

COURT/ESTATE FILE NUMBER **24-3356741**

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

JUDICIAL CENTRE **EDMONTON**

FILING PARTY **G. CHAN & ASSOCIATES INC.**

DOCUMENT **FEE AFFIDAVIT OF THE PROPOSAL TRUSTEE**

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

**AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF**

ENDRUM ENERGY CORP.

DATED SEPTEMBER 10, 2026

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

PROPOSAL TRUSTEE:

**G. CHAN & ASSOCIATES INC.
201, 9426 51 AVE NW
EDMONTON, ALBERTA T6E 5A6**

ATTENTION: **GARRETT CHAN, CIRP, LIT**
TELEPHONE: **780.619.7616**
FACSIMILE: **780.306.4986**
EMAIL: **garrett@gcalit.ca**

COUNSEL:

**WITTEN LLP
SUITE 2500, 10303 JASPER AVENUE
EDMONTON, ALBERTA T5J 3N6**

ATTENTION: **BREN CARGILL/AMANDA COLEMAN**
TELEPHONE: **780.701.3776**
FACSIMILE: **780.429.2559**
EMAIL: **bargill@wittenlaw.com / acoleman@wittenlaw.com**

AFFIDAVIT OF GARRETT CHAN
SWORN ON September 10th, 2026

I, Garrett Chan, of Edmonton, Alberta, SWEAR AND SAY THAT:

1. I am the President of G. Chan & Associates Inc., Trustee in the Matter of the Proposal of Endrum Energy Corp. and not in its personal capacity and as such I have personal knowledge of the facts and matters herein deposed to except where stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. I am a Licensed Insolvency Trustee with over 15 years of experience in the area of Insolvency and Restructuring and have been handling the day-to-day administrative work in relation to the Proposal Trustee's administration during the proposal proceedings.
3. With respect to the Trustee's interim accounts covering fees and disbursements incurred by the Trustee for the period of June 12, 2026, to September 8, 2026, which accounts are contained herein as **Exhibit "A"** (the "**Accounts**")

- a. The Accounts specifically outline the date of the work completed, the description of the work completed, the length of time taken to complete the work, and the name of the individual who completed the work;
- b. The hourly rate for each and every individual employee of the Trustee who completed work in regard to the Proposal (the "Hourly Rates"), including non-professional staff is as follows:

The G. Chan & Associates Team:

- I. Garrett Chan, President and Licensed Insolvency Trustee, \$580.00
- II. Warren Chan, Analyst, \$260.00
- III. Hana Hashi, Trust Banking Administrator, \$150.00

- c. I submit that the Hourly Rates are reasonable and comparable to the hourly rates of other accountant firms within the city of Edmonton of equivalent competence and expertise in the insolvency area.
4. With respect to the Proposal Trustee's independent legal counsel, Witten LLP ("Witten"), accounts covering fees and disbursements incurred by counsel for the period June 11, 2026, to September 8, 2026, which accounts are contained herein as Exhibit "B" (the "Witten Accounts"):
 - a. The Witten Accounts specifically outline the date of the work completed, the description of the work completed, the length of time taken to complete the work, and the name of the individual who completed the work:

- b. The hourly rate for each and every individual employee of the Proposal Trustee's independent legal counsel who completed work in regard to the Proposal (the "Witten Hourly Rates"), including non-professional staff is as follows:

The Witten team:

- i. Bren R. Cargill, Lawyer - \$500.00
- ii. Amanda E. Coleman, Lawyer - \$375.00

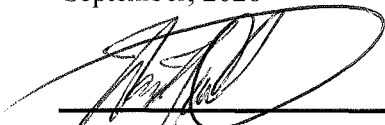
- c. I submit that the Witten Hourly Rates are reasonable and comparable to the hourly rates of other law firms within the city of Edmonton of equivalent competence and expertise in the insolvency area; and

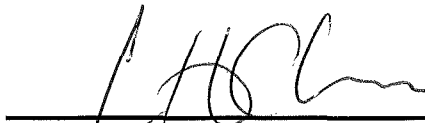
- d. The disbursements contained within the Witten Accounts totaling \$427.82 are comprised of:

- i. Online Service Charge fee of \$10.00
- ii. Document Production fee of \$312.90
- iii. File Management Fee of \$50.00
- iv. Court House Fax/Email Filing fee of \$20.00
- v. PPR - Internal Search fee of \$3.00
- vi. Corporate Registry Search fee of \$7.15
- vii. Purolator Courier fee of \$17.24
- viii. Postage fee of \$1.75
- ix. Mc'Dispatch fee of \$5.78

5. I make this Affidavit in support of the application to approve the fees and GST of \$18,651.15 which have been rendered by G. Chan & Associates Inc. as Proposal Trustee and to approve the Fees, Disbursements, and other charges, and GST and of \$15,837.65 which have been rendered by Witten, counsel to the Proposal Trustee, within this Action.

SWORN before me at the City of Edmonton, in
the Province of Alberta, this 10th day of
September, 2026



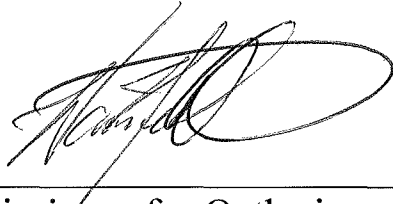
Warren Chan

GARRETT CHAN
President

A Commissioner for Oaths in and for the Province
of Alberta

MY COMMISSION EXPIRES
DECEMBER 16, 2027

This is **Exhibit “ A ”** referred to in the
Affidavit of GARRETT CHAN sworn to before me at the
City of Edmonton, in the Province of Alberta
This 10th day of September, 2026



A Commissioner for Oaths in and for the Province of Alberta

WARREN CHAN
MY COMMISSION EXPIRES DECEMBER 16, 2027

INVOICE

G. Chan & Associates Inc.
201 9426 51 Avenue Northwest
Edmonton, AB T6E 5A6
GST/HST Registration No.
717979751RT0001

info@gcalit.ca
+17806197616

Bill to
Endrum Energy Corp.

Ship to
Endrum Energy Corp.

Invoice details

Invoice no.: 1014

Terms: Due on receipt

Invoice date: 2026-09-09

Due date: 2026-09-09

Product or service	Description	Amount	Tax
Services	NOI Trustee	\$17,763.00	GST
		Subtotal	\$17,763.00
		GST @ 5% on \$17,763.00	\$888.15
		Total	\$18,651.15

**IN THE MATTER OF THE PROPOSAL OF
ENDRUM ENERGY CORP.
TIME DOCKET OF THE PROPOSAL TRUSTEE**

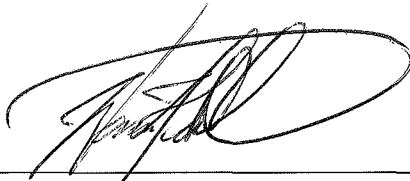
For the period of June 12, 2026, to September 8, 2026

Date	Description	Timekeeper	Duration (decimal)	Billable Rate CAD	Billable Amount CAD
2026-06-12	Commission affidavit	Warren Chan	0.1	260.00	26.00
2026-06-12	Finalize report; phone calls with debtor counsel and Trustee counsel; revise and swear fee affidavit	Garrett Chan	2.8	580.00	1,624.00
2026-06-12	Update Website (Fee affidavit, application, 2nd report of trustee); E-file with OSB	Warren Chan	0.5	260.00	130.00
2026-06-15	Phone call with debtor counsel re: cash flow, return of funds, Court application; attend second extension hearing	Garrett Chan	1.0	580.00	580.00
2026-06-15	Phone call with debtor counsel re: cash flow, wells, and creditor issues	Garrett Chan	0.5	580.00	290.00
2026-06-15	Review cease and desist letter to Jake Energy; attend AER meeting re: limited eligibility	Garrett Chan	0.2	580.00	116.00
2026-06-15	Review cease and desist letter to Jake Energy	Garrett Chan	0.1	580.00	58.00
2026-06-16	Review eligibility letter from AER	Garrett Chan	0.1	580.00	58.00
2026-06-16	Review email to service list from C. Gallant	Garrett Chan	0.2	580.00	116.00
2026-06-16	Trust banking disbursement for trustee fees	Hana Hashi	0.2	150.00	30.00
2026-06-17	Review and respond to email from debtor re: Gas Pro and restarting wells	Garrett Chan	0.2	580.00	116.00
2026-06-22	E-file Order and post to website. (order approving interim proposal trustee's activities, fees and disbursements)	Warren Chan	0.4	260.00	104.00
2026-06-22	Review email from counsel re: payment of landowner arrears	Garrett Chan	0.1	580.00	58.00
2026-06-24	E-file Order and post to website.	Warren Chan	0.2	260.00	52.00
2026-06-25	Respond to email from Critical Control	Garrett Chan	0.1	580.00	58.00
2026-07-07	Take call from interested buyer	Warren Chan	0.1	260.00	26.00
2026-07-07	Email to debtor re: interested purchaser	Garrett Chan	0.1	580.00	58.00
2026-07-08	Meeting with Endrum	Garrett Chan	1.0	580.00	580.00
2026-07-10	Take call from CRA (payroll)	Warren Chan	0.2	260.00	52.00
2026-07-15	Bank reconciliation	Hana Hashi	0.1	150.00	15.00
2026-07-15	Take call from environmental requesting crossing agreement	Warren Chan	0.1	260.00	26.00
2026-07-24	Review demand from Surface Rights Tribunal	Garrett Chan	0.1	580.00	58.00
2026-07-28	Review supplemental application materials and response from Jake Energy	Garrett Chan	0.5	580.00	290.00

Date	Description	Timekeeper	Duration (decimal)	Billable Rate CAD	Billable Amount CAD
2026-07-28	Update Website	Warren Chan	0.5	260.00	130.00
2026-07-28	Email to debtor re: monitoring	Garrett Chan	0.4	580.00	232.00
2026-07-28	Review cash-flow	Garrett Chan	0.7	580.00	406.00
2026-07-28	Review third extension application materials; review cash-flow correspondence	Garrett Chan	0.4	580.00	232.00
2026-07-29	Phone call with Trustee counsel re: injunction application	Garrett Chan	0.2	580.00	116.00
2026-07-30	Drafting third report	Garrett Chan	4.5	580.00	2,610.00
2026-07-30	Drafting third report	Garrett Chan	0.7	580.00	406.00
2026-07-31	Revise and sign third report	Garrett Chan	0.2	580.00	116.00
2026-08-04	Review correspondence from debtor counsel re: adjournment of injunction application; review affidavit of F. Hamdan	Garrett Chan	0.2	580.00	116.00
2026-08-04	Take call from CRA; provisional proof of claim	Warren Chan	0.2	260.00	52.00
2026-08-05	Attend Court hearing for third extension	Garrett Chan	0.4	580.00	232.00
2026-08-06	Review Jake injunction materials	Garrett Chan	0.4	580.00	232.00
2026-08-07	Update website	Warren Chan	0.3	260.00	78.00
2026-08-10	Forward email from creditor (CNRL)	Warren Chan	0.1	260.00	26.00
2026-08-11	Email to Trustee counsel re: Jake	Garrett Chan	0.1	580.00	58.00
2026-08-13	Take call from ATCO	Warren Chan	0.1	260.00	26.00
2026-08-20	Phone call with debtor counsel re: Jake update and MAC	Garrett Chan	0.3	580.00	174.00
2026-08-24	Conference call with debtor counsel re: MAC	Garrett Chan	0.6	580.00	348.00
2026-08-24	Attend injunction hearing; phone call with Trustee counsel	Garrett Chan	1.5	580.00	870.00
2026-08-24	Review email from Jake Energy counsel; call with Trustee counsel re: MAC and injunction relief	Garrett Chan	0.2	580.00	116.00
2026-08-26	Phone calls with Trustee and debtor counsel re: MAC and injunction	Garrett Chan	0.5	580.00	290.00
2026-08-26	Update Website - Injunction and Preservation	Warren Chan	0.3	260.00	78.00
2026-08-26	Considering material adverse change; lengthy email to debtor re: material adverse change and information requests	Garrett Chan	2.2	580.00	1,276.00
2026-08-27	Phone call with Trustee counsel and debtor counsel to discuss MAC, injunction, and reporting matters	Garrett Chan	0.3	580.00	174.00
2026-08-27	Update website and e-file - Notice of Adverse Material Change	Warren Chan	0.2	260.00	52.00
2026-08-27	Drafting Fourth Report	Garrett Chan	3.0	580.00	1,740.00

Date	Description	Timekeeper	Duration (decimal)	Billable Rate CAD	Billable Amount CAD
2026-08-28	Attend injunction hearing; phone call with Trustee counsel and email re: decision	Garrett Chan	1.1	580.00	638.00
2026-09-01	Update Website and e-file (stay extension order)	Warren Chan	0.2	260.00	52.00
2026-09-02	Review file and save POC Alberta Treasure Board	Warren Chan	0.2	260.00	52.00
2026-09-03	Emails with Trustee counsel and debtor counsel re: proposal structuring and applicability of s. 81 to disputed wells	Garrett Chan	0.2	580.00	116.00
2026-09-04	Phone call with Trustee counsel re: injunction order and s. 81 issue	Garrett Chan	0.3	580.00	174.00
2026-09-08	Drafting proposal from precedent	Garrett Chan	0.3	580.00	174.00
2026-09-08	Phone call with debtor counsel re: valuation, extension, proposal drafting	Garrett Chan	0.6	580.00	348.00
2026-09-08	Review file and save statement from creditor; email creditor	Warren Chan	0.2	260.00	52.00
2026-09-08	Email to Government of Alberta re: claim and holdback under bankruptcy; review email from J. McMahon providing update on insurance claim and oil wells; review updated cash flow; email to Endrum re: monitoring and cash-flow	Garrett Chan	2.5	580.00	1,450.00
Totals			33.0	538.27	17,763.00

This is **Exhibit “ B ”** referred to in the
Affidavit of GARRETT CHAN sworn to before me at the
City of Edmonton, in the Province of Alberta
This 10th day of September, 2026



A Commissioner for Oaths in and for the Province of Alberta

WARREN CHAN

MY COMMISSION EXPIRES DECEMBER 16, 2027



2500, 10303 Jasper Avenue
Edmonton, Alberta T5J 3N6
Canada

T: 780.428.0501
F: 780.429.2559
lawyers@wittenlaw.com
www.wittenlaw.com

G. Chan & Associates - Licensed Insolvency Trustee
201, 9425 51 Ave NW
Edmonton, AB T6E 5A6

September 9, 2026
Invoice No.: 547980
Our File No.: 137173-1

Attention: Garrett Chan

GST/HST 121418982

RE: Division I Proposal of Endrum Energy Corp.

To all professional services provided for or on your behalf relating to the matters undertaken by our firm for your benefit and at your request which, without restriction, include the following services:

Total Fees	\$14,762.50
Total Taxable Other Charges subject to GST	125.50
Non Taxable Disbursements	132.00
Total Taxable Disbursements subject to GST	69.76
Total GST	747.89
INVOICE TOTAL	<u>\$15,837.65</u>

/DR



2500, 10303 Jasper Avenue
Edmonton, Alberta T5J 3N6
Canada

T: 780.428.0501
F: 780.429.2559
lawyers@wittenlaw.com
www.wittenlaw.com

G. Chan & Associates - Licensed Insolvency Trustee
201, 9425 51 Ave NW
Edmonton, AB T6E 5A6

September 9, 2026
Invoice No.: 547980
Our File No.: 137173-1

Attention: Garrett Chan

GST/HST 121418982

RE: Division I Proposal of Endrum Energy Corp.

To all professional services provided for or on your behalf relating to the matters undertaken by our firm for your benefit and at your request which, without restriction, include the following services:

DATE	LYR	HOURS	DESCRIPTION	VALUE
11/Jun/26	BRC	0.10	Email from G. Chan;	50.00
11/Jun/26	AEC	1.50	Emails with G. Chan; Review and revise application materials; Telephone call with G. Chan; Review accounts and revise fee affidavit; Review proposal trustee's draft report; Service of application materials	562.50
12/Jun/26	BRC	0.20	Review emails from C. Gallant;	100.00
12/Jun/26	AEC	0.20	Email from C. Gallant	75.00
15/Jun/26	BRC	0.20	Review email and enclosed correspondence from S. Trace;	100.00
15/Jun/26	AEC	1.50	Email from S. Trace; Prepare for application; Attend application to extend time to file NOI and to approve proposal trustee's activities and fees	562.50
17/Jun/26	BRC	0.10	Email from G. Chan;	50.00
17/Jun/26	AEC	0.10	Email from G. Chan	37.50
19/Jun/26	AEC	0.10	Letter to service list re: serving order approving trustee's activities	37.50
21/Jun/26	BRC	0.10	Email from S. Trace;	50.00
22/Jun/26	AEC	0.10	Email from S. Trace	37.50
23/Jun/26	BRC	0.20	Review email and correspondence from L. Macklin;	100.00
25/Jun/26	BRC	0.10	Email from S. Trace;	50.00
02/Jul/26	BRC	0.20	Review emails from S. Trace and N. Morales;	100.00
08/Jul/26	BRC	0.80	Phone call with S. Trace, L. Macklin, G. Chan and representatives of Endrum;	400.00
09/Jul/26	BRC	0.80	Review email from S. Trace; Review correspondence and enclosed documents from Lawson Lundell, re: Jake Energy and disputed wells; Email from J. Buchanan; Email to G. Chan;	400.00

E. & O. E. This account may not include all disbursements incurred to date. Additional disbursements (if any) will be billed later. Account due when rendered. Interest will be charged at 18.00% per annum on all accounts over 30 days.



16/Jul/26	BRC	0.30	Review emails from S. Trace, J. Buchanan and L. Macklin;	150.00
17/Jul/26	BRC	0.50	Review correspondence from L. Macklin; Review emails from L. Macklin and J. Buchanan; Phone call with G. Chan;	250.00
20/Jul/26	BRC	0.50	Review emails from S. Trace and J. Buchanan; Review email from L. Macklin;	250.00
22/Jul/26	BRC	0.10	Email from S. Trace;	50.00
23/Jul/26	BRC	0.10	Email from N. Morales	50.00
28/Jul/26	BRC	0.50	Review correspondence from S. Trace; Review pleadings for third extension and injunction;	250.00
28/Jul/26	AEC	0.20	Receipt and review of debtor's application materials	75.00
29/Jul/26	BRC	1.10	Correspondence from J. Buchanan; Review pleadings filed by Endrum, i.e. supplemental Affidavit and Bench Brief; Phone call with G. Chan; Exchange emails with S. Trace;	550.00
30/Jul/26	BRC	0.30	Review emails from K. Hiller and J. Buchanan;	150.00
31/Jul/26	BRC	0.80	Exchange emails with G. Chan; Review proposed form of Third Trustee's Report; Draft service letter;	400.00
05/Aug/26	BRC	0.30	Review email from C. Burik; Review emails from F. Hamdan;	150.00
05/Aug/26	BRC	0.90	Review materials in preparation for attendance in commercial chambers; Attendance in commercial chambers;	450.00
07/Aug/26	BRC	0.80	Emails from J. Buchanan, S. Trace and C. Burik; Review pleadings of Jake Energy;	400.00
12/Aug/26	BRC	1.70	Review emails from S. Trace and J. Buchanan; Exchange emails and phone calls with G. Chan; Review materials in preparation for attendance in commercial chambers; Review email from K. Schmitz; Exchange emails with K. Hiller; Exchange emails with S. Trace and J. Buchanan; Phone call with S. Trace; Appearance in commercial chambers, re: adjournment;	850.00
13/Aug/26	BRC	0.10	Email from F. Hamdan;	50.00
17/Aug/26	BRC	0.10	Review email from F. Hamdan;	50.00
21/Aug/26	BRC	0.10	Email from F. Deni;	50.00
23/Aug/26	BRC	0.60	Review emails from S. Trace and J. Buchanan; Review Affidavit of J. McMahon; Email to G. Chan;	300.00
24/Aug/26	BRC	3.10	Email from J. Buchanan; Phone call with G. Chan; Exchange emails with G. Chan; Email from S. Trace; Review correspondence from J. Buchanan; Review email from K. Hiller; Attendance in commercial chambers; Phone call with G. Chan, S. Trace and K. Hiller;	1,550.00



24/Aug/26	AEC	1.20	Attendance in Commercial Chambers for Endrum's injunction application	450.00
26/Aug/26	BRC	0.90	Exchange emails with G. Chan; Review email from G. Chan, re: MAC; Review emails from N. Morales; Review correspondence from M. Lavelle and enclosed Brief of Law;	450.00
27/Aug/26	BRC	0.80	Exchange emails with G. Chan; Review proposed Fourth Trustees Report; Review email from S. Trace; Draft correspondence to service list; Review email from N. Morales; Review correspondence from J. Buchanan;	400.00
28/Aug/26	BRC	4.00	Review of materials in preparation for attendance in commercial chambers; Attendance in commercial chambers; Exchange emails with G. Chan; Phone call with G. Chan;	2,000.00
29/Aug/26	BRC	0.40	Review emails from S. Trace, J. Buchanan and L. Macklin;	200.00
30/Aug/26	BRC	0.30	Review email from S. Trace; Exchange emails with L. Macklin;	150.00
31/Aug/26	BRC	0.40	Review emails from C. Auch and M. Lavelle; Exchange emails with L. Macklin;	200.00
01/Sep/26	BRC	1.20	Meeting with S. Trace, L. Macklin and J. Buchanan, re: terms of form of Order;	600.00
02/Sep/26	BRC	0.20	Email from L. Macklin; Review correspondence from L. Macklin; Email to G. Chan;	100.00
03/Sep/26	BRC	0.20	Email from J. Buchanan; Email to G. Chan;	100.00
03/Sep/26	BRC	0.60	Exchange emails with G. Chan; Review email from J. Buchanan; Phone call with S. Trace and K. Hiller;	300.00
03/Sep/26	AEC	0.20	Teams call with B. Cargill, S. Trace and K. Hiller	75.00
04/Sep/26	BRC	0.80	Exchange emails with A. Hasnain; Phone call with G. Chan; Correspondence from L. Macklin;	400.00
08/Sep/26	BRC	0.20	Exchange emails with J. Buchanan;	100.00
08/Sep/26	BRC	1.00	Draft pleadings for application for interim approval of trustee's activities and fees;	500.00

OUR FEES	\$14,762.50
GST at 5%	738.13

Taxable Other Charges:

Document Production	125.50
GST at 5%	6.28

Non Taxable Disbursements:

Court House Fax/Email Filing	132.00
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Taxable Disbursements:

	Postage	69.76
GST at 5%		3.48
INVOICE TOTAL		\$15,837.65
Total GST		747.89

WITTEN LLP

Per: Bren R. Cargill

/DR