on website
Cel Quality Services Ltd. PO Box 1377 Rocky Mountain House AB T4T 1B1		accounts@celqualityservices.com	Via Email
Chantan Resource Management 5512 – 4St NW PO Box 64112 RPO Thorncliffe Calgary AB T2K 6J1			Posting on website

Chris Page & Associates Ltd. 14435 – 124th Avenue Edmonton AB T5L 3B2		accountsreceivable@chrispage.ca	Via Email
Corptex Systems Ltd. 3029 - 4th Street SW Calgary AB T2S 1X9 County of Stettler No. 6 Box 1270 Stettler AB T0C 2L0		brian.shyba@corptexsystems.ca	Via Email
Critical Control Technologies Inc. 910, 140 - 10th Avenue SE Calgary AB T2G 0R1		accounts.receivable@criticalcontrol.com	Via Email
Curtis John McNaughton & Michele Dawn McNaughton Box 87 Rumsey AB T0J 2Y0		mdmcurt@gmail.com	Via Email
Dariel McNaughton Box 87 Rumsey AB T0J 2Y0			Posting on website
Darrin Eugene Howard P.O. Box 68 Munson AB T0J 2C0			Posting on website
David Samuel Sengaus Donna May Sengaus Box 47 Rumsey AB T0J 2Y0		dsengaus@gmail.com	Via Email
David Sengaus Box 47 Rumsey AB T0J 2Y0		dsengaus@gmail.com	Via Email
Derek Joel Krywcun P.O. Box 53 Rumsey AB T0J 2Y0			Posting on website

Devon Joel Sengaus & David Sengaus Box 47 Rumsey AB T0J 2Y0			Posting on website
Diamond Valley Pressure Services Ltd. 209 Kuusamo Close Red Deer AB T4E 2J5		GENERAL@DVPS.CA	Via Email
Direct Energy Business c/o C15873C PO Box 1587, Station M Calgary AB T2P 3B9		BusinessInfo@directenergy.com	Via Email
Dirty Deeds Oilfield Box 2110 Stettler AB T0C 2L0		debbiehiller_34@hotmail.com	Via Email
Edie Exploration Limited Partnership c/o Donald C. Edie E1100-500 Eau Claire Ave S.W. Calgary AB T2P 3R8			Posting on website
Edward Joseph Knievel Box 365 Trochu AB T0M 2C0			Posting on website
Eleanor Darlene Richmond Box 91 Rumsey AB T0J 2Y0			Posting on website
Ember Resources Inc. The Devon Tower 800, 400 - 3Rd Avenue S.W. Calgary AB T2P 4H2			Posting on website
Ener-Controls 72 Quarry Gardens Calgary AB T2C 5H7		admin@enercontrols.ca	Via Email
Ernest R. Goddard Box 104 Rumsey AB T0J 2Y0			Posting on website

Evergreen Energy Tank Rentals Ltd. Box 580 Red Deer AB T4N 5G1		accounting@evergreenenergy.ca	Via Email
Fadalco Farms Ltd. P.O. Box 13 Trochu AB T0M 2C0			Posting on website
Fine Line Locating Ltd. Box 470 Erskine AB T0C 1G0		finelinelocating@hotmail.com	Via Email
Flomax Compression Ltd. Box 1527 Drumheller AB T0J 0Y0		tinam@flomaxcompression.com	Via Email
Foothills Oilfield Services 7 - 828 Coach Bluff Cr. SW Calgary AB T3H 1A8			Posting on website
Freehold Royalties Partnership 1000, 517 - 10 Ave S.W. Calgary AB T2R 0A8		service@computershare.com	Via Email
Gas Pro Compression Corp Box 24 Three Hills AB T0M 2A0		office@gaspro.ca	Via Email
George Adams Trucking Inc. PO Box 458 Three Hills AB T0M 2A0			Posting on website
Gridley, Randy (Ranold) & Melanie Box 1 Rumsey AB T0J 2Y0			Posting on website
H Kahl Construction Ltd. Box 370 Erskine AB T0C 1G0			Posting on website

Harvard International Resources Ltd. 2200, 255 - 5Th Ave S.W Bow Valley Square 3 Calgary AB T2P 3G6			Posting on website
Hoffman's Tank Truck Service Ltd. P.O, Box 67 Elk Point AB T0A 1A0		ar@challengerts.com	Via Email
Hutterian Brethren Church of East River P.O. Box 1930 Drumheller AB T0J 0Y0			Posting on website
Hutterian Brethren Church of Starland P.O. Box 1720 Drumheller AB T0J 0Y0			Posting on website
I OT Dynamics 143 Creekstone Way SW Calgary AB T2X 4P9			Posting on website
James B. Lynn Box 107 Rumsey AB T0J 2Y0		jalynn@netago.ca	Via Email
James Rodney Nelson & Danna Nelson Box 48 Rumsey AB T0J 2Y0			Posting on website
Judd & Leanne Moren Box 521 Three Hills AB T0M 2A0			Posting on website
Judith Irene Stoneman Box 69 Rumsey AB T0J 2Y0			Posting on website
Justin and Julie Miller Box 52 Rumsey AB T0J 2Y0			Posting on website

Kathy Hofer Box 420 Rockyford AB T0J 2R0			Posting on website
Kenneth Goddard & Sharon Goddard Box 104 Rumsey AB T0J 2Y0			Posting on website
Kenneth Hatt & Patricia Hatt Box 906 Trochu AB T0M 2C0			Posting on website
Kent Patrick & Jill Holowath Box 127 Rumsey AB T0J 2Y0		holowath@telusplanet.net	Via Email
Kings Energy Services 277 Burnt Park Drive Red Deer County AB T4S 0K7		rd.ar@kingsenergy.com	Via Email
Kneehill County PO Box 400 Three Hills AB T0M 2A0		kc.billing@kneehillcounty.com	Via Email
Larry William Meyer and Brenda Joy Meyer Box 147 Big Valley AB T0J 0G0			Posting on website
Larry's Hot Oil Box 2257 Stettler AB T0C 2L0		larryshotoil@gmail.com	Via Email
Lawrence S. Griffith 173 Portmeirion Lane Castle Rock CO 80104 USA			Posting on website
Leon Nicholas Gogol Box 36 Rumsey AB T0J 2Y0			Posting on website

Linda Stanger Po Box 1167 Drumheller AB T0J 0Y0			Posting on website
Lo-Cost Propane PO Box 1167 Drumheller AB T0J 0Y0		lo-costpropane@yourenergyinfo.com	Via Email
Lohr Oil Service Box 514 Daysland AB T0B 1A0		lohroilservice@gmail.com	Via Email
Lorne & Sharon Wagstaff Box 382 Trochu AB T0M 2C0			Posting on website
Mark McNaughton & Sandy McNaughton Box 124 Rumsey AB T0J 2Y0			Posting on website
Mars Royalty Partnership 1020, 407 – 2nd Street SW Calgary AB T2P 2Y3		info@marsenergyca.com	Via Email
Mary V. Hildebrandt R.R. #1 Didsbury AB T0M 0W0			Posting on website
Maximum Controls Inc. Box 103 Tees AB T0C 2N0		cathysharp@maximumcontrols.ca	Via Email
MDM Aqua Farms Ltd. Box 87 Rumsey AB T0J 2Y0			Posting on website
Michael Kroetsch Box 269 Killam AB T0B 2L0			Posting on website
Nelson Ag Ltd. Box 48 Rumsey AB T0J 2Y0			Posting on website

Norma Weisse Box 62 Rumsey AB T0J 2Y0			Posting on website
Palliser Airshed Society Box 23121 Medicine Hat AB T1B 4C7		Imorishita@shaw.ca	Via Email
Performance 2020 Inc. 7459 Edgar Industrial Bend Unit 13 Red Deer AB T4P 3Z5		rburton@performance2020.ca	Via Email
Perspectum Drone Inspection Services Ltd. 1925 High Park Circle NW High River AB T1V 2E7		info@perspectum.ca	Via Email
Pinnacle Oil Tools Inc. #100, 335 Energy Way Red Deer County AB T4E 0A6		emily.k@potools.ca	Via Email
Platinum Grover 300 - 1060 7 Street SW Calgary AB T2R 0E4		ar23@platinumgrover.com	Via Email
Ponto's Patch Service Ltd. Box 394 Big Valley AB T0J 0G0		pps@pontospatch.com	Via Email
Prairie Storm Controls Inc. Box 671 Consort AB T0C 1B0		pscontrols@gmail.com	Via Email
Prairiesky Royalty Ltd. 1700, 350 - 7 Avenue SW Calgary AB T2P 3N9		insolvencies@prairiesky.com	Via Email
Prestige Worldwide Services Inc. 7 - 828 Coach Bluff Crescent SW Calgary AB T3H 1A8			Posting on website

Providence Trucking Inc. Box 25042, RPO Red Deer Red Deer AB T4R 2M2			Posting on website
Q2 Artificial Lift Services ULC 7883 Edgar Industrial Way Red Deer AB T4P 3R2		estatement@q2als.com	Via Email
Ray Wetmore General Delivery Gallahad AB T0B 1R0			Posting on website
Rayco Reclamation 35119 Hwy 805 Red Deer AB T4G 0M4			Posting on website
RBW Waste Management Ltd. 3280 - 10 Street Nisku AB T9E 1E7		alex.pacheco@rbwgroup.com	Via Email
Receiver General 875 Heron Road Ottawa ON T1A 1G9			Posting on website
RCM Transport Ltd. 49 McKenzie Drive Red Deer AB T4S 2H4		april@rcmtransport.ca	Via Email
Reality Bytes Incorporated 155 3rd Avenue West PO Box 1298 Drumheller AB T0J 0Y0		accounting@realitybytesinc.com	Via Email
Revive Optimization Ltd. Box 103 Big Valley AB T0J 0G0		colton@revopt.ca	Via Email
Ricky Lynn Sengaus Box 773 Trochu AB T0M 2C0			Posting on website
Robert Sherman Tolman & Joanne Elizabeth Tolman Box 67 Rumsey AB T0J 2Y0			Posting on website

Ron & Cheryl Ferguson Box 2889 Three Hills AB T0M 2A0			Posting on website
Ryan Fuller Contracting Ltd. Box 973 Castor AB T0C 0X0		ryanfullercontractingltd@outlook.com	Via Email
Sarge's Oilfield Services Box 238 Delia AB T0J 0W0		jwilson.3hills@gmail.com	Via Email
Secure Energy Services Inc. 2300, 225 - 6th Ave SW Calgary AB T2P 1N2		bigvalleyfst@secure-energy.com	Via Email
Signalta Resources Limited PO Box 6150, Postal Station "D" Calgary AB T2P 2C7		info@signalta.com	Via Email
SS Applied Lease Maintenance Ltd. RR # 2 Camrose AB T4V 2N1		jaidaseverson@hotmail.com	Via Email
Stan & Wanda Hampton Box 72 Morrin AB T0J 2B0			Posting on website
Stealth Oilfield Inspections Ltd. #8, 6580 - 71 Street Red Deer AB T4P 3Y7		ar@stealthinspections.com	Via Email
Terroco Oilfield Services 27212 Twp Rd 391 Red Deer AB T4P 0Z8		dreddecliff@terroco.com	Via Email
Theresa Marie Stankievech 703 - 33 Street NW Calgary AB T2N 2W7			Posting on website

TMS Trucking Ltd. PO Box 1048 Blackfalds AB T0M 0J0		orderdesk@tmstrucking.ca	Via Email
Topaz Energy Corp. Suite 2900, 250 - 6Th Ave S.W. Calgary AB T2P 3H7		lester@topazenergy.ca	Via Email
Uncle Rob's Oilfield Services Ltd. Box 1306 Three Hills AB T0M 2A0		uncle.rob.office@gmail.com	Via Email
V.M. Moran Farm Ltd. RR 4 Innisfail AB T4G 1T9			Posting on website
Victoria Ruth Lynn Holsworth P.O. Box 615 Sedgewick AB T0B 4C0			Posting on website
Vytal Filtration technologies Inc. 3247 Roper Road NW Edmonton AB T6P 0G1		accountsreceivable@vytal.ca	Via Email
Wallace Stanley Herd Box 49 Rumsey AB T0J 2Y0			Posting on website
Walter Sacuta 334 - 22 E Royal Avenue New Westminster BC V3L 0H1		waltsacuta@gmail.com	Via Email
Warren Weisse & Elaine Weisse Box 62 Rumsey AB T0J 2Y0			Posting on website
Wes Enterprise 2017 Ltd. Box 131 Donalda AB T0B 1H0		wesenterprise2017@outlook.com	Via Email
Western Canadian Spill Services Ltd. #280, 6815 - 8th Street NE		accounting@wcass.ab.ca	Via Email

Calgary AB T2E 7H7			
William & Rebecca Kowalchuk 2012 North River Drive Drumheller AB T0J 0Y1			Posting on website
Zyzygy Resources Ltd. 114 Rosery Dr. NW Calgary AB T2K 1L7			Posting on website
OTHER INTERESTED PARTIES			
Jake Energy Inc.	Lawson Lundell LLP Suite 1100 Brookfield Place 225-6th Avenue S.W. Calgary, Alberta T2P 1N2	jbuchanan@lawsonlundell.com	Via email
2672682 Alberta Ltd.			
Brad Peake			
Brett Fizzell		bfizz@hotmail.com	Via email
2770860 Alberta Inc. c/o Registered Office 7-828 COACH BLUFF CR SW Calgary AB T3H 1A8			Via Registered Mail
2756520 Alberta Inc. c/o Registered Office 7-828 COACH BLUFF CR SW Calgary AB T3H 1A8			Via Registered Mail
Prestige Worldwide Services Inc. c/o Registered Office 509 – 8225 19 Ave SW Calgary AB T3H 6L1			Via Registered Mail
Ralston Resources Inc. SUITE 613, 185-911 YATES ST. VICTORIA BC V8V 4Y9 CANADA			Via Registered Mail

VIA EMAIL:

Garrett Chan <garrett@gcalit.ca>; Bren Cargill <bcargill@wittenlaw.com>; 'Maria.lavelle@aer.ca'; insolvency@aer.ca; Shauna.Gibbons@aer.ca; Emmett.Larsen@gov.ab.ca'; 'Robert.Sonogo@gov.ab.ca'; RZahara@mltaikins.com; ewilson@mltaikins.com; lprrt.recovery@gov.ab.ca; RentalRecovery@gov.ab.ca; lprrt.appeals@gov.ab.ca; tbf.minister@gov.ab.ca; minister.municipalaffairs@gov.ab.ca; minister.energy@gov.ab.ca; epa.minister@gov.ab.ca; chris@thecoteriegroupp.com; info@pbilodeau.ca; jenny.zhan@beyondgm.com; 'dvucijak@mcleod-law.com'; 'jbouchier@mltaikins.com'; 'mmacgillivray@mltaikins.com'; corey@peaklc.ca; gerhard@peaklc.ca; 'dhigham@warrensinclair.com'; 'cauch@brownleelaw.com'; gplester@brownleelaw.com; osbservice-bsfservice@ised-isde.gc.ca; vern@2com.ca; tracey@3dpatchwork.com; mattiej@telus.net; all_gotta_go@hotmail.com; mark.huang@beyond-wm.com; office@breakawayhotshot.com; accounts@celqualityservices.com; accountsreceivable@chrispage.ca; brian.shyba@corptextsystems.ca; accounts.receivable@criticalcontrol.com; mdmcurt@gmail.com; dsengaus@gmail.com; GENERAL@DVPS.CA; BusinessInfo@directenergy.com; debbiehiller_34@hotmail.com; admin@enercontrols.ca; accounting@evergreenenergy.ca; finelinelocating@hotmail.com; tinam@flomaxcompression.com; service@computershare.com; office@gaspro.ca; ar@challengerts.com; jalynn@netago.ca; holowath@telusplanet.net; rd.ar@kingsenergy.com; kc.billing@kneehillcounty.com; larryshotoil@gmail.com; lo-costpropane@yourenergyinfo.com; lohroilservice@gmail.com; info@marsenergyca.com; cathysharp@maximumcontrols.ca; lmorishita@shaw.ca; rburton@performance2020.ca; info@perspectum.ca; emily.k@potools.ca; ar23@platinumgrover.com; pps@pontospatch.com; pscontrols@gmail.com; insolvencies@prairiesky.com; estatment@q2als.com; alex.pacheco@rbwgroupp.com; april@rcmtransport.ca; accounting@realitybytesinc.com; colton@revopt.ca; ryanfullercontractingltd@outlook.com; jwilson.3hills@gmail.com; bigvalleyfst@secure-energy.com; info@signalta.com; jaidaseverson@hotmail.com; ar@stealthinspections.com; dreddecliff@terroco.com; orderdesk@tmstrucking.ca; lester@topazenergy.ca; uncle.rob.office@gmail.com; accountsreceivable@vytal.ca; waltsacuta@gmail.com; wesenterprise2017@outlook.com; accounting@wcass.ab.ca; jbuchanan@lawsonlundell.com; bfizz@hotmail.com

SCHEDULE “B”

Clerk’s stamp:

COURT FILE NUMBER
COURT

JUDICIAL CENTRE

DOCUMENT

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENT

24-3356741
COURT OF KING’S BENCH OF ALBERTA IN
BANKRUPTCY AND INSOLVENCY
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
NOTICE OF INTENTION TO MAKE A
PROPOSAL OF ENDRUM ENERGY CORP.
ORDER APPROVING INTERIM PROPOSAL
TRUSTEE’S ACTIVITIES, FEES AND
DISBURSEMENTS

Witten LLP
Barristers & Solicitors
Suite 2500 - 10303 Jasper Avenue
Edmonton, AB T5J 3N6
Phone: (780) 428-0501
Fax: (780) 429-2559
Solicitors for G. Chan & Associates Inc. in its
capacity as Proposal Trustee of Endrum Energy
Corp.

**Attention: Bren R. Cargill / Amanda E.
Coleman**
File No.: 137173.1/BRC

DATE ON WHICH ORDER WAS PRONOUNCED: **September 17, 2026**

LOCATION WHERE ORDER WAS PRONOUNCED: **Edmonton, Alberta**

NAME OF JUSTICE WHO MADE THIS ORDER: **The Honourable Justice J. T. Nielson**

UPON THE APPLICATION of G. Chan & Associates Inc. in its capacity as Trustee (the “Trustee”) of Endrum Energy Corp. (the “Company”) under a Notice of Intention to Make a Proposal; **AND UPON HAVING READ** the Application, the Third Report of the Trustee dated July 31, 2026 (the “Third Report”), the Fourth Report of the Trustee dated August 27, 2026 (the “Fourth Report”), the Fifth Report of the Trustee dated _____, 2026 (the “Fifth Report”), the Fee Affidavit of the Trustee sworn September 10, 2026 (the “Fee Affidavit”), and the affidavit of service; **AND UPON HEARING** counsel for the Trustee, and any other interested parties that may be present.

IT IS HEREBY ORDERED AND DECLARED THAT:

1. Service of 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 Application is properly returnable today.
2. The Trustee's accounts for its fees and disbursements, as set out in the Fee Affidavit, are hereby approved without the necessity of a formal passing of its accounts.
3. The accounts of the Trustee's legal counsel, Witten LLP, for its fees and disbursements, as set out in the Fee Affidavit, are hereby approved without the necessity of a formal assessment of their accounts.
4. The actions, conduct, and activities of the Trustee as set out in the Third Report, Fourth Report and Fifth Report are hereby ratified and approved.
5. 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
 - (iv) Posting a copy of this Order on the Trustee's website at:
 - (a) <https://www.gcalit.ca/endrum>; andService on any other person is hereby dispensed with.
6. 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.

Justice of the Court of King's Bench of Alberta